



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1692

Date Filmed 8/3/84 Camera No. --- 2

Cameraman JRL

84040471686

FEDERAL ELECTION COMMISSION

12- Dry Report 5/8/84

7 Comment sheets 5/17/84

Routing Slips

Memo resigning CSP, MUR Assignment Form

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):

34040471687

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy                             |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents                         |   |

Signed Robert Thom  
date 7/27/84

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1692  
Reverend Jesse L. Jackson )  
The Saudi Arabian Oil Company )  
of Dairen, Saudi Arabia )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 24, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1692:

1. Find no reason to believe that Reverend Jesse L. Jackson and The Saudi Arabian Oil Company of Dairen, Saudi Arabia violated 2 U.S.C. § 441e.
2. Approve the letters attached to the First General Counsel's Report signed July 18, 1984.
3. Close the file.

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

Attest:

7-24-84  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary:  
Circulated on tally vote basis:

7-18-84, 10:42  
7-18-84, 4:00

84040471688



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 26, 1984

Dr. Jerome Diamond  
6509 Western Run Drive  
Baltimore, Md. 21215

Re: MUR 1692

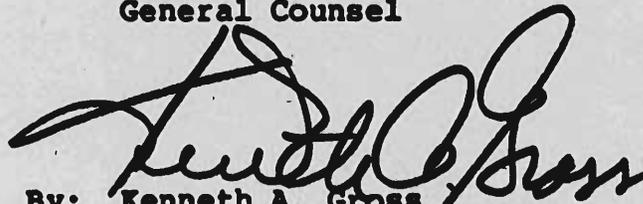
Dear Dr. Diamond:

The Federal Election Commission has reviewed the allegations of your complaint dated May 2, 1984, and determined that on the basis of the information provided in your complaint and information provided by the Respondents 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

Enclosure  
General Counsel's Report

84040471689



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 26, 1984

The Saudi Arabian Oil Company  
Dairen, Saudi Arabia

Re: MUR 1692

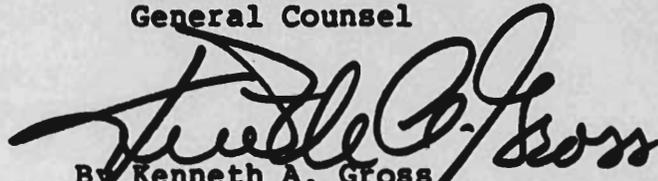
• Dear Sirs:

On May 7, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

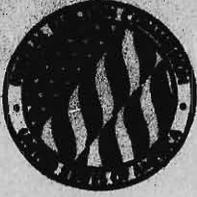
The Commission, on July 24, 1984, determined that on the basis of the information in the complaint, and other pertinent information, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This 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

34040471690



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

July 26, 1984

Edward C. Coaxum, Jr.  
James H. Hewitt, III  
Suite 1600  
The Illuminating Building  
55 Public Square  
Cleveland, Ohio 44113

Re: MUR 1692  
Jesse Jackson

Dear Messrs. Coaxum and Hewitt:

On May 7, 1984, the Commission notified your client, Jesse Jackson, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on July 24, 1984, 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

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By Kenneth A. Gross  
Associate General Counsel

84040471691



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: July 18, 1984
SUBJECT: MUR 1692 - First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of
Open Session
Closed Session

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote [x] Compliance [X]
Sensitive [X]
Non-Sensitive [ ] Audit Matters [ ]
24 Hour No Objection [ ] Litigation [ ]
Sensitive [ ]
Non-Sensitive [ ] Closed MUR Letters [ ]
Information [ ] Status Sheets [ ]
Sensitive [ ]
Non-Sensitive [ ] Advisory Opinions [ ]
Other [ ] Other (see distribution below) [ ]

34040471692

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

**FIRST GENERAL COUNSEL'S REPORT**

84 JUL 18 A10:42

DATE AND TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION 7/18/84 - 10:45

MUR 1692

DATE COMPLAINT RECEIVED  
BY OGC May 3, 1984

DATE OF NOTIFICATION TO  
RESPONDENT May 7, 1984

STAFF MEMBER R. Raich

**COMPLAINANT'S NAME:**

Dr. Jerome Diamond

**RESPONDENTS' NAMES:**

Reverend Jesse L. Jackson  
The Saudi Arabian Oil Company of  
Dairen, Saudi Arabia

**RELEVANT STATUTE:**

2 U.S.C. § 441e

**INTERNAL REPORTS CHECKED:** Public Records

**FEDERAL AGENCIES CHECKED:** None

**SUMMARY OF ALLEGATIONS**

In a complaint filed on May 3, 1984, Dr. Jerome Diamond alleged that the respondent Rev. Jesse L. Jackson, a candidate for the Democratic nomination for president, admitted receiving a \$200,000 contribution from the respondent Saudi Arabian Oil Company of Dairen, Saudi Arabia ("Company"). Such a contribution would be a violation of 2 U.S.C. § 441e and 11 C.F.R. § 110.4(a), which prohibit contributions by, and from, foreign nationals in connection with an election to any political office. The complaint makes reference to similar offenses by other candidates whom the complaint does not name.

**FACTUAL AND LEGAL ANALYSIS**

The Company has not responded to the complaint, a copy of which was mailed to the Company on May 7, 1984. Complainant

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has alleged facts which warrant the presumption that the Company is a "foreign national" within the meaning of the Act.

