

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Ronald Reagan

}

MUR 021 (75)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 12, 1976, the Commission determined by a vote of 6-0, that there was no reason to believe a violation of the Federal Election Campaign Act of 1971, as amended, had been committed in the above - mentioned matter. Accordingly, the file has now been closed.

*Marjorie W. Emmons*  
\_\_\_\_\_  
Marjorie W. Emmons  
Commission Secretary

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of ) MUR 021 (75)  
 )  
Ronald Reagan )

GENERAL COUNSEL'S REPORT

I. Allegation

This matter arises out of a complaint filed with the Federal Election Commission on August 29, 1975, by James Horwitz, a Los Angeles County Election Commissioner and private citizen.

Mr. Horwitz asserted that a radio program titled "Viewpoint," featuring Governor Ronald Reagan, was related to the Reagan campaign for nomination as the Republican candidate for President, and therefore Reagan was obligated to report the costs of the show as expenditures. In addition, it was alleged that costs of producing the show had been assumed by various corporations, thereby constituting a violation of 18 U.S.C. §610 [2 U.S.C. §441b].

The campaign reports of Governor Reagan, on file with the Commission, fail to disclose the costs of the show as an expenditure.

II. Evidence

A. The Reagan Candidacy

Citizens for Reagan ("the Committee"), the authorized group supporting Governor Ronald Reagan's ("Reagan") candidacy

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for President, registered with the Commission on July 24, 1975. The Committee's October 10, 1975 report discloses the receipt of contributions as early as July 15, 1975. Therefore, as of July 15, 1975, Reagan was a candidate within the meaning of the Federal Election Campaign Act of 1971, as amended ("the Act"). See 2 U.S.C. §431(b)(2).

B. The Radio Commentary

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By a letter dated November 13, 1975, the Office of the General Counsel sought information on various aspects of the program "Viewpoint." A response was received from Loren Smith, counsel for Reagan, on December 8, 1975. The response stated that "Viewpoint" was first produced on January 7, 1975 and was first aired on January 20, 1975. A total of 65 commentaries were aired between July 18, 1975 and November 19, 1975, with Reagan participating in all but seven of the programs. Reagan had a contract with O'Connor Creative Services ("O'Connor") which produced and syndicated "Viewpoint" to over 300 stations. All production costs were paid by O'Connor and in turn all revenue from the sale of the program went directly to O'Connor. O'Connor then paid Reagan a portion of its sales revenue. Reagan has never received any remittance from any radio station for "Viewpoint," and his sole role was the presentation of commentary.

The  
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commentaries were made on a wide range of topics of current interest--from "improving social security" to "Panama Canal" to "detente" to "New York City." (See Attachment #1 for a full list of topics.)

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In his letter Mr. Smith declined to provide any information on the costs of the programs or the persons paying these costs. He stated that information on production costs and similar information should be sought directly from O'Connor as Reagan and the Committee have no information on these matters. Mr. Smith did respond that money paid for the airing of "Viewpoint" was never contributed to or commingled with funds utilized by the Committee. In subsequent telephone conversations on January 16, 1976, and March 9, 1976, Mr. Smith reiterated the contents of the letter and indicated that O'Connor would not volunteer any information on the costs of "Viewpoint" or the persons paying these costs.

In the General Counsel's Report of June 14, 1976, it was recommended that the file on this matter be kept open and that a letter be sent to Reagan requesting certain clarifying information. On June 24, 1976, after discussion in executive session, the Commission voted 5 to 0 (Commissioner Springer was not present and did not vote) to approve the General Counsel's recommendation. Accordingly, on June 29, 1976 a letter was sent to Reagan which stated

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view of the Commission that the costs of producing the show may constitute a disclosable expenditure under 2 U.S.C. §431(e) unless it was demonstrated that the costs were independent expenditures by O'Connor. On August 9, 1976, Mr. Smith responded for Reagan and respectfully declined to provide the requested information because: (1) Reagan and the Committee do not have access to any such data; and (2) the data requested cannot be provided until the Commission specifically rules "whether being a candidate only for the technical purpose of compliance with the Federal Election Act means that a regular radio commentary becomes a campaign expenditure." (See Attachment #2.)

Reagan resumed taping his five minute radio commentaries on September 1, 1976, and planned to begin the distribution of these commentaries on September 20, 1976. Washington Post, September 2, 1976, Sec. C, at 3. Reagan stated that he was resuming "Viewpoint" (as well as returning to the lecture circuit and possibly taking up his newspaper column again) as a means of returning to the six-figure annual income which he received prior to his declaration for the presidency. Newsweek, August 30, 1976, at 45-46.

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III. Analysis

The issue raised by MUR 021 may be summarized as follows: If an individual is regularly employed as a commentator on a radio program and thereby receives great public exposure, and the individual subsequently becomes a candidate for purposes of the Act, does the cost of subsequent radio programs broadcast prior to the election year per se constitute an expenditure for the purpose of influencing an election?

As a general rule "[i]t is the Commission's view that appearances before a substantial number of people who comprise a part of the electorate with respect to which the individual is a Federal candidate are presumably made for the purpose of enhancing the candidacy." AO 1975-108, 41 FR 5753 (February 9, 1976). Accordingly, since the sponsorship of an appearance by a single candidate has the unavoidable impact of advancing the chances of that candidate's election, Policy Statement on Presidential Debates (August 30, 1976), at 1, the sponsor of the appearance will be presumed to have used the occasion for the purpose of influencing an election. However, this

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presumption is by no means irrebuttable. In fact, the Commission has taken a number of actions which have modified this rule so that mere public exposure by an individual who is a candidate will not be presumed to be for the purpose of influencing an election, provided that it can be shown that the appearance had some alternative justification. 1/ Thus the appearance will not be presumed to be for the major or primary purpose of influencing an election if: the candidate's appearance was made in a non-election year for party building purposes<sup>2/</sup>; the candidate's appearance was made in a non-election year as part of a broadcast to one's constituents of a

1/ This is the approach followed in U.S. v. Nat. Com. for Impeachment, 469 F. 2d 1135, 1141-1142 (2d Cir., 1972). There is also evidence that Congress intended the phrase "for the purpose of influencing" to be applicable to the advocacy of the election or defeat of a candidate, and did not intend that the Act impinge on those activities of a candidate which merely have the incidental effect of influencing an election. 120 Cong. Rec. H 7812 (daily ed., August 7, 1974).

2/ See AO 1975-72, 40 FR 56589 (December 3, 1975). The opinion distinguishes itself from AO 1975-13, 40 FR 36747 (August 21, 1975) by noting that the general rule "is applicable only to an appearance which in contrast to the present situation, serves directly to benefit the candidate. This is not the case with regard to party appearances prior to January 1 of the election year, where such appearances are not accompanied by any express communication evidently directed to advancing a candidate's chances for election." Supra, at 56590.

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Congressional "newsletter of the air"<sup>3/</sup> or the candidate's appearance was made in a non-election year in the form of broadcast commentary which was undertaken in exchange for a stipend<sup>4/</sup>.

Similarly, it is the view of the Office of the General Counsel that the cost of the radio programs which featured Reagan should not be per se treated as an expenditure since: Reagan's involvement in the program was part of a financially motivated transaction which pre-dated his candidacy by approximately six months and was resumed shortly following the termination of his candidacy; Reagan's role in the programs was solely as a commentator<sup>5/</sup> on matters of public

<sup>3/</sup> See MUR 002 (75), Conciliation Agreement in the matter of Congressman Jerry Litton (March 22, 1976), at 2; Memorandum on the Compliance Action in this matter of Congressman Jerry Litton, at 18. The costs of the show "Dialogue with Litton" were ruled to not be an expenditure for broadcasts made solely within the Congressman's district in a non-election year.

<sup>4/</sup> See AO 1975-46, 40 FR 57756 (December 11, 1975). The Commission ruled "that the consideration which Representative Jordan receives for her television commentary does not constitute an honorarium." Supra. While the Commission did not discuss whether such an appearance would constitute an expenditure, the Commission impliedly appears to have rejected such an analysis.

<sup>5/</sup> One court has declared that "[o]nce hired as a commentator and presented to the public as one who speaks his own sincere opinions and analysis from his own viewpoint or bias, we hold a commentator has First Amendment rights." Evans v. Amer. Fed. of Television & Radio Artists, 354 F. Supp. 823, 842 (S.D. N.Y., 1973), rev'd on jurisdictional grounds, Buckley v. Amer. Fed. of Television & Radio Artists, 307 (2d Cir., 1974).

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interest<sup>6/</sup>; there is no evidence that Reagan made any express communications to advance his candidacy in any of the programs; all production costs of the programs were paid by O'Connor and in turn all revenue from the programs was paid directly to O'Connor; none of the revenue from the programs was commingled with the Committee's funds; Reagan stopped making the programs on the date he officially announced his candidacy for the presidency; and all of the challenged programs were aired prior to the election year. It is our view that the Commission should treat the costs of such radio programs as expenditures only if it is also shown that the programs were made with the primary or major purpose of influencing an election.

IV. Conclusion

Since the costs of the radio programs should not be presumed to be expenditures in the absence of evidence that these were made for the purpose of influencing an

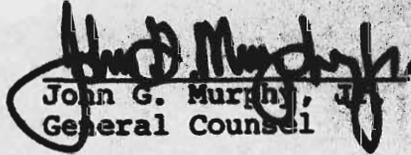
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<sup>6/</sup> It is arguable that the costs of the radio programs cannot be treated as an expenditure because the program constitutes a commentary. It is provided in 2 U.S.C. §431(f)(4)(A) that an expenditure does not include "any . . . commentary . . . distributed through the facilities of any broadcast station . . . unless such facilities are owned or controlled by any political party, political committee, or candidate." There is no evidence that any of the stations broadcasting Reagan's commentary are owned by a candidate, political committee, or political party.

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Office of General Counsel**

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election, and Mr. Horwitz has not provided any evidence which would support a finding of such purpose, we recommend that the file be closed because there is insufficient evidence to show that a violation of the Act has occurred.

  
John G. Murphy, Jr.  
General Counsel

Date: October 4, 1976

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RONALD REAGAN's VIEWPOINTS

8/19-9/8

Oil and the Shah of Iran  
Cuba, OAS and Us  
Helsinki Document  
CIA  
Images (Ike & Cal)  
Crime - Cure & Prevention  
Pollution #1  
Pollution #2  
Pollution #3  
Letter to Congress  
Permits to Plow?  
Ruritania  
Indians' Plight  
Gun Control  
Nader

PBC Survey  
Double-Dipping  
CEDU

10/22-11/6

A Break for the Handicapped  
Food Stamp Reform  
Incredible Bread Machine  
Superintendent's Dilemma  
Secret Service  
Detente  
Economic Planning  
The Russian Wheat Deal  
New Gasoline Lines?  
Common Situs Picketing  
Some thoughts on Unemployment  
Samizdat Bulletin

9/9-9/22

Improved Social Security #1  
Improved Social Security #2  
Improved Social Security #3  
Academic Freedom  
Washington Ironies  
Tax Limitation  
Saving Energy & Lives on the Freeway  
Reducing the Federal Burden  
Regional Government  
Update: Vandalism, UNICEF

11/7-11/19

Government Pay  
Welfare Letter  
Letter to Employees  
Clearcutting  
Panama Canal  
Land Use Policy #1  
Land Use Policy #2  
Land Use Police #3  
New York City

9/23-10/3

A few ironies  
National Economic Planning  
Public Employee Strikes  
Federal Register  
More on Regulation  
New York  
The Federal Rathole  
Nuclear Power

10/6-10/21

Communist Conspiracy? #1  
Communist Conspiracy? #2  
Communist Conspiracy? #3  
Gun Laws, Drug Laws  
Kokomo Plan  
Uncle Sam, Advertiser  
Producers in the Minority  
Castro, Cleaver & Puerto Rico

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ED Attachment #2

# CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

August 9, 1976

**HAND DELIVERED**

John G. Murphy, Esq.  
General Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, D. C. 20463

Re: MUR 021(75)

Dear Mr. Murphy:

**FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL**

77010010798

I apologize for my delay in response to your letter of June 29, 1976 addressed to Governor Reagan. I am responding in my capacity as the Governor's counsel in this matter.

In your letter you suggest that: "On the basis of the information presently available to it, the Commission is of the view that the costs of producing "Viewpoint" during the period in which you were both a candidate and a show participant may constitute an expenditure within the meaning of 2U. S. C. Section 431 (e)." (emphasis added). Therefore, you request further data on the financial aspects of the show's production.

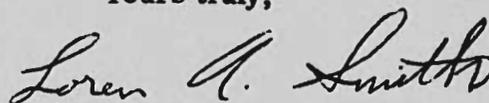
I must respectfully decline such additional material. First, because neither Governor Reagan, Citizens for Reagan nor myself have ever had access to such data. The radio show never was and in no way is connected with the Reagan campaign. Thus we strongly believe that the Commission does not have a legal right to such data pursuant to its most important obligation to monitor candidate spending, fundraising and reporting. Secondly, we feel that before any financial information on this matter is requested we should have a legal determination of what is a purely legal issue requiring no fact finding; namely whether being a candidate only for the technical purposes of compliance with the Federal Election Campaign Act means that a regular radio commentary becomes a campaign expenditure and its sponsorship becomes a corporate contribution.

