



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1417

Date Filmed 3/25/82 Camera No. --- 2

Cameraman GPC

FEDERAL ELECTION COMMISSION

Blue "burbs" card

(2) 12 Day Report Comment Sheets

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 [Signature]
date 3/24/82

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tony Coelho, Chairman
Democratic National Campaign Committee
400 North Capitol Street, N.W., Suite 319
Washington, D.C. 20001

Re: MUR 1417

Dear Mr. Coelho:

The Federal Election Commission has reviewed the allegations of your complaint dated December 14, 1981 and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

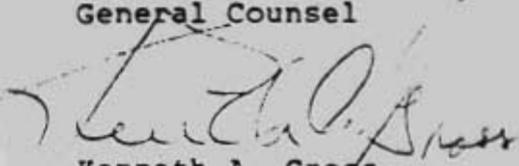
Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

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

92070311454



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 22, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Schweitzer
Baker & Hostetler
818 Connecticut Avenue
Washington, D.C. 20006

Re: MUR 1417

Dear Mr. Schweitzer:

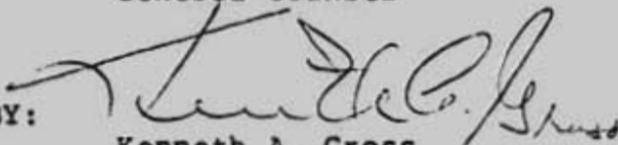
On or about December 28, 1981, the Commission notified you of a complaint alleging that your clients, the forty eight (48) congressmen named in the complaint had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on February 24, 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 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

8201011455



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tony Coelho, Chairman
Democratic National Campaign Committee
400 North Capitol Street, N.W., Suite 319
Washington, D.C. 20001

RHF

Re: MUR 1417

Dear Mr. Coelho:

The Federal Election Commission has reviewed the allegations of your complaint dated December 14, 1981 and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. 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

32010:11455



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Schweitzer
Baker & Hostetler
818 Connecticut Avenue
Washington, D.C. 20006

RAA

Re: MUR 1417

Dear Mr. Schweitzer:

On or about December 28, 1981, the Commission notified you of a complaint alleging that your clients, the forty eight (48) congressmen named in the complaint had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on February , 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 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Honorable Jack Fields, et al.) MUR 1417

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 24, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1417:

1. Find No Reason to Believe that the forty-eight (48) Congressmen named in this complaint violated 2 U.S.C. § 441d by failing to include the proper disclaimer on the communication dated October 30, 1981.
2. Find No Reason to Believe that the forty-eight (48) Congressmen named in this complaint violated 2 U.S.C. § 433 for failing to register themselves as a political committee.
3. Close the File.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively; Commissioner Harris did not cast a vote in this matter.

Attest:

2/24/82
Date

Judy A. Custer
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 2-19-82, 3:53
Circulated on 48 hour tally: 2-22-82, 11:00

92010311453



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/JODY CUSTER *JC*
DATE: FEBRUARY 24, 1982
SUBJECT: COMMENTS RE: MUR 1417

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding a typographical error in the letter to Mr. Schweitzer.

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ATTACHMENT:
Copy of Vote Sheet



48 HOUR BALLOT

SENSITIVE

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Date and Time Transmitted: MONDAY, 2-22-82, 11:00

COMMISSIONER: MCGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, FEBRUARY 24, 1982, 11:00

SUBJECT: MUR M17 - First General Counsel's Report dated
February 19, 1982

- I approve the recommendation
 I object to the recommendation

COMMENTS: Ltr to W^m Schweitzer has typo on final line.
Should read "30 days."

Date: 2-23-82

Signature: J. Aikens

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

PLEASE RETURN BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

February 19, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1417

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

Attachment

cc: Andersen

3201911471

SENSITIVE

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 FEB 19 P 3: 53

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION: 2/19/82
MUR 1417
DATE COMPLAINT RECEIVED BY OGC: 12/14/81
DATE OF NOTIFICATION TO RESPONDENT: 12/27/81
STAFF MEMBER: R. Lee Andersen

COMPLAINANT'S NAME: Democratic Congressional Campaign Committee, Tony Coelho, Chairman

RESPONDENT'S NAME: Honorable Jack Fields, et al.

RELEVANT STATUTE: 2 U.S.C. §§ 431(4)(A), 433 and 441d
11 C.F.R. § 109.1(b)(2)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

A signed and sworn complaint was filed by the Democratic Congressional Campaign Committee ("DCCC"), Tony Coelho, Chairman, on December 14, 1981, against forty eight (48) named Republican members of Congress. The complaint alleges that the congressmen violated 2 U.S.C. §§ 441d and 433. DCCC characterizes a letter dated October 30, 1981, and distributed to various political action committees as a solicitation for contributions by the named congressmen (see complaint). DCCC alleges that the communication to the PACs was in violation of Section 441d because it failed to include the required "disclaimer" stating

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the identity of the persons who authorized and paid for the communication. Second, DCCC alleges that the forty eight (48) named congressmen are in violation of Section 433 for failing to register themselves with the Commission as a political committee.

FACTUAL AND LEGAL ANALYSIS

A. Allegation of Section 441b Violation

2 U.S.C. § 441d requires, inter alia, that a person who "solicits any contribution" through a direct mailing must clearly state upon the communication who paid for and authorized the solicitation. The complaint alleges that the October 30 communication "clearly constitutes a direct mail solicitation under § 441d", and, therefore, maintains that the signatories, the named 48 congressmen, are in violation of this section of the Act. It is true that there is no "disclaimer" printed on the communication (see October 30 letter attached to complaint), but the issue remains whether the communication is a solicitation for purposes of the Act.

In analyzing solicitations for purposes of 2 U.S.C. § 441b, the Commission has adopted a standard for determining whether an action can properly be considered a solicitation. The Commission has stated that informing a person of a fundraising activity is to be considered a solciitation. (See AO 1979-13 citing other advisory opinions and supporting legislative history). Following this standard in the context of an alleged Section 441d violation, the letter complained of is not a solicitation.

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In the first place, the October 30 letter informs the reader of no particular fundraising activity. The letter is of a general nature. There is no specific request to send money to any person, candidate or organization. And as stated in respondents' reply letter to the Commission dated January 14, 1982, the purpose of the letter appears to be to encourage political action committees to develop contribution guidelines for the 1982 elections that would be favorable to all Republican candidates (see Attachment 1 at page 4).

Second, an affidavit supplied by counsel for respondents, and signed by Nancy Sinnott, the Executive Director of the National Republican Congressional Committee ("NRCC"), sets out the basic practices and procedures used by NRCC for direct mail solicitation (see Attachment 1 at pages 6 and 7). This affidavit, based upon the personal knowledge of the affiant, states the following facts: (1) that all 1,360 letters mailed to managers of political action committees were prepared, typed and mailed by NRCC's in-house staff; (2) that NRCC paid all expenses associated with the communication in question; (3) that the letters bore the return address of NRCC; (4) that there were no other enclosures mailed with the letter; (5) that it is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution; (6) that it is the practice of the NRCC to print a disclaimer notice as required by 2 U.S.C. § 441d on all letters

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that are intended to solicit contributions; and (7) that no contributions have been received by NRCC in response to any of the letters.

Thus it seems apparent that the October 30 communication to PAC managers cannot realistically be considered an effort to solicit contributions for any identifiable candidate or political action committee. Furthermore, the communication in question evinces no intent by NRCC to solicit contributions for itself. And, as the letter clearly seeks support for all Republican incumbents and challengers, it cannot reasonably be characterized as a solicitation for contributions specifically to the congressmen who are signatories of the letter (see page 2 of October 30 letter attached to complaint).

Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the forty eight (48) congressmen named in this complaint violated 2 U.S.C. § 441d by failing to include a proper disclaimer on the communication dated October 30, 1981.

B. Allegation of the Section 433 Violation

2 U.S.C. § 431(4), in relevant part, defines political committee as, "any committee, club, association, or other group of person which ... makes expenditures aggregating in excess of \$1,000 during a calendar year" DCCC alleges that the cost of preparing, printing and distributing the October 30 letter was in excess of \$1,000. Therefore, DCCC reasons, the forty eight (48) congressmen should be considered a political committee.

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Regardless of the possible complications which complainant's novel theory might entail should the \$1,000 dollar threshold have been exceeded in producing the October 30 communication, the NRCC makes it clear that it paid all costs associated with the October 30, letter and, in any event, the total cost of all expenses was only \$366.52 (see Attachment 1 at page 6). Thus the dollar requirement necessary to trigger the Section 431 definition of a political committee is unsatisfied and this second allegation by DCCC should also be deemed without merit. Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the forty eight (48) congressmen named in this complaint violated 2 U.S.C. § 433 for failing to register themselves as a political committee.

RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. find no reason to believe that the forty eight (48) congressmen named in this complaint violated 2 U.S.C. § 441d by failing to include the proper disclaimer on the communication dated October 30, 1981;

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2. find no reason to believe that the forty eight (48) congressmen named in this complaint violated 2 U.S.C. § 433 for failing to register themselves as a political committee; and
3. close the file.

Feb 19, 1982
Date

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter to complainant (1 page)
2. Letter to respondents
(1 page)
3. Response of counsel
for respondents (7 pages)

Actual Document Labeled:

- Attachment 1 (1)
Attachment 2 (2)
Attachment 3 (3)-(9)

32040311477



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Schweitzer
Baker & Hostetler
818 Connecticut Avenue
Washington, D.C. 20006

Re: MUR 1417

Dear Mr. Schweitzer:

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The Commission, on February , 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 30 ays.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

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Attachment 1



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tony Coelho, Chairman
Democratic National Campaign Committee
400 North Capitol Street, N.W., Suite 319
Washington, D.C. 20001

Re: MUR 1417

Dear Mr. Coelho:

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Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. 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

Attachment 2

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6044 6090
82 JAN 18 P12:00 (3)
Andersen
IN DENVER, COLORADO
500 CAPITOL LIFE CENTER
DENVER, COLORADO 80203
(303) 551-0500
IN ORLANDO, FLORIDA
550 CNA TOWER
ORLANDO, FLORIDA 32802
(305) 224-1111

BAKER & HOSTETLER

ATTORNEYS AT LAW

518 CONNECTICUT AVE., N.W.

WASHINGTON, D. C. 20006

(202) 551-1500

TELESCOPIER (202) 557-0040

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 521-0500
TWX 510 481 5375

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 222-1541

WRITER'S DIRECT DIAL NO.:

(202) 551-

January 14, 1982

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

Re: MUR 1417

Dear Mr. Steele:

This office represents the National Republican Congressional Committee ("NRCC") and 48 Republican Members of Congress ("Members").^{1/} The Members each received a letter from you dated December 23, 1981, informing them that

1/ Those named in the complaint are: Honorable Jack Fields, Honorable John Hiler, Honorable Duncan Hunter, Honorable Steve Gunderson, Honorable Eugene Johnston, Honorable David Dreier, Honorable Christopher H. Smith, Honorable Albert L. Smith, Jr., Honorable James V. Hansen, Honorable Bob McEwen, Honorable Thomas E. Hartnett, Honorable Daniel R. Coats, Honorable Hank Brown, Honorable John LeBoutillier, Honorable Bill Hendon, Honorable Harold Rogers, Honorable Judd Gregg, Honorable James K. Coyne, Honorable Clint Roberts, Honorable Guy V. Molinari, Honorable Jim Dunn, Honorable Pat Roberts, Honorable Bobbi Fielder, Honorable Cooper Evans, Honorable Larry E. Craig, Honorable Hal Daub, Honorable David M. Staton, Honorable E. Clay Shaw, Jr., Honorable Thomas J. Bliley, Jr., Honorable George Wortley, Honorable Michael S. Oxley, Honorable Ed Weber, Honorable Lynn Martin, Honorable Gregory Carman, Honorable David B. Martin, Honorable Frank R. Wolf, Honorable Sid Morrison, Honorable Bill Lowery, Honorable Joe Skeen, Honorable John L. Napier, Honorable Wendell Bailey, Honorable Bill McCullom, Honorable Denny Smith, Honorable James L. Nelligan, Honorable Vin Weber, Honorable Cleve Benedict, Honorable Bill Emerson and Honorable Raymond McGrath. Designations of Counsel signed by each of the above and the NRCC are enclosed.

Attachment 3

82 JAN 18 P 5: 00
GENERAL COUNSEL

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Charles N. Steele, Esquire
January 14, 1982
Page 2

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they were named in a complaint filed with the Federal Election Commission ("FEC") by Congressman Tony Coelho, Chairman of the Democratic Congressional Campaign Committee ("DCCC"). The Complaint has been designated by you as Matter Under Review ("MUR") 1417.

On the basis of the reasons stated below and the attached Affidavit of Nancy Sinnott, the Members and the NRCC urge the FEC to find no reason to believe that there has been any violation of the Federal Election Campaign Act, as amended ("Act").

FACTS

On or about October 30, 1981, letters, signed by the Members, were mailed to 1360 individuals who are managers of various political action committees ("PACs"). Affidavit of Nancy Sinnott, Executive Director of the NRCC ¶ 3 (attached, hereafter "Sinnott Aff."). The letters were prepared, typed and mailed by in-house personnel of the NRCC. Sinnott Aff. ¶ 4. All expenses relating to these letters were borne solely by the NRCC and such expenses totalled \$366.52. Sinnott Aff. ¶ 5.

The letters were enclosed in envelopes that contained the return address of NRCC. Sinnott Aff. ¶ 6. There were no other enclosures. Sinnott Aff. ¶ 7. No contribution has been received by the NRCC in apparent response to the letters. Sinnott Aff. ¶ 8.

The letter expressed general gratitude for the fact that in 1980 "Republican congressional candidates nationwide received more money from business PACs than did Democratic candidates." This is followed by a description of the support that two unsuccessful Republican challengers received from business PACs in the last election. The letter concludes with a statement expressing the Members desire that PACs "make an even greater effort to provide pro-free enterprise business Republican challengers and incumbents the financial assistance necessary to achieve our shared goal of a Republican-controlled House of Representatives in 1982."

It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution. Sinnott Aff. ¶ 10. It is the practice of the NRCC to print a notice pursuant to the Act

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Charles N. Steele, Esquire
 January 14, 1982
 Page 3

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on all letters that are intended to solicit contributions and/or on all response cards that are enclosed. Sinnott Aff. ¶ 11. The purpose of the letter was to encourage PACs to formulate contribution guidelines that in 1982 would allow consideration of Republican incumbents and challengers. Sinnott Aff. ¶ 12.

The DCCC complaint alleges that the Act, 2 U.S.C. § 441d, requires a notice on the letter at issue stating the identity of the person who paid for and authorized it. The complaint further alleges that the Members are a "political committee" as defined in the Act, 2 U.S.C. § 431(4). Neither allegation has merit.

ARGUMENT

I. Section 441d Has Not Been Violated.

Section 441d specifies the conditions under which a notice is required. A notice is required on a communication that either "expressly advocates the election or defeat of a clearly identified candidate" or "solicits any contribution," provided that the communication is made through "general public political advertising" including "direct mailing." The letter signed by the Members is not a communication as described in section 441d.

A. The Letter Does Not Expressly Advocate the Election or Defeat of a Clearly Identified Candidate.

The term "expressly advocating" has a narrow meaning. The term refers only to express words of advocacy such as "vote for," "elect," "support," "cast your ballot for," "Smith for Congress," "vote against," "defeat," "reject." 11 C.F.R. § 109.1(b)(2) (1981); Buckley v. Valeo, 424 U.S. 1, 44 n.52 (1976). The letter at issue does not contain any of these express words nor any words that urge a person to vote for or against a candidate. Accordingly, the letter cannot be subject to section 441d because it does not "expressly advocate."

B. The Letter Does Not Solicit Contributions.

The FEC has never addressed in its advisory opinions relating to notices the question of what constitutes "soliciting contributions." In the Matter of Tom Hagedorn,

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Charles N. Steele, Esquire
January 14, 1982
Page 4

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MUR 1230, General Counsel's Report at 3, n.2 (Aug. 23, 1980). In a totally different context, the FEC has stated that "informing persons of a fundraising activity is considered a solicitation." *Id.* at 2, citing Advisory Opinions 1976-96, 1978-83, and 1978-97 (solicitation under 2 U.S.C. § 441b(b)(4)(D)). Presumably, the FEC has taken this position because someone thus informed might be moved to make a contribution to a specified candidate or political committee. This standard envisions a "solicitation" sufficiently specific so that the presumed "solicitee" would know where to send his money. Such is not the case here.

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The letter is so generalized that it cannot reasonably be construed as a solicitation. Where would anyone who was "solicited" send his check? To whom would it be made out? There was no return card or envelope. *Sinnott Aff.* § 7. The letter contains no directive or request to send money, nor is there any reference to any amount. Neither the Members nor the NRCC seek contributions for themselves, nor have any contributions been received in apparent response to these letters. *Sinnott Aff.* § 8.

It is clear from all the circumstances that no solicitation was intended. *Sinnott Aff.* § 9. It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution. *Sinnott Aff.* § 10. No such enclosures accompanied the letter. *Sinnott Aff.* § 7. When the NRCC solicits a contribution it does so expressly and prints the required notices on the solicitation letter and/or the response card. *Sinnott Aff.* § 11.

The express purpose of the letter was to encourage PACs to develop "contribution guidelines for the 1982 campaign year" which would be favorable to Republican challengers and incumbents. *Sinnott Aff.* § 12. A generalized appeal on behalf of virtually all Republican candidates is not a solicitation for purposes of section 441d. The letter, therefore, is not required to have a notice.

II. The Members Are Not A "Political Committee".

A "political committee" includes any group of persons that receives contributions or makes expenditures in excess of \$1,000 per calendar year. 2 U.S.C. § 431(4)(A). The Members received no contributions nor did they make any expenditures. All expenses relating to the preparation and

Charles N. Steele, Esquire
January 14, 1982
Page 5

mailing of the letter were paid by the NRCC and totalled \$366.52. Sinnott Aff. ¶ 5. The NRCC is a registered political committee and files regular reports pursuant to the Act. Accordingly, the complaint erroneously alleges that the Members are a political committee.