The complaint is sworn and notarized, but does not state whether it is based on complainant's personal knowledge. The complaint provides no evidence concerning when or where Jackson allegedly made the statement or the specifics of the statement.

Respondent Jackson was granted a 15 day extension of time in which to respond to the complaint. The response by Jackson's counsel generally denies the allegations of the complaint, and specifically denies: 1) that the campaign ever received such a contribution, and 2) that Jackson ever made a public statement regarding the alleged contribution.

Reports filed with the Commission do not disclose any receipts by Jackson's principal or authorized campaign committees from the Company. Nothing in the reports indicates that Jackson received a \$200,000 contribution directly or indirectly from the Company or any agent of the Company. There is no evidence of a reporting violation.

In the absence of more specific information from the complainant, and in the absence of any evidence suggesting a reporting violation, we have no further basis to proceed in this matter. Accordingly, the General Counsel recommends that the Commission find no reason to believe that the respondents have violated 2 U.S.C. § 441e.

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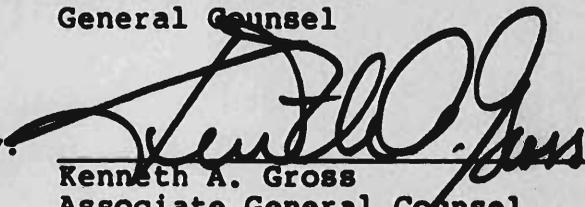
**RECOMMENDATIONS**

1. Find no reason to believe that Reverend Jesse L. Jackson and The Saudi Arabian Oil Company of Dairen, Saudi Arabia violated 2 U.S.C. § 441e.
2. Approve the attached letters.
3. Close the file.

Charles N. Steele  
General Counsel

July 18, 1984  
Date

By:

  
Kenneth A. Gross  
Associate General Counsel

**Attachments**

- I. Letter to counsel for Jackson
- II. Letter to the Saudi Arabian Oil Company
- III. Jackson's Response

84040471695



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Edward C. Coaxum, Jr.  
James H. Hewitt, III  
Suite 1600  
The Illuminating Building  
55 Public Square  
Cleveland, Ohio 44113

Re: MUR 1692  
Jesse Jackson

Dear Messrs. Coaxum and Hewitt:

On May 7, 1984, the Commission notified your client, Jesse Jackson, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1984, 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

Attachment I

84040471696



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

The Saudi Arabian Oil Company  
Dairen, Saudi Arabia

Re: MUR 1692

Dear Sirs:

On May 7, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on \_\_\_\_\_, 1984, determined that on the basis of the information in the complaint, and other pertinent information, 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

Attachment II

84040471697

HAND DELIVERED  
84 JUN 6 P1:20

*Coaxum & Hewitt*  
*Attorneys and Counselors at Law*  
*Suite 1600 The Illuminating Building*  
*55 Public Square*  
*Cleveland, Ohio 44113*  
*(216) 241-7496*

*Edward C. Coaxum, Jr.*  
*James H. Hewitt, III*

*Of Counsel:*  
*Robert H. Donohoe*  
*Ralph J. Robinson*

GCC # 3499

June 5, 1984

Kenneth A. Gross, Esquire  
Associate General Counsel  
Federal Election Commission  
Washington, DC 20463

VIA GUARANTEED  
OVERNIGHT MAIL

Re: MUR 1692

Dear Mr. Gross:

The undersigned attorneys for Jesse L. Jackson for President, Inc., the principal campaign committee for Rev. Jesse L. Jackson (the "Jackson Campaign"), are submitting this letter in reply to your letter of May 7, 1984, advising of the above-referenced Complaint, and is intended to serve as our official response.

By letter dated May 17, 1984, we requested additional time to prepare a written response, until June 6, 1984, and by your letter dated May 24, 1984, we were advised that our request for extension of time had been granted.

As explained more fully below, there is no merit to any of the charges contained in this Complaint and therefore, we urge the Commission to enter a finding that there is no reason to believe that a violation of the statute has been committed, and the Commission should close its file in this matter. Upon review of applicable records and appropriate documentation, we assert that the Complaint is groundless and without any basis in fact, law or truth. The statements contained therein are, at best, illusory.

The Complaint, filed by Dr. Jerome Diamond of 6509 Western Run Drive, Baltimore, Maryland, appears to be an unsubstantiated and unwarranted allegation that the Jackson Campaign received "illegal donations from foreigners" by allegedly "publicly admitting receiving a \$200,000 contribution from the Saudi Arabian Oil Company of Dairen, Saudi, Arabia". The simple and complete response to Dr. Diamond's allegation is that no contributions have been made to it by any foreign national, as that term is defined by 11 CFR §110.4(a), directly or through any other person, at any time, or as the result of any fund-raising event.