Since the Commission is undecided on the issue we feel the factual data requested is certainly premature. We also most strongly request an opportunity to be heard

before the Commission finally resolves the basic legal question involved. Further, we ask the Commission to consider two other key points before going any further on this matter. 1.) There has been an entire presidential primary campaign conducted at this point. There has proceeded a period of over a year during which no final and binding Commission regulations have become effective governing this matter or shedding any light on it. The campaign has as such proceeded to make its financial calculations and plans upon the basis of a full expenditure limitation. If suddenly a retroactive decision puts our campaign over the spending limit then one of the most egregious violations of due process of law imaginable in this area would occur. The new law is certainly not intended to produce such an appalling result. 2.) Any attempt to tie the Governor's pre-announcement commentary to the campaign expenditure limits raises the most serious of First Amendment questions. I would personally hope that the Commission would be most sensitive to such issues.

Our campaign is ready to discuss this issue at any time with the Commission.

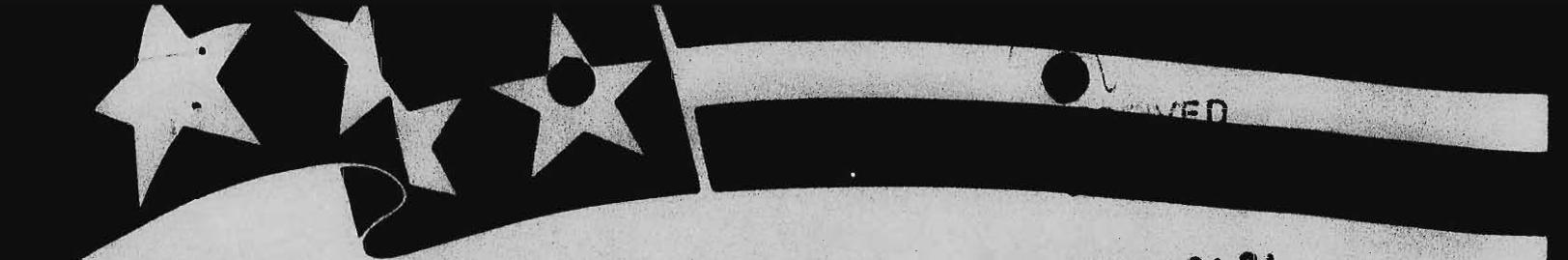
Yours truly,



Loren A. Smith  
General Counsel

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# CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

August 9, 1976

John G. Murphy, Esq.  
General Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, D. C. 20463

Re: MUR 021(75)

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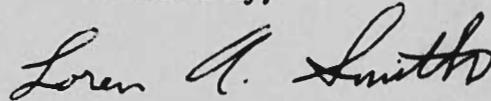
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Our campaign is ready to discuss this issue at any time with the Commission.

Yours truly,



Loren A. Smith  
General Counsel

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# CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006

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Attn. David R. Spiegel, Esq.

John G. Murphy, Esq.  
General Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, DC 20463

77040010003

11/11/79

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Honorable Ronald Reagan  
10980 Wilshire Blvd.  
Suite 512  
Los Angeles, California 90024

Re: 100-111-100

Reagan on 11-79

Dear Governor Reagan:

In a previous letter to you, dated November 11, 1979, the Federal Election Commission sought disclosure of certain information related to your former radio show, "Viewpoint." In particular, the Commission was interested in the costs of producing the show during the period in which you were both a candidate [as the word is defined in 2 U.S.C. Section 431 (b)(2)] and a participant in "Viewpoint."

Your response, through your counsel, Louis A. Smith indicated, inter alia, that all information regarding production costs was held by O'Connor Creative Services, Inc., the syndication firm with which you had contracted regarding the show. During two subsequent telephone conversations with a member of my staff Mr. Smith indicated that O'Connor Creative Services was unwilling to disclose the information in question.

On the basis of the information presently available to it, the Commission is of the view that the costs of producing "Viewpoint" during the period in which you were both a candidate and a show participant may constitute an expenditure within the meaning of 2 U.S.C. Section 431(e). If this is true, unless you can demonstrate that these costs constitute an independent expenditure by O'Connor Creative Services, Inc. [as such term is defined in 2 U.S.C. 412, 661-664 (1976)], they must be disclosed by you pursuant to your reporting obligations under 2 U.S.C. Section 434(a) and (b).

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We would appreciate it if you would respond to this letter within ten days of its receipt. The attorney assigned to this matter is David R. Spiegel (telephone no. 202/382-4035).

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.  
General Counsel

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*P.C.*

● 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..... 15¢

Show to whom, date, & address of delivery.. 35¢

RESTRICTED DELIVERY.  
Show to whom and date delivered..... 65¢

RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

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

| 439357 | |

(Always obtain signature of addressee or agent.)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent

*[Signature]*

4. DATE OF DELIVERY  
JUL 2 1976

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1960 Alameda  
Berkeley Calif 94704

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★ GPO: 1976-O-566-247

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

RECEIVED THE NATIONAL COMMISSION  
ON THE STATUS OF THE  
JUL 2 1976  
OFFICE OF GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Ronald Reagan

)  
)  
)  
MUR 021 (75)

GENERAL COUNSEL'S REPORT

I. Issue

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This matter arises out of a complaint filed with the Federal Election Commission on August 29, 1975, by James Horwitz, a Los Angeles County Election Commissioner and private citizen.

Mr. Horwitz asserted that a radio program titled "Viewpoint," featuring Governor Ronald Reagan, was related to the Reagan campaign for nomination as the Republican candidate for President, and therefore Reagan was obligated to report the costs of the show as expenditures. In addition, it was alleged that costs of producing the show had been assumed by various corporations, thereby creating a violation of 18 U.S.C. §610.

Campaign reports of Governor Reagan, on file with the Commission, do not disclose the costs of the show.

II. Evidence

A. The Reagan Candidacy

Citizens for Reagan, the authorized group supporting Governor Reagan's candidacy for President, registered with

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the Federal Election Commission on July 24, 1975. The group's October 10, 1975 report lists contributions back to and including July 15, 1975. Therefore, as of July 15, 1975, Governor Reagan was a candidate within the meaning of the Federal Election Campaign Act of 1971, as amended [see 2 U.S.C. §431(b)(2)].

B. The Radio Show

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Responding papers filed by counsel for Governor Reagan indicated that "Viewpoint" was started on January 20, 1975. The commentaries, which were almost all made by Governor Reagan, involved a wide range of topics of current affairs interest -- from "food stamps" and "unemployment" to a "Cuban Documentary" and "Federal Budget". The broadcasts were sold to over 300 stations by a producer-syndicator named O'Connor Creative Services, Inc. Governor Reagan's involvement in the broadcasts appears to have ended in November 1975, when he formally announced his candidacy.

By letter dated November 13, 1975, the Office of General Counsel sought information on a series of questions which had been left unanswered by Governor Reagan's response; the questions involved, inter alia, the costs of the show

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and the persons paying for the costs (see attachment 1 for a copy of the letter).

A letter was received on December 8, 1975, from Loren Smith, counsel for Governor Reagan. This response contained no information bearing on the costs of the show. Mr. Smith indicated that this information was all, allegedly, in the hands of O'Connor Creative Services (attachment 2).

In subsequent telephone conversations on January 16, 1976, and March 9, 1976, counsel for Governor Reagan reiterated what had been said in the letter. In addition, it was indicated by Mr. Smith that O'Connor Creative Services would not make the information available.

### III. Analysis and Recommendations

#### A.

There are two issues in this matter: (1) whether the costs of a public affairs show such as Viewpoint can be characterized as an expenditure "made for the purpose of influencing the nomination for election, or election of any person to Federal office [see 2 U.S.C. §431(e)]; (2) if the answer to (1) is yes, whether this result is changed by the fact that the show existed for approximately six months prior to Governor Reagan's candidacy and was arguably created for commercial reasons.

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The first issue appears to be governed by the Commission's resolution of MUR 002 (75) (Litton). Here, the Commission approved a conciliation agreement and underlying staff report which argued that the costs of a regular, public affairs show involving a candidate for Federal office, were attributable to the candidacy. It did not matter that the show made no reference to the individual's candidacy or that it was non-partisan in appearance. The salient reality was the exposure advantage to its central figure -- the candidate. However, it should be noted that the public affairs show in MUR 002 (75) did not involve commercial gain; instead, it was allegedly started by a Congressman in order to communicate with his constituents. Thus, the second issue involved in this matter was not raised.

There is one case dealing with the second issue herein and it suggests that the original purpose of "Viewpoint" is irrelevant to the question of whether it can now be considered as campaign-related. In Paulsen v. FCC, 491 F. 2d 887 (9th Cir. 1974), the court held that it is permissible for the FCC to apply its equal time provisions to an entertainer who had announced his candidacy for the presidency -- even if he was appearing in a show with no public affairs significance whatsoever and even if the candidacy was frivolous. However, the definition of candidacy involved in Paulsen required, as per FCC Rules and Regulations (see 47 CFR §§73.120(a), 73.290(a), 73.657(a)), an actual declaration by the person involved. Thus, read literally, the case may be considered inapplicable to the present situation.

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B.

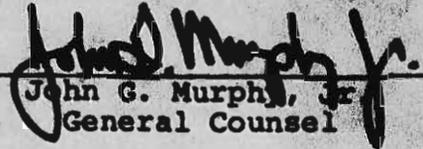
As this matter presently stands, it would appear that the Commission is obligated to seek the cost data for "Viewpoint" from O'Connor Creative Services, which apparently does not intend to voluntarily disclose the data. However, staff believes that a disclosure process involving O'Connor would be time consuming and unnecessary; the costs for "Viewpoint" in the period from July 14, 1975 until the show's termination in November 1975, constitute an expenditure made with the obvious authorization of Governor Reagan. As such, the Governor has the primary obligation for obtaining the data and disclosing it in his reports (see 2 U.S.C. §434(b); Proposed Disclosure Regulations §§ 100.7, 103.3). If the costs were made on the Governor's behalf by O'Connor and were not repaid, they would be reportable as contributions in kind. Since this would involve a §610 issue (O'Connor is a corporation), the issue might be resolved by having the Governor repay O'Connor for costs made on his behalf and then independently report the costs as an expenditure.

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V. Conclusions

We recommend that the file in this matter be kept open and that the attached letter be sent to Citizens for Reagan.

  
John G. Murphy, Jr.  
General Counsel

DATE: June 14, 1976

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CA-021-75

# Citizens for Reagan For President

FEDERAL ELECTION  
COMMISSION

'75 DEC 8 PM 3:15

Sen. Paul Laxalt  
Chairman

John P. Sears  
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan  
Treasurer

December 8, 1975

Mr. John G. Murphy, Jr.  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

Dear Mr. Murphy:

In response to your November 13, 1975 letter to Governor Reagan, I am submitting the following information. This information is numbered to correspond to your questions in the November 13 letter.

In his November 24, 1975 letter to you, I believe, Governor Reagan indicated that I would respond for him. If there is any further information I can provide please do not hesitate to contact me.

- (1) Our committee is the only political committee authorized by Governor Reagan at this time. No other committees are currently contemplated.
- (2) The program "Viewpoint" was first produced January 7, 1975. It was first aired January 20, 1975.
- (3) Governor Reagan's participation in "Viewpoint" involved the recording of a spoken commentary of approximately three minutes per program. Governor Reagan provided the contents of such commentary. The program was aired five days a week, beginning January 20, 1975. Governor Reagan participated in all but seven of the programs. In those seven, guests he invited provided their own commentary. These guests were paid honoraria for their services. The programs were apparently aired at different times in different places. In Los Angeles, the programs were aired at 8:35 a.m. and sometimes repeated at 6:55 p.m. In Washington, D.C. I have heard the show at 8:20 a.m. (attached is an update of "Viewpoint" topics through the final program).
- (4) O'Connor Creative Services, Inc. produces and syndicates "Viewpoint." Governor Reagan has a contract with that firm. O'Connor Creative Services pays the Governor a portion of its sales revenue. O'Connor Creative Services pays for all production costs. O'Connor Creative Services, Inc.: address: Post Office Box 1000, Universal City, California 91608, phone: (213) 769-1000. Mr. Harry O'Connor is President of the company.

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OFFICE OF THE FEDERAL ELECTION COMMISSION

2021 L St., N.W., Suite 340, Washington, D.C. 20036 • Phone: 202 / 223-8560

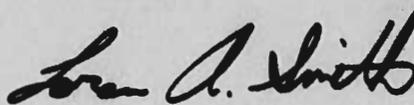
A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

(5) Governor Reagan has never received any remittances from any radio station for "Viewpoint." All production costs and other similar information should be sought from O'Connor Creative Services which was solely responsible for the production and marketing of "Viewpoint." Neither the Governor nor any of our committee staff has the information in this area, since the Governor's role in "Viewpoint" consisted of presenting the commentary.

(6) No.

(7) No.