CONCLUSION

For all the above reasons, the FEC should find no reason to believe that either the Members or the NRCC violated the Act as alleged in the complaint.

Respectfully submitted,

BAKER & HOSTETLER

By William H. Schweitzer
William H. Schweitzer

Jan W. Baran
Jan W. Baran

cc: Lawrence J. Halloran, Esq.

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AFFIDAVIT OF NANCY SINNOTT

District of Columbia

)
)
)

ss:

Nancy Sinnott for her affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am the Executive Director of the National Republican Congressional Committee ("NRCC").

3. On or about October 30, 1981, letters, signed by 48 Republican Members of Congress, were mailed to 1,360 managers of political action committees ("PACs").

4. The letters were prepared, typed and mailed by in-house personnel of the NRCC.

5. The NRCC paid all expenses relating to preparation and mailing of the letters which expenses totalled \$366.52.

6. The letters were sent in an envelope bearing the return address of the NRCC.

7. There were no other enclosures with the letters.

8. No contribution has been received by the NRCC in response to any of these letters.

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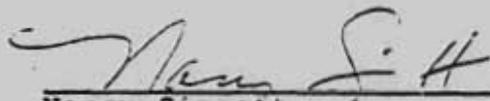
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9. The NRCC did not intend or request that the recipients of these letters respond with a contribution to any specific candidate or political committee.

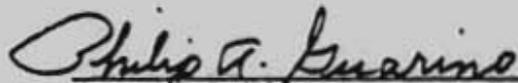
10. It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution.

11. It is the practice of the NRCC to print a notice pursuant to the Federal Election Campaign Act, as amended, 2 U.S.C. § 441d, on all letters that are intended to solicit contributions and/or on all response cards that are enclosed.

12. The purpose of the letter was to encourage PACs to formulate contribution guidelines that in 1982 would allow consideration of Republican incumbents and challengers.


Nancy Sinnott

Subscribed and sworn before me this 12 day of January, 1982.


Notary Public

My commission expires:
COMMISSION EXPIRES
JUNE 15, 1986

32040311435

Comment Sheet

12 Day Report

MUR # 1417

Staff Member Andersen

Date 1-28-82

Time of Transmittal 11 AM

Expiration of 72-hour Comment Period: _____

Comments:

82010310197

approve _____

object _____

no comment _____

initials _____

conference date/time _____

12 DAY REPORT
January 12, 1982

MUR 1417
STAFF MEMBER: Lee Andersen
DATE ASSIGNED TO STAFF:
12/17/81

SOURCE OF MUR: Complaint
RESPONDENT'S NAME: Honorable Jack Fields, Et al.*
RELEVANT STATUTE: 2 U.S.C. §§ 431(4)(A), 441(d)
11 C.F.R. § 109.1(b)(2)
INTERNAL REPORTS CHECKED: None
FEDERAL AGENCIES CHECKED: None

STATEMENT OF THE CASE

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A signed and sworn complaint was filed by the Democratic National Campaign Committee ("DNCC"), Tony Coelho, Chairman, on December 14, 1981, against forty eight (48) named Republican members of Congress. The complaint alleges violations of 2 U.S.C. §§ 441(d) and 433 respectively for: (1) failing to state the identity of the persons or persons who authorized and paid for a certain letter mailed to a number of political action committees; and (2) for the possible failure of the named congressman to register themselves with the Federal Election Commission (the "Commission") as a political committee.

Complainant has submitted to the Commission a copy of the letter which it has characterized as a fundraising appeal as

*/ A complete list of 48 named congressman may be found in the complaint.

part of its complaint. Complainant argues that the letter is a solicitation for contributions to the congressmen, requiring a Section 441(d)(1) or (2) disclaimer. Further, complainant suggests that it believes that the expenses incurred for producing the letter may have exceeded \$1,000. Complainant argues that if expenses incurred by respondents reached that \$1,000 level, the congressman should be considered a political committee for purposes of Section 431 and 433 and be required to register and report to the Commission.

PRELIMINARY DISCOVERY PLAN

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Proof of the first allegation in the complaint will depend upon whether the Commission finds that the letter in question was a solicitation, thereby triggering the disclaimer requirement of Section 441(d). This judgment will, in turn, depend upon an analysis of the letter itself and a comparison of this letter to other instruments or occasions in which the Commission has determined that a solicitation has taken place. Since we have the letter in hand at this time, we expect to be able to make our analysis and recommendations to the Commission based upon the physical evidence which the complainant has presented along with any response which the named congressman in the complainant care to make.

As to the second allegation, the complainant had no stated knowledge of the cost associated with the letter of October 30, 1981. It is possible that the response which we are likely to receive from the congressmen will shed light on the issue of how

much money was involved in producing the letter. We do not expect to become involved in the taking of depositions or other intensive investigative actions as the factual issues relevant would seem to be of a type determinable from the respondents' records and from the legal principles applicable to this matter.

TRACK DESIGNATION

The Office of General Counsel designates this as a Track Two matter under review.

32040311477

MEMORANDUM

TO: The File
From: Kenneth J. Gross
SUBJECT: MUR 1417



On December 30, 1981, Bill Schweitzer called me to arrange or to discuss the time limit in which the responses to the above referenced matter is due. He wants to know how we computed the fifteen day response time and I told him that we allow three days for mailing on either side of the fifteen days. He also did not know the exact date in which the letters were mailed out and I believe it is December 22nd however I can check that. According to our calculation eighteen days after the letter was mailed would land on January 9th which is a Saturday which would go over to January 11th Monday. However, if we add an additional three days for mailing back to us that would bring the date to January 12th because then you would not have the date carryover by it landing on a Saturday. In that there are forty-eight respondents in this matter and there is undoubtedly some notice problems and there is a great difficulty in obtaining all the designations of counsels in the period of time. I have agreed that they would respond that Friday which is January 15th. So rather than getting into a question of how to count the days and causing undo concern for a matter of a couple of days I have set this date as a reasonable time without getting into a formal request for extension of time.

Please note that and handle the matter accordingly. Thank you.

cc: Gary Johansen
Lee Anderson

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BAKER & HOSTETLER

ATTORNEYS AT LAW

818 CONNECTICUT AVE., N.W.

WASHINGTON, D. C. 20006

(202) 861-1800

TELECOPIER (202) 867-0010

RECEIVED
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82 JAN 18 P12:00

IN CLEVELAND, OHIO
3200 NATIONAL CITY CENTER
CLEVELAND, OHIO 44114
(216) 821-0200
TWX 810 421 8375

IN COLUMBUS, OHIO
100 EAST BROAD STREET
COLUMBUS, OHIO 43215
(614) 228-1541

IN DENVER, COLORADO
500 CAPITOL LIFE CENTER
DENVER, COLORADO 80203
(303) 861-0800

IN ORLANDO, FLORIDA
850 CNA TOWER
ORLANDO, FLORIDA 32802
(308) 841-1111

WRITER'S DIRECT DIAL NO.:

(202) 861-

January 14, 1982

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

11
P 5:00

Re: MUR 1417

Dear Mr. Steele:

This office represents the National Republican Congressional Committee ^{1/}("NRCC") and 48 Republican Members of Congress ("Members"). ^{1/}The Members each received a letter from you dated December 23, 1981, informing them that

1/ Those named in the complaint are: Honorable Jack Fields, Honorable John Hiler, Honorable Duncan Hunter, Honorable Steve Gunderson, Honorable Eugene Johnston, Honorable David Dreier, Honorable Christopher H. Smith, Honorable Albert L. Smith, Jr., Honorable James V. Hansen, Honorable Bob McEwen, Honorable Thomas E. Hartnett, Honorable Daniel R. Coats, Honorable Hank Brown, Honorable John LeBoutillier, Honorable Bill Hendon, Honorable Harold Rogers, Honorable Judd Gregg, Honorable James K. Coyne, Honorable Clint Roberts, Honorable Guy V. Molinari, Honorable Jim Dunn, Honorable Pat Roberts, Honorable Bobbi Fielder, Honorable Cooper Evans, Honorable Larry E. Craig, Honorable Hal Daub, Honorable David M. Staton, Honorable E. Clay Shaw, Jr., Honorable Thomas J. Bliley, Jr. Honorable George Wortley, Honorable Michael S. Oxley, Honorable Ed Weber, Honorable Lynn Martin, Honorable Gregory Carman, Honorable David B. Martin, Honorable Frank R. Wolf, Honorable Sid Morrison, Honorable Bill Lowery, Honorable Joe Skeen, Honorable John L. Napier, Honorable Wendell Bailey, Honorable Bill McCullom, Honorable Denny Smith, Honorable James L. Nelligan, Honorable Vin Weber, Honorable Cleve Benedict, Honorable Bill Emerson and Honorable Raymond McGrath. Designations of Counsel signed by each of the above and the NRCC are enclosed.

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Charles N. Steele, Esquire
January 14, 1982
Page 2

they were named in a complaint filed with the Federal Election Commission ("FEC") by Congressman Tony Coelho, Chairman of the Democratic Congressional Campaign Committee ("DCCC"). The Complaint has been designated by you as Matter Under Review ("MUR") 1417.

On the basis of the reasons stated below and the attached Affidavit of Nancy Sinnott, the Members and the NRCC urge the PEC to find no reason to believe that there has been any violation of the Federal Election Campaign Act, as amended ("Act").

FACTS

On or about October 30, 1981, letters, signed by the Members, were mailed to 1360 individuals who are managers of various political action committees ("PACs"). Affidavit of Nancy Sinnott, Executive Director of the NRCC ¶ 3 (attached, hereafter "Sinnott Aff."). The letters were prepared, typed and mailed by in-house personnel of the NRCC. Sinnott Aff. ¶ 4. All expenses relating to these letters were borne solely by the NRCC and such expenses totalled \$366.52. Sinnott Aff. ¶ 5.

The letters were enclosed in envelopes that contained the return address of NRCC. Sinnott Aff. ¶ 6. There were no other enclosures. Sinnott Aff. ¶ 7. No contribution has been received by the NRCC in apparent response to the letters. Sinnott Aff. ¶ 8.

The letter expressed general gratitude for the fact that in 1980 "Republican congressional candidates nationwide received more money from business PACs than did Democratic candidates." This is followed by a description of the support that two unsuccessful Republican challengers received from business PACs in the last election. The letter concludes with a statement expressing the Members desire that PACs "make an even greater effort to provide pro-free enterprise business Republican challengers and incumbents the financial assistance necessary to achieve our shared goal of a Republican-controlled House of Representatives in 1982."

It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution. Sinnott Aff. ¶ 10. It is the practice of the NRCC to print a notice pursuant to the Act

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Charles N. Steele, Esquire
January 14, 1982
Page 3

on all letters that are intended to solicit contributions and/or on all response cards that are enclosed. Sinnott Aff. ¶ 11. The purpose of the letter was to encourage PACs to formulate contribution guidelines that in 1982 would allow consideration of Republican incumbents and challengers. Sinnott Aff. ¶ 12.

The DCCC complaint alleges that the Act, 2 U.S.C. § 441d, requires a notice on the letter at issue stating the identity of the person who paid for and authorized it. The complaint further alleges that the Members are a "political committee" as defined in the Act, 2 U.S.C. § 431(4). Neither allegation has merit.

ARGUMENT

I. Section 441d Has Not Been Violated.

Section 441d specifies the conditions under which a notice is required. A notice is required on a communication that either "expressly advocates the election or defeat of a clearly identified candidate" or "solicits any contribution," provided that the communication is made through "general public political advertising" including "direct mailing." The letter signed by the Members is not a communication as described in section 441d.

A. The Letter Does Not Expressly Advocate the Election or Defeat of a Clearly Identified Candidate.

The term "expressly advocating" has a narrow meaning. The term refers only to express words of advocacy such as "vote for," "elect," "support," "cast your ballot for," "Smith for Congress," "vote against," "defeat," "reject." 11 C.F.R. § 109.1(b)(2) (1981); Buckley v. Valeo, 424 U.S. 1, 44 n.52 (1976). The letter at issue does not contain any of these express words nor any words that urge a person to vote for or against a candidate. Accordingly, the letter cannot be subject to section 441d because it does not "expressly advocate."

B. The Letter Does Not Solicit Contributions.

The FEC has never addressed in its advisory opinions relating to notices the question of what constitutes "soliciting contributions." In the Matter of Tom Hagedorn,

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Charles N. Steele, Esquire
January 14, 1982
Page 4

MUR 1230, General Counsel's Report at 3, n.2 (Aug. 23, 1980). In a totally different context, the FEC has stated that "informing persons of a fundraising activity is considered a solicitation." *Id.* at 2, citing Advisory Opinions 1976-96, 1978-83, and 1978-97 (solicitation under 2 U.S.C. § 441b(b)(4)(D)). Presumably, the FEC has taken this position because someone thus informed might be moved to make a contribution to a specified candidate or political committee. This standard envisions a "solicitation" sufficiently specific so that the presumed "solicitee" would know where to send his money. Such is not the case here.

The letter is so generalized that it cannot reasonably be construed as a solicitation. Where would anyone who was "solicited" send his check? To whom would it be made out? There was no return card or envelope. *Sinnott Aff.* ¶ 7. The letter contains no directive or request to send money, nor is there any reference to any amount. Neither the Members nor the NRCC seek contributions for themselves, nor have any contributions been received in apparent response to these letters. *Sinnott Aff.* ¶ 8.

It is clear from all the circumstances that no solicitation was intended. *Sinnott Aff.* ¶ 9. It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution. *Sinnott Aff.* ¶ 10. No such enclosures accompanied the letter. *Sinnott Aff.* ¶ 7. When the NRCC solicits a contribution it does so expressly and prints the required notices on the solicitation letter and/or the response card. *Sinnott Aff.* ¶ 11.

The express purpose of the letter was to encourage PACs to develop "contribution guidelines for the 1982 campaign year" which would be favorable to Republican challengers and incumbents. *Sinnott Aff.* ¶ 12. A generalized appeal on behalf of virtually all Republican candidates is not a solicitation for purposes of section 441d. The letter, therefore, is not required to have a notice.

II. The Members Are Not A "Political Committee".

A "political committee" includes any group of persons that receives contributions or makes expenditures in excess of \$1,000 per calendar year. 2 U.S.C. § 431(4)(A). The Members received no contributions nor did they make any expenditures. All expenses relating to the preparation and

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Charles N. Steele, Esquire
January 14, 1982
Page 5

mailing of the letter were paid by the NRCC and totalled \$366.52. Sinnott Aff. ¶ 5. The NRCC is a registered political committee and files regular reports pursuant to the Act. Accordingly, the complaint erroneously alleges that the Members are a political committee.

CONCLUSION

For all the above reasons, the FEC should find no reason to believe that either the Members or the NRCC violated the Act as alleged in the complaint.

Respectfully submitted,

BAKER & HOSTETLER

By William H. Schweitzer
William H. Schweitzer

Jan W. Baran
Jan W. Baran

cc: Lawrence J. Halloran, Esq.

32040311495

AFFIDAVIT OF NANCY SINNOTT

District of Columbia)
) ss:
)

Nancy Sinnott for her affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am the Executive Director of the National Republican Congressional Committee ("NRCC").

3. On or about October 30, 1981, letters, signed by 48 Republican Members of Congress, were mailed to 1,360 managers of political action committees ("PACs").

4. The letters were prepared, typed and mailed by in-house personnel of the NRCC.

5. The NRCC paid all expenses relating to preparation and mailing of the letters which expenses totalled \$366.52.

6. The letters were sent in an envelope bearing the return address of the NRCC.

7. There were no other enclosures with the letters.

8. No contribution has been received by the NRCC in response to any of these letters.

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9. The NRCC did not intend or request that the recipients of these letters respond with a contribution to any specific candidate or political committee.

10. It is the practice of the NRCC to enclose a return envelope and response card with all letters that are intended to solicit a contribution.

11. It is the practice of the NRCC to print a notice pursuant to the Federal Election Campaign Act, as amended, 2 U.S.C. § 441d, on all letters that are intended to solicit contributions and/or on all response cards that are enclosed.

12. The purpose of the letter was to encourage PACs to formulate contribution guidelines that in 1982 would allow consideration of Republican incumbents and challengers.



Nancy Sinnott

Subscribed and sworn before me this 13th day of January, 1982.



Notary Public

My commission expires:

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STATEMENT OF DESIGNATION OF COUNSEL

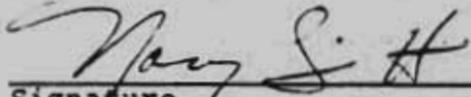
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 7, 1982
Date


Signature
Nancy Sinnott
Executive Director
National Republican Cong. Comm.
[Print or Type Name]

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STATEMENT OF DESIGNATION OF COUNSEL

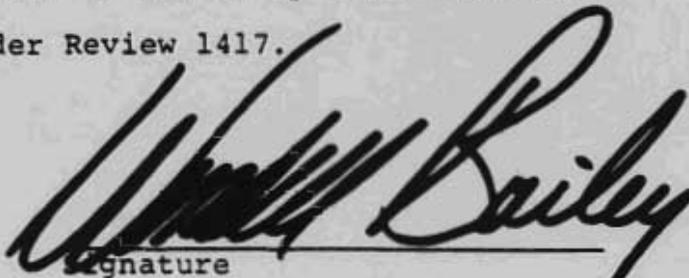
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec. 28, 1981
Date


Signature

Wendell Bailey, H.C.
[Print or Type Name]

82010311500

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

1/4/82
Date

Thomas J. Bliley, Jr.
Signature

Thomas J. Bliley, Jr.
[Print or Type Name]

8201031150?

STATEMENT OF DESIGNATION OF COUNSEL

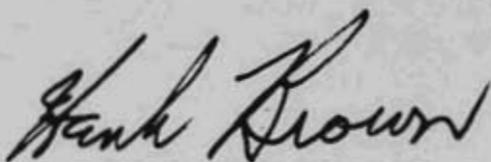
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 24, 1981
Date


Signature

Hank Brown
Member of Congress
[Print or Type Name]

82010311503

STATEMENT OF DESIGNATION OF COUNSEL

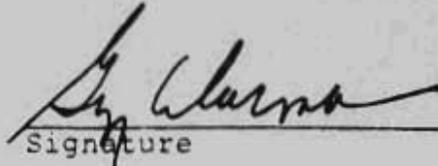
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 2, 1981
Date


Signature

GREGORY W CARKMAN
[Print or Type Name]

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STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec. 29, 1981
Date

Daniel R. Coats
Signature

DANIEL R. COATS
[Print or Type Name]

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STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N.W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

3 2 0 4 0 3 1 5 0 6
Date 12

Jim Coyne
Signature
JIM COYNE

NAME: Hon. James K. Coyne

ADDRESS: 119 Cannon House Office Building, D.C.