Specifically, the Jackson Campaign denies the fatuous allegations contained in the Complaint for the following reasons:

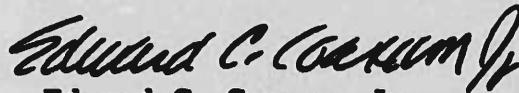
Attachment III

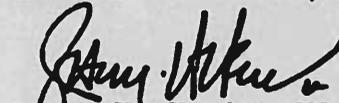
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3

- a. No contribution, as referred to in the Complaint, was ever received, directly or indirectly, by the Jackson Campaign. Upon careful analysis of reports filed with the Commission, and upon review of underlying documentation, there is no evidence or suggestion of any contribution to the Jackson Campaign from the Saudi Arabian Oil Company of Dairen, Saudi, Arabia.
- b. Additionally, the Complaint lacks other elements that would support an allegation that a contribution was received by the Jackson Campaign, such as whether it was made by cash or other negotiable instrument, reference to any bank, the date of this alleged contribution, or account number.
- c. Rev. Jackson has made no public statements regarding receipt of funds as alleged in the Complaint.

Based on the foregoing, we respectfully request that the Federal Election Commission take whatever reasonable and necessary action to dismiss this groundless Complaint and close the file in this matter. Should you, however, have any questions relating to the above, we request that you contact the undersigned at the address and telephone number set forth above. Thank you.

Very truly yours,

  
Edward C. Coaxum, Jr.

  
James H. Hewitt, III

ECC/JHH/gjs

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RECEIVED AT THE FEC  
**HAND DELIVERED**  
84 JUN 6 P 1: 28

*Coacum & Hewitt*  
*Attorneys and Counsellors at Law*  
*Suite 1600 The Illuminating Building*  
*55 Public Square*  
*Cleveland, Ohio 44113*  
*(216) 241-7496*

*Edward C. Coacum, Jr.*  
*James H. Hewitt, III*

*Of Counsel:*  
*Conrad H. Bruckner*  
*Philip J. Polunian*

*GCC # 3499*

June 5, 1984 *Kramer*

Kenneth A. Gross, Esquire  
Associate General Counsel  
Federal Election Commission  
Washington, DC 20463

VIA GUARANTEED  
OVERNIGHT MAIL

Re: MUR 1692

Dear Mr. Gross:

The undersigned attorneys for Jesse L. Jackson for President, Inc., the principal campaign committee for Rev. Jesse L. Jackson (the "Jackson Campaign"), are submitting this letter in reply to your letter of May 7, 1984, advising of the above-referenced Complaint, and is intended to serve as our official response.

By letter dated May 17, 1984, we requested additional time to prepare a written response, until June 6, 1984, and by your letter dated May 24, 1984, we were advised that our request for extension of time had been granted.

As explained more fully below, there is no merit to any of the charges contained in this Complaint and therefore, we urge the Commission to enter a finding that there is no reason to believe that a violation of the statute has been committed, and the Commission should close its file in this matter. Upon review of applicable records and appropriate documentation, we assert that the Complaint is groundless and without any basis in fact, law or truth. The statements contained therein are, at best, illusory.

The Complaint, filed by Dr. Jerome Diamond of 6509 Western Run Drive, Baltimore, Maryland, appears to be an unsubstantiated and unwarranted allegation that the Jackson Campaign received "illegal donations from foreigners" by allegedly "publicly admitting receiving a \$200,000 contribution from the Saudi Arabian Oil Company of Dairen, Saudi, Arabia". The simple and complete response to Dr. Diamond's allegation is that no contributions have been made to it by any foreign national, as that term is defined by 11 CFR §110.4(a), directly or through any other person, at any time, or as the result of any fund-raising event.

Specifically, the Jackson Campaign denies the fatuous allegations contained in the Complaint for the following reasons:

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Kenneth A. Gross Esquire

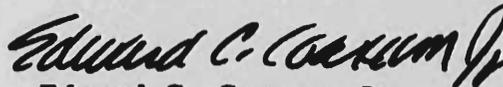
Page 2

June 5, 1984

- a. No contribution, as referred to in the Complaint, was ever received, directly or indirectly, by the Jackson Campaign. Upon careful analysis of reports filed with the Commission, and upon review of underlying documentation, there is no evidence or suggestion of any contribution to the Jackson Campaign from the Saudi Arabian Oil Company of Dairen, Saudi, Arabia.
- b. Additionally, the Complaint lacks other elements that would support an allegation that a contribution was received by the Jackson Campaign, such as whether it was made by cash or other negotiable instrument, reference to any bank, the date of this alleged contribution, or account number.
- c. Rev. Jackson has made no public statements regarding receipt of funds as alleged in the Complaint.

Based on the foregoing, we respectfully request that the Federal Election Commission take whatever reasonable and necessary action to dismiss this groundless Complaint and close the file in this matter. Should you, however, have any questions relating to the above, we request that you contact the undersigned at the address and telephone number set forth above. Thank you.

Very truly yours,



Edward C. Coaxum, Jr.