Sincerely,



Loren A. Smith  
General Counsel

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OFFICE OF GENERAL COUNSEL

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RONALD REAGAN'S VIEWPOINTS

8/19-9/8

Oil and the Shah of Iran  
Cuba, OAS and Us  
Helsinki Document  
CIA  
Images (Ike & Cal)  
Crime - Cure & Prevention  
Pollution #1  
Pollution #2  
Pollution #3  
Letter to Congress  
Permits to Plow?  
Ruritania  
Indians' Plight  
Gun Control  
Nader

PBC Survey  
Double-Dipping  
CEDU

10/22-11/6

A Break for the Handicapped  
Food Stamp Reform  
Incredible Bread Machine  
Superintendent's Dilemma  
Secret Service  
Detente  
Economic Planning  
The Russian Wheat Deal  
New Gasoline Lines?  
Common Situs Picketing  
Some thoughts on Unemployment  
Samizdat Bulletin

9/9-9/22

Improved Social Security #1  
Improved Social Security #2  
Improved Social Security #3  
Academic Freedom  
Washington Ironies  
Tax Limitation  
Saving Energy & Lives on the Freeway  
Reducing the Federal Burden  
Regional Government  
Update: Vandalism, UNICEF

11/7-11/19

Government Pay  
Welfare Letter  
Letter to Employees  
Clearcutting  
Panama Canal  
Land Use Policy #1  
Land Use Policy #2  
Land Use Police #3  
New York City

9/23-10/3

A few ironies  
National Economic Planning  
Public Employee Strikes  
Federal Register  
More on Regulation  
New York  
The Federal Rathole  
Nuclear Power

10/6-10/21

Communist Conspiracy? #1  
Communist Conspiracy? #2  
Communist Conspiracy? #3  
Gun Laws, Drug Laws  
Kokomo Plan  
Uncle Sam, Advertiser  
Producers in the Minority  
Castro, Cleaver & Puerto Rico

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OFFICE OF GENERAL COUNSEL

770 0010815

Mr. John G. Murphy, Jr.  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

C: 20036

CA 02-75



FEDERAL ELECTION COMMISSION

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

November 19, 1975

Loren A. Smith, Esq.  
General Counsel  
Citizens for Reagan Committee  
2021 L Street, N. W.  
Suite 340  
Washington, D. C. 20036

Dear Mr. Smith:

Please consider this letter as an extension of time  
of and until December 8, 1975, in which to respond to my  
letter of November 13, 1975.

Sincerely yours,

Stephen Schachman  
Assistant General Counsel

77040010R16

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL



# Citizens for Reagan For President

Sen. Paul Laxalt  
Chairman

John P. Sears  
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan  
Treasurer

November 17, 1975

Dear Steve:

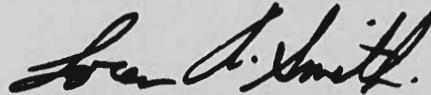
Pursuant to our phone conversation of November 17, I am requesting a week's delay in responding to your letter of November 13, 1975. This delay is necessary as I will be out of town from November 21 through December 2.

The delay will give me adequate time to draft a response that fully supplies you with the information you have requested.

I will provide you with a written response no later than December 8, 1975.

Best regards.

Sincerely,



Loren A. Smith  
General Counsel

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

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

77040010817

CERTIFICATE OF RECEIPT

I hereby certify that on this 13th day of November, 1975, I, Loren Smith, have received a copy of a letter dated November 13, 1975, addressed to Ronald Reagan from the Federal Election Commission, signed by Stephen Schachman, Assistant General Counsel on behalf of the General Counsel.

*Loren A. Smith*

Loren Smith  
Citizens for Reagan Committee

*Nov. 13, 1975*

*Step Schachman*

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OFFICE OF GENERAL COUNSEL

77040010818



FEDERAL ELECTION COMMISSION

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

November 13, 1975

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Honorable Ronald Reagan  
10960 Wilshire Boulevard  
Suite 812  
Los Angeles, California 90026

Re: CA 021-75

Dear Governor Reagan:

The Federal Election Commission is continuing its review of the allegations in the above named complaint (CA 021-75), and in particular the relationship of these expenditures filed by Citizens for Reagan. It is my assessment that proper Commission disposition of the issues raised requires the development of additional information. Accordingly, we have drafted the following questions, to which we would like responses by November 30, 1975. Your cooperation will be greatly appreciated.

(1) We note that a political committee titled Citizens for Reagan, which registered with the Commission on July 24, 1975, has been authorized by you to receive contributions and make expenditures on behalf of your candidacy for President of the United States. Are there any other similar committees operating or which you contemplate operating with your authorization? If so, please state (a) the date(s) of formation of such committee(s); (b) whether the committee(s) has (have) accepted contributions or made expenditures in your behalf.

(2) On what date was the Radio Program "Viewpoint" first produced?

(3) Please describe in full the extent of your participation in "Viewpoint." You should include in your description (a) the dates of such participation, (b) the time of day when the program was aired, and (c) a list of any new topics covered on the show between the last

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OFFICE OF GENERAL COUNSEL**

date on the list included in Appendix A in your reply brief to the complaint herein, and the date you receive this letter.

(4) Please list all contractual arrangements made by you or your authorized agents or representatives for the sale of "Viewpoint" to radio broadcasting stations, including, where appropriate, any relevant documentation. Your answer should include: (a) the person(s)/group(s) acting as your representative(s) in this matter; (b) any arrangements by which stations agree to remit to you any percentage of advertising fees; (c) the station(s)/broadcasting group to which the program was sold.

(5) Please describe in full the costs of producing "Viewpoint," identifying all persons or organizations who paid such costs and the amounts paid in each case. To what degree (if any) are these persons or organizations compensated for their investment?

(6) Are any of the monies paid to you for "Viewpoint" contributed to or commingled with funds utilized by any of the duly authorized political committees listed in question (1)? If the answer is yes, please indicate the amounts involved.

(7) Subsequent to the date(s) listed in question (1), have you appeared as a spokesman or commentator on any radio or television programs involving public affairs issues such as those discussed in "Viewpoint," for which appearance you were paid by a source other than the radio or television station or network carrying the program? If the answer to the question is yes, please list (a) the date(s) of all such appearances, (b) the topic(s) discussed, (c) the sources who made the payments to you.

We look forward to hearing from you.

Sincerely yours,

John G. Murphy, Jr.  
General Counsel

By:   
Stephen Schachman  
Assistant General Counsel  
(202) 382-3153

cc: Loren A. Smith, Esq.  
Citizens for Reagan Committee  
2021 L Street, N. W., Suite 340  
Washington, D. C. 20036

**FEDERAL ELECTION COMMISSION**  
**OFFICIAL FILE COPY**  
Office of General Counsel

77040010820

26 OCT 1976

James Horwitz, President  
Valley Publication, Inc.  
4616 West Magnolia Boulevard  
Burbank, California 91505

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

Re: MUR 021 (75)

Dear Mr. Horwitz:

On October 12, 1976, the Commission voted to terminate its inquiry into alleged violations of 2 U.S.C. §§431(f), 434(b)(9) and 441b by Ronald Reagan. The Commission determined that there was no reason to believe that the Federal Election Campaign Act of 1971, as amended, had been violated. Accordingly, the Commission intends to close its file on this matter.

A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. If you have any questions, please contact David Anderson (telephone No. 202-382-3153), the attorney assigned to this matter.

Sincerely yours,

Signed: John G. Murphy, Jr.

John G. Murphy, Jr.  
General Counsel

Enclosures

DAnderson:cfb:10/22/76  
cc: Compliance Section  
JGM  
DA

77040010021

3 6 OCT 1976

Loren A. Smith, Esquire  
General Counsel  
Citizens for Reagan  
1835 K Street, N.W.  
Washington, D.C. 20006

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

Re: MUR 021 (75)

Dear Mr. Smith:

On October 12, 1976, the Commission voted to terminate its inquiry into alleged violations of 2 U.S.C. §§431(f), 434(b)(9), and 441b by Ronald Reagan. The Commission determined that there was no reason to believe that the Federal Election Campaign Act of 1971, as amended, had been violated. Accordingly, the Commission intends to close its file on this matter.

A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. If you have any questions, please contact David Anderson (telephone No. 202-382-3153), the attorney assigned to this matter.

Sincerely yours,

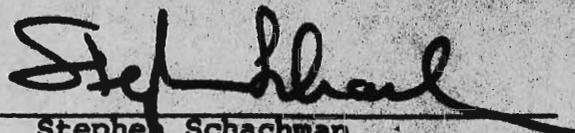
Signed: John G. Murphy, Jr.  
John G. Murphy, Jr.  
General Counsel

Enclosures

DAnderson:cfb:10/22/76  
cc: Compliance Section  
JGM  
DA

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letters dated October 8, 1975 and October 21, 1975, were mailed, Certified, Return Receipt Requested, this 21 day of October, 1975, to Honorable Ronald Reagan, 10960 Wilshire Boulevard, Suite 812, Los Angeles, California 90024.



Stephen Schachman  
Assistant General Counsel

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OFFICE OF GENERAL COUNSEL



## FEDERAL ELECTION COMMISSION

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

October 21, 1975

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Honorable Ronald Reagan  
10960 Wilshire Boulevard  
Suite 812  
Los Angeles, CA 90024

Dear Governor Reagan:

Enclosed please find a copy of our letter dated October 8, 1975, sent to you Certified Mail, Return Receipt Requested. As we received the Return Receipt without a signature and undated, I am sending you a copy of the October 8, 1975 letter to ensure that you have been properly notified of the information contained therein. You, of course, will have 10 days from the receipt of this letter to notify us if Mr. Loren Smith of the Citizens for Reagan Committee is not acting as your counsel.

Sincerely yours,

Stephen Schachman  
Assistant General Counsel

Enclosure

cc: Loren A. Smith, Esq.  
Citizens for Reagan Committee  
2021 L Street, N.W.  
Suite 340  
Washington, D. C. 20036

blc: Lan Potter  
Jack Murphy  
Drew McKay ✓  
Peter Roman  
Michael Hershman  
Stephen Schachman



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OFFICE OF GENERAL COUNSEL

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# Citizens for Reagan

## For President

SS

\*75 OCT 20 AM 9:20

Sen. Paul Laxalt  
Chairman

John P. Sears  
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan  
Treasurer

October 14, 1975

COMMENTS ON AOR 1975-72  
Pub. F.R. Sept. 24, 1975

77010010925

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

Dear Sirs:

We respectfully submit the following comments on AOR-1975-72. We hope this will be helpful to the Commission.

AOR 1975-72 raises the question of whether the Republican National Committee (RNC) can legitimately provide funds, in light of the recent federal election law amendments, for political travel by President Ford while he is a candidate for his party's presidential nomination. And further, whether these expenditures count against candidate Ford's campaign expenditure limitations under 18 U. S. C. section 608(c). It appears to our committee that several facts must be considered before a conclusion on the RNC's request can be reached.

First, President Ford is an announced and declared candidate for his party's nomination. He has, as of this date, made campaign trips and authorized a committee which has made campaign expenditures on behalf of his campaign. He indicated on a nationally televised news conference (October 9, 1975) that he hoped his political trips made on behalf of the RNC would help his election. He has made the decision to actively campaign at an earlier date than has been the customary political practice of past incumbent Presidents.

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OFFICE OF GENERAL COUNSEL

Second, Gerald R. Ford was the first individual appointed to the Vice Presidency under the provisions of the recently enacted 25th Amendment. Following the resignation of Richard M. Nixon as President, Gerald R. Ford succeeded to that office. His Vice President, Nelson A. Rockefeller, also became such by the operation of the 25th Amendment, after having been rejected for the Republican presidential nomination by the Republican National Conventions of 1964 and 1968. These facts are quite important in providing some political perspective to the relationship of the Presidency, its current occupant, and the Republican Party.

Third, there is an active political committee in existence, authorized by Governor Reagan, and registered with the Federal Election Commission, that has raised significant amounts of money from many thousands of persons in every state. This committee is actively promoting the candidacy of Governor Ronald Reagan for the Republican Party's presidential nomination.

Fourth, one of the basic purposes of the 1974 amendments to the body of federal election law is to insure that no candidate, regardless of his position or financial means, could "buy" the Presidency by means of excessive financial expenditures. To this end, the key provision of the 1974 Act is 18 U.S.C. section 608. This section imposes strict expenditure limitations on all candidates for federal office. The purpose of these limitations is, in part, to provide every candidate with an equal opportunity to present his campaign to the electorate.

Fifth, a key criticism of the new election law is that it favors incumbents in that it protects them against challengers. This is so, many feel, because a challenger can only overcome the multiple advantages of incumbency by greater campaign spending than the incumbent. It is certainly true that an incumbent President enjoys great political advantages by virtue of his official position, advantages such as government-paid travel around the country to "non-political events" and the national forum of the televised Presidential press conference (recently exempted from equal time by the Federal Communications Commission). Does he also, in a primary campaign situation, enjoy the official mantle of the party and use of its funds merely by virtue of his title?

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OFFICE OF GENERAL COUNSEL

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With these basic factual referents in mind we submit the following analysis of the RNC's request:

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Traditionally an incumbent President seeking reelection has been considered unchallengeable within his own political party for his party's nomination. No incumbent President in this century has been denied renomination by his party. In fact, so strong is the traditional role of the incumbent President that only twice in this century has one been defeated in a general election. In 1975 and 1976 the situation in this country is and will be unique politically. The incumbent President and Vice President of the Republican Party have never faced the national electorate or, in the case of President Ford, the Republican Party membership as expressed through its national party convention. Thus, President Ford is clearly not in the same position as former Republican Party presidents were. In fact, it is clear that one of the important factors in the 1976 nomination contest is the current lack of a nationally chosen or mandated Republican Party "leader" in the traditional sense. The Republican Party's only elected national spokesman is its chairman, Mrs. Mary Louise Smith.

Thus, while Gerald R. Ford is legally and constitutionally the Chief Executive, with all the President's powers and privileges, and entitled to all the traditional support and respect due our Head of State, he does not stand in the traditional role an incumbent President has had as the titular leader of the Republican Party. Further, actions that tend not only to place him in such a role but also to emphasize it directly benefit his campaign for the party's nomination for President. In fact, a key selling point of the President's campaign has been his incumbency. To argue that his campaign for the nomination should not be hindered because of his activities as "party leader," is very like the boy, who having killed his parents, says he should not be punished because he is an orphan.

Only the 1976 nominee of the Republican National Convention will be the party's chosen leader.