HOME PHONE:

BUSINESS PHONE:

STATEMENT OF DESIGNATION OF COUNSEL

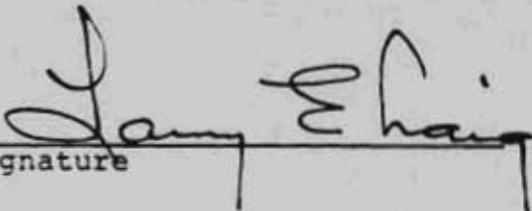
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 28, 1981
Date


Signature

Larry E. Craig M.C.
[Print or Type Name]

82010311507

STATEMENT OF DESIGNATION OF COUNSEL

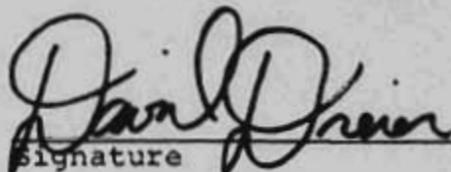
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

DEC. 31, 1981
Date


Signature

DAVID DEIER
[Print or Type Name]

8200011500

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N.W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. & 111.23, the above named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

8 2 0 1 0 3 1 1 5 1 0
28-12-81
Date


Signature

JIM DUNN
(Print or Type Name)

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 4, 1982
Date

Bill Emerson
Signature

Bill Emerson
[Print or Type Name]

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STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 23, 1981
Date


Signature

Cooper Evans
[Print or Type Name]

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

1-17-82
Date

Bobbi Fiedler
Signature

Bobbi Fiedler
[Print or Type Name]

8201011513

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 23, 1981
Date

Jack Fields, M.C.
Signature
Jack Fields, M.C.
[Print or Type Name]

32010311514

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

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Date

4/5/82

Signature

Judd Gregg

JUDD GREGG

[Print or Type Name]

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 23, 1981
Date


Signature

Hon. Steve Gunderson, M.C.
[Print or Type Name]

8 2 0 1 0 5 1 1 5 1 5

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran
ADDRESS: 818 Connecticut Avenue, N.W., Washington, D.C. 20006
TELEPHONE: 202/861-1500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notification and
other communications from the Commission and to act on
my behalf before the Commission.

3 2 9 1 9 1 1 5 1 7

3/28/11
DATE

[Signature]
SIGNATURE

NAME: James V. Hansen
ADDRESS: 1407 Longworth House Office Building

HOME PHONE:
BUSINESS PHONE:

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran
ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006
TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 5, 1982
Date

Thomas F. Hartnett
Signature

Thomas F. Hartnett, M.C.
[Print or Type Name]

8 2 0 4 0 3 1 1 5 1 8

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

24 December 1981
Date

Bill Hendon
Signature

Bill Hendon
[Print or Type Name]

3 2 0 1 0 1 1 5 1 9

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Date

1/2/82

Signature

John P. Hiler

John P. Hiler
[Print or Type Name]

32010311520

STATEMENT OF DESIGNATION OF COUNSEL

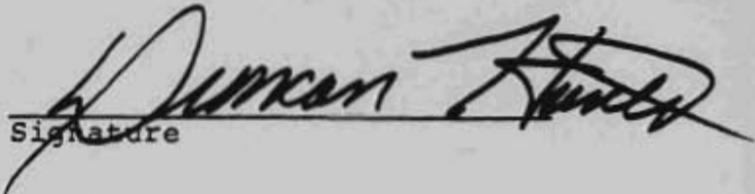
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

1-5-92
Date


Signature

Duncan Hunter
[Print or Type Name]

8 2 0 0 7 3 1 1 5 2 1

STATEMENT OF DESIGNATION OF COUNSEL

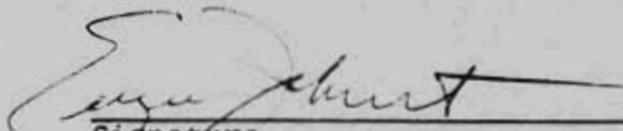
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran
ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006
TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Date

12/30/81

Signature



EUGENE JOHNSTON
[Print or Type Name]

20207311500

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

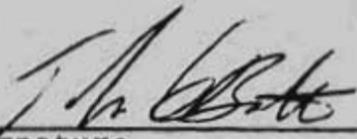
ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 24, 1981

Date


Signature

John LeBoutillier

[Print or Type Name]

3 0 0 1 5 3 3

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec 23, 1981
Date

Bill Lowery
Signature

BILL LOWERY, M.C.
[Print or Type Name]

82040311521

STATEMENT OF DESIGNATION OF COUNSEL

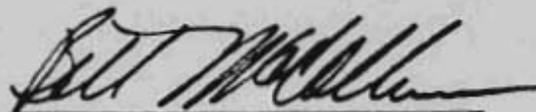
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N.W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 29, 1981
Date


Signature

Bill McCollum
(Print or Type Name)

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STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12/20/81
Date

W. H. Schweitzer
Signature
Jan W. Baran
[Print or Type Name]

3-2010311525

STATEMENT OF DESIGNATION OF COUNSEL

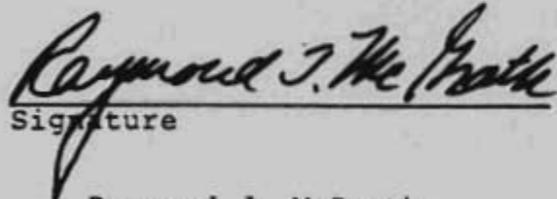
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 29, 1981
Date


Signature

Raymond J. McGrath
[Print or Type Name]

32010311527

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran
ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006
TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12-26-81
Date

David O'B Martin
Signature

David O'B. Martin, M.C.
[Print or Type Name]

David O'B. Martin, Member of Congress
House of Representatives
Washington, D.C. 20515

Tel: 202 225-4611

92010311529

STATEMENT OF DESIGNATION OF COUNSEL

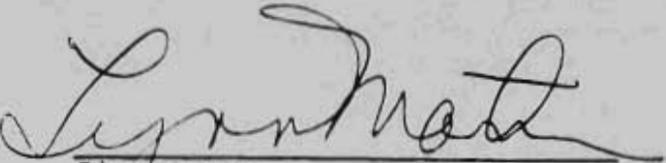
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12/30/81
Date


Signature

REP. LYNN MARTIN
[Print or Type Name]

82010311529

STATEMENT OF DESIGNATION OF COUNSEL

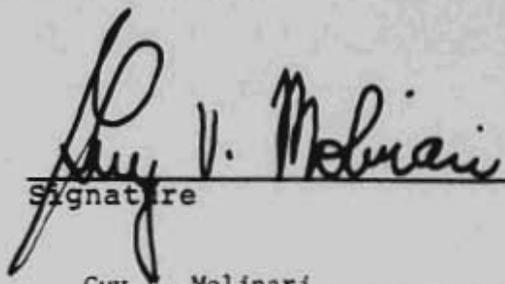
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

1/4/82
Date


Signature

Guy V. Molinari
[Print or Type Name]

82010311539

STATEMENT OF DESIGNATION OF COUNSEL

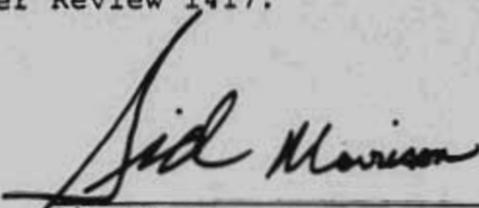
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 3, 1982
Date



Signature

Sid Morrison
[Print or Type Name]

32040511531

STATEMENT OF DESIGNATION OF COUNSEL

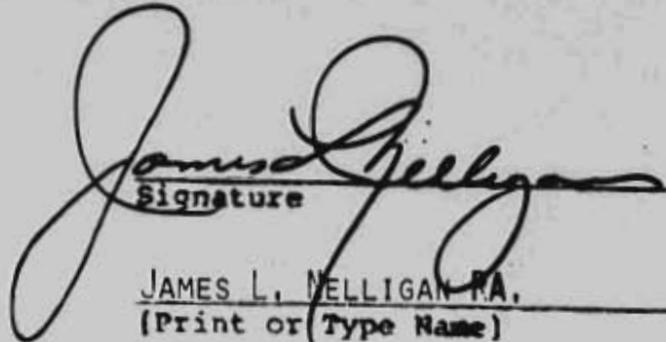
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec. 24, 1981
Date


Signature

JAMES L. NELLIGAN, PA.
(Print or Type Name)

32042311533

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12/31/81
Date


Signature

Michael G. Oxley
[Print or Type Name]

8 2 0 1 0 3 1 1 5 3 4

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N.W., Washington, D. C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12-23
Date

Clint Roberts
Signature

Clint Roberts
(Print or Type Name)

8 2 0 4 0 3 1 1 5 3 5

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec 28 1981
Date

Chris Smith
Signature

Rev. Christopher H. Smith
[Print or Type Name]

8 2 0 1 0 3 1 1 5 3 6

STATEMENT OF DESIGNATION OF COUNSEL

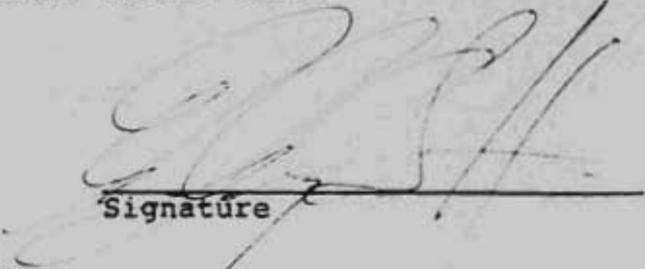
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 28, 1981
Date


Signature

E. Clay Shaw, Jr.
[Print or Type Name]

92040711537

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Nov 29, 1981
Date

[Handwritten Signature]
Signature

ROBERTS
[Print or Type Name]

8204011539

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12-24-81
Date

Harold Rogers
Signature

Harold Rogers, M.C.

[Print or Type Name]

82010311539

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

December 28, 1981
Date

Albert Lee Smith Jr.
Signature

Rep. Albert Lee Smith, Jr.
[Print or Type Name]

82040311540

STATEMENT OF DESIGNATION OF COUNSEL

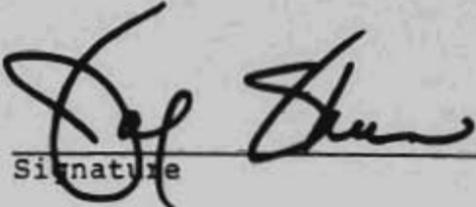
NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 4, 1982
Date


Signature

Joe Skeen
[Print or Type Name]

82040311542

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec. 24, 1981
Date

David Michael Staton
Signature

David Michael STATON
[Print or Type Name]

82047011513

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

January 4, 1982
Date


Signature

Ed Weber, M.C.
[Print or Type Name]

8 2 0 4 0 3 1 1 5 4 4

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

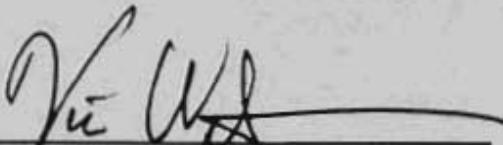
ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

12/24/81

Date



Signature

Vin Weber

[Print or Type Name]

9 2 0 1 0 3 1 1 5 4 5

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Dec 30, 1981
Date


Signature
FRANK R WOLF (V*)
[Print or Type Name]

NAME: Frank R. Wolf

ADDRESS: 414 Cannon Building

BUSINESS PHONE: 225-5136/202

8 2 0 1 0 3 1 1 5 9 5

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: William H. Schweitzer and Jan W. Baran

ADDRESS: 818 Connecticut Avenue, N. W., Washington, D.C. 20006

TELEPHONE: 202/861-1500

Pursuant to 11 C.F.R. § 111.23, the above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission in Matter Under Review 1417.

Date

12/26/81

Signature

George C. Wortley

GEORGE C. WORTLEY
[Print or Type Name]

92010311547

HAND DELIVERED

BY HAND

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

● 20403115 ●

31:mv

BAKER & HOSTETLER

815 CONNECTICUT AVE., N.W.

WASHINGTON, D. C. 20006

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Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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CC# 6089

82 JAN 18 P 2: 25

PERKINS, COIE, STONE, OLSEN & WILLIAMS

ANCHORAGE OFFICE
420 L STREET
SUITE 301
ANCHORAGE, ALASKA 99501
TELEPHONE: 907-279-8561
TELECOPIER: 907-276-3108

1110 VERMONT AVENUE, N.W.
WASHINGTON, D. C. 20005
TELEPHONE: 202-687-9030

SEATTLE OFFICE
1900 WASHINGTON BUILDING
SEATTLE, WASHINGTON 98101
TELEPHONE: 206-682-8770
TELECOPIER: 206-682-8784
CABLE "PERKINS SEATTLE"
DOM TELEX: 32-0319
INT'L TELEX: 47123

PLEASE REPLY TO WASHINGTON, D. C. OFFICE

January 12, 1982

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

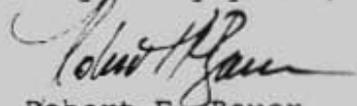
RE: Complaint Filed by Democratic
Congressional Campaign Committee

Dear Sir:

On December 14, 1981, the Democratic Congressional Campaign Committee filed a complaint alleging a violation of the Federal Election Campaign Act by 48 Members of the House of Representatives in connection with their financing of a funds solicitation letter. This complaint was forwarded to the FEC on that date via first class mail, postage prepaid and return receipt requested.

On Thursday, December 17, 1981, the press office informed the undersigned counsel that the complaint was received as of that day. The returned receipt, however, came by mail to DCCC's office only days later and contained no statement or other indication of the day the complaint was actually accepted at the FEC. Thus, this letter serves to confirm our understanding that the complaint was, in fact, duly received on Thursday, December 17 as represented by the press office, and complainant DCCC will rely on this representation unless advised to the contrary by return mail.

Very truly yours,



Robert F. Bauer

RFB:peg

00:38:00

PERKINS, COIE, STONE, OLSEN & WILLIAMS

10 VERMONT AVENUE, N.W.

WASHINGTON, D.C. 20005

22 JAN 18 12:25

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

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Handwritten signature of Kenneth A. Gross
BY: Kenneth A. Gross
Associate General Counsel

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Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

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1417 Andersen D/13

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Wendell Bailey

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	RETURNED NO.
	<i>913429</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE *[Signature]* Handwritten agent

4. DATE OF DELIVERY *71*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

WASHINGTON, DC
POSTMARK
1981
DEC 7
SIA NO. 7
SPS

☆GPO : 1979-000-489

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 1 1 5 3 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

REGISTERED MAIL

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Cleve K. Benedict

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943410

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Other agent
[Handwritten Signature]

DATE OF DELIVERY

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

STATION, WASHINGTON, D.C. 20540
DEC 23 1986
U.S. MAIL

EPO : 1979-300-499



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Thomas J. Bliley, Jr.
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Bliley:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

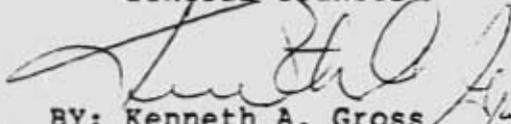
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 1 1 5 3 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

12/23

REGISTERED MAIL

1. The following service is requested (check one.)

Show to whom and date delivered..... 6

Show to whom, date and address of delivery..... 6

RESTRICTED DELIVERY
Show to whom and date delivered..... 6

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. 3

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Thomas J. Bliley, Jr.
FA

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943421	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Dec. 28, 1981

4. DATE OF DELIVERY
Phyllis Troy

5. ADDRESS (Complete only if required)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC
1861
87
358
USPS
ON VISIT

☆GPO : 1979-300-488



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Hank Brown
Rayburn House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Brown:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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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.

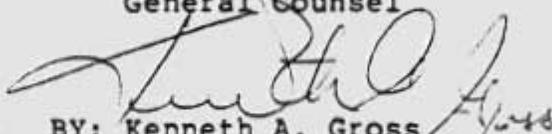
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

8201011539

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 9 1 1 5 5 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

SEND: Complete items 1, 2, and 3. Add your address to the "RETURN TO" space on cover.

1. The following service is requested (check one.)

- Show to whom and date delivered.....0
- Show to whom, date and address of delivery.....0
- RESTRICTED DELIVERY
Show to whom and date delivered.....0
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 3.....

(CONSULT FOREMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Hank Brown

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943432

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Date of delivery

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

WASHINGTON, DC
DEC 28 1981
SIN. NO. 2

8250 : 1979-900-480



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 23, 1981

Honorable Gregory W. Carman
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Carman:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

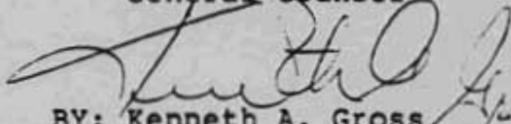
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 9 1 0 3 1 1 5 5 1

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Daniel R. Coats
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Coats:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James K. Coyne
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Coyne:

8 2 0 1 0 3 1 1 5 3 1

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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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.

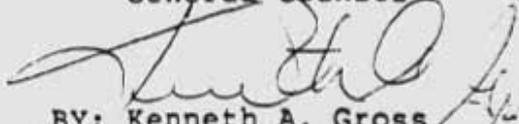
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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

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Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

539		
1. The following service is requested (check one.)		
<input type="checkbox"/>	Show to whom and date delivered.....	C
<input type="checkbox"/>	Show to whom, date and address of delivery.....	C
<input type="checkbox"/>	RESTRICTED DELIVERY	
<input type="checkbox"/>	Show to whom and date delivered.....	C
<input type="checkbox"/>	RESTRICTED DELIVERY.	
<input type="checkbox"/>	Show to whom, date, and address of delivery.....	C
(CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: <i>Rep. James K. Coyne</i>		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943418</i>	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE	Address	Authenticated agent
<i>Janet K. Leonard</i>		
4. DATE OF DELIVERY		
5. ADDRESS (Complete only if requested)		
6. UNABLE TO DELIVER BECAUSE:		
		INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Larry E. Craig
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Craig:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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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.