James H. Hewitt, III

ECC/JHH/gjs

84040471701

4040471702

*Crosman & Harvitt*  
*Attorneys and Counselors at Law*  
*Suite 1000 The Manufacturing Building*  
*55 Public Square*  
*Cleveland, Ohio 44113*

1 JUN 6 P4:17

**HAND DELIVERED**

**04 JUN 6 P 1: 27**

**Kenneth A. Gross, Esquire**  
**Associate General Counsel**  
**Federal Election Commission**  
**Washington, DC 20463**

RECEIVED AT THE POST OFFICE

24 JUL 81 10:01

84040471703

**FROM:**  
 Edward C. Coaxam, Jr., Esquire  
 James H. Hewitt, III, Esquire  
 Suite #600 55 Public Square  
 Cleveland, Ohio 44113

Customer Number, if any:

**TO:**  
 Kenneth A. Gross, Esquire  
 Associate General Counsel  
 Federal Election Commission  
 Washington, DC 20463

★ U.S.G.P.O. 1984-425-341 Label 11B (1-84)

**EXPRESS MAIL** POST OFFICE TO ADDRESSEE  
 NEXT DAY SERVICE

**ORIGIN:**

Post Office: FT

ZIP Code: 44113

Date: 7/21/81

Time in: 11:00

Weight: 1.00

Package: 11B

**B 09664284**

**DESTINATION:**

Date of Del: 7/28/81

Time of Del: 1310

Initials of Del. Emp.:

Signature of Addressee or Agent:

**DELIVERY WAS ATTEMPTED**

Date: Time:

Notice Left By:

**EXPRESS MAIL SERVICE**

TO REMOVE PEEL BACK HERE

6007 3008

# Jesse Jackson for President Committee

2100 M Street, N.W. Suite 316  
Washington, D.C. 20037  
202-293-1289

May 17, 1984

Ms. Beverly Kramer  
Office of the General Counsel  
Federal Elections Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

14 MAY 18 1984  
MUR 1692  
Kramer

GENERAL COUNSEL

Re: MUR 1692

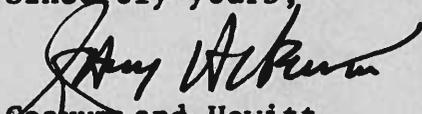
Dear Ms. Kramer:

We have recently received a letter from Kenneth E. Gross, Esq., containing a copy of the complaint captioned above, alleging that Reverend Jesse L. Jackson may have violated sections of the Federal Election Campaign Act.

We are conducting an investigation into this matter and request an extension of time to and including Tuesday, June 5, 1984, to submit an appropriate response.

Also enclosed, kindly find a completed statement of Designation of Counsel. We ask that future notices or requests for information from the Office of General Counsel be directed to us at the address and telephone number designated therein. Thank you.

Sincerely yours,

  
Coakum and Hewitt  
By James H. Hewitt, III  
For the Firm

Enclosure

84040471704

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1692

NAME OF COUNSEL: Coaxum and Hewitt

ADDRESS: Edward C. Coaxum, Jr.

James H. Hewitt, III

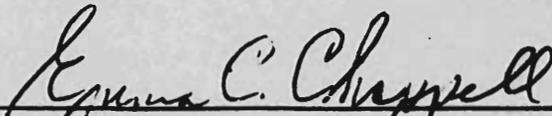
Suite 1600 Illuminating Building

Cleveland, Ohio 44113

TELEPHONE: (216) 241-1835

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.

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Signature

Emma C. Chappell  
National Campaign Treasurer

RESPONDENT'S NAME: Jesse L. Jackson for President, Inc.

ADDRESS: 2100 M Street, N.W., Suite 316

Washington, D.C. 20037

HOME PHONE: \_\_\_\_\_

BUSINESS PHONE: (202) 293-1289

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84040471706

**Jesse Jackson for President Committee**  
2100 M Street, N.W. Suite 316  
Washington, D.C. 20037

**Ms. Beverly Kramer**  
Office of the General Counsel  
Federal Elections Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

DATE 4MAY84

1983-1984  
CANDIDATE INDEX OF SUPPORTING DOCUMENTS (EX) 8 4 0 4 0 7 7 0 8

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT OFFICE SOUGHT/ PARTY RECEIPTS DISBURSEMENTS # OF MICROFILM  
PRIMARY GENERAL PRIMARY GENERAL COVERAGE DATES PAGES LOCATION  
TYPE OF FILER