The 1974 amendments to federal election law mandate strict expenditure limitations for all federal candidacies. They do this separately with respect to candidates for the nomination of

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for the candidates of parties in general elections. Further, the law embodies a very expansive and comprehensive definition of contributions and expenditures so as to close nearly every potential loophole left in past legislative attempts at regulation. This legislative plan clearly manifests the intent of Congress, as ratified by President Ford in signing the law, to establish a system of electoral regulation that would control, limit and disclose all expenditures that promote and influence a federal campaign. It cannot be seriously argued that political trips made by a declared candidate, as "leader" of a political party, directed at those very individuals who will ultimately choose the party's nominee, does not directly benefit and influence and promote such candidate's campaign. If President Ford's campaign is not charged with the cost of trips made as the "leader" of the Republican Party under these circumstances then section 608 is not the comprehensive expenditure limitation section it clearly was intended to be.

If the Commission's interpretation of this new law is not to favor incumbents over other candidates and if the traditional relationship of the Presidency to its own political party is not to become a vehicle for allowing the new election law to be gravely distorted then the RNC's planned actions must be modified. It would certainly be divisive within the Republican Party if the RNC were to bestow a non-reportable and uncontrolled election benefit on only one candidate for the party's nomination. This would raise constitutional questions of whether 18 U.S.C. section 608's effect, if not its purpose, is to stifle legitimate political challenges to incumbents from within their own parties.

If the party provided truly equal treatment to all candidates for its nomination then few serious objections could be raised. Then, the party would not be promoting a campaign but would be providing its national membership with a better opportunity for seeing all its candidates. It would be performing a legitimate informational function by helping members to make more intelligent choices among the candidates. While a TV appearance by one candidate benefits his campaign, a program presenting all of the candidates equally benefits the electorate. Of course, a fair and equitable mechanism would have to be worked out to determine who the individuals are who are legitimately entitled to such consideration. But this should not be difficult. A simple criterion, like qualification for federal matching funds, would provide an adequate method for discriminating between bona fide candidates and other

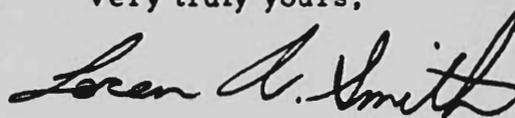
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If the RNC chooses not to consider such an option it seems to our committee that its current proposal raises serious questions under both the contribution limitations and the expenditure limitations of section 608. If party "leadership" is to confer substantial financial electoral benefits it should be both formalized and brought within the guidelines of the election law. Governor Reagan has over the past years raised millions of dollars for the Republican Party at numerous party events across the nation and by direct mail. He has done this as a member of the party who deeply believes in its principles. Our committee feels that the party treasury, built up in the interests of the whole party, should not become a vehicle for any single candidate in contest for the party's nomination, regardless of any office he may hold.

In 1975 and 1976 a new federal election law prevails. Examples of past practice no longer suffice to justify present actions. We hope our comments will aid the Federal Election Commission in deciding this question.

Very truly yours,



Loren A. Smith  
General Counsel

LAS:jf

cc: Hon. Thomas B. Curtis  
Hon. Neil Staebler  
Hon. Joan Aikens  
Hon. Thomas E. Harris  
Hon. Vernon W. Thomson  
Hon. Robert O. Tiernan  
Hon. Benton L. Becker  
Hon. Mary Louise Smith

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

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CITIZENS FOR REAGAN  
2021 L St., N.W., Suite 340  
Washington, D.C. 20036

75 OCT 14 11 1:37

Federal Election Commission  
1525 K Street, N.W.  
Washington, D.C. 20463  
Attn: Campaign Expenditures  
(Presidential)

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

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VINSON, ELKINS, SEARLS, CONNALLY & SMITH  
ATTORNEYS AT LAW  
FIRST CITY NATIONAL BANK BUILDING  
HOUSTON, TEXAS 77002

LONDON OFFICE  
47 CHARLES STREET, BERNLEY SQUARE  
LONDON W1K 7PD, ENGLAND  
TELEPHONE: 7230  
CABLE ADDRESS: VESB  
TELEX: 82449

TELETYPE UNIT  
13 OCT 11 10:43

WASHINGTON OFFICE  
1701 PENNSYLVANIA AVENUE, N.W.  
SUITE 1200  
WASHINGTON, D. C. 20006  
TELETYPE UNIT  
CABLE ADDRESS: VESB  
TELEX: 82449

October 9, 1975

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

Re: Vital Issues of America, Inc.  
-- Withdrawal of Registration

Gentlemen:

On July 31, 1975, we filed a Registration Form and Statement of Organization on behalf of Vital Issues of America, Inc. and furnished copies to the Office of the Secretary of State of the State of Texas.

On July 31, 1975, we requested the opinion of Mr. John G. Murphy, Jr., General Counsel of the Federal Election Commission, whether the prohibition contained in §610, Title 18, U.S.C., against corporate contributions or expenditures in connection with any election would apply to a nonprofit corporation such as Vital Issues of America, Inc. By letter dated September 26, 1975, Mr. Murphy advised us that the prohibition contained in §610 applies to all corporations, other than one which is essentially a political committee as defined in 18 U.S.C. Section 591(d), citing Advisory Opinion 1975-16. In his letter, Mr. Murphy noted that Vital Issues of America, Inc. had attempted to register as a Section 437a committee and that Section 437a had been held unconstitutional by decision of the U. S. Court of Appeals for the D. C. Circuit on August 15, 1975, thus possibly obviating the need for registration by Vital Issues of America, Inc. The pertinent portion of Mr. Murphy's opinion states:

On the other hand, we note that Vital Issues of America has filed a form with the Commission attempting to register as a §437a

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Federal Election Commission  
October 9, 1975  
Page 2

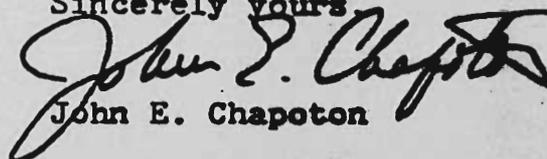
committee. This would appear to indicate that your organization views itself as a group "whose only connection with the elective process arises from completely nonpartisan discussion on issues of public importance" (Buckley v. Valeo, \_\_\_ F. 2d \_\_\_, (D.C. Cir., Aug. 15, 1975), p. 1551). If this is the case, it is clear that the Buckley decision obviates the need for Vital Issues to register with the Commission since 18 U.S.C. 437a was therein declared unconstitutional. If that is the nature of the corporation, however, it would be subject to the prohibitions on contributions and expenditures set forth in §610. Vital Issues, may, however, set up a separate segregated political fund, as is permitted by §610. All individuals contributing to that fund would be subject to the limitations set forth in 18 U.S.C. §608(b), and the fund would be subject to the reporting requirements and the contribution and expenditure limitations of the Act.

We have now determined, based on the decision of Buckley v. Valeo, as interpreted by the General Counsel of the Commission, that Vital Issues of America, Inc. is not required to register with the Commission. Therefore, we hereby request that our Registration Form and Statement of Organization mailed to you on July 31, 1975 (as well as the earlier Registration Form and Statement of Organization mailed to you on July 30, 1975) be withdrawn.

If we must take further steps to effectuate the withdrawal of our earlier registration with the Commission, please advise us.

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

Sincerely yours,

  
John E. Chapoton

285:77D

77040010832

# Valley Publication, Inc.

4816 W. MAGNOLIA BLVD.

BURBANK, CALIFORNIA, 91506

(213) 761-5440

RECEIVED  
FEDERAL ELECTION  
COMMISSION



Delivered to  
DEPENDENT INQUIRY  
AND  
INVESTIGATIVE REPORTING

OCT 14 PM 12:00

October 10, 1975

Gordon Andrew McKay  
Assistant Staff Director  
For Disclosure and Compliance  
Federal Election Commission  
Washington, DC 20463

Dear Mr. McKay:

In regard to your response (copy enclosed) to my complaint, you stated Mr. Reagan and Mr. Buchanan had ten days to answer, after they received their copy of the complaint. It is now over 40 days. Could you please respond.

Thanks,

James Horwitz, President  
Valley Publications, Inc.

HJH/ge

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OFFICE OF GENERAL COUNSEL

77040010833

**VALLEY PUBLICATIONS INC.**

4616 W. MAGNOLIA BLVD.

P. O. BOX 1115

BURBANK, CALIF. 91505

77040010834

**FEDERAL ELECTION COMMISSION  
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Gordon Andrew McKay  
Assistant Staff Director  
For Disclosure and Compliance  
Federal Election Commission  
Washington, DC 20463

# Citizens for Reagan<sup>®</sup>

## For President

13 OCT 14 1975

Sen. Paul Laxalt  
Chairman  
John P. Sears  
Exec. Vice Ch.  
George Cook  
H. R. Gross  
Louie B. Nunn  
Mrs. Stanhope C. Ring  
Henry Buchanan  
Treasurer

October 9, 1975

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

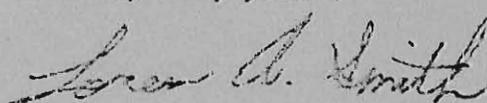
Attention: Campaign Expenditures (Presidential)

Dear Sirs:

We are today filing the enclosed report in compliance with federal election statutes, specifically 2-U.S.C. section 434. We have tried to fully and completely comply with all Commission guidelines. If, however, there are any questions or any further information is desired please let us know as soon as possible.

On the basis of our current computer records as of September 30, 1975, our committee believes that it has fully met the initial qualification for federal matching funds under Chapter 96 of Title 26 of the United States Code. We stand ready at this time to begin the process of such certification by the Commission. We therefore request instructions from the Commission as to current auditing requirements in this area.

Very truly yours,



Loren A. Smith  
General Counsel

LAS:jj  
Enclosure

CERTIFIED MAIL

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# FEDERAL ELECTION COMMISSION

75 OCT 14 PM 1:37

WASHINGTON, D.C. 20463

## REPORT OF RECEIPTS AND EXPENDITURES

FOR A

POLITICAL COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR NOMINATION OR ELECTION TO

FEDERAL OFFICE

Citizens for Reagan

(Full Name of Committee)

2021 L Street, N.W. Suite 340

(Street)

Washington, D.C. 20036

(City, State, ZIP code)

Check if New Address

### TYPE OF ELECTION

PRIMARY     GENERAL     SPECIAL     RUNOFF     CONVENTION OR CAUCUS

### TYPE OF REPORT

10 DAY PRE-ELECTION     30 DAY POST-ELECTION

APRIL 10     AMENDMENT TO \_\_\_\_\_ REPORT

JULY 10     SUSPENSION

OCTOBER 10     TERMINATION

JANUARY 10

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE EXAMINED THIS REPORT INCLUDING THE STATEMENTS, AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE, CORRECT, AND

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*Henry M. Buchanan*

Signature of Treasurer of Committee

OCTOBER 8, 1975

Date

RETURN COMPLETED REPORT AND ATTACHMENTS TO:

FEDERAL ELECTION COMMISSION  
1325 K STREET, N.W.  
WASHINGTON, D.C. 20463

7040000836

**SUMMARY PAGE**

Name of Committee Citizens for Reagan

REPORT COVERING PERIOD FROM July 15, 1975 THRU September 30, 1975

	Column A— This period	Column B— Calendar year to date
<b>SECTION A - RECEIPTS:</b>		
<b>Part 1. Individual contributions:</b>		
a. Itemized (use schedule A*) .....	\$ 133,449.10	
b. Unitemized. ....	\$ 262,343.77	
Total individual contributions	\$ 395,792.87	\$ 395,792.87
<b>Part 2. Sales and collections:</b>		
Itemized (use schedule B and as necessary schedule A*) .....	\$ none	\$ none
<b>Part 3. Loans received:</b>		
a. Itemized (use schedule A*) .....	\$ none	
b. Unitemized .....	\$ none	
Total loans received	\$ none	\$ none
<b>Part 4. Other receipts (refunds, rebates, interest, etc.):</b>		
a. Itemized (use schedule A*) .. <u>In-Kind Contributions</u> .....	\$ 669.79	
b. Unitemized .....	\$ none	
Total other receipts	\$ 669.79	\$ 669.79
<b>Part 5. Transfers in:</b>		
Itemize all (use schedule A*) .....	\$ none	\$ none
<b>TOTAL RECEIPTS</b>	<b>\$ 396,462.66</b>	<b>\$ 396,462.66</b>

<b>SECTION B - EXPENDITURES:</b>		
<b>Part 6. Void: Use Part 9.</b>		
<b>Part 7. Expenditures for personal services, salaries, and reimbursed expenses:</b>		
a. Itemized (use schedule D*) .....	\$ 20,519.05	
b. Unitemized. ....	\$ 103.67	
Total expenditures for personal services, salaries, and reimbursed expenses	\$ 20,622.72	\$ 20,622.72
<b>Part 8. Loans made:</b>		
a. Itemized (use schedule E*) .....	\$ none	
b. Unitemized .....	\$ none	
Total loans made	\$ none	\$ none
<b>Part 9. Media and other expenses:</b>		
a. Itemized (use schedule C*) .....	\$ 273,658.33	
b. Unitemized .....	\$ 918.53	
Total other expenditures	\$ 274,576.86	\$ 274,576.86
<b>Part 10. Transfers out:</b>		
Itemize all (use schedule C*) .. <u>In-Kind Contributions</u> .....	\$ 669.79	\$ 669.79
<b>TOTAL EXPENDITURES</b>	<b>\$ 295,869.37</b>	<b>\$ 295,869.37</b>

<b>SECTION C - CASH BALANCES:</b>		
Cash on hand at beginning of reporting period .....	\$ -0-	
Add total receipts (section A above) .....	\$ 396,462.66	
Subtotal .....	\$ 396,462.66	
Subtract total expenditures (section B above) .....	\$ 295,869.37	
Cash on hand at close of reporting period .....	\$ 100,593.29	