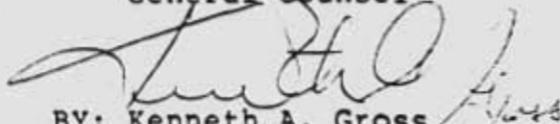
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 7 1 1 5 5 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

Form 3811, Jan. 1979

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Larry E. Craig

3. ARTICLE DESCRIPTION:
REGISTERED NO. 943420 INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
12-28-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

WASHINGTON, DC
DEC 28 1981
POSTMARK

GPO : 1979-800-459

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

9 2 0 1 0 1 1 5 3 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

117 DEC 28

Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered..... 0
- Show to whom, date and address of delivery..... 0
- RESTRICTED DELIVERY
Show to whom and date delivered..... 0
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. 5

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Harold Damb

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
414546

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if not on label)

6. UNABLE TO DELIVER BECAUSE OF: NO INITIALS

WASHINGTON, DC
DEC 28 1981
SSPS

U.S. POSTAGE

PSNPO : 1979-300-400



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable David T. Dreier
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Dreier:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

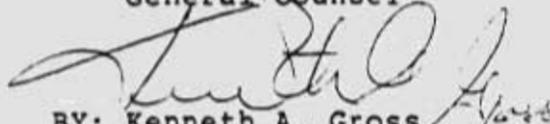
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 1 1 5 7 1

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered.....C

Show to whom, date and address of delivery.....C

RESTRICTED DELIVERY
Show to whom and date delivered.....C

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. David Dreier

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943723	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Randy Davis

4. DATE OF DELIVERY: 12/29/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER REASON:

82 JAN 5 P12: 2

CLERK'S INITIALS

RECEIVED

U.S. GPO : 1979-300-499



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Jim Dunn
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Dunn:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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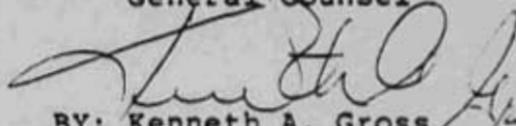
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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 7 4 1 1 5 7 3

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable William Emerson
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Emerson:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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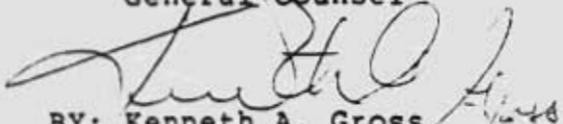
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8 2 0 0 1 1 5 7 1

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 3 1 1 5 7 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1461 Henderson 12/23

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:
Rep. Bill Emerson

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943425	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: *L. B. Little* CLASS: *Registered mail*

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

WASHINGTON, D.C. 20540
DEC 23 1981
JEC

202-523-488



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Cooper Evans
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Evans:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]

BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 7 1 1 5 7 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

Form 3811, Jan 1978

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

1. The following service is requested (check one.)

- Show to whom and date delivered.....¢
- Show to whom, date and address of delivery.....¢
- RESTRICTED DELIVERY
Show to whom and date delivered.....¢
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$_____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Cooper Evans

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943427	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Authorized agent

Dorothy K. Cavanaugh

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1981 DEC 23 10 21 AM '81

U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Bobbi Fiedler
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Ms. Fiedler:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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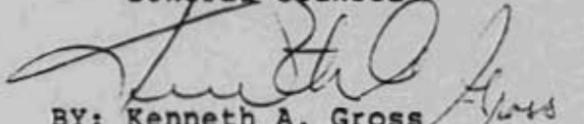
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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 3 1 1 5 7 9

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Jack Fields
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Fields:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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9201011590

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 1 1 5 3 1

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

447 Andersen 125

RECEIVED: Complaints Items 1, 2, and 3.
Add your address to the "RETURN TO" space on front.

1. The following service is requested (check one.)

- Show to whom and date delivered..... 0
- Show to whom, date and address of delivery..... 0
- RESTRICTED DELIVERY
Show to whom and date delivered..... 0
- RESTRICTED DELIVERY,
Show to whom, date, and address of delivery..... 0

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Jack Fields

3. ARTICLE IDENTIFICATION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>114576</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

B. Lund

4. DATE OF DELIVERY

5. ADDRESSEE (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

WASHINGTON, DC
POSTMARK
DEC 1981
SIA NO. 2

GPO : 1979-300-489



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Judd Gregg
Connon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Gregg:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross

Associate General Counsel

8 2 0 0 1 1 5 9 3

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Judd Gregg

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
| *943397* |

(Always obtain signature of addressee or agent)

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

4. *[Signature]*
DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

NO. 2
DEC 28 198
POSTAL SERVICE
CLERK'S INITIALS

U.S. POSTAGE AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Steve N. Gunderson
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Gunderson:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 0 7 1 1 5 3 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 And. sen 12/23

REGISTERED MAIL, REGISTERED, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Steve W. Gunderson

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>60636b</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY

5. ADDRESS (Duplicate only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

WASHINGTON DC
POSTMARK
DEC 19 1981
STATION NO.

GPO : 1979-300-000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James V. Hansen
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Hansen:

9 2 0 1 7 5 9 5
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

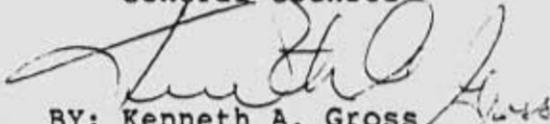
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 9 : 1 1 5 3 7

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered..... 0

Show to whom, date and address of delivery..... 0

RESTRICTED DELIVERY
Show to whom and date delivered..... 0

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery..... 0

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. James V. Hansen

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943427	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
12/26/81

5. ADDRESS (Complete only if different)

6. UNABLE TO DELIVER BECAUSE

MAIL MONITOR

U.S. MAIL

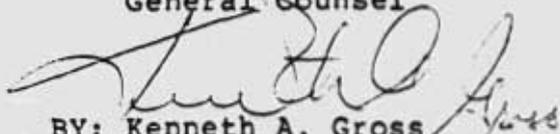
U.S. POSTAL SERVICE

GPO : 1979-000-100

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 0 1 1 5 3 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

SENDER: Complete items 1, 2, and 3. Add your address to the "RESTRICTED DEL" space on reverse.

1. The following service is requested (check one.)

Show to whom and date delivered..... 6

Show to whom, date and address of delivery..... 6

RESTRICTED DELIVERY
Show to whom and date delivered..... 6

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery..... 6

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Thomas F. Hartnett

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943414	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: 20/12/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

DEC 20 1981

lc | b | f | e | -2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Bill Hendon
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Hendon:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

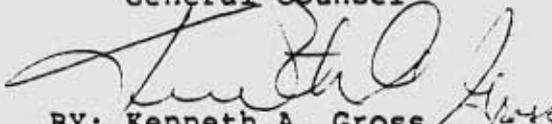
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

9 2 0 1 7 1 1 5 9 0

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

3 2 0 0 3 1 1 5 9 1

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

Lee Andersen 12/23

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:
Rep. Bill Hendon

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	9065hb	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

S. Elkins

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requesting)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

DEC 23 1981

GPO : 1979-300-480



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable John P. Hiler
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Hiler:

8 2 0 1 0 3 1 1 5 9 2
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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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.

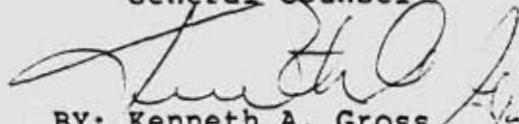
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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 3 1 1 5 9 3

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Anderson 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered.....c

Show to whom, date and address of delivery.....c

RESTRICTED DELIVERY
Show to whom and date delivered.....c

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. John P. Hiler

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943441	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE _____ ADDRESS _____ Classified agent _____

4. DATE OF DELIVERY _____

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: _____

CLERK'S INITIALS _____

WASHINGTON, DC
NOV 20 1973
SIA NO. 2
USPS

RECEIVED BY MAIL, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Duncan L. Hunter
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Hunter:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted within 15 days, the Commission may take further action based on the available information.

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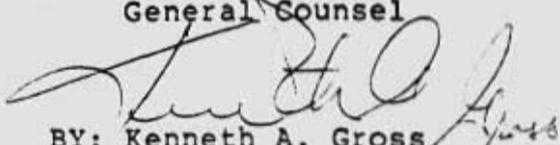
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

8 2 0 4 0 3 1 1 5 9 4

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 1 5 9 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/13

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

1. The following service is requested (check one.)

- Show to whom and date delivered.....0
- Show to whom, date and address of delivery.....0
- RESTRICTED DELIVERY
Show to whom and date delivered.....0
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 3.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Duncan L. Hunter

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943431	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

INITIALS

POSTMARK
1981
DEC 13
HUNTER



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable W. Eugene Johnston, III
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Johnston:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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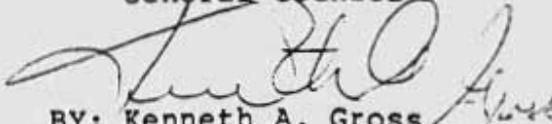
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8 2 0 1 7 1 5 9 6

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 7 1 1 5 7 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1 1 1 8

REGISTERED MAIL

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:
Rep. W. Eugene Johnston

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943435</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

CK

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

1981
DEC
28

NO 2

U.S. MAIL

U.S. POSTAGE

U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable John LeBoutillier
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. LeBoutillier:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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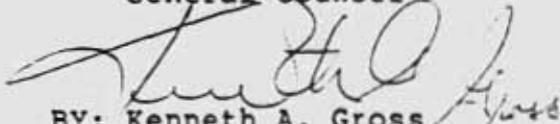
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 3 1 1 5 9 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

Andersen 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered..... c

Show to whom, date and address of delivery..... c

RESTRICTED DELIVERY
Show to whom and date delivered..... c

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. John BeBoutillier

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943438</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

L. Shiley

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK
1961
DEC 23

MAIL RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Bill Lowery
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Lowery:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

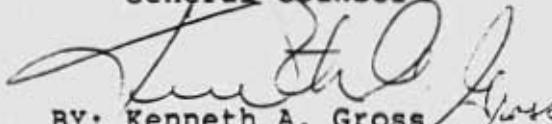
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

8 2 0 4 7 1 1 6 0 7

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 0 3 1 1 6 0 1

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Anderson 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered..... 6

Show to whom, date and address of delivery..... 6

RESTRICTED DELIVERY
Show to whom and date delivered..... 6

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 3.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. William D. Lowery

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943417	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

U.S. POSTAL SERVICE, REGISTERED, RESTRICTED, CERTIFIED AND GUARANTEED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Bill McCollum
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. McCollum:

8 2 0 4 7 1 1 6 7 ?
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

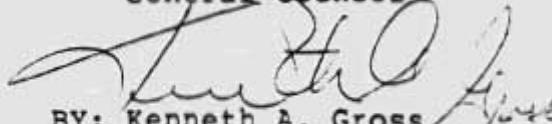
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 7 1 1 6 0 3

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Andersen 12/23

REGISTER: Complete items 1, 2, and 3.
Add "air address" in the "RETURN TO" space on back.

1. The following service is requested (check one.)

Show to whom and date delivered.....c

Show to whom, date and address of delivery.....c

RESTRICTED DELIVERY
Show to whom and date delivered.....c

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.1.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Bill McCollum

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943438</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Authorized agent

K. J. [Signature]

4. DATE OF DELIVERY

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER REASON

CLERK'S INITIALS

★GPO : 1979-500-459



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Bob McEwen
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. McEwen:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

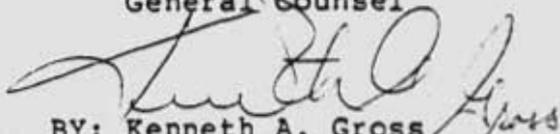
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

9204711604

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 6 0 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1412 Andersen 12/23

REGISTERED MAIL

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:
Rep. Bob McEwen

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943426	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. *Clinda Skonick*
DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. *824...*

7. SENDER'S INITIALS

WASHINGTON, DC
POSTMARK
1981
DEC 23

824...

RECEIVED *GPO : 1979-000-489



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Raymond J. McGrath
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. McGrath:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

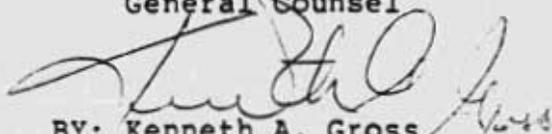
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

8 2 0 1 7 3 1 1 6 0 5

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

9 2 0 1 0 5 1 1 6 0 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

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:
Rep. Raymond J. McGrath

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943443

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent
MB McGrath

4. DATE OF DELIVERY
DEC 28 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable David O'B. Martin
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Martin:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

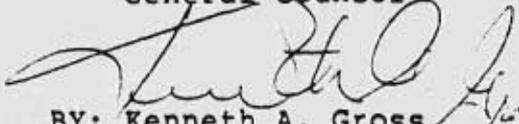
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8 2 0 4 0 5 1 1 6 0 9

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

9201711609

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 1/12/23

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. David O'B. Martin

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943444	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE:  DATE OF DELIVERY: 12-28-81

4. DATE OF DELIVERY: 12-28-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER REASON:

82 JAN 5 P12:28

CLERK'S INITIALS

POSTMARK: DEC 20 1981

★GPO : 1979-300-400

RECEIVED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Lynn M. Martin
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mrs. Martin:

8
2
0
4
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3
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6
1
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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted within 15 days, the Commission may take further action based on the available information.

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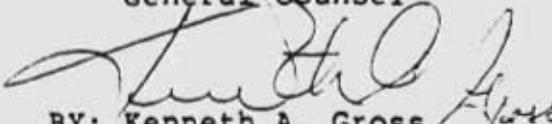
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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 0 3 1 6 1 1

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

TO: **RECEIVED** Complete items 1, 2, and 3. Add your address to the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

- Show to whom and date delivered.....c
- Show to whom, date and address of delivery.....c
- RESTRICTED DELIVERY Show to whom and date delivered.....c
- RESTRICTED DELIVERY. Show to whom, date, and address of delivery 3.....c

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Lynn M. Martin

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
| 106546 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if insured)

6. UNABLE TO DELIVER BECAUSE: NO SUCH PERSON NO SUCH ADDRESS OTHER (Specify) _____

WASHINGTON, DC
DEC 23 1973
U.S. MAIL

U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Guy V. Molinari
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Molinari:

8 2 0 1 0 3 1 1 6 1 2
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 7 1 1 6 1 3

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

REGISTERED MAIL

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:
Rep. Gray V. Molinari

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943430	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE *[Handwritten Signature]*

DATE OF DELIVERY

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE:

DEC 28 1981

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Sid Morrison
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Morrison:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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82019311611

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 3 1 6 1 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

1. The following service is requested (check one.)

Show to whom and date delivered..... 0

Show to whom, date and address of delivery..... 0

RESTRICTED DELIVERY
Show to whom and date delivered..... 0

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery..... 0

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Sed Morrison

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943433	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER REASON:

WASHINGTON, DC
1861
STAMP

U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable John L. Napier
Longworth House Building
Washington D.C. 20515

MUR 1417

Dear Mr. Napier:

8 2 0 1 0 1 6 1 5
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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 notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

23, 1981

Sincerely,

Charles N. Steele
General Counsel

[Signature]
BY: Kenneth A. Gross
Associate General Counsel

December 17, 1981 the complaint which alleges is of the Federal Election Act") or Chapters 95 and a complaint is enclosed. Please refer to this number

ty to demonstrate, in against you in connection submitted within 15 days, ed on the available

materials which you analysis of this matter. bmitted under oath.

in accordance with 2) unless you notify the tter to be made public.

ounsel in this matter, letter of representation mber of such counsel, o receive any notifica- mission. Mr. William stetler has provided us e will be representing t. In order to accomp- ed by the Commission's ovide a written request s we have provided a llow us to forward all

8 2 0 1 7 5 1 6 1 7

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Andersen 12/23

REGISTERED MAIL SERVICE REGISTERED MAIL SERVICE REGISTERED MAIL SERVICE REGISTERED MAIL SERVICE								
1. The following service is requested (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. ARTICLE ADDRESSED TO: <i>Rep. John L. Napier</i>								
3. ARTICLE DESCRIPTION: <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td><i>943408</i></td> <td></td> </tr> </table> (Always obtain signature of addressee or agent)			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		<i>943408</i>	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	<i>943408</i>							
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>Karen Johnson</i>								
4. DATE OF DELIVERY <i>DEC 28 1981</i>								
5. ADDRESS (Complete only if requested)								
6. UNABLE TO DELIVER BECAUSE:								

*EPO : 1070-900-000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James L. Nelligan
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Nelligan:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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Sincerely,

Charles N. Steele
General Counsel

Handwritten signature of Kenneth A. Gross

BY: Kenneth A. Gross
Associate General Counsel

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Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

REGISTERED MAIL, FIRST CLASS, POSTPAID, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one.)