JACKSON, JESSE L	PRESIDENT DEMOCRATIC PARTY					1984 ELECTION	ID# P40001018
1. STATEMENT OF CANDIDATE							
1983 STATEMENT OF CANDIDATE						9NOV83	1 83FEC/217/0058
STATEMENT OF CANDIDATE - AMENDMENT						8DEC83	2 83FEC/217/0315
1984 STATEMENT OF CANDIDATE - AMENDMENT						21FEB84	3 84FEC/217/3695
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES							
2.1 PRINCIPAL CAMPAIGN COMMITTEE							
JESSE JACKSON FOR PRESIDENT							
1983 STATEMENT OF ORGANIZATION							
STATEMENT OF ORGANIZATION - AMENDMENT						14NOV83	2 83FEC/217/0073
YEAR-END	281,632		183,085			28NOV83	1 83FEC/217/0225
✓ YEAR-END - AMENDMENT	280,632		183,085			10CT83 -31DEC83	69 84FEC/217/2445
REQUEST FOR ADDITIONAL INFORMATION						10CT83 -31DEC83	6 84FEC/217/2553
REQUEST FOR ADDITIONAL INFORMATION 2ND						10CT83 -31DEC83	2 84FEC/217/4166
1984 STATEMENT OF ORGANIZATION - AMENDMENT							
STATEMENT OF ORGANIZATION - AMENDMENT						10CT83 -31DEC83	3 84FEC/217/5122
MISCELLANEOUS REPORT						13JAN84	2 84FEC/217/0814
MISCELLANEOUS REPORT						21FEB84	1 84FEC/217/3701
MISCELLANEOUS REPORT						23FEB84 TO FEC	3 84FEC/217/3895
STATEMENT OF ORGANIZATION - AMENDMENT						28FEB84 FROM FEC	2 84FEC/217/4186
MISCELLANEOUS REPORT						21MAR84 FROM FEC	3 84FEC/306/0163
MISCELLANEOUS REPORT						9APR84	4 84FEC/300/0025
STATEMENT OF ORGANIZATION - AMENDMENT						10APR84 FROM FEC	3 84FEC/300/0066
MISCELLANEOUS REPORT						1JAN84 -31JAN84	77 84FEC/217/3752
✓ FEBRUARY MONTHLY	328,892		425,847			1JAN84 -31JAN84	2 84FEC/306/0157
REQUEST FOR ADDITIONAL INFORMATION						1JAN84 -31JAN84	3 84FEC/308/2789
REQUEST FOR ADDITIONAL INFORMATION 2ND						1FEB84 -29FEB84	78 84FEC/217/4669
✓ MARCH MONTHLY	619,573		714,667			1FEB84 -29FEB84	3 84FEC/300/0058
REQUEST FOR ADDITIONAL INFORMATION						1MAR84 -31MAR84	89 84FEC/300/1326
✓ APRIL MONTHLY	885,575		907,148				
TOTAL	2,114,672	0	2,230,747	0			353 TOTAL PAGES
4. AUTHORIZED COMMITTEES							
JACKSON FOR PRESIDENT COMMITTEE - CALIFORNIA							
1984 STATEMENT OF ORGANIZATION							
✓ FEBRUARY MONTHLY	16,668		9,511			21FEB84	3 84FEC/217/3698
✓ MARCH MONTHLY	23,377		29,766			1JAN84 -31JAN84	6 84FEC/217/4127
✓ APRIL MONTHLY	50,832		44,281			1FEB84 -29FEB84	9 84FEC/217/4592
						1MAR84 -31MAR84	16 84FEC/306/1415
							34 TOTAL PAGES
NEW YORKERS FOR JESSE JACKSON							
1983 STATEMENT OF ORGANIZATION							
✓ YEAR-END	50,208		34,515			8DEC83	3 83FEC/217/0317
✓ YEAR-END - AMENDMENT	50,208		34,515			19NOV83 -31DEC83	20 84FEC/217/2533
✓ YEAR-END - AMENDMENT	49,338		34,704			19NOV83 -31DEC83	22 84FEC/217/4565
REQUEST FOR ADDITIONAL INFORMATION						19NOV83 -31DEC83	16 84FEC/300/1062
1984 ✓ FEBRUARY MONTHLY							
✓ FEBRUARY MONTHLY - AMENDMENT	28,211		38,727			19NOV83 -31DEC83	1 84FEC/217/4184
REQUEST FOR ADDITIONAL INFORMATION	28,011		39,104			1JAN84 -31JAN84	17 84FEC/217/3703
						1JAN84 -31JAN84	15 84FEC/300/1047
						1JAN84 -31JAN84	2 84FEC/306/0154

8 4 0 4 0 4 7 1 7 0 9

FEDERAL ELECTION COMMISSION  
1983-1984

DATE 4MAY84

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 3

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
REQUEST FOR ADDITIONAL INFORMATION 2ND MARCH MONTHLY			57,696		55,688		1JAN84 -31JAN84	7	84FEC/300/2796
MARCH MONTHLY - AMENDMENT			56,622		54,614		1FEB84 -29FEB84	18	84FEC/217/2104
REQUEST FOR ADDITIONAL INFORMATION							1FEB84 -29FEB84	17	84FEC/300/1030
APRIL MONTHLY			101,003		96,016		1FEB84 -29FEB84	2	84FEC/300/0070
							1MAR84 -31MAR84	21	84FEC/300/2185

157 TOTAL PAGES

4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES

191 AUTH TOT PAGES

*000 copy  
Kramer*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

MEMORANDUM TO: THE COMMISSION  
FROM: MARJORIE W. EMMONS/ SUSAN M. TEIR *SMTT*  
DATE: MAY 4, 1984  
SUBJECT: ORIGINAL COMPLAINT - MUR 1692  
dated May 2, 1984

The attached has been circulated for your information.

84040471710

Attachment

MUR 1692

GA 43030

MAY 2, 1984

General Counsel  
Federal Election Commission

325 K St. N.W.

SENSITIVE

Washington D.C. 20463

Dear Counsel:

My full name  
is Dr. JEROME DIAMOND  
of 6509 Western Pine Ave  
Baltimore, Maryland 21215

This is a citizens  
complaint on what I  
believe is a flagrant  
violation of section 6H(b)  
of title 2 of the  
Illegal Campaign  
Contributions of a  
foreign national, be  
it an individual or  
group for the  
objective of monetarily  
influencing the  
Campaign contributions

RECEIVED  
OFFICE OF THE  
COMMISSIONER

RECEIVED  
OFFICE OF THE  
COMMISSIONER

84 MAY 3 P3:21

of an American  
Presidential candidate  
in a presidential  
preferential primary  
or general election  
itself