<b>SECTION D - DEBTS AND OBLIGATIONS:</b>		
Part 11. Debts and obligations owed to the committee (use schedule F*) .....	\$	
Part 12. Debts and obligations owed by the committee (use schedule F*) .....	\$ 190,722.82	

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\*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

SCHEDULE A

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PRINCIPAL PLACE OF BUSINESS	AMT. OF RECEIPT THIS PERIOD
07/15/75	MR JOSEPH M CROSBY 316 ALTA VISTA S PASADENA CA 91030		\$1,000.00
07/15/75	MR WAYNE BARTHOLOMEW 1604 REDWOOD LN DAVIS CA 95616		\$1,000.00
07/17/75	MR JOHN GARABEDIAN 3104 HUNTINGTON BLV FRESNO CA 93702		\$1,000.00
07/17/75	MR JOE M ROGERS PO BOX 7051 NASHVILLE TN 37210		\$1,000.00
07/17/75	MR PAUL M DANIELL WATKINS C DANIELL PO BOX 372 ATLANTA GA 30301		\$1,000.00
07/17/75	R E JEWELL BAILEYS CROSS PDS PO BOX 1156 ARLINGTON VA 22201		\$1,000.00
07/18/75	MR WILLIAM B CANNON PO BOX 2 DECATUR IL 62525		\$1,000.00
07/18/75	MR ROBERT ARTHUR 4300 CHEROKEE LN BEVERLY HILLS CA 90210		\$500.00
07/21/75	MRS MARY P ALLES 1316 W HAVEN RD SAN MARINO CA 91108		\$1,000.00

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ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

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07/21/75	MR JACK M ROTH 4 OSODAR LN BRADBURY CA 91010	300 BRADBURY RD MONROVIA CA 91016 FARMING CITRUS	\$1,000.00
07/21/75	MRS FRANK R SEAVER 20 CHESTER PL LOS ANGELES CA 90007		\$1,000.00
07/21/75	MR PHIL ABRAMS 32 PICKWICK RD WEST NEWTON MA 02165		\$1,000.00
07/21/75	ELEANOR KING 801 TOLITA AVE CORONADO CA 92118		\$1,000.00
07/22/75	MR G L HANEY MD CULLOUGH 300 OLIVE HILL LN WOODSIDE CA 94062		\$1,000.00
07/22/75	E T KLASSEN 7224 APPROVED RD BETHESDA MD 20834		\$500.00
07/22/75	MR FRED J RUSSELL PO BOX 54228 LOS ANGELES CA 90054		\$1,000.00
07/22/75	MR JACK L COURTEMANCHE 621 S LORRAINE BLV LOS ANGELES CA 90005		\$1,000.00
07/22/75	MR & MRS PAT BOONE 9255 SUNSET BLV LOS ANGELES CA 90069		\$200.00

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ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PRINCIPAL PLACE OF BUSINESS	AMT. OF RECEIPT THIS PERIOD
07/23/75	MRS CHARLES COOK 430 MADELINE DR PASADENA CA 91105		\$1,000.00
		\$1,000.00	
07/25/75	MR CHARLES E COOK 430 MADELINE DR PASADENA CA 91105	15421 E GALE AVE INDUSTRY CA 91745 CORPORATE EXECUTIVE	\$1,000.00
		\$1,000.00	
07/25/75	MR & MRS LLOYD B HOLAN 239 N BRISTOL AVE LOS ANGELES CA 90049	EBM 132 S RODEO DR BEVERLY HILLS CA 90212 ACTOR	\$1,000.00
		\$1,000.00	
07/25/75	MR SHERMAN CHICKERING 854 FRANCISCO ST SAN FRANCISCO CA 94109	111 SUTTER ST SAN FRANCISCO CA 94104 ATTORNEY	\$1,000.00
		\$1,000.00	
07/23/75	HOLMES FLYTLE 637 S HUSSON AVE LOS ANGELES CA 90005	145 N LA BREL AVE LOS ANGELES CA 90036 AUTOMOBILE DEALER	\$1,000.00
		\$1,000.00	
07/23/75	MR REESE L MILNER 706 N CANYON DR BEVERLY HILLS CA 90210		\$1,000.00
		\$1,000.00	
07/23/75	MRS. REESE L. MILNER 706 N CANYON DR BEVERLY HILLS CA 90210	9470 SANTA MONICA BLV BEVERLY HILLS CA 90210 SELF	\$1,000.00
		\$1,000.00	
07/23/75	OVIDE E DE ST AUBIN NORTAM ACRES RT 3 SILVER CITY NC 27344		\$500.00
		\$500.00	
07/23/75	MR FRANK ROUSE PO BOX 3449 KINSTON NC 28501		\$1,000.00
		\$1,000.00	

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SCHEDULE A

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

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07/28/75	CORBETT QUINN, MD MAGNOLIA NC 28453		\$500.00
07/28/75	W G BROTTON 814 CHURCH ST SCOTLAND NECK NC 27874		\$500.00
07/28/75	R W JONES RT 3 BENSON NC 27504		\$300.00
07/28/75	MR J A REECE PO DRAWER 667 CLARKSVILLE TN 37040		\$250.00
07/28/75	MR E J STANLEY JR 4100 LODGE RD MONROE LA 71201		\$500.00
07/28/75	MR WILLIAM B KERAN 2417 KATHERINE DR MONROE LA 71201		\$500.00
07/29/75	MRS ROBERT H ADAMS, JR PO BOX 468 VALLEY CENTER CA 92092		\$150.00
07/29/75	MR CHARLES E BROWN BOX 2432 MONROE LA 71201		\$500.00
07/29/75	MR EDWIN W THOMAS 447 FAIRHILLS DR SAN RAFAEL CA 94901		\$200.00

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CITIZENS FOR REAGAN

PART NO. 1

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07/29/75	MR EDWIN SEIPP, JR 49 TUSCALOOSA AVE ATHERTON CA 94025		\$1,000.00
07/30/75	MR JAMES E LYON 2001 KIRBY DR #1300 HOUSTON TX 77019		\$1,000.00
07/30/75	MR EVETTS HALEY, JR 228 COMMERCIAL BANK MIDLAND TX 79701		\$500.00
07/30/75	MARY S HAZELWOOD BOX 505 3425 S MERR LAB RD ADA OK 74000		\$300.00
07/30/75	ROSALIND K HALEY 5224 16TH LUBBOCK TX 79416		\$1,000.00
07/30/75	J EVETTS HALEY PO BOX 990 CANYON TX 79015		\$750.00
08/01/75	MR MORRIS B PENDLETON 2433 LEONIS BLV #309 VERNON CA 90058		\$250.00
08/01/75	MR DAVID H MARCOLIS 1196 ABRIGO RD PALM SPRINGS CA 92262		\$250.00
08/01/75	MR JEREMIAH HILBANK 620 ROUND HILL GREENWICH CT 06830	60 E 42ND ST NEW YORK NY 10017 INVESTMENTS	\$1,000.00

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ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

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07/29/75	MR EDWIN SEIPP, JR 49 TUSCALOOSA AVE ATHERTON CA 94025		\$1,000.00
07/30/75	MR JAMES E LYON 2001 KIRBY DR #1300 HOUSTON TX 77019		\$1,000.00
07/30/75	MR EVETTS HALEY, JR 228 COMMERCIAL BANK MIDLAND TX 79701		\$500.00
07/30/75	MARY S HAZELWOOD BOX 505 3425 S KERR LAB RD ADA OK 74300		\$300.00
07/30/75	ROSALIND H HALEY 5224 16TH LUBBOCK TX 79416		\$1,000.00
07/30/75	J EVETTS HALEY PO BOX 390 CANYON TX 79015		\$750.00
07/01/75	MR MORRIS B PENDLETON 2033 LEDNIS BLV #309 VERNON CA 90058		\$250.00
07/01/75	MR DAVID H MARGOLIS 1196 ABRIGO RD PALM SPRINGS CA 92262		\$250.00
07/01/75	MR JEREMIAH MILBANK 620 ROUND HILL GREENWICH CT 06930	60 E 42ND ST NEW YORK NY 10017 INVESTMENTS	\$1,000.00

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ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PRINCIPAL PLACE OF BUSINESS	AMT. OF RECEIPT THIS PERIOD
08/04/75	MR E W BROWN, JR PO BOX 400 GRANGE TX 77630		\$1,000.00
08/04/75	MR JOSEPH COORS 100 CASTLE ROCK DR GOLDEN CO 80401	ADOLPH COORS CO GOLDEN CO 80401 EX VICE PRES	\$1,000.00
08/04/75	P A B WIDENER PO BOX 979 SHERIDAN WY 82801		\$1,000.00
08/04/75	HOLLY COORS 100 CASTLE ROCK DR GOLDEN CO 80401		\$1,000.00
08/04/75	LUCY S RITTON 10375 WILSHIRE BLV #A LOS ANGELES CA 90024	196 EL CAMINO BEVERLY HILLS CA 90212 INVESTMENTS	\$1,000.00
08/05/75	MR LEIGH H BATTSON 10375 WILSHIRE BLV #A LOS ANGELES CA 90024	196 EL CAMINO BEVERLY HILLS CA 90212 BUSINESS MANAGER	\$1,000.00
08/05/75	MR FRANK BUTTERWORTH 640 TUTTLE AVE MT CARMEL CT 06128		\$1,000.00
08/05/75	MR W LIPSCOMB DAVIS DAVIS CABINET CO NASHVILLE TN 37205		\$200.00
08/05/75	MR ELLICE MC DONALD, JR BOX 92 INVERGARRY MONTCHANIN DE 19710		\$1,000.00

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03/06/75	MRS EDMEE R MORSMAN 40 BRIDLE TRAIL DARIEN CT 06820		\$1,000.00
		\$1,000.00	\$1,000.00
03/06/75	MR J J MORSMAN, JR 40 BRIDLE TRAIL DARIEN CT 06820		\$1,000.00
		\$1,000.00	\$1,000.00
03/02/75	MR CARL GILLIS ADRIAN GA 31002		\$250.00
		\$250.00	\$250.00
03/03/75	DR JULES STEIN 1330 ANGELO DR BEVERLY HILLS CA 90213	UNIVERSAL CITY PLAZA UNIVERSAL CITY CA 91608 FOUNDER MCA INC	\$1,000.00
		\$1,000.00	\$1,000.00
03/03/75	MRS DOTIS STEIN 1330 ANGELO DR LOS ANGELES CA 90213		\$1,000.00
		\$1,000.00	\$1,000.00
03/03/75	MR MIKE CURB 1920 CAPLA RIDGE BEVERLY HILLS CA 90210	9255 SUNSET BLV HOLLYWOOD CA MIKE CURB PRODUCTIONS	\$1,000.00
		\$1,000.00	\$1,000.00
03/03/75	MR GAVIN S HERBERT, JR 2525 DUPONT DR ORANGE CA 92664		\$500.00
		\$500.00	\$500.00
03/03/75	MR LEO H GRIFFIN 33 EDGEHILL RD LITTLE ROCK AR 72207		\$1,000.00
		\$1,000.00	\$1,000.00
07/11/75	M E MOSES 5521 NANETA DR DALLAS TX 75209	PO BOX 24535 DALLAS TX 75224 MERCHANT	\$200.00
		\$200.00	\$200.00

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09/11/75	MR CHARLEY BARTLETT 1414 E BRYAN SAPULPA OK 74066	BARTLETT-COLLINS CO SAPULPA OK 74066 GLASSWARE MFG	\$100.00
		\$350.00	
08/11/75	MR THOMAS G SOMERMEIER, JR 9599 SUNSET BLV BEVERLY HILLS CA 90210		\$1,000.00
		\$1,000.00	
08/11/75	MR JOSEPH A GARCIA 3761 FAIRVIEW RD HOLLISTER CA 95023	3761 FAIRVIEW RD HOLLISTER CA 95023 LIVESTOCK FURS SPORTING GOODS	\$200.00
		\$200.00	
08/10/75	MR EDWARD D WILLIAMS PO BOX 2107 MOBILE AL 36601		\$200.00
		\$200.00	
08/08/75	MRS JOHN S LEHMANN 10 APPLE TREE LN ST LOUIS MO 63124		\$100.00
		\$1,000.00	
08/07/75	W K WALLRIDGE PO BOX 294 SHORT HILLS NJ 07078		\$1,000.00
		\$1,000.00	
08/12/75	MISS MARGARET BAKER PO BOX 967 SPRINGFIELD OH 45501	PO BOX 967 SPRINGFIELD OH 45501 MANUFACTURER	\$300.00
		\$300.00	
08/12/75	MR W H EVANS 1201 UNION COMM BLDG CLEVELAND OH 44115	1201 UNION COMM BLDG CLEVELAND OH 44115 INVESTMENTS	\$250.00
		\$250.00	
08/12/75	MISS FLORENCE E COOKE 6030 BELLEVUE LA JOLLA CA 92037		\$100.00
		\$200.00	

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12/12/75	MR CHARLEY BARTLETT 1414 E BRYAN SAPULPA OK 74066	BARTLETT-COLLINS CO SAPULPA OK 74066 GLASSWARE MFG	\$250.00
		\$350.00	
12/12/75	I A BIRD SANCO RT ROBERT LEE TX 76945		\$300.00
		\$300.00	
12/12/75	MRS ELLA ATWELL 3349 6TH PORT ARTHUR TX 77640		\$200.00
		\$200.00	
12/12/75	MRS FRIEDA WITTWER BOX 185-4 RT 1 BAYSIDE CA 95524		\$250.00
		\$250.00	
12/12/75	FANNIE HODGE MC KENZIE 804 N ALPINE DR BEVERLY HILLS CA 90210		\$100.00
		\$200.00	
12/12/75	MS ALICE C TYLER 661 STONE CANYON BEL AIR CA 90024		\$300.00
		\$300.00	
12/13/75	MR ROBERT C MINZELER, JR MINZELER STAMPING CO MONTPELIER OH 43543		\$1,000.00
		\$1,000.00	
12/13/75	MRS JOHN S LEHMANN 10 APPLE TREE LN ST LOUIS MO 63124		\$100.00
		\$100.00	
12/13/75	MR CARL GILLIS, JR ADRIAN GA 31002		\$250.00
		\$250.00	