Show to whom and date delivered..... \$

Show to whom, date and address of delivery..... \$

RESTRICTED DELIVERY
Show to whom and date delivered..... \$

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. James L. Neeligan

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943419</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

GPO : 1979-300-469



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Michael G. Oxley
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Oxley:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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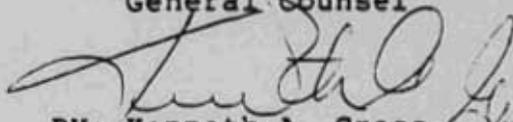
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If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

82040311621

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Clint Roberts
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Roberts:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 6 2 3

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

Show to whom and date delivered..... c

Show to whom, date and address of delivery..... c

RESTRICTED DELIVERY
Show to whom and date delivered..... c

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSING TO:
Rep. Clint Roberts

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>914E16</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Certified post

Donna Bell

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC
1981
DEC 9
USA



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Pat Roberts
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Roberts:

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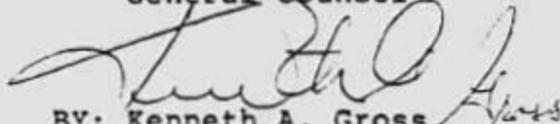
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9 2 0 1 0 3 1 1 6 2 4

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 3 1 1 6 2 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

- Show to whom and date delivered..... 6
- Show to whom, date and address of delivery..... 6
- RESTRICTED DELIVERY
Show to whom and date delivered..... 6
- RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. 3

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Pat Roberts

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943415	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

J. Lavin

4. DATE OF DELIVERY
12/29

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
WASHINGTON, DC
1981
6:25
NOV 29

NO. 2

☆ GPO : 1979-500-489



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Harold Rogers
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Rogers:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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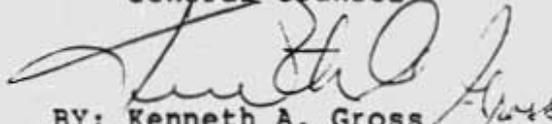
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8 2 0 4 0 3 1 6 2 5

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 3 1 6 2 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

RECEIVED

1861

353

CLERK'S INITIALS

81 DEC 31 1969

DATE OF DELIVERY

SIGNATURE *B. J. O'Keefe*

I have received the article described above.

(Always obtain signature of addressee or agent)

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943412	

2. ARTICLE ADDRESS TO: *Rep. Harold Rogers*

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)

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable David Michael Staton
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Staton:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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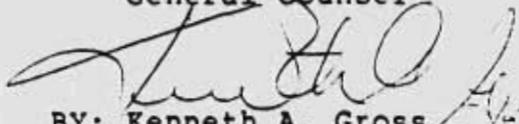
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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 3 1 1 6 2 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Anderson 10/12/81

PS Form 3811, Jan. 1979

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. David Michael Staton

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>50hshb</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

P. J. Rones

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

WASHINGTON, DC
1981
OCT 12 2 10 PM '81
STA N 2

★GPO : 1979-300-459



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable E. Clay Shaw
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Shaw:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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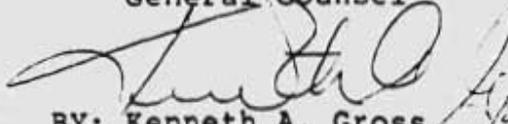
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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

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Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Rep. E. Clay Shaw, Jr.

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	993436	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Address Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
WASHINGTON, DC
DEC 20 1981
SIA

U.S. MAIL
INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Joseph R. Skeen
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Skeen:

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This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

3 2 0 1 0 3 1 1 6 3 3

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one):

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Joe Skeen

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

943425

(Always obtain signature of addressee or agent)

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

J Rhode

4. DATE OF DELIVERY
12-28-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

WASHINGTON, DC
DEC 29 1981
SIA NO. 2

U.S. POSTAGE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Albert Lee Smith, Jr.
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Smith:

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1

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. 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 you in connection with this matter. Your response must be submitted 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.

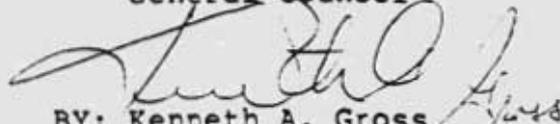
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If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notification and other communications from the Commission. Mr. William Schweitzer of the law firm of Baker and Hostetler has provided us with a written statement indicating that he will be representing all individuals mentioned in this complaint. In order to accomplish this designation of counsel as required by the Commission's regulations, it is necessary for you to provide a written request to that effect. To facilitate that process we have provided a designation of counsel letter which will allow us to forward all future communications through counsel.

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 3 1 1 6 3 5

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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:
Rep. Albert Lee Smith, Jr.
J. Gilbert Johnston

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943734

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC
DEC 27 1981
CLERK'S OFFICE

U.S. POST OFFICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Christopher H. Smith
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Smith:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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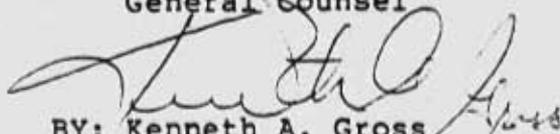
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3 2 0 1 0 1 1 6 3 5

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 1 1 6 3 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen R/23

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Christopher H. Smith

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943399

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent
A. Spencer

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON 1981
DEC 20
INITIALS

INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Denny Smith
Longworth House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Smith:

8 2 0 1 7 1 1 6 3 9
This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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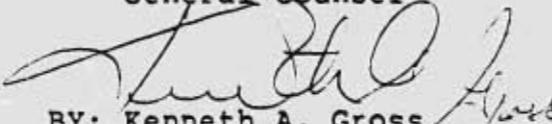
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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

9 2 0 1 7 1 1 6 3 9

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Denny Smith

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943700

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [Addressed] [Certified agent]
Add Johnson

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

U.S. MAIL
1981
DEC
CLERK'S OFFICE

REVERSE RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Ed Weber
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Weber:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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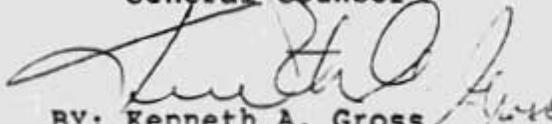
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32040311610

If you have any questions, please contact Lee Andersen, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 1 0 3 1 1 6 1 1

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Edward Weber

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | *1075ND*

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE *Daniel* | Address | Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

REGISTERED DELIVERY MAIL

POSTMARK
1987
DET

CLERK'S INITIALS

RECEIVED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Vin Weber
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Weber:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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82010;11612

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Sincerely,

Charles N. Steele
General Counsel

[Handwritten Signature]
BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 3 1 1 6 4 3

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one.)

- Show to whom and date delivered.....
- Show to whom, date and address of delivery.....
- RESTRICTED DELIVERY Show to whom and date delivered.....
- RESTRICTED DELIVERY. Show to whom, date, and address of delivery.3.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Vin Weber

3. ARTICLE DESCRIPTION:
REGISTERED NO. *F 50646* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Describe only if requested)

6. UNABLE TO DELIVER BECAUSE:

DEC 23 1981
REC
INITIALS

U.S. POSTAGE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Frank R. Wolf
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Wolf:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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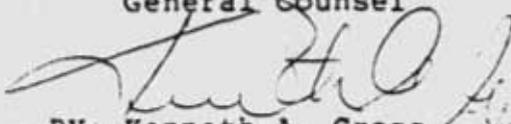
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32040311641

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 7 ; 1 1 6 1 5

Enclosures

1. Complaint
2. Procedures
3. Designation of Council Statement

1417 Anderson 12/23

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

1. The following service is requested (check one):

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. Frank R. Wolf

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
1ch5hb

(Always obtain signature of addressee or agent)

I have received the article described above:
SIGNATURE ADDRESS Authorized agent

4. DATE OF DELIVERY
Bill Jones

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK
J. 3
ON

★GPO : 1979-300-459



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable George C. Wortley
Cannon House Office Building
Washington, D.C. 20515

MUR 1417

Dear Mr. Wortley:

This letter is to notify you that on December 17, 1981 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1417. Please refer to this number in all future correspondence.

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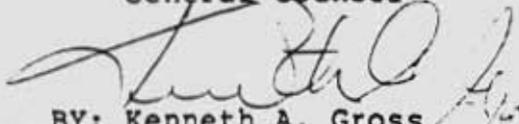
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8 2 0 1 0 3 1 6 4 5

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Sincerely,

Charles N. Steele
General Counsel



BY: Kenneth A. Gross
Associate General Counsel

8 2 0 4 0 1 1 6 4 7

Enclosures

- 1. Complaint
- 2. Procedures
- 3. Designation of Council Statement

1417 Andersen 12/23

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

1. The following service is requested (check one):

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Rep. George E. Wortley

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943440	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
S. P. Woods

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

WASHINGTON, DC
DEC 23 1981
JEC
STATION

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tony Coelho
Democratic Congressional Campaign Committee
400 N. Capitol Street, NW, Suite 319
Washington, D.C. 20001

Dear Mr. Coelho:

This letter is to acknowledge receipt of your complaint of December 14, 1981, against 48 United States Congressmen 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 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 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.

Sincerely,

Elissa T. Garr
Elissa T. Garr
Docket Chief

Enclosure

82010311513

Complaint
Before the
FEDERAL ELECTION COMMISSION

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE,

Plaintiff,

v.

- REP. JACK FIELDS, REP. JOHN P. HILER,
- REP. DUNCAN L. HUNTER, REP. STEVE N. GUNDERSON,
- REP. W. EUGENE JOHNSTON, REP. DAVID DREIER,
- REP. CHRISTOPHER H. SMITH, REP. BOB MCEWEN,
- REP. ALBERT LEE SMITH, JR., REP. JAMES V. HANSEN,
- REP. THOMAS F. HARTNETT, REP. DANIEL R. COATS,
- REP. HANK BROWN, REP. JOHN LEBOUTILLIER,
- REP. BILL HENDON, REP. HAROLD ROGERS,
- REP. JUDD GREGG, REP. JAMES K. COYNE,
- REP. CLINT ROBERTS, REP. GUY V. MOLINARI,
- REP. JIM DUNN, REP. PAT ROBERTS,
- REP. BOBBI FIEDLER, REP. COOPER EVANS,
- REP. LARRY E. CRAIG, REP. HAROLD DAUB,
- REP. DAVID MICHAEL STATON, REP. EDWARD WEBER,
- REP. E. CLAY SHAW, JR., REP. LYNN M. MARTIN,
- REP. THOMAS J. BLILEY, JR., REP. GEORGE C. WORTLEY,
- REP. MICHAEL G. OXLEY, REP. GREGORY W. CARMAN,
- REP. DAVID O'B. MARTIN, REP. WILLIAM D. LOWERY,
- REP. FRANK R. WOLF, REP. SID MORRISON,
- REP. JOE SKEEN, REP. JOHN L. NAPIER
- REP. WENDELL BAILEY, REP. BILL MCCOLLUM
- REP. DENNY SMITH, REP. JAMES L. NELLIGAN
- REP. VIN WEBER, REP. CLEVE K. BENEDICT
- REP. BILL EMERSON, REP. RAYMOND J. MCGRATH,

Respondents.

DEC 17 P 2:14

INTRODUCTION

Plaintiff Democratic Congressional Campaign Committee ("DCCC") herewith files this complaint, pursuant to § 437g of the Federal Election Campaign Act (the "Act"), as amended, alleging that respondents have engaged jointly in the solicitation of contributions for use in a federal election without complying with the requirements of the Act.

Specifically, plaintiff alleges that, in a letter dated October 30, 1981, these respondents signed an appeal for contributions which was directed toward numerous political action committees. On two counts, this activity appears to have been undertaken without regard for the plain letter of the Act.

1. The solicitation does not include the "disclaimer" mandated by 2 U.S.C. § 441d, which would clearly state the identity of the person or persons who paid for and authorized this communications; and

2. The costs of the production and wide-spread distribution of this communication may well have exceeded \$1,000, with the result that respondents were required to register as a "political committee" pursuant to 2 U.S.C. § 431.

Each of these allegations is discussed in full below. On the information herewith presented, the DCCC requests a full and complete investigation by the Federal Election Commission, and the imposition of all measures necessary to remedy this violation.

1. FAILURE OF SOLICITATION TO INCLUDE REQUIRED
"DISCLAIMER"

The Act provides that whenever contributions are solicited "through any . . . direct mailing," the mailing must include what is commonly called a "disclaimer" -- a clear statement of who paid for and authorized the solicitation. FECA § 441d. This requirement is an essential component of the policy of full disclosure which underlies the Act.

The attached fundraising letter of October 30, 1981, clearly constitutes a direct mail solicitation under § 441d.* Accordingly, this letter should have included the "disclaimer" mandated by that section. As it did not, an investigation and any necessary enforcement action by the Commission is required and herewith requested.

II. FAILURE OF RESPONDENTS TO REGISTER AS A "POLITICAL COMMITTEE"

Under the Act, a "political committee" is created whenever a "group of persons" makes over \$1,000 in expenditures in any calendar year. FECA § 431(4). Any political committee, of course, is subject in full to the Act's registration and reporting requirements. FECA §§ 433 & 434.

The attached fundraising letter of October 30, 1981 appears to have been handsomely produced and widely distributed. The total production and distribution cost may well have exceeded \$1,000 and if so, respondents were required to register as a "political committee" -- subject in full to all reporting requirements -- within ten days of making the expenditure in question. FECA §§ 431(4), 433(a). Plaintiff knows, however, of no newly formed political committee registered by respondents with the Commission.

*That the letter in question was prepared on official stationery of the House of Representatives, or a facsimile thereof, is immaterial to the alleged violation of § 441d. Any solicitation, from whatever source, is subject to the requirements of § 441d. Moreover, the House of Representatives has made clear that these requirements apply without question to fundraising appeals by Members on official letterhead or facsimiles thereof. See Committee on Standards of Official Conduct, Advisory Opinion No. 5 (April 4, 1979).

Thus, plaintiff respectfully requests that this matter also receive the Commission's prompt attention in a full investigation.

III. CONCLUSION

On the basis of the foregoing information, plaintiff Democratic Congressional Campaign Committee respectfully requests that the Commission devote prompt attention to these matters. The activities described in this complaint have been undertaken in complete disregard of the requirements of law.

Respectfully submitted,

Tony Coelho

TONY COELHO
CHAIRMAN
Democratic Congressional
Campaign Committee

December 14, 1981

Charles A. Malton

Sworn to and subscribed before me this 14 day of
1981

Charles A. Malton

Notary Public for the District of Columbia
Commission Expires, Sept. 30, 1984

Democratic Congressional
Campaign Committee
400 N. Capitol St., N.W.
Suite 319
Washington, D. C. 20001

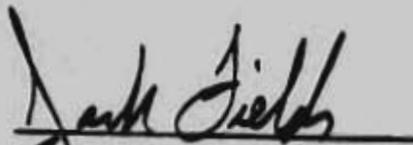
October 30, 1981
Page Two

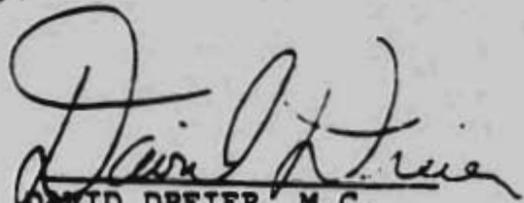
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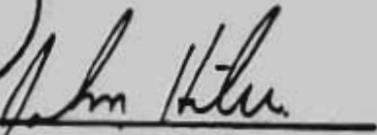
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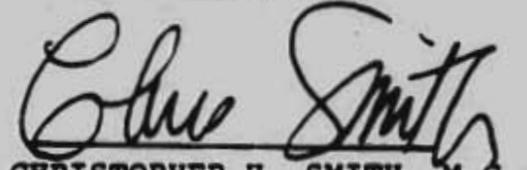
Your PAC can help in this effort by improving on the commendable record of giving it established in 1980. We all hope we can count on your PAC to make an even greater effort to provide pro-free enterprise business Republican challengers and incumbents the financial assistance necessary to achieve our shared goal of a Republican-controlled House of Representatives in 1982. That kind of House will mean a brighter future for America -- and American business -- in the years ahead.

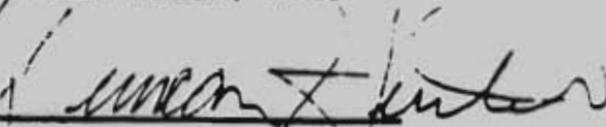
Sincerely,

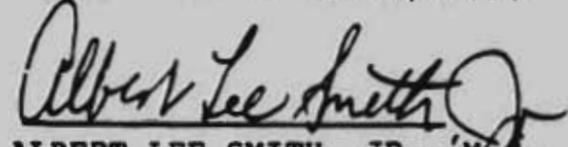

JACK FIELDS, M.C.

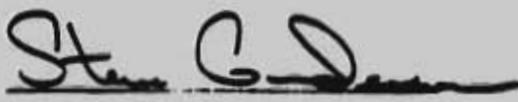

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JOHN HILER, M.C.


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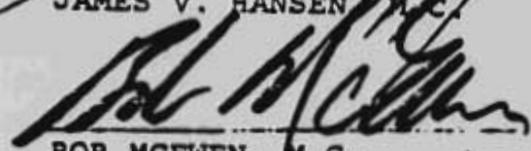

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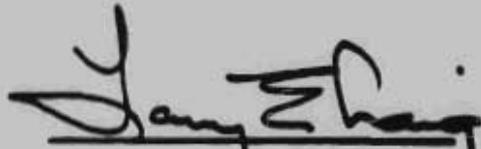

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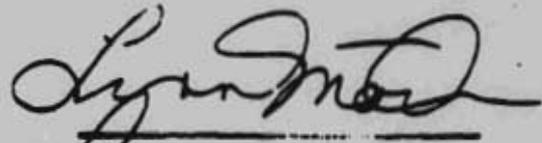

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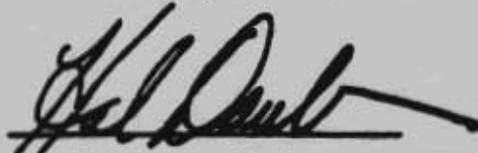

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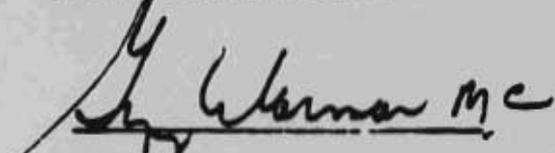

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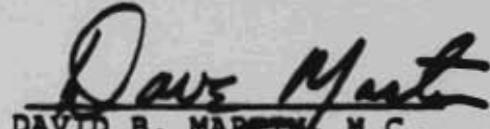

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LYNN MARTIN, M.C.