Specific reference is  
made to Rev. Jessie  
L. Jackson a Democratic  
Contestant who publicly  
admitted receiving a  
\$200,000 contribution  
from the Saudi-  
Arabian Oil Company  
of Dairen, Saudi Arabia,  
and stated it was  
for welfare purposes.  
Another violation, as  
said, illegal contribution  
to begin with was  
made for reasons of  
influencing and  
interfering with the  
Constitutional procedures  
relating to Campaign  
Contributions

84040471712

84040471713

It is suggested further that Rev. Jessie L. Jackson, by Federal Law be compelled to return the contribution to the Saudi-Arabian Oil Company; and that a U.S. Dept. of Justice subpoena be issued for the accounting records of the Saudi Arabian Oil Company with a writ of mandamus be issued on the officials of that company that, unless Rev. Jessie L. Jackson makes restitution - that he be temporarily suspended from entering any remaining primary and that a complete audit of all his personal and public contributions in public

4. To the disclosure to the Federal Election Commission at 1325 N.W.K. Street. Washington, D.C. 20463 be

made, as also to other Presidential Candidates of other parties, who may have committed a similar offense.

If Rev. Jessie L. Jackson does not comply; He should be barred from any future primaries; from forming a new independent third party; and be disqualified from the national nominating convention as a delegate, candidate, or elector.

James H. ...  
HARRIS & AMMERMAN  
147 Constitution Building, Wash. D.C. 20001

surely  
J. ROME  
DIAMOND



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 24, 1984

Edward C. Coaxum, Jr.  
James H. Hewitt, III  
Suite 1600 Illuminating Building  
Cleveland, Ohio 44113

Re: MUR 1692  
Jesse L. Jackson for President, Inc.

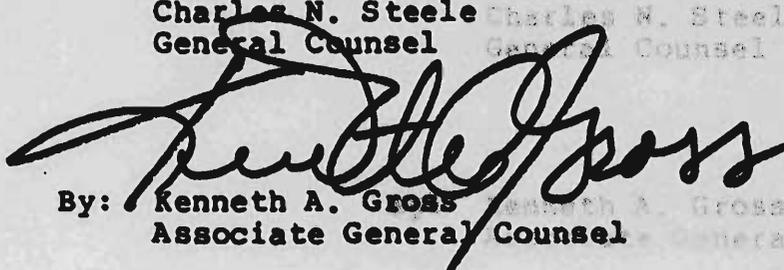
Dear Mr. Coaxum and Mr. Hewitt:

This is in reference to your letter dated May 17, 1984, requesting an extension until June 6, 1984, to respond to the Commission's notice of a complaint filed in the above-referenced matter. After considering the circumstances presented in your letter, the Office of General Counsel has determined to grant you your requested extension. Accordingly, your response will be due on June 6, 1984.

If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

34040471715

6cc 4 30 4 8

# Jesse Jackson for President Committee

2100 M Street, N.W. Suite 316  
Washington, D.C. 20037  
202-293-1289

May 17, 1984

Ms. Beverly Kramer  
Office of the General Counsel  
Federal Elections Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

MUR 1692  
Kramer  
HY  
ONLY

Re: MUR 1692

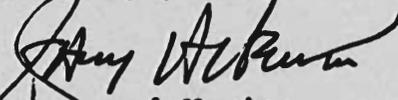
Dear Ms. Kramer:

We have recently received a letter from Kenneth E. Gross, Esq., containing a copy of the complaint captioned above, alleging that Reverend Jesse L. Jackson may have violated sections of the Federal Election Campaign Act.

We are conducting an investigation into this matter and request an extension of time to and including Tuesday, June 5, 1984, to submit an appropriate response.

Also enclosed, kindly find a completed statement of Designation of Counsel. We ask that future notices or requests for information from the Office of General Counsel be directed to us at the address and telephone number designated therein. Thank you.

Sincerely yours,

  
Coaxum and Hewitt  
By James H. Hewitt, III  
For the Firm

Enclosure

34040471716

MUR # 1692

DATE 5/3/84

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

4040471717

Respondents: Jesse Jackson for President Committee  
Samuel L. Foggie, Jr. Treasurer  
8100 M Street N.W., Suite 316  
Washington, D.C. 20036

1. Rev. Jesse L. Jackson  
6845 S. Constance Avenue  
Chicago, Illinois

606 419

cc: Samuel L. Foggie, Sr. Treasurer  
Jesse Jackson for President Committee  
8100 M Street, N.W. Suite 316  
Washington, D.C. 20036

2. The Saudi Arabian Oil Company  
Dairan, Saudi Arabia

// →



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 7, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Reverend Jesse L. Jackson  
6845 S. Constance Avenue  
Chicago, Illinois 60649

Re: MUR 1692

Dear Reverend Jackson:

This letter is to notify you that on May 3, 1984 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"). A copy of the complaint is enclosed. We have numbered this matter MUR 1692. 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 of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040471718

If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

*Kenneth A. Gross*  
By Kenneth A. Gross  
Associate General Counsel

cc: Samuel L. Foggie, Sr

Enclosures

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

84040471719

Case No. 118

1. The following party is assigned to this case:  
 None  
 Beverly Kramer  
 None

2. The following party is assigned to this case:  
 None  
 Kenneth A. Gross  
 None

3. Name of complainant: *NEW JESS*  
 4. Name of respondent: *LOWE'S*  
 5. City: *Chicago*  
 6. State: *Illinois*  
 7. Zip: *60649*