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7/14/75	MR HAL WALLIS 515 S MAPLETON DR LOS ANGELES CA 90024	UNIVERSAL CITY CA 91608 PRODUCER FILMS	\$500.00 \$500.00
7/14/75	MR DEAN A WATKINS 3333 HILLVIEW AVE PALO ALTO CA 94304		\$1,000.00 \$1,000.00
7/16/75	MR ARRON R CHESTNUT, JR 2305 ANITA LN MONROE LA 71201		\$150.00 \$150.00
7/16/75	MR JOHN D MULLENS 1711 SPENCER AVE MONROE LA 71201		\$125.00 \$125.00
7/16/75	MR MARGEN H COLLET PT 1 BOX 114 FARMERVILLE LA 71241		\$200.00 \$200.00
7/16/75	MARY RIVES MOORE 200 RIVER COKES DR WEST MONROE LA 71291		\$200.00 \$200.00
7/16/75	MR HOWARD GRIFFIN C/O GSR BOATS W MONROE LA 71291		\$250.00 \$250.00
7/16/75	ALICE G WALLACE 93 PROSPECT ST FITCHBURG MA 01420		\$1,000.00 \$1,000.00
7/16/75	MR GEORGE R WALLACE 93 PROSPECT ST FITCHBURG MA 01420	470 MAIN ST FITCHBURG MA 01420 RETIRED	\$1,000.00 \$1,000.00

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7/16/75	MR MATT LAWSON 14311 MULHOLLAND DR LOS ANGELES CA 90024		\$1,000.00
7/18/75	MRS WM E BOEING, JR 140 LAKE WASH BLV E SEATTLE WA 98112		\$1,000.00
7/19/75	B B BLAIR 704 ATLAS LIFE BLDG TULSA OK 74103		\$250.00
7/19/75	MR HENRY L STAMBACH 136 MORADA LN SANTA BARBARA CA 93105		\$200.00
7/19/75	MR HERBERT F KRECHKEHEFER PO BOX 1116 SCOTTSDALE AZ 85252		\$500.00
7/19/75	MR & MRS W W MC KINLEY PO BOX 471 SAN JUAN CA 96875	ARMSTRONG AVE IRVINE CA MC KINLEY EQUIP CORP	\$400.00
7/19/75	E A SNOW 2444 MADISON RD #1210 CINCINNATI OH 45208		\$500.00
7/19/75	MR GORDON W REED 100 CLAPBOARD RDG RD GREENWICH CT 06830	GREENWICH CT 06830 CHAIRMAN FINANCE COMMITTEE	\$1,000.00
7/18/75	MR WM M B LOVE 8 PORTLAND PL ST LOUIS MO 63108	2300 WESTERN FED BLDG DENVER CO 80202 INVESTOR	\$1,000.00

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ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

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7/18/75	MR ARTHUR A SCHUPP 4650 E STATE ST SAGINAW MI 48603		\$1,000.00
7/18/75	T SEWELL HINES 2917 ILLINOIS BOX 988 BILLINGS MT 59103	14 N 30TH ST BILLINGS MT 59101 EXECUTIVE-RANCHER	\$200.00
8/19/75	MR LARRY W GODWIN PO BOX 1137 DUNN NC 28334		\$500.00
8/19/75	MR F K WEYERHAEUSER 294 SUMMIT AVE ST PAUL MI 55102		\$500.00
8/19/75	MRS CAROLINE GOOD PO BOX 436 WILLIAMSON WV 26661		\$500.00
8/19/75	MR WILLIAM L RUTHERFORD 4101 PROSPECT RD PEORIA HTS IL 61614	4901 PROSPECT RD PEORIA HTS IL 61614 ATTORNEY	\$250.00
8/19/75	MR EVERETT BAYES 501 SOUTHFIELD RD SHREVEPORT LA 71106		\$1,000.00
8/19/75	MR JOHN P GNAU, JR BLOOMFIELD HLS MI 48013		\$200.00
8/19/75	J B PATTERSON PO BOX 246 PATTERSON CA 95363		\$500.00

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08/19/75	DR ROBERT H ANDERSON 15 CLUB VIEW LN ROLLING HLS EST CA 90274	9841 AIRPORT BLV MARI LOS ANGELES CA 90095 ENGINEER-EXECUTIVE PRES	\$250.00 \$250.00
08/19/75	MR HARWOOD WARRINER PO BOX 217 SARATOGA CA 95070		\$500.00 \$500.00
08/20/75	MR HAROLD RANSBURG HANSBURG CORP PO BOX 8320 INDIANAPOLIS IN 46208		\$1,000.00 \$1,000.00
08/20/75	MR LLOYD NOBLE 400 LINCOLN CTR ARMORE OK 73401		\$1,000.00 \$1,000.00
08/20/75	MR DON R HUGHES RR 4 BOX 38-A ENID OK 73701		\$500.00 \$500.00
08/20/75	MR HOWARD BUTCHER, 3RD 1500 WALNUT ST PHILADELPHIA PA 19102		\$500.00 \$500.00
08/21/75	MR TATNALL L HILLMAN 422 BELROSE LN RADNOR PA 19087		\$1,000.00 \$1,000.00
08/21/75	MR FRANK H TERPELL 1715 COMMERCE BK BLDG KANSAS CITY MO 64106		\$250.00 \$250.00
08/22/75	MR LELAND K WHITTIER 1300 W FOURTH ST LOS ANGELES CA 90017		\$1,000.00 \$1,000.00

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08/22/75	MR N PAUL WHITTIER 1300 W 4TH ST LJS ANGELES CA 90017		\$1,000.00
		\$1,000.00	
08/22/75	HELEN W WOODWARD 1300 W 4TH ST LOS ANGELES CA 90017		\$1,000.00
		\$1,000.00	
08/22/75	MR ROBERT A NORDSKOG 19135 KAREN DR TARZANA CA 91356	16000 STRATHERN ST VAN NUYS CA 91406 CCRP PRESIDENT	\$500.00
		\$500.00	
08/22/75	MRS LELAND K WHITTIER 1300 W 4TH ST LOS ANGELES CA 90017		\$1,000.00
		\$1,000.00	
08/22/75	OLIVE H WHITTIER 1300 W 4TH ST LOS ANGELES CA 90017		\$1,000.00
		\$1,000.00	
08/25/75	W A STOCKARD 903 HOUSTON NTRL GAS HOUSTON TX 77002		\$500.00
		\$500.00	
08/25/75	MR GEORGE W STRAKE, JR 3300 GULF BLG HOUSTON TX 77002		\$500.00
		\$500.00	
08/25/75	MRS CLAUDE C HARNON 2440 E 28TH TULSA OK 74114		\$500.00
		\$500.00	
08/25/75	H J PORTER 1111 HOUSTON CLUB BLG HOUSTON TX 77002		\$500.00
		\$500.00	

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08/25/75	MR WELDON H SMITH 1228 BANK OF THE SW HOUSTON TX 77002		\$500.00
08/25/75	MR LEO LINBECK, SR PO BOX 22500 HOUSTON TX 77027		\$200.00
08/25/75	MR JAMES MARTIN HILL, JR 4655 WILD INDIGO HOUSTON TX 77027		\$1,000.00
08/25/75	H E CHILES BOX 186 FT WORTH TX 76101	PO BOX 186 FT WORTH TX 76101 PRES & CEO WESTERN CO	\$500.00
08/25/75	MR PAUL WISE SUITE 1905 BK OF THE SOUTHWEST HOUSTON TX 77002		\$500.00
08/25/75	W H COCKE PO BOX 483 HOUSTON TX 77001		\$500.00
08/25/75	MRS HENRY BRAUN 1585 ORLANDO RD PASADENA CA 91106		\$500.00
08/25/75	MR HUGH G CHATHAM CHATHAM MANUFACTURING CO PO BOX 620 ELKIN NC 28621	CHATHAM MANUFACTURING ELKIN NC 28621 CHAIRMAN OF THE BOARD	\$1,000.00
08/27/75	MR HARRY DICKINSON PO BOX 6206 BIRMINGHAM AL 35217	RED HOLLOW RD BIRMINGHAM AL 35217 OWNER/CHIEF EXECUTIVE OFFICER	\$200.00

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1/19/75	DR ROBERT H ANDERSON 15 CLUB VIEW LN ROLLING HLS EST CA 90274	9841 AIRPORT BLV M91 LOS ANGELES CA 90095 ENGINEER-EXECUTIVE PRES \$250.00	\$250.00
1/19/75	MR HARWOOD WARRINER PO BOX 217 SARATOGA CA 95070		\$500.00
1/20/75	MR HAROLD RANSBURG HANSBURG CORP PO BOX 8820 INDIANAPOLIS IN 46208		\$1,000.00
1/20/75	MR LLOYD NOBLE 400 LINCOLN CTR ARDMORE OK 73401		\$1,000.00
1/20/75	MR DON R HUGHES RT 4 BOX 38-A ENID OK 73701		\$500.00
1/20/75	MR HOWARD BUTCHER, 3RD 1500 WALNUT ST PHILADELPHIA PA 19102		\$500.00
1/21/75	MR TATHALL L MILLMAN 422 BELROSE LN RAUNDR PA 19087		\$1,000.00
1/21/75	MR FRANK W TAYLOR 1715 CUMBERLAND DR SW KANSAS CITY MO 64108		\$250.00
1/21/75	MR ISLAND M. WILKINSON 1300 W. BANCROFT ST LOS ANGELES CA 90017		\$1,000.00

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08/28/75	MR C E KOCH APT 1112 4100 GALT OCEAN DR FORT LAUDERDALE FL 33308		\$500.00
08/28/75	GLADYS P BENDETSSEN 2918 GARFIELD TER NW WASHINGTON DC 20008		\$250.00
08/28/75	J E BOSWELL INDEPENDENT ST CO LEBANON MO 65536	INDEPENDENT STAVE CO LEBANON MO 65536 PRESIDENT AND OWNER	\$200.00
08/28/75	N H NOYES 307 E MCCARTHY ST INDIANAPOLIS IN 46202		\$250.00
08/28/75	MS BLGA A PIROGOWA 61 MIAMI TRAIL ROCKAWAY NJ 07866	BELL TELEPHONE LABS WHIPPANY NJ PROGRAMMER	\$200.00
08/28/75	MR F MC DONALD 11511 TENNESSEE AVE LOS ANGELES CA 90064	11511 TENNESSEE W LOS ANGELES CA 90064 PRES-MC DONALD ENTERPRISES INC	\$250.00
08/29/75	RICHARD H LYNCH, MD 600 HERMANN PROF BLG HOUSTON TX 77025		\$500.00
08/29/75	MRS ROSE H KERNER 200 WEST END AVE #5-F NEW YORK NY 10025		\$200.00
08/29/75	MS GERTALDE M FOWLER 300 NE 91ST ST MIAMI SHORES FL 33138		\$200.00

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08/29/75	R W MAYRENNE, JR MILITARY RD BOX 230 RT 5 COVINGTON LA 70433	PG BOX 432 HARVEY LA 70058 EXECUTIVE	\$250.00 \$250.00
08/31/75	MR J MARSHALL ROBBINS 130 STEPHENSON HWY TROY MI 48084		\$200.00 \$200.00
09/02/75	W H HUDDLESTON 2959 EMERALD DR JONESBORO GA 30286	PO BOX 506 STOCKBRIDGE GA 30281 PRESIDENT HUDDLESTON CONE	\$200.00 \$200.00
09/02/75	MR L MASON 666 5TH AVE NEW YORK NY 10022	666 5TH AVE NEW YORK NY 10019 LAWYER	\$500.00 \$500.00
09/02/75	MR HAL H ROBERTS LOCK BOX A DIXON IL 61021	PG BOX A DIXON IL 61021 PRES HALL ROBERTS CO INC	\$200.00 \$200.00
09/02/75	MR LOUIS NIPPERT 2300 CENTRAL TRUST CINCINNATI OH 45202	2300 CENTRAL TRUST CINCINNATI OH 45202 ATTORNEY	\$1,000.00 \$1,000.00
09/02/75	DR WM B COCKPOFT 4280 WALNUT GRV MEMPHIS TN 38117		\$200.00 \$200.00
09/02/75	MR WM C BROWN 5000 N PORTLAND OKLAHOMA CITY OK 73112		\$1,000.00 \$1,000.00
09/02/75	J HOBART WILSON 1345 OLIVE ST EUGENE OR 97401		\$500.00 \$500.00