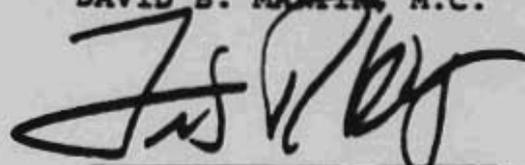

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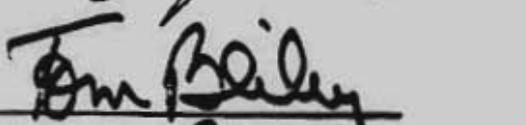

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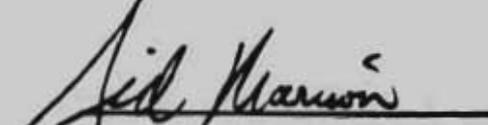

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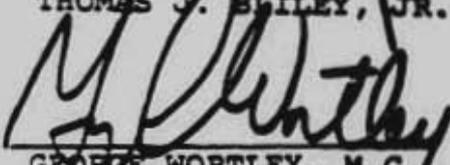

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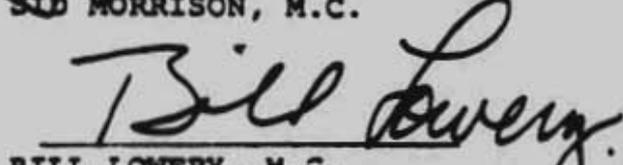

E. CLAY SHAW, JR. M.C.

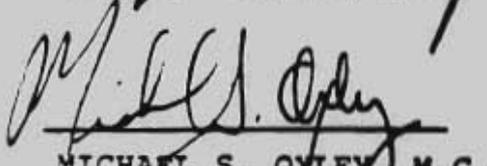

FRANK R. WOLF, M.C.


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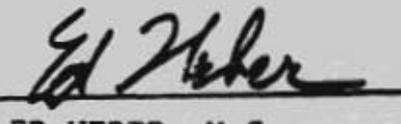

SID MORRISON, M.C.

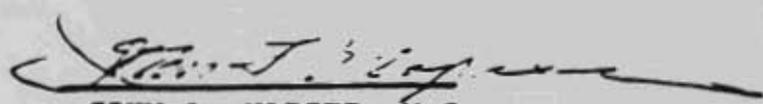

GEORGE WORTLEY, M.C.


BILL LOWERY, M.C.

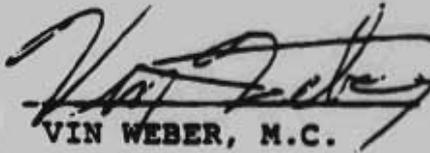

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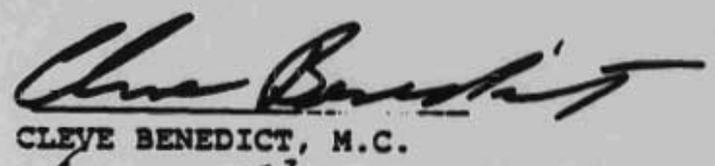

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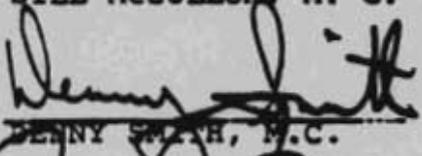

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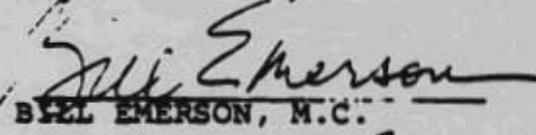

WENDELL BAILEY, M.C.


VIN WEBER, M.C.

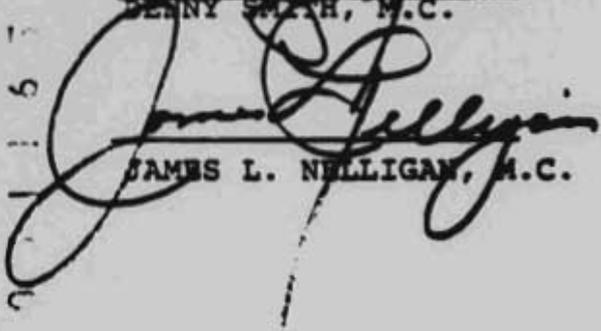

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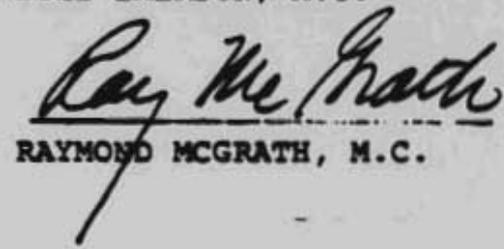

CLEVE BENEDICT, M.C.


DENNY SMITH, M.C.


BILL EMERSON, M.C.

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JAMES L. NELLIGAN, M.C.


RAYMOND MCGRATH, M.C.

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LEGISLATIVE CONGRESSIONAL CAMPAIGN COMMITTEE

Suite 519

400 North Capitol Street
Washington, D.C. 20001

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

PT

DEC 17 P 2: 16

Complaint
Before the
FEDERAL ELECTION COMMISSION

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE,

Plaintiff,

v.

- REP. JACK FIELDS, REP. JOHN P. HILER,
- REP. DUNCAN L. HUNTER, REP. STEVE N. GUNDERSON,
- REP. W. EUGENE JOHNSTON, REP. DAVID DREIER,
- REP. CHRISTOPHER H. SMITH, REP. BOB MCEWEN,
- REP. ALBERT LEE SMITH, JR., REP. JAMES V. HANSEN,
- REP. THOMAS F. HARTNETT, REP. DANIEL R. COATS,
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- REP. VIN WEBER, REP. CLEVE K. BENEDICT
- REP. BILL EMERSON, REP. RAYMOND J. MCGRATH,

Respondents.

INTRODUCTION

Plaintiff Democratic Congressional Campaign Committee ("DCCC") herewith files this complaint, pursuant to § 437g of the Federal Election Campaign Act (the "Act"), as amended, alleging that respondents have engaged jointly in the solicitation of contributions for use in a federal election without complying with the requirements of the Act.

Specifically, plaintiff alleges that, in a letter dated October 30, 1981, these respondents signed an appeal for contributions which was directed toward numerous political action committees. On two counts, this activity appears to have been undertaken without regard for the plain letter of the Act.

1. The solicitation does not include the "disclaimer" mandated by 2 U.S.C. § 441d, which would clearly state the identity of the person or persons who paid for and authorized this communications; and

2. The costs of the production and wide-spread distribution of this communication may well have exceeded \$1,000, with the result that respondents were required to register as a "political committee" pursuant to 2 U.S.C. § 431.

Each of these allegations is discussed in full below. On the information herewith presented, the DCCC requests a full and complete investigation by the Federal Election Commission, and the imposition of all measures necessary to remedy this violation.

I. FAILURE OF SOLICITATION TO INCLUDE REQUIRED
"DISCLAIMER"

The Act provides that whenever contributions are solicited "through any . . . direct mailing," the mailing must include what is commonly called a "disclaimer" -- a clear statement of who paid for and authorized the solicitation. FECA § 441d. This requirement is an essential component of the policy of full disclosure which underlies the Act.

The attached fundraising letter of October 30, 1981, clearly constitutes a direct mail solicitation under § 441d.* Accordingly, this letter should have included the "disclaimer" mandated by that section. As it did not, an investigation and any necessary enforcement action by the Commission is required and herewith requested.

II. FAILURE OF RESPONDENTS TO REGISTER AS A "POLITICAL COMMITTEE"

Under the Act, a "political committee" is created whenever a "group of persons" makes over \$1,000 in expenditures in any calendar year. FECA § 431(4). Any political committee, of course, is subject in full to the Act's registration and reporting requirements. FECA §§ 433 & 434.

The attached fundraising letter of October 30, 1981 appears to have been handsomely produced and widely distributed. The total production and distribution cost may well have exceeded \$1,000 and if so, respondents were required to register as a "political committee" -- subject in full to all reporting requirements -- within ten days of making the expenditure in question. FECA §§ 431(4), 433(a). Plaintiff knows, however, of no newly formed political committee registered by respondents with the Commission.

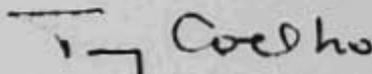
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Thus, plaintiff respectfully requests that this matter also receive the Commission's prompt attention in a full investigation.

III. CONCLUSION

On the basis of the foregoing information, plaintiff Democratic Congressional Campaign Committee respectfully requests that the Commission devote prompt attention to these matters. The activities described in this complaint have been undertaken in complete disregard of the requirements of law.

Respectfully submitted,



TONY COELHO
CHAIRMAN
Democratic Congressional
Campaign Committee

December 14, 1981

Sworn to and subscribed before me this _____ day of
_____ 1981

Democratic Congressional
Campaign Committee
400 N. Capitol St., N.W.
Suite 319
Washington, D. C. 20001

Congress of the United States
House of Representatives
Washington, D.C. 20515

October 30, 1981

Dear PAC Manager:

We are writing to you today as friends of the business community. In 1980, America's business PACs showed a new sophistication in their political contributions. That sophistication demonstrated their awareness that America's free enterprise system can grow best under the principles espoused by the Republican Party. In 1980, for the first time, Republican congressional candidates nationwide received more money from business PACs than did Democratic candidates. And, equally important to the business community, PACs such as yours showed an increased willingness to contribute to challengers as well as incumbents.

For this new sophistication and generosity, we all are grateful. Many of us would not now be serving in the Congress were it not for your PAC's campaign contribution last year. Let us stress that regardless of your decision to support or not support any particular Republican, Republican Members of Congress will continue to work hard to implement economic policies that will strengthen our nation's economy, improve the business environment, and provide business and industry with adequate returns on investments.

We can more easily achieve these common goals if we can gain control of the House of Representatives in addition to controlling the White House and the Senate. Coming battles over tax cuts and budget reconciliation will provide further evidence that Republicans' pro-free enterprise influence can be neutralized by House Democrats' control of the flow of legislation and their disproportionate majorities on key committees, such as Appropriations and Ways and Means.

Two cases illustrate particularly well how greater support from business PACs might have elected two additional pro-free enterprise Republicans to Congress last year. In Indiana, Dave Crane of the famous political family was making his third strong challenge to Rep. Dave Evans, a lukewarm (at best) supporter of the free enterprise system. In his six years in Congress, Evans received ratings of 44 per cent from the U.S. Chamber of Commerce. Because of Crane's strong run in 1978, and because of his support for the free enterprise system, it was expected he would receive major backing from business PACs. Crane received strong support -- \$58,000 -- from business PACs: but, incredibly, Evans received \$68,000 from such PACs. That support was in addition to the \$54,000 Evans received from other PACs.

A similarly unfortunate situation developed in New Jersey where popular state Rep. Marie Muhler challenged Democratic Rep. Jim Howard. In his eight terms in Congress, Howard received ratings of 17 per cent from the U.S. Chamber

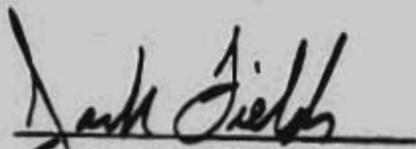
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Page Two

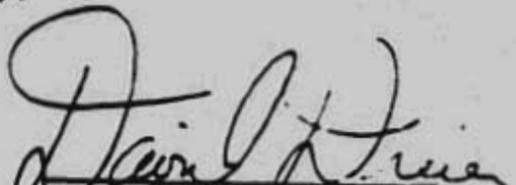
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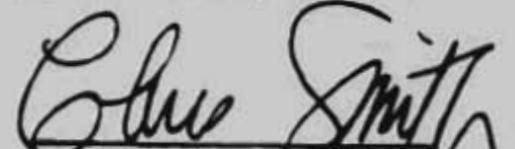
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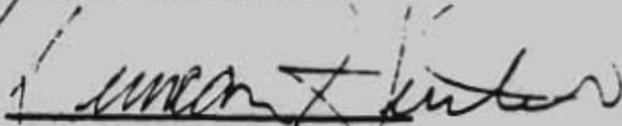
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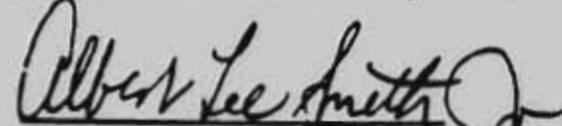

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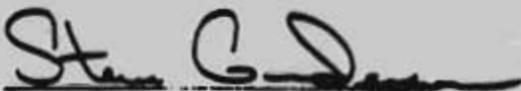

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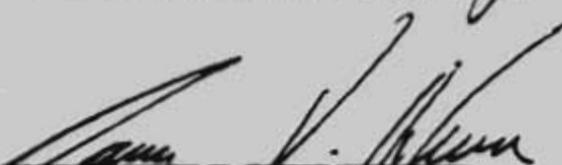

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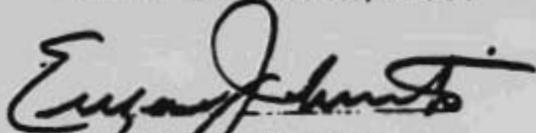

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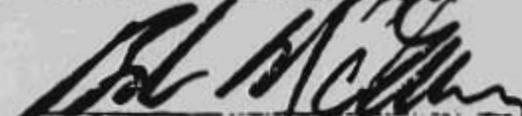

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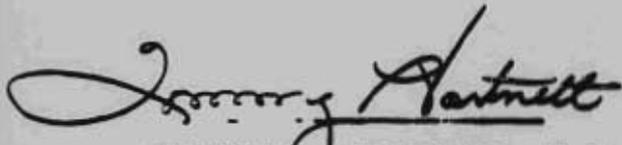

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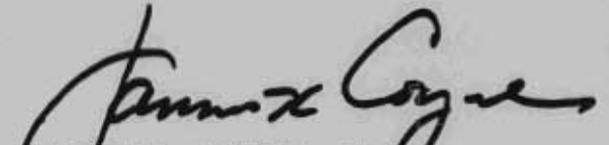

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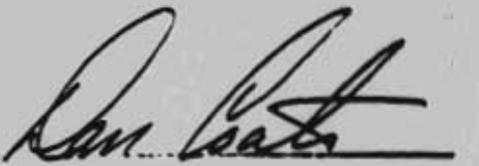

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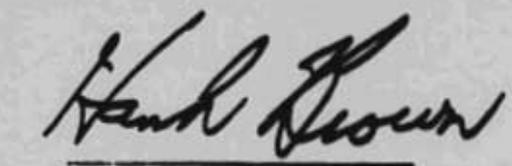
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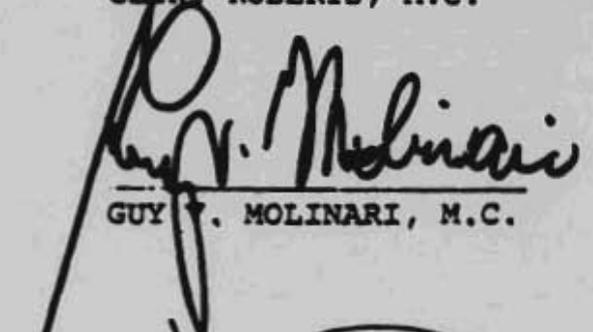

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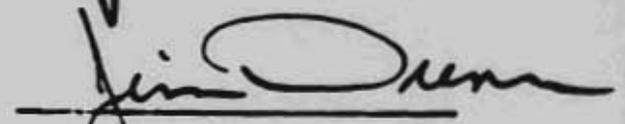

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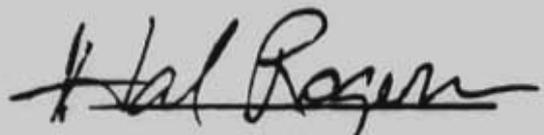
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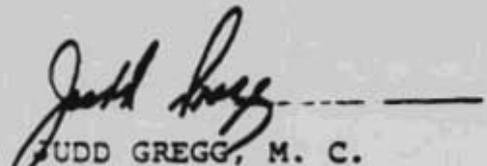

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BOBBI FIEDLER, M.C.


JUDD GREGG, M. C.


COOPER EVANS, M.C.

Wendell Bailey
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Vin Weber
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Bill McCullon
BILL MCCULLON, M. C.

Cleve Benedict
CLEVE BENEDICT, M.C.

Denny Smith
DENNY SMITH, M.C.

Byel Emerson
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James L. Nelligan
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- REP. BILL EMERSON, REP. RAYMOND J. MCGRATH,

Respondents.

INTRODUCTION

Plaintiff Democratic Congressional Campaign Committee ("DCCC") herewith files this complaint, pursuant to § 437g of the Federal Election Campaign Act (the "Act"), as amended, alleging that respondents have engaged jointly in the solicitation of contributions for use in a federal election without complying with the requirements of the Act.

Specifically, plaintiff alleges that, in a letter dated October 30, 1981, these respondents signed an appeal for contributions which was directed toward numerous political action committees. On two counts, this activity appears to have been undertaken without regard for the plain letter of the Act.

1. The solicitation does not include the "disclaimer" mandated by 2 U.S.C. § 44ld, which would clearly state the identity of the person or persons who paid for and authorized this communications; and

2. The costs of the production and wide-spread distribution of this communication may well have exceeded \$1,000, with the result that respondents were required to register as a "political committee" pursuant to 2 U.S.C. § 431.

Each of these allegations is discussed in full below. On the information herewith presented, the DCCC requests a full and complete investigation by the Federal Election Commission, and the imposition of all measures necessary to remedy this violation.

I. FAILURE OF SOLICITATION TO INCLUDE REQUIRED
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The Act provides that whenever contributions are solicited "through any . . . direct mailing," the mailing must include what is commonly called a "disclaimer" -- a clear statement of who paid for and authorized the solicitation. FECA § 44ld. This requirement is an essential component of the policy of full disclosure which underlies the Act.

The attached fundraising letter of October 30, 1981, clearly constitutes a direct mail solicitation under § 441d.* Accordingly, this letter should have included the "disclaimer" mandated by that section. As it did not, an investigation and any necessary enforcement action by the Commission is required and herewith requested.

II. FAILURE OF RESPONDENTS TO REGISTER AS A "POLITICAL COMMITTEE"

Under the Act, a "political committee" is created whenever a "group of persons" makes over \$1,000 in expenditures in any calendar year. FECA § 431(4). Any political committee, of course, is subject in full to the Act's registration and reporting requirements. FECA §§ 433 & 434.

The attached fundraising letter of October 30, 1981 appears to have been handsomely produced and widely distributed. The total production and distribution cost may well have exceeded \$1,000 and if so, respondents were required to register as a "political committee" -- subject in full to all reporting requirements -- within ten days of making the expenditure in question. FECA §§ 431(4), 433(a). Plaintiff knows, however, of no newly formed political committee registered by respondents with the Commission.