8. Type of complaint:  
 Discrimination  
 Harassment  
 Retaliation  
 Other: *993509*

9. I have reviewed the above information and agree that the information is true and correct.  
 Yes  
 No

10. Signature of complainant: *H. Hurdan*  
 11. Date of signature: *5/11/84*

12. Signature of respondent: *Paul Smith*  
 13. Date of signature: *5-7-84*

84040471720

MLR 1692 Kramm

PS Form 3811, July 1982

● **SENDER:** Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- Show to whom and date delivered .....
  - Show to whom, date, and address of delivery .....
2.  **RESTRICTED DELIVERY**.....  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

3. **ARTICLE ADDRESSED TO:**  
Samuel L. Foggie, Sr. Treasurer  
Jesse Jackson for President Cmte.  
3100 M Street, N.W., Suite 316  
Wash DC 20036

4. **TYPE OF SERVICE:**
- REGISTERED       INSURED
  - CERTIFIED         COB
  - EXPRESS MAIL
- ARTICLE NUMBER: 943508

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Agent

5. DATE OF DELIVERY  
5/10/84

POSTMARK  
(only to be returned with)

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

57-84

WFO: 102570-000



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 7, 1984

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

The Saudi Arabian Oil Company  
Dairen, Saudi Arabia

Re: MUR 1692

Dear Sirs:

This letter is to notify you that on May 3, 1984 the Federal Election Commission received a complaint which alleges that your company may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1692. 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 the company in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

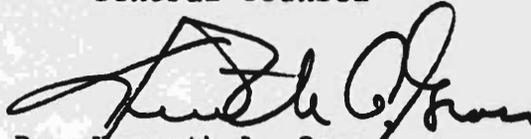
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

84040471721

If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

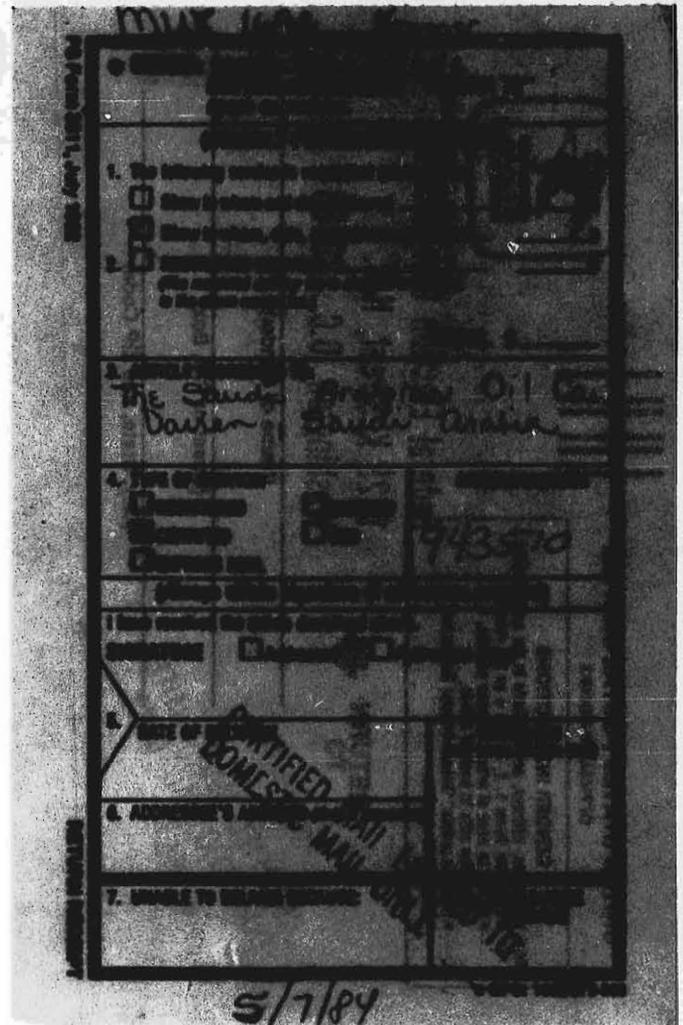


By Kenneth A. Gross  
Associate General Counsel

Enclosures

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

84040471722



The form contains several sections, some of which are partially legible:

- Section 1: Includes a date field with the handwritten date "5/7/84".
- Section 2: Contains the handwritten name "The Saudi Arabian Oil Co." and "Darien".
- Section 3: Includes a handwritten number "943570".
- Section 4: Features a large, diagonal stamp that reads "CERTIFIED MAIL".
- Section 5: Contains the text "ADDRESSEE'S ADDRESS".
- Section 6: Contains the text "UNABLE TO DELIVER".



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 7, 1984

Dr. Jerome Diamond  
6509 Western Run Drive  
Baltimore, MD 21215

Dear Dr. Diamond:

This letter is to acknowledge receipt of your complaint of May 2, 1984, which we received on May 3, 1984, against Reverend Jesse L. Jackson and the Saudi Arabian Oil Company 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 five days.

You will be notified as soon as the Commission takes final action on your client's complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

By Kenneth A. Gross  
Associate General Counsel

Enclosure

84040471723

84040471724

FORM 1190 Kramer

PS Form 3871, July 1982

● GENERAL: Complete items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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

Show to whom and date delivered .....