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09/02/75	MR DONALD LEROY BREN 349 NORTH FARING RD LOS ANGELES CA 90024	15233 VENTURA BLVD SHERMAN OAKS CA 91403 EXECUTIVE PRESI	\$1,000.00
		\$1,000.00	
09/02/75	R E FRASCH, JR PO BOX 1733 BAKERSFIELD CA 93302		\$1,000.00
		\$1,000.00	
09/02/75	MARION RUSSELL PO BOX 323 LAPINE OR 97739		\$200.00
		\$200.00	
09/02/75	MR FRANK GRABARITS 4225 GEORGIA ST SAN DIEGO CA 92103	SD STATE UNIV SAN DIEGO CA 92115 PHYSICIAN	\$150.00
		\$150.00	
09/02/75	MR CYRIL WRIGHT 15427 HUME DR SARATOGA CA 95070	442 POST SAN FRANCISCO CA 94102 MANAGEMENT CONSULTANT	\$200.00
		\$200.00	
09/03/75	B J LEONARD 7113 N TOTUM BLV PARADISE VLY AZ 85253		\$200.00
		\$200.00	
09/04/75	MR JDS A MOORE, JR MOORE DRY DOCK CO 351 CALIFORNIA ST SAN FRANCISCO CA 94104		\$500.00
		\$500.00	
09/04/75	DR DAVID D STONECYPHER GROSSMONT EYE CLINIC 6966 GROSSMONT CTR DR LA MESA CA 92041		\$200.00
		\$200.00	
09/04/75	MR ARCHIE KAPLAN 1350 W OCEAN BLVD PALM BEACH FL 33480		\$1,000.00
		\$1,000.00	

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09/05/75	FAYE DAVIS GREENE 156 FAIRLAWN RD TOPEKA KS 66606		\$200.00
		\$200.00	
09/05/75	J RAYMOND STACY, MD 415 NW 12TH ST OKLAHOMA CITY OK 73103		\$250.00
		\$250.00	
09/05/75	MR & MRS K M LAWRENCE 3910 S GARY PL TULSA OK 74105		\$250.00
		\$250.00	
09/05/75	DORIS G BOICH 23 BILTMORE ESTATES PHOENIX AZ 85016		\$1,000.00
		\$1,000.00	
09/05/75	MR DENNIS H DUNN 37 TSTODSH KEY BELLEVUE WA 98006	4130 ARCADE BLG SEATTLE WA 98108 REP PARTY COUNTY CHAIRMAN	\$250.00
		\$250.00	
09/05/75	FANNIE HODGS MC KENZIE 804 N ALPINE DR BEVERLY HILLS CA 90210		\$100.00
		\$100.00	
09/05/75	MR L L PICKERING 920 CRTIZ DR NE ALBUQUERQUE NM 87108	920 CRTIZ NE ALBUQUERQUE NM 87108 ATTORNEY AT LAW	\$1,000.00
		\$1,000.00	
09/05/75	MR EDWARD J SCHNUCK 2701 S LINDBERGH HUNTLIGH MO 63131	12921 ENTERPRISE WAY BRIDGETON MO 63044 C E O	\$1,000.00
		\$1,000.00	
09/05/75	THEO LAV 713 RIVER OAKS BANK TWP 2001 KIRBY DR HOUSTON TX 77019		\$1,000.00
		\$1,000.00	

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09/08/75	G A BUDER, JR 7 N SEVENTH ST ST LOUIS MO 63101		\$1,000.00
09/08/75	S V WILKINS, JR RT 1 AMHERST VA 24521	RT 1 AMHERST VA 24521 CONTRACTOR	\$500.00
09/08/75	MR GLENN H KENT 2701 4TH AVE MINNEAPOLIS MN 55408		\$200.00
09/09/75	MR CLYDE B PINSON PO BOX 513 HUNTINGTON WV 25710		\$500.00
09/09/75	MR FOSTER G MC GAW PO BOX 1038 EVANSTON IL 60204		\$500.00
09/09/75	DR G C MORROW 613 JENKINS BLDG PITTSBURGH PA 16340		\$102.00
09/09/75	A H BEAZLEY BOX 938 TEMESCAL RNCH CORONA CA 91720	PO BOX 938 CORONA CA 91720 RANCHER	\$200.00
09/10/75	MR REID MORAN 1630 172 MYRTLE AVE SAN DIEGO CA 92103	BOX 1390 SAN DIEGO CA 92112 REFORMIST	\$1,000.00
09/10/75	MR M J JUSTESON BOX 493 RT 2 GRIDLEY CA 95948	RT 2 BOX 493 GRIDLEY CA 95948 RANCHER	\$200.00

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09/10/75	MR & MRS DOUGLAS BROWN 4415 INGERSOLL HOUSTON TX 77027	6601 HILLCROFT AVE HOUSTON TX 77036 ADVERTISING	\$200.00 \$200.00
09/11/75	MR EARL L HENKE BOX 41 COOKSON OK 74427		\$200.00 \$200.00
09/11/75	J J MORSMAN 40 BRIALE TRAIL DARIEN CT 06820		\$250.00 \$250.00
09/12/75	MR STEPHEN M OWNBEY 417 BROOKVIEW CT MECHANICSBURG PA 17055	SHIPS PART CNTRL CTR MECHANICSBURG PA 17055 FED CIVIL SERV EMPLOYEE	\$1,000.00 \$1,000.00
09/12/75	MR GEORGE F BAKER, JR 20 EXCHANGE PL NEW YORK NY 10005		\$1,000.00 \$1,000.00
09/12/75	MR & MRS WILLIAM A DUNCAN BOX 93-B RR 1 BROWNSBURG IN 46112	204 MEADOW DR DARVILLE IN 46122 PHYSICIAN	\$1,000.00 \$1,000.00
09/12/75	MR LEROY COREY 3011 SHADY LN CEDAR FALLS IA 50613		\$200.00 \$255.00
09/12/75	MR PAUL PELLETT RR 3 ATLANTIC IA 50022		\$1,000.00 \$1,000.00
09/12/75	MR LOUIS COURTEMANCHE, JR 47-220 W ELORADO DR INDIAN WELLS CA 92260	BOX 14490 PORTLAND OR 97214 CHAIRMAN ORANGE INC	\$500.00 \$500.00

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09/12/75	MR JAMES W PINKERTON 916 TURNER RD LODI CA 95240		\$1,000.00
09/12/75	MR REUBEN P HUGHES 1200 W DWYER DR ANAHEIM CA 92801		\$1,000.00
09/15/75	MR GORDON F SNOW 3101 N ELI MACIRD DR EL MACIRD CA 95618		\$250.00
09/15/75	MISS FLORENCE E COOKE 6030 BELLEVUE LA JOLLA CA 92037		\$100.00
09/15/75	L E WOOTEN PO BOX 2984 RALEIGH NC 27602		\$200.00
09/15/75	MR HOWARD M SIEGLER 1020 HERMANN PROF BLDG HOUSTON TX 77025		\$1,000.00
09/15/75	MR JOHN R BUTLER, JR 4605 POST OAK PL #130 HOUSTON TX 77027		\$1,000.00
09/15/75	ANN H LYON 1908 RIVER OAKS BLV HOUSTON TX 77019		\$1,000.00
09/15/75	MR JACK T CURRIE 3209 BANK OF SW BLDG HOUSTON TX 77002		\$800.00

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09/15/75	MR CHARLES E DIMIT 3415 S RACE ENGLEWOOD CO 80110	1776 S JACKSON #703 DENVER CO 80210 PETROLEUM DEV & INVESTMENTS	\$200.00 \$200.00
09/15/75	MR JOHN J MORAN PO BOX 36329 HOUSTON TX 77036		\$500.00
09/16/75	MR WILLIAM M LAUB PO BOX 1450 LAS VEGAS NV 89101	BOX 1450 LAS VEGAS NV 89101 GAS UTILITY EXEC	\$500.00
09/16/75	MR DALE A SCHOMBERG 2947 ASHLEY DR W WEST PALM BEACH FL 33406		\$197.10
09/16/75	MRS FRIEDA WITFVER RT 1 BOX 135-A BAYSIDE CA 95524		\$150.00
09/18/75	G COLKET CANER, MD 63 MARLBORO ST BOSTON MA 02116		\$250.00
09/22/75	MR DOUGLAS W KENDALL 417 N HIGHLAND MURFREESBORO TN 37130		\$150.00
09/22/75	E A MORRIS PO BOX 21488 GREENSBORO NC 27420		\$1,000.00
09/22/75	MR CHARLES SEDERSTROM 1353 S PACIFIC AVE SAN PEDRO CA 90731		\$500.00

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09/22/75	MRS CHARLOTTE I CRUICKSHANK 340 CARMEL VALLEY RD CARMEL VALLEY CA 93924		\$1,000.00
09/23/75	MR F R MC ABEY 3040 MAKET ST SEATTLE WA 98107	3040 NW MARKET ST SEATTLE WA 98107 PROPERTY MANAGEMENT	\$500.00
09/23/75	MR RAYMOND H FIELDS 2621 BERKSHIRE WAY OKLAHOMA CITY OK 73120		\$500.00
09/23/75	MR GEORGE A FORMAN, JP 806 MARINE TRUST BUFFALO NY 14203		\$200.00
09/24/75	MR JACK E MOLESWORTH 83 BEACON ST BOSTON MA 02108		\$110.00
09/24/75	MR JAMES B CERSTORPHINE 2500 KALAKAUA AVE HONOLULU HI 96815		\$200.00
09/25/75	L J SVERDRUP 1155 HILLSIDE DRIVE ST LOUIS MO 63101	Chairman of the Board Sverdrup & Purcell & Assoc., Inc. 800 N. 12th Boulevard St. Louis, Mo. 63101	\$1,000.00
09/25/75	MR RODGER S LEMATTY 300 W CORNWALLIS DR GREENSBORO NC 27408		\$500.00
09/25/75	E L BARNHART 1736 ILLINOIS ST GOLDEN CO 80401		\$500.00

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9/25/75	J T TAYLOR BOX 1062 NEW BEREN NC 28560		\$200.00
		\$200.00	
9/26/75	MR RICHARD C SEAVER 714 W OLYMPIC BLV LOS ANGELES CA 90015	714 W OLYMPIC BLV LOS ANGELES CA 90015 MANUFACTURING EXEC	\$500.00
		\$500.00	
9/26/75	MRS JOHN S LEHMANN 10 APPLE TREE LN ST LOUIS MO 63124		\$800.00
		\$1,000.00	
9/26/75	MR W P HENDRIX THIRD NATL BANK BLDG NASHVILLE TN 37219		\$250.00
		\$250.00	
9/29/75	MR JACK W LONGEN 2124 E THOMAS RD PHOENIX AZ 85016		\$250.00
		\$250.00	
9/29/75	MR WILLIAM A BARNSTEAD 76 ASHFORD ST BRIGHTON MA 02135		\$250.00
		\$250.00	
9/29/75	MR & MRS CHARLES Z WICK 120 S MAPLETON DR LOS ANGELES CA 90024		\$1,000.00
		\$1,000.00	
9/29/75	MR MICHAEL GODWIN 2125 E BALBOA DR TEMPE AZ 85282		\$250.00
		\$250.00	
9/29/75	MR WILLIAM LOGAN 631 MAIN ST KEOKUK IA 52632	631 MAIN ST KEOKUK IA 52632 BANKING EXECUTIVE	\$200.00
		\$200.00	

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TOTAL THIS PERIOD  
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SCHEDULE A

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PRINCIPAL PLACE OF BUSINESS	AMT. OF RECEIPT THIS PERIOD
09/30/75	MR LEROY COREY 3011 SHADY LN CEDAR FALLS IA 50613		\$255.00 \$50.00
09/30/75	MR LEROY COREY 3011 SHADY LN CEDAR FALLS IA 50613		\$255.00 \$5.00
09/30/75	AGUSTA H PETRONE 1608 W MAIN ST MARSHALLTOWN IA 50158		\$110.00 \$110.00
09/30/75	MR JACK E MOLESWORTH 88 BEACON ST BOSTON MA 02108		\$110.00 \$100.00
09/30/75	PERRIN MARCH, 3RD 7 GRANDIN PL CINCINNATI OH 45208	BOX 11111 CINCINNATI OH 45211 MANUFACTURER	\$500.00 \$500.00
09/30/75	JOHN W MURPHY, MD 866 MEDICAL PLAZA JACKSON MS 39204		\$250.00 \$250.00
09/30/75	MR & MRS R C SHAW SIDON MS 38954		\$250.00 \$250.00
09/30/75	JAMES MC MILLEN, DDS MEDICAL TOWER BLDG 440 E MIDWAYD WILSON JACKSON MS 39216		\$250.00 \$250.00
09/30/75	MR JACK BRUCE PO BOX 4827 JACKSON MS 39216		\$250.00 \$250.00

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TOTAL THIS PERIOD  
(LAST PAGE OF THIS PART ONLY)

SCHEDULE A

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

CITIZENS FOR REAGAN

PART NO. 1

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PRINCIPAL PLACE OF BUSINESS	AMT. OF RECEIPTS THIS PERIOD
09/30/75	MRS. W. J. BREED 5405 RIVER THAMES RD JACKSON MS 39211		\$250.00
09/30/75	MR WIRT YERGER, JR BOX 1139 JACKSON MS 39205		\$250.00

TOTAL THIS PERIOD \$133,449.10  
(LAST PAGE OF THIS PART ONLY) -----

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77040010866

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SCHEDULE A IN-KIND CONTRIBUTIONS

ITEMIZED RECEIPTS—CONTRIBUTIONS, TICKET PURCHASES, DONATIONS, AND TRANSFERS

Citizens for Reagan

(Full Name of Candidate or Committee)