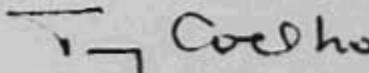
*That the letter in question was prepared on official stationery of the House of Representatives, or a facsimile thereof, is immaterial to the alleged violation of § 441d. Any solicitation, from whatever source, is subject to the requirements of § 441d. Moreover, the House of Representatives has made clear that these requirements apply without question to fundraising appeals by Members on official letterhead or facsimiles thereof. See Committee on Standards of Official Conduct, Advisory Opinion No. 5 (April 4, 1979).

Thus, plaintiff respectfully requests that this matter also receive the Commission's prompt attention in a full investigation.

III. CONCLUSION

On the basis of the foregoing information, plaintiff Democratic Congressional Campaign Committee respectfully requests that the Commission devote prompt attention to these matters. The activities described in this complaint have been undertaken in complete disregard of the requirements of law.

Respectfully submitted,



TONY COELHO
CHAIRMAN
Democratic Congressional
Campaign Committee

December 14, 1981

Sworn to and subscribed before me this _____ day of
_____ 1981

Democratic Congressional
Campaign Committee
400 N. Capitol St., N.W.
Suite 319
Washington, D. C. 20001

Congress of the United States
House of Representatives
Washington, D.C. 20515

October 30, 1981

Dear PAC Manager:

We are writing to you today as friends of the business community. In 1980, America's business PACs showed a new sophistication in their political contributions. That sophistication demonstrated their awareness that America's free enterprise system can grow best under the principles espoused by the Republican Party. In 1980, for the first time, Republican congressional candidates nationwide received more money from business PACs than did Democratic candidates. And, equally important to the business community, PACs such as yours showed an increased willingness to contribute to challengers as well as incumbents.

For this new sophistication and generosity, we all are grateful. Many of us would not now be serving in the Congress were it not for your PAC's campaign contribution last year. Let us stress that regardless of your decision to support or not support any particular Republican, Republican Members of Congress will continue to work hard to implement economic policies that will strengthen our nation's economy, improve the business environment, and provide business and industry with adequate returns on investments.

We can more easily achieve these common goals if we can gain control of the House of Representatives in addition to controlling the White House and the Senate. Coming battles over tax cuts and budget reconciliation will provide further evidence that Republicans' pro-free enterprise influence can be neutralized by House Democrats' control of the flow of legislation and their disproportionate majorities on key committees, such as Appropriations and Ways and Means.

Two cases illustrate particularly well how greater support from business PACs might have elected two additional pro-free enterprise Republicans to Congress last year. In Indiana, Dave Crane of the famous political family was making his third strong challenge to Rep. Dave Evans, a lukewarm (at best) supporter of the free enterprise system. In his six years in Congress, Evans received ratings of 44 per cent from the U.S. Chamber of Commerce. Because of Crane's strong run in 1978, and because of his support for the free enterprise system, it was expected he would receive major backing from business PACs. Crane received strong support -- \$58,000 -- from business PACs: but, incredibly, Evans received \$68,000 from such PACs. That support was in addition to the \$54,000 Evans received from other PACs.

A similarly unfortunate situation developed in New Jersey where popular state Rep. Marie Muhler challenged Democratic Rep. Jim Howard. In his eight terms in Congress, Howard received ratings of 17 per cent from the U.S. Chamber

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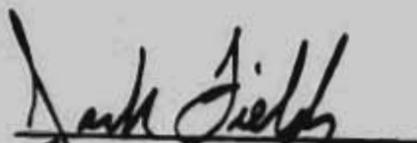
October 30, 1981
Page Two

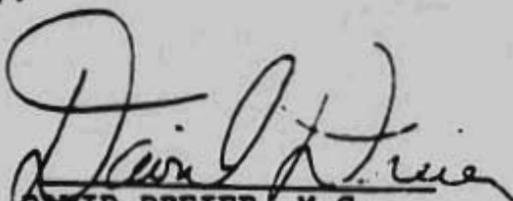
of Commerce. During the campaign, Muhler received \$28,000 from business PACs. However, Howard received 40 percent more (\$40,000) -- in addition to the \$51,000 he received from other PACs.

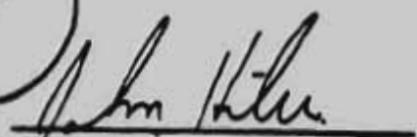
All of us hope you will seriously consider these two examples as your PAC develops its contribution guidelines for the 1982 campaign year. America's business PACs can provide the extra push necessary to guarantee pro-free enterprise Republicans control of the House of Representatives in 1982.

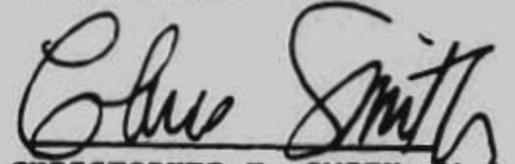
Your PAC can help in this effort by improving on the commendable record of giving it established in 1980. We all hope we can count on your PAC to make an even greater effort to provide pro-free enterprise business Republican challengers and incumbents the financial assistance necessary to achieve our shared goal of a Republican-controlled House of Representatives in 1982. That kind of House will mean a brighter future for America -- and American business -- in the years ahead.

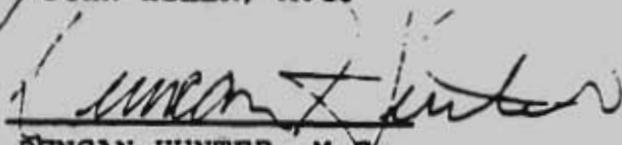
Sincerely,

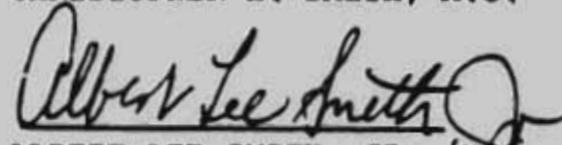

JACK FIELDS, M.C.


DAVID DREIER, M.C.

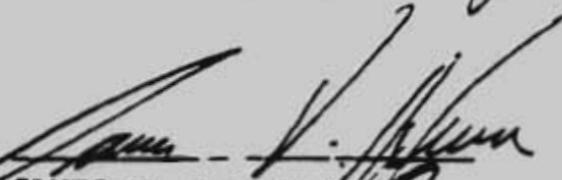

JOHN HILER, M.C.

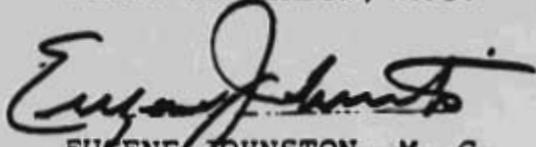

CHRISTOPHER H. SMITH, M.C.

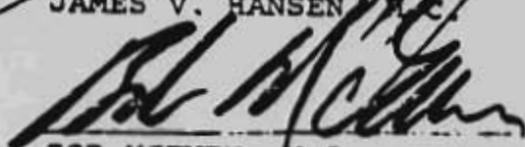

DUNCAN HUNTER, M.C.


ALBERT LEE SMITH, JR., M.C.

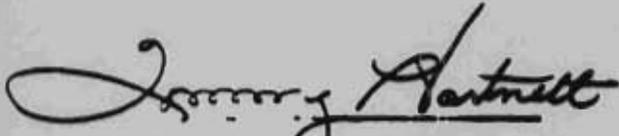

STEVE GUNDERSON, M.C.

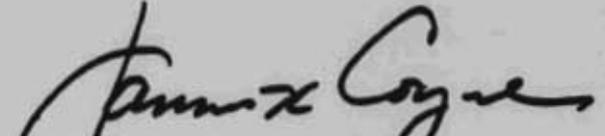

JAMES V. HANSEN, M.C.

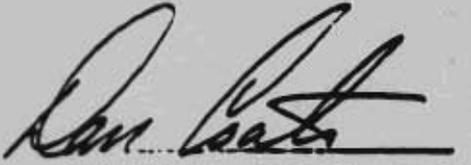

EUGENE JOHNSTON, M. C.

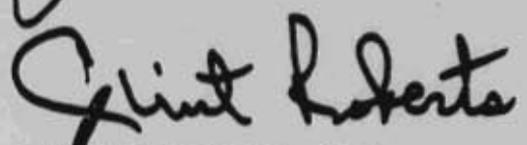

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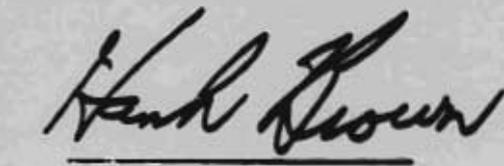
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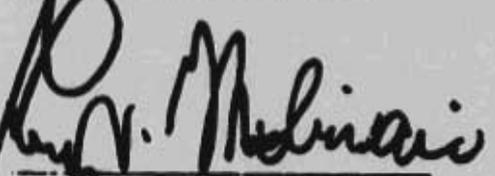

THOMAS F. HARTNETT, M.C.


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DANIEL R. COATS, M.C.

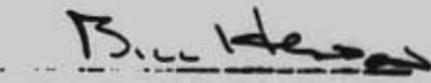

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HANK BROWN, M.C.

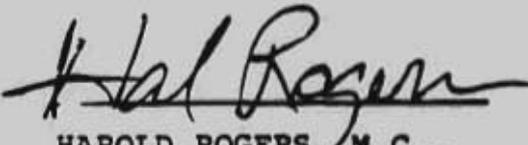

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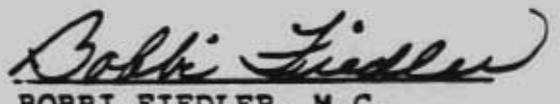

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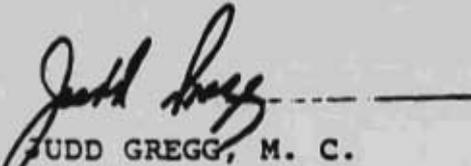

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PAT ROBERTS, M.C.

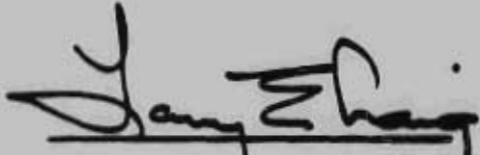

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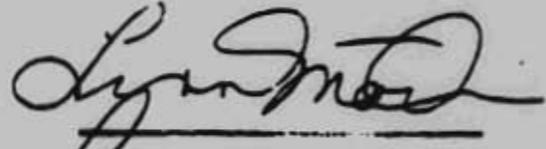

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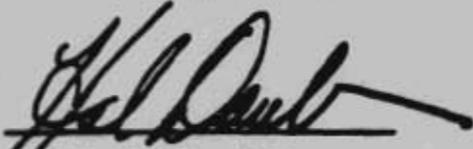

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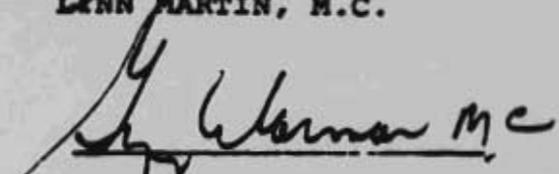

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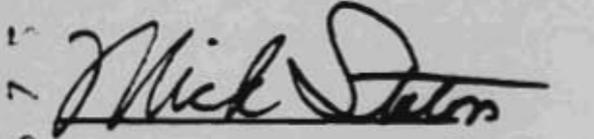
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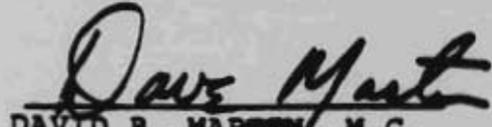

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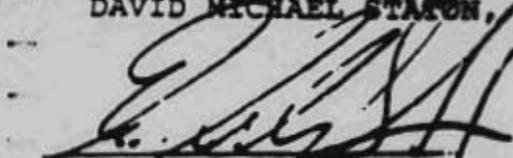

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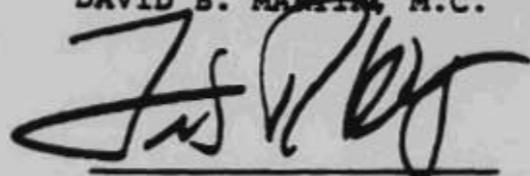

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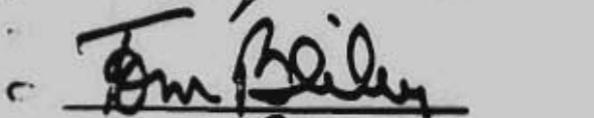

GREGORY CARMAN, M.C.

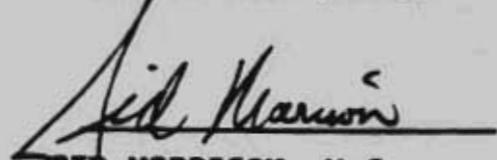
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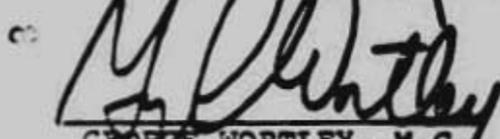

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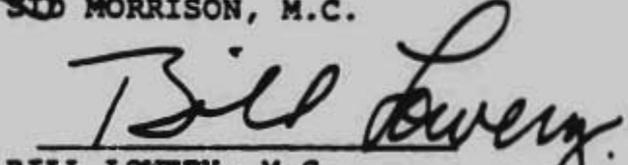

E. CLAY SHAW, JR. M.C.

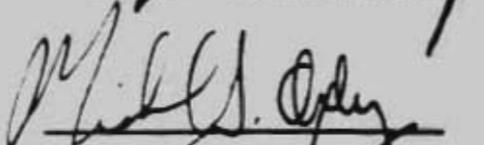

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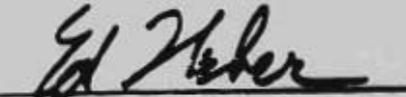

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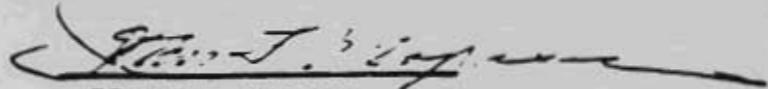

GEORGE WORTLEY, M.C.

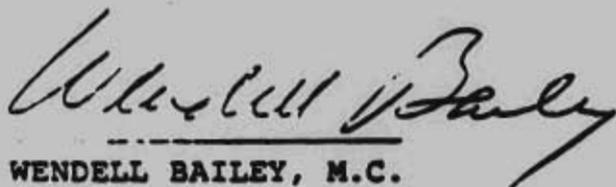

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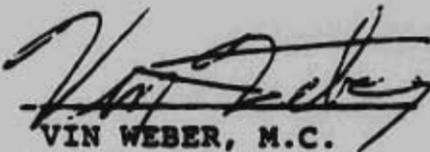

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JOE SKEIN, M. C.


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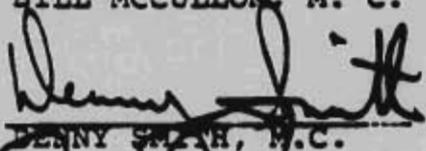

JOHN L. NAPIER, M.C.

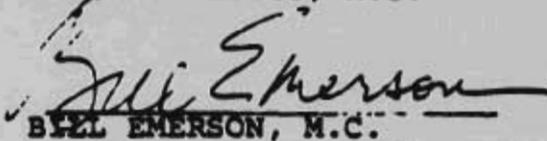

WENDELL BAILEY, M.C.


VIN WEBER, M.C.

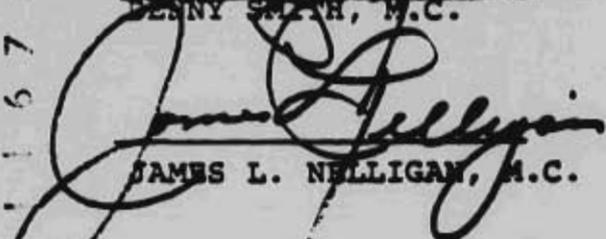

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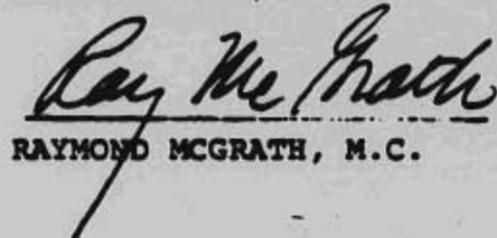

CLEVE BENEDICT, M.C.


PENNY SMITH, M.C.


BILL EMERSON, M.C.

8201011675


JAMES L. NELLIGAN, M.C.


RAYMOND MCGRATH, M.C.

Complaint
Before the
FEDERAL ELECTION COMMISSION

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE,)
)
)
 Plaintiff,)
)
 v.)
)
)
 REP. JACK FIELDS, REP. JOHN P. HILER,)
 REP. DUNCAN L. HUNTER, REP. STEVE N. GUNDERSON,)
 REP. W. EUGENE JOHNSTON, REP. DAVID DREIER,)
 REP. CHRISTOPHER H. SMITH, REP. BOB MCEWEN,)
 REP. ALBERT LEE SMITH, JR., REP. JAMES V. HANSEN,)
 REP. THOMAS F. HARTNETT, REP. DANIEL R. COATS,)
 REP. HANK BROWN, REP. JOHN LEBOUTILLIER,)
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 REP. DENNY SMITH, REP. JAMES L. NELLIGAN)
 REP. VIN WEBER, REP. CLEVE K. BENEDICT)
 REP. BILL EMERSON, REP. RAYMOND J. MCGRATH,)
)
)
 Respondents.)
)

INTRODUCTION

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Specifically, plaintiff alleges that, in a letter dated October 30, 1981, these respondents signed an appeal for contributions which was directed toward numerous political action committees. On two counts, this activity appears to have been undertaken without regard for the plain letter of the Act.

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"DISCLAIMER"

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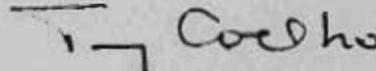
*That the letter in question was prepared on official stationery of the House of Representatives, or a facsimile thereof, is immaterial to the alleged violation of § 441d. Any solicitation, from whatever source, is subject to the requirements of § 441d. Moreover, the House of Representatives has made clear that these requirements apply without question to fundraising appeals by Members on official letterhead or facsimiles thereof. See Committee on Standards of Official Conduct, Advisory Opinion No. 5 (April 4, 1979).