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

2.  RESTRICTED DELIVERY .....

(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$ \_\_\_\_\_

3. ARTICLE ADDRESSED TO:  
Dr. Jerome Diamond  
6809 Western Run Dr.  
Baltimore, MD 21215

4. TYPE OF SERVICE:

REGISTERED       INSURED

CERTIFIED       COD

EXPRESS MAIL

ARTICLE NUMBER  
943503

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee     Authorized agent

5. DATE OF DELIVERY  
E. Nothman  
MAY 10 1984

6. ADDRESSEE'S ADDRESS (Only if item is returned)

7. UNABLE TO DELIVER BECAUSE:

DELIVERED FROM WINDOW  
AT ARLINGTON STATION  
BALTIMORE, MD 21215

EMPLOYEE'S INITIALS  
5-7-84

© SPG 1982 375-583

LARGE PRINT RETURN RECEIPT

MUR 1692

Case # 3030

MAY 2, 1984

1984

RECEIVED IN THE  
FEDERAL  
ELECTIONS  
COMMISSION  
MAY 2 1984

General Counsel  
Federal Election Commission

25 K St. N.W.  
Washington D.C. 20463

Dear Council:

My full name  
is Dr. JEROME DIAMOND  
of 6509 Western Pine Drive  
Baltimore, Maryland 21215

This is a citizens  
complaint on what I  
believe is a flagrant  
violation of section 611(b)  
of title 52 of the  
Illegal Campaign  
Contributions of a  
foreign national, or  
of an individual or  
group for the  
objective of monetarily  
influencing the  
Campaign Contributions

34040471725

WHR 1048 JUM

of an American  
Presidential candidate  
in a presidential  
preferential primary  
or General Election  
itself.

Specific reference is  
made to Rev. Jessie  
L. Jackson a Democratic  
Contestant who publicly  
admitted receiving a  
\$200,000 contribution  
from the Saudi-  
Arabian Oil Company  
of Dairen, Saudi Arabia.  
and stated it was  
for welfare purposes.  
another violation, as  
said illegal contribution  
to begin with was  
made for reasons of  
influencing and  
interfering with the  
Constitutional procedures  
relating to Campaign  
Contributions

84040471726

It is suggested further that Rev. Jessie L. Jackson, by federal law be compelled to return the contribution to the Saudi-Arabian Oil Company; and that a U.S. Dept. of Justice subpoena of the accounting records of the Saudi Arabian Oil Company with a writ of mandamus be issued on the officials of that company that, unless Rev. Jessie L. Jackson makes restitution that he be temporarily suspended from entering any remaining primary and that a complete audit of all his personal and public contributions in public

84040471727

can order of crown has been made

My Commission Expires November 30, 1988  
 Royal Police District of Columbia  
 HARRIS V. WASHINGTON

4. to the  
disclosure to the  
Federal Election  
Commission at 1325  
N.W. Street, Washington,  
D.C. 20463 be

made, as also  
to other Presidential  
Candidates of other  
parties, who may  
have committed  
a similar offense.

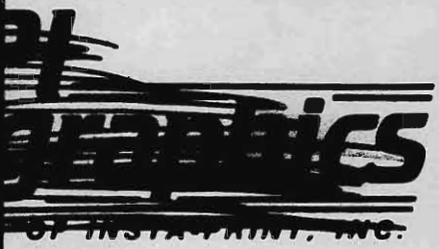
If Rev. Jessie L.  
Jackson does not  
comply; He should  
be barred from  
any future primaries;  
from forming a  
new independent third  
party; and be disqualified  
from the national nominating  
Convention as a delegate; and as a  
candidate for the office.

Received and stored by Justice  
400 7th St. N.W. Wash. D.C. 20004  
HARRIS & AMMERMAN  
Notary Public, District of Columbia 8  
My Commission Expires November 30, 1988

Truly  
Yours,  
J. ROME  
DIAMOND

8 4 0 4 0 4 7 1 7 2 9

RECEIVED AT THE FED  
HAND DELIVERED  
84 MAY 2 P2: 51



SUBJECT:  
ILLEGAL  
RPP CAMPAIGN  
CONTRIBUTIONS

4TH  
FLOOR

GENERAL COUNSEL  
FEDERAL ELECTION  
COMMISSION

1325 K STREET NW  
WASHINGTON

DISTRICT OF  
COLUMBIA 20463

34040471730

6509 WESTER... APRIL 22 1984

264  
6084  
Federal Election Commission

Commissioner  
GCC#3105

1325 NWK Street

Washington, D.C.

Body of Government

Commissioner

Mr Donald

Dear Commissioner;

A flagrant violation of Section 22-  
Code 401 of the

Federal Election

Laws regulating the  
illegal contribution from  
a foreign company



OFFICE OF THE  
COMMISSION SECRETARY

BALTIMORE, MD  
PM  
29 APR  
1984

RECEIVED AT THE  
NATIONAL ARCHIVES  
81 MAY 9 1984

84 MAY 10 AID: 00

THE CONGRESS HOTEL

306 W. Franklin Street  
Baltimore, Maryland 21201

FEDERAL ELECTION  
COMMISSION 20468

1325 <sup>SE</sup> NW K STREET  
WASHINGTON  
DISTRICT OF COLUMBIA

COMMISSIONER  
MCDONALD

MAILED 1672



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1692

Date Filmed

8/3/84

Camera No. --- 2

Cameraman

JRL

84040471733