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Respectfully submitted,



TONY COELHO
CHAIRMAN
Democratic Congressional
Campaign Committee

December 14, 1981

Sworn to and subscribed before me this _____ dat of
_____ 1981

Democratic Congressional
Campaign Committee
400 N. Capitol St., N.W.
Suite 319
Washington, D. C. 20001

Congress of the United States
House of Representatives
Washington, D.C. 20515

October 30, 1981

Dear PAC Manager:

We are writing to you today as friends of the business community. In 1980, America's business PACs showed a new sophistication in their political contributions. That sophistication demonstrated their awareness that America's free enterprise system can grow best under the principles espoused by the Republican Party. In 1980, for the first time, Republican congressional candidates nationwide received more money from business PACs than did Democratic candidates. And, equally important to the business community, PACs such as yours showed an increased willingness to contribute to challengers as well as incumbents.

For this new sophistication and generosity, we all are grateful. Many of us would not now be serving in the Congress were it not for your PAC's campaign contribution last year. Let us stress that regardless of your decision to support or not support any particular Republican, Republican Members of Congress will continue to work hard to implement economic policies that will strengthen our nation's economy, improve the business environment, and provide business and industry with adequate returns on investments.

We can more easily achieve these common goals if we can gain control of the House of Representatives in addition to controlling the White House and the Senate. Coming battles over tax cuts and budget reconciliation will provide further evidence that Republicans' pro-free enterprise influence can be neutralized by House Democrats' control of the flow of legislation and their disproportionate majorities on key committees, such as Appropriations and Ways and Means.

Two cases illustrate particularly well how greater support from business PACs might have elected two additional pro-free enterprise Republicans to Congress last year. In Indiana, Dave Crane of the famous political family was making his third strong challenge to Rep. Dave Evans, a lukewarm (at best) supporter of the free enterprise system. In his six years in Congress, Evans received ratings of 44 per cent from the U.S. Chamber of Commerce. Because of Crane's strong run in 1978, and because of his support for the free enterprise system, it was expected he would receive major backing from business PACs. Crane received strong support -- \$58,000 -- from business PACs: but, incredibly, Evans received \$68,000 from such PACs. That support was in addition to the \$54,000 Evans received from other PACs.

A similarly unfortunate situation developed in New Jersey where popular state Rep. Marie Muhler challenged Democratic Rep. Jim Howard. In his eight terms in Congress, Howard received ratings of 17 per cent from the U.S. Chamber

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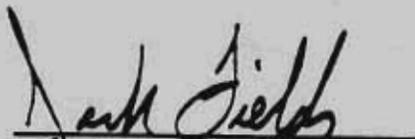
October 30, 1981
Page Two

of Commerce. During the campaign, Muhler received \$28,000 from business PACs. However, Howard received 40 percent more (\$40,000) -- in addition to the \$51,000 he received from other PACs.

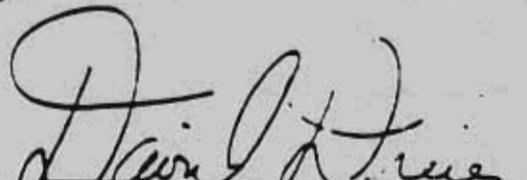
All of us hope you will seriously consider these two examples as your PAC develops its contribution guidelines for the 1982 campaign year. America's business PACs can provide the extra push necessary to guarantee pro-free enterprise Republicans control of the House of Representatives in 1982.

Your PAC can help in this effort by improving on the commendable record of giving it established in 1980. We all hope we can count on your PAC to make an even greater effort to provide pro-free enterprise business Republican challengers and incumbents the financial assistance necessary to achieve our shared goal of a Republican-controlled House of Representatives in 1982. That kind of House will mean a brighter future for America -- and American business -- in the years ahead.

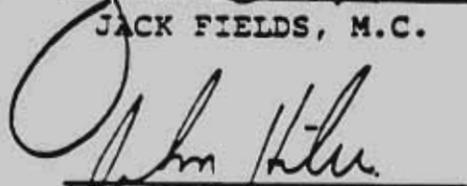
Sincerely,



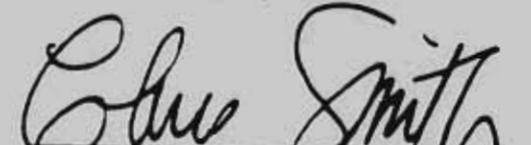
JACK FIELDS, M.C.



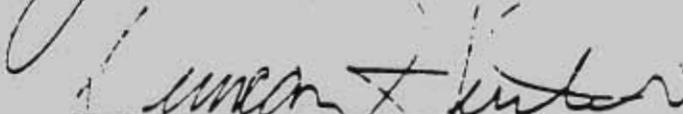
DAVID DREIER, M.C.



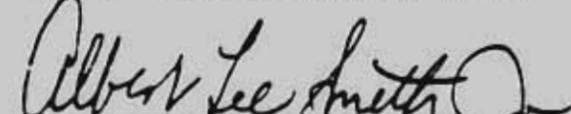
JOHN HILER, M.C.



CHRISTOPHER H. SMITH, M.C.



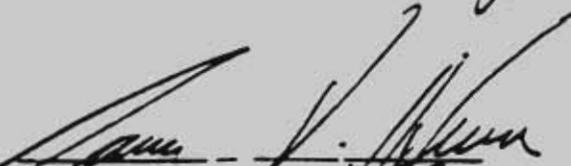
DUNCAN HUNTER, M.C.



ALBERT LEE SMITH, JR., M.C.



STEVE GUNDERSON, M.C.



JAMES V. HANSEN, M.C.

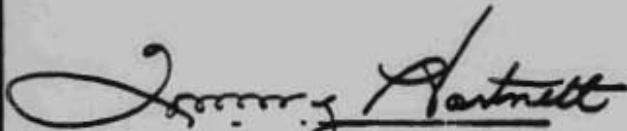


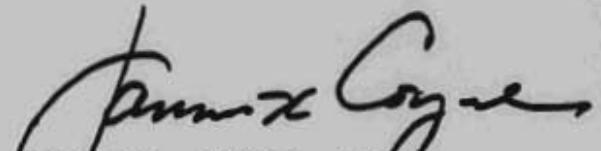
EUGENE JOHNSTON, M. C.

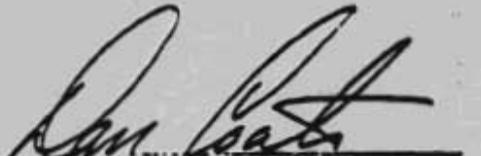


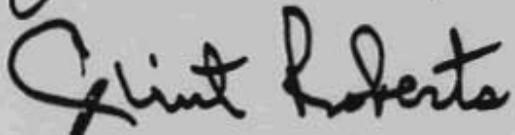
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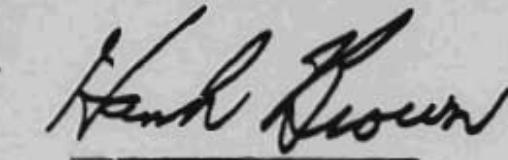
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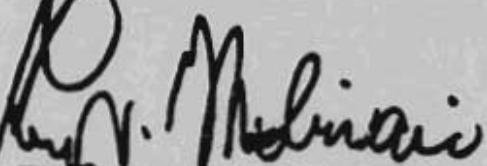

THOMAS F. HARTNETT, M.C.


JAMES K. COYNE, M.C.


DANIEL R. COATS, M.C.

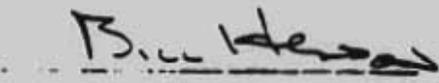

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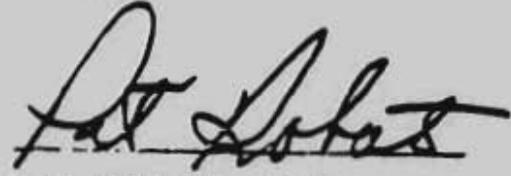

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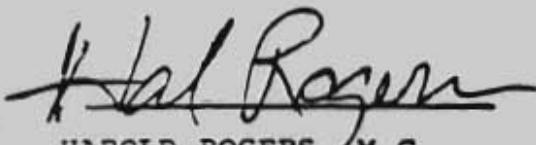

GUY V. MOLINARI, M.C.

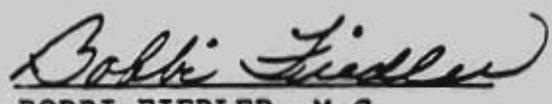

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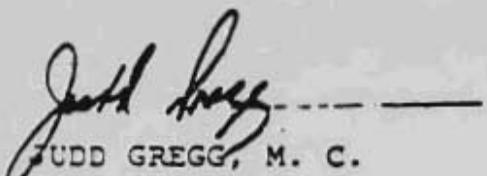

JIM DUNN, M.C.


BILL HENDON, M. C.


PAT ROBERTS, M.C.

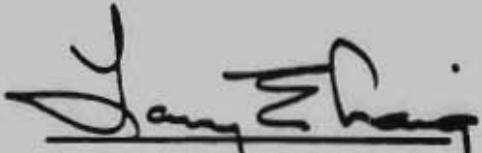

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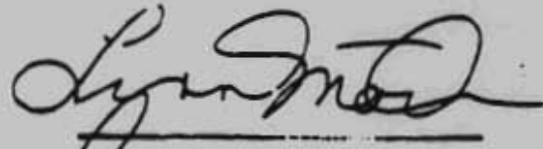

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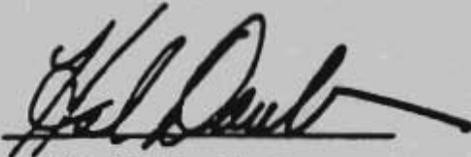

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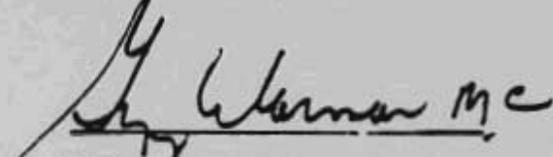

COOPER EVANS, M.C.

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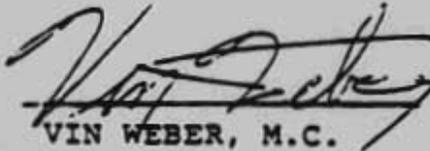

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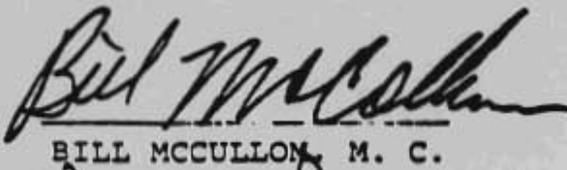

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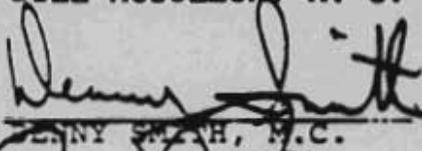
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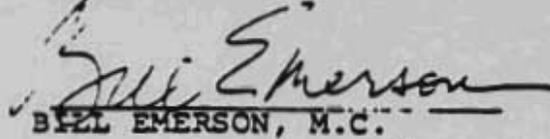

WENDELL BAILEY, M.C.


VIN WEBER, M.C.

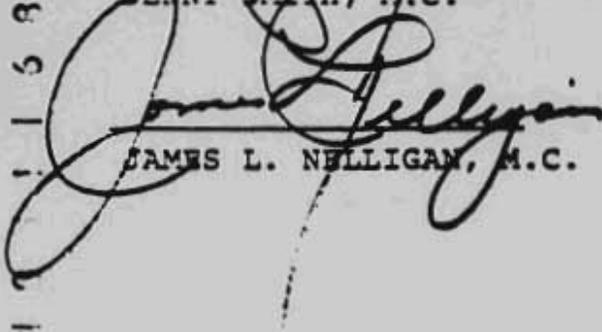

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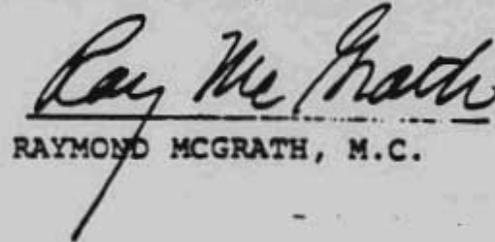

CLEVE BENEDICT, M.C.


PENNY SMITH, M.C.


BILL EMERSON, M.C.

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JAMES L. NELLIGAN, M.C.


RAYMOND MCGRATH, M.C.



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1417

Date Filmed 3/25/82 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

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

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THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MJR 1417.



RECEIVED
Gcch 7515
82 APR 8 AIO: 53



April 7, 1982

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 1417

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P 5: 08

Dear Mr. Gross:

On February 24, 1982, the Commission dismissed a complaint I filed as Chairman of the Democratic Congressional Campaign Committee. In that complaint, I alleged, in part, that a solicitation of funds by the National Republican Congressional Committee did not include the "notice" required on all solicitations by § 441d of the Federal Election Campaign Act. 1/ That notice -- fundamental to the FECA's scheme of public disclosure--requires a statement of precisely who paid for and authorized a solicitation for funds to be used in federal elections.

THE DECISION

The FEC's decision is, in part, remarkable, because it is without foundation in law, shot through with profound illogic, and generally a poor piece of work. At the same time, I cannot truly confess to surprise over all of this, in view of the FEC's unfortunate record of often unsound, indefensible and inconsistent constructions of the FECA. I am all the more distressed by its performance in this and similar cases, because I have been, and will remain, a staunch supporter of the goals of this country's campaign finance laws.

In all fairness, I will elaborate on the basis on my concern with the result in this case. In doing so I would hope that you will return the favor by affording other complainants in the future a fairer hearing on the merits of their complaints.

FACTS OF THE CASE

So what do we have in this case? A registered political committee--indeed a national committee of the Republican Party--sends a letter, over the signatures of 48 Republican Congressmen, to 1,360 PAC managers. The letter does not seek to persuade on

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Democratic Congressional Campaign Committee
Tony Coelho, CA, *Chairman*
Suite 219, 400 North Capitol Street
Washington, D.C. 20001
202 789 2920

the issues of the day; it does not call for the PAC managers (or their employers) to lobby for Republican programs and policies on the Hill. It is addressed to one issue and one issue alone: money, and how it should be given--in impressive quantities--to Republican candidates for the Congress in 1982. In fact, the letter begins with an expression of gratitude for contributions received last election year ("Many of us would not now be serving . . . were it not for your PAC's campaign contribution"), and ends with an appeal for more ("We all hope we can count on your PAC to make an even greater effort to provide . . . Republican [candidates] the financial assistance necessary [to win control of the House in 1982].") Nor should any of this textual analysis be necessary to persuade the Commission or any other reader about the purpose of this letter; it was sent, after all, to PAC managers, whose function is to collect and disburse money.

THE LOGIC OF THE FEC

So the FEC concludes, after all this, that the letter is not a "solicitation" at all. Hence, it is held, § 441d does not apply, and no notice need have been affixed to the letter. What are the components of the FEC's positions as set forth in the General Counsel's Report?

FEC ARGUMENT NO. 1 (pp.3-4 of the First General Counsel's Report)

Premise: It is NRCC's "practice," when it solicits, to include a solicitation notice in conformity with § 441d.

Premise: No such notice was included on the letter in question.

Conclusion: The letter was not a solicitation.

New rule formulated by the FEC in Argument No. 1: if you often avoid violating the law, then you can be presumed to never violate it. This kind of reasoning does not require comment.

FEC ARGUMENT NO. 2 (p. 4)

Premise: There was no response (or as counsel to NRCC more candidly admits, no "apparent" response) to the letter.

Conclusion: Thus the letter was not a solicitation.

New rule formulated by the FEC in Argument No. 2: unsuccessful solicitations do not require solicitation notices under § 441d. If they didn't get any money out of it (not "apparently" at least), why enforce the law?

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FEC ARGUMENT NO. 3 (p. 3)

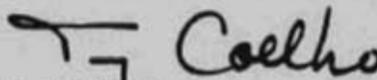
Premise: Since no response card or envelope was included with the letter, and no other clear direction on how to forward contributions for use by Republican candidates, the contributors did not know where to send money.

Conclusion: A solicitation, for § 441d purposes, is one in which the solicitor is explicit about the address to which money should be sent. Since the NRCC letter was not explicit on this point, it was not a solicitation.

Of course, it might have occurred to the Commission that 1,360 PAC managers, urged to send funds to Republicans, a) know where the Republican National Committee and other party committees, such as the NRCC, are located, and b) may learn the identity and address of some of the Republican candidates for the Congress this year.^{2/}

I need say no more. Please place this letter in the MUR file in this case so that the public may also evaluate your performance in this case.

Sincerely,


TONY COELHO
CHAIRMAN

cc: All Commissioners

^{1/}I also alleged a failure of the signatories, 48 Members of Congress, to register as a political committee upon making expenditures for this mailing. See FECA § 431(4). Since it was discovered only subsequently that NRCC--its identity concealed by the absence of the required solicitations notice--was the source of funds for this letter, and that the total cost of the mailing was allegedly under \$1,000, this allegation has been laid aside.

^{2/}I might add here a technical note. The agency dresses up its conclusion on this point by referring to a "standard" it alleges to have adopted in defining a "solicitation." This standard, it argues, is that a solicitation only occurs when someone is informed of a specific fundraising activity. The argument, as the General Counsel well knows, is disingenuous at best. Even the counsel to NRCC concede that this standard was applied in a "totally different context"--the context of determining when impermissible solicitations

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have been made of member corporations by trade associations. In that context, this standard functions as a very strict rule, one which, for example, prohibits associations from listing PAC fundraising events on general association convention agenda circulated to all members, including members who have not consented to the solicitation as required by law. This "standard" has nothing whatsoever to do with solicitation notices required under § 44ld. So what the FEC has done here, simply is to pervert a strict rule in one context, into an excuse for absolving someone of a violation of the Act in a wholly different context.

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Democratic Congressional Campaign Committee
Suite 319, 400 North Capitol Street
Washington, D.C. 20001

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

F



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MJR 1417.

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