Part No. 4

(Use for itemizing Part 1, 2, 3, 4, or 5)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page (s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Aggregate Year-to-date (complete if applicable)	Amount of Receipt This Period
8-12-75	Dr. Perry Tambind Presbyterian Hospital Oklahoma City, Ok. 73102	Printing Aggregate Year-to-date \$ 127.00	\$ 127.00
8-28-75	Andrew W. Green, Esq. 533 Lancaster Avenue Wynnwood, Pa. 19096	Pennsylvania Annotated Statutes Aggregate Year-to-date \$ 53.00	53.00
9-17-75	Dr. J. Raymond Stacy 415 N. W. 12th Oklahoma City, Ok. 73103	Office supplies Stationery Aggregate Year-to-date \$ 160.58	160.58
9-18-75	Mr. Hugh Ledbetter 1225 West Main Norman, Oklahoma 73069	Printing Bumper Stickers Aggregate Year-to-date \$ 60.26	60.26
9-18-75	Mr. Ash Gockel 1208 Glenwood Oklahoma City, Okla. 73116	Postage Aggregate Year-to-date \$ 50.00	50.00
9-27-75	Milan D. Bish P. O. Box 1365 Grand Island, Nebraska	Printing and Postage for Fund Raising Aggregate Year-to-date \$ 218.95	218.95
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	
		Aggregate Year-to-date \$	

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TOTAL THIS PERIOD  
(Last page of this Part only)

5669.79

**SCHEDULE D**

**ITEMIZED EXPENDITURES—PERSONAL SERVICES, LOANS, AND TRANSFERS**

**Citizens for Reagan**

(Full Name of Candidate or Committee)

**Part No. 7**

(Use for Itemizing Part 7, 8, or 10)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (If self-employed, also check box)	Amount of Expenditure
			This Period
8-1-75	Joan E. Follick 2440 Virginia Ave., N.W. Washington, D.C. 20037	Citizens for Reagan	This period \$ 453.35
8-15-75		Secretary <input type="checkbox"/> pay checks	Aggregate Year-to-Date \$ 1,767.18 This period 440.36
8-29-75	Joan E. Follick 2440 Virginia Avenue, N.W. Washington, D.C. 20037	Citizens for Reagan	This period \$ 433.11
9-15-75		Secretary <input type="checkbox"/> pay checks	Aggregate Year-to-Date \$ 1,767.18 This period 440.36
8-29-75	Loren A. Smith 1811 N. Highland Street Arlington, Va. 22201	Citizens for Reagan	This period \$ 1,426.25
		General Counsel <input type="checkbox"/> pay check	Aggregate Year-to-Date \$ 1,426.25
8-29-75	Margaret Carmel Sheahan 6715 Bostwick Drive Springfield, Va. 22151	Citizens for Reagan	This period \$ 241.02
		Direct Mail Coordinator <input type="checkbox"/> pay checks	Aggregate Year-to-Date \$ 538.53 This period 297.51
8-29-75	Franklyn C. Nofziger 4041 American River Dr. Sacramento, Ca. 95814	Citizens for Reagan	This period \$ 2,089.00
		Press Liaison <input type="checkbox"/> pay checks	Aggregate Year-to-Date \$ 6,144.29
9-4-75	Franklyn C. Nofziger 4041 American River Dr. Sacramento, Ca. 95814	Citizens for Reagan	This period \$ 426.63
		Press Liaison <input type="checkbox"/> Telephone	Aggregate Year-to-Date \$ 6,144.29
9-4-75	Franklyn C. Nofziger 4041 American River Dr. Sacramento, Ca. 95814	Citizens for Reagan	This period \$ 3,217.56
9-10-75		Press Liaison <input type="checkbox"/> Travel Expense	Aggregate Year-to-Date \$ 6,144.29 This period 423.63
8-29-75	Mae Neal Peden #204 6528 Lee Valley Dr. Springfield, Va. 22150	Citizens for Reagan	This period \$ 423.63
9-15-75		Secretary <input type="checkbox"/> pay checks	Aggregate Year-to-Date \$ 882.26 This period 458.63
8-29-75	John Patrick Sears 7718 Falstaff Court McLean, Va. 22101	Citizens for Reagan	This period \$ 2,670.38
		Exec. Vice Chairman <input type="checkbox"/> pay check	Aggregate Year-to-Date \$ 2,670.38
8-29-75	James H. Lake 6107 Holly Tree Drive Alexandria, Va. 22304	Citizens for Reagan	This period \$ 1,819.40
		Regional Fieldman <input type="checkbox"/> pay check	Aggregate Year-to-Date \$ 2,814.22
9-1-75	James H. Lake 6107 Holly Tree Drive Alexandria, Va. 22304	Citizens for Reagan	This period \$ 524.62
		Regional Fieldman <input type="checkbox"/> Travel Expense	Aggregate Year-to-Date \$ 2,814.22

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**SCHEDULE D**

**ITEMIZED EXPENDITURES—PERSONAL SERVICES, LOANS, AND TRANSFERS**

Citizens for Reagan  
(Full Name of Candidate or Committee)

Part No. 7  
(Use for Itemizing Part 7, 8, or 10)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date (month, day, year)	Full Name, Mailing Address, and ZIP Code	Occupation and Principal Place of Business, if any (If self-employed, also check box)	Amount of Expenditure
			This Period
8-29-75	Jeffrey L. Bell 1401 N Street, N.W. #210 Washington, D.C. 20005	Citizens for Reagan Director of Research <input type="checkbox"/> pay check	This period \$ 1,321.76
8-29-75	Arlene Triplett 8632 Victoria Road Springfield, Va. 22151	Citizens for Reagan Bookkeeper <input type="checkbox"/> pay check	This period \$ 195.36
9-15-75	Katherine Anderson 1523 Olive Avenue Gulfport, Miss. 39501	Citizens for Reagan Direct Mail Coordinator <input type="checkbox"/> pay check	This period \$ 240.39
9-15-75	Carmel J. Giancola C 1611 1600 Joyce Street Arlington, Va. 22202	Citizens for Reagan Secretary <input type="checkbox"/> pay check	This period \$ 384.25
9-8-75	Anderson Carter P. O. Box 725 Lovington, N. M. 88260	Rancher Fund Raising Expense <input type="checkbox"/> Reimbursement	This period \$ 787.82
7-23-75	Paul Laxalt 412 N. Division St. Carson City, Nev. 89701	U.S. Senator Reimbursement for Fund Raising Exp.	This period \$ 71.64
8-20-75	Paul Laxalt 412 N. Division St. Carson City, Nev. 89701	U.S. Senator Reimbursement for Fund Raising Exp.	This period \$ 35.00
8-27-75	David Keene 814 South Lee Street Alexandria, Va. 22314	Citizens for Reagan Regional Fieldman <input type="checkbox"/> Travel Exp.	This period \$ 331.64
9-12-75	Jerry Dundero 2700 Virginia Avenue, N.W. Washington, D.C. 20037	Aide to Senator Laxalt Reimbursement for Nev. Nat'l	This period \$ 181.22
7-29-75	Tom Anderson 1523 Olive Avenue Gulfport, Miss.	Aide-Congressman Trent Lott Reimbursement for office supplies	This period \$ 370.30
7-27-75	Tom Anderson 1523 Olive Avenue Gulfport, Miss. 39501	Aide-Congressman Trent Lott Reimbursement for office supplies	This period \$ 92.05

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TOTAL THIS PERIOD 20,519.05

SCHEDULE C

ITEMIZED EXPENDITURES

Other

Citizen for Reagan

77040010870

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

DATE OF PAYMENT (Month, day, year)	PAYEE (Recipient of Payment) Full Name, occupation, address, place of business, if any	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Rinoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
9-5-75	Ricard Associates Walton Road New Castle, N. H. 03854	Computer Consultant Services	X				X	\$ 500.00		
9-1-75	Internal Revenue Service 8001 Roosevelt Blvd. Philadelphia, Pa. 19155	Federal Withholding Tax Deposit	X				X	5,892.98		
8-3-75	Omega List Company 301 Maple Avenue West Vienna, Virginia 22180	Mailing Lists	X				X	132.00		
8-3-75								132.00		
8-3-75								157.00		
8-1-75								369.40		
8-12-75	Omega List Company 301 Maple Avenue West Vienna, Virginia 22180	Mailing Lists	X				X	210.50		
8-27-75								617.00		
9-5-75								10,459.84		
9-19-75								160.56		
7-31-75	Bruce W. Eberle Assoc., Inc. 301 Maple Avenue West Suite Two Vienna, Virginia 22180	Postage for Fund Raising Consultant Fees	X				X	5,000.00		
9-12-75	Philip F. Sheats Assoc., Inc. 1012 Russell Street Baltimore, Md. 21230	Fund Raising Computer Services	X				X	7,970.97		

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SCHEDULE C

ITEMIZED EXPENDITURES

Other

Citizens for Reagan

77040010871

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

DATE OF PAYMENT (Month, Day, Year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Runoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
8-1-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia	Postage for Fund Raising	X				X	\$6,000.00		
8-7-75							5,000.00			
8-7-75							5,000.00			
8-8-75							5,000.00			
8-11-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising	X				X	5,000.00		
8-12-75							5,000.00			
8-12-75							5,000.00			
8-13-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising	X				X	5,000.00		
8-16-75							6,187.00			
8-19-75							5,800.00			
8-20-75					2,800.00					
8-21-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising						1,200.00		
8-22-75							1,200.00			
8-23-75							1,400.00			
8-26-75			X				X	1,600.00		
8-27-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising						950.00		
8-28-75							950.00			
8-28-75							950.00			
8-29-75					X			X		
8-29-75							950.00			
9-1-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising						950.00		
9-2-75							1,600.00			
9-3-75					X			X		

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SCHEDULE C

ITEMIZED EXPENDITURES

Other

Candidate for Reagan

77040010872

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS  
(Use separate page (s) for each numbered Part)

DATE	PAYEE (Recipient of Payment) Full Name, Mailing Address, Occupation and principal place of business, if any	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Runoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
8-28-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising	X				X	\$1,600.00		
8-28-75								950.00		
9-1-75								950.00		
9-1-75								950.00		
8-28-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110	Postage for Fund Raising	X				X	1,700.00		
8-28-75								2,582.81		
9-1-75								1,500.00		
9-1-75								3,500.00		
7-25-75	U.S. Postmaster 20th Street Station 1216 20th Street, N.W. Washington, D.C. 20036	Postage for Fund Raising	X				X	180.00		
7-29-75		Postage for Fund Raising						1,380.00		
7-29-75		Postage for Office						100.00		
8-1-75		Postage for Fund Raising						5,000.00		
8-5-75	U.S. Postmaster 20th Street Station 1216 20th Street, N.W. Washington, D.C. 20036	Postage for Fund Raising	X				X	50.00		
8-12-75		Postage for Fund Raising						150.00		
8-12-75		Postage for Fund Raising						200.00		
8-20-75		Postage for Fund Raising						250.00		
8-26-75	U.S. Postmaster 20th Street Station 1216 20th Street, N.W. Washington, D.C. 20036	Postage for Fund Raising	X				X	250.00		
8-26-75		Postage for Office						100.00		
9-2-75		Postage for Fund Raising						250.00		
9-2-75		Postage for Fund Raising						250.00		
9-3-75	U.S. Postmaster 20th Street Station 1216 20th Street, N.W. Washington, D.C. 20036	Postage for Fund Raising	X				X	500.00		
8-5-75		Postage for Office						100.00		
9-11-75		Postage for Fund Raising						250.00		
9-11-75		Postage for Office						100.00		

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SCHEDULE C

Other

ITEMIZED EXPENDITURES

Obama for Reagan

77040010873

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS  
(Use separate page(s) for each numbered Part)

DATE OF PAYMENT (month, day, year)	PAYEE (Recipient of Payment) (Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Runoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
1-23-75	U.S. Postmaster 2350 Street Station 1236 20th Street, N.W. Washington, D.C. 20036	Postage for Fund Raising	X				X	\$250.00		
1-5-75	Park Lane Press 1501 N. Guilford Ave. Baltimore, Maryland 21202	Printing for Fund Raising	X				X	12,300.00		
1-6-75	Commercial Envelope 2345 Wilmarco Avenue Baltimore, Md. 21223	Fund Raising Envelopes	X				X	11,552.85		
1-23-75	Henry M. [redacted] man, CPA, PA 7379 Old [redacted] Town Rd. Suite 311 Bethesda, Md. 20814	Accounting Services	X				X	375.00		
1-1-75	Reese, York & Assoc., Inc. 610 Executive Blvd. Rockville, Md. 20852	Liability Insurance	X				X	200.00		
1-26-75	Beneficial Employees Security Trust c/o Peter Thomas 3120 [redacted] Street	Health Insurance	X				X	322.50		

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SCHEDULE C

Other

ITEMIZED EXPENDITURES

Candidate for Reagan

77040010874

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

DATE OF PAYMENT (Month, Day, Year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, Occupation and principal place of business, if any	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Ratoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
-2-75	Xerox Corporation	Xerox Rental and Supplies	X			X	\$2,300.00			
-4-75	1416 N. Fort Myer Drive						252.35			
-4-75	Arlington, Va. 22209						275.21			
-10-75	Sheraton Carlton Hotel P. O. Box 1512 Washington, D.C. 20013	Room Rental and Expenses for Press Conference	X			X	174.30			
-30-75	Congressional Liquors 401 First Street, S.E. Washington, D.C. 20003	Liquor for Reception for National Republican Committee	X			X	139.37			
-4-75	Louis Joseph Co. 2 Thomas Circle Washington, D.C. 20005	Office Equipment	X			X	198.45			
-23-75	Capitol Office Furniture Co., Inc. 1623 L Street, N.W. Washington, D.C. 20036	Office Furniture and Equipment	X			X	2,721.00			
-30-75							21.00			
-7-75							126.00			
-13-75							142.80			
-25-75	Capitol Office Furniture Co., Inc.	Office Furniture and Equipment	X			X	183.75			
-5-75	1623 L Street, N.W. Washington, D.C. 20036						57.75			

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SCHEDULE C

ITEMIZED EXPENDITURES

Other

Candidate for Reagan

77040010875

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

DATE OF PAYMENT	PAID TO (Recipient of Payment) Full Name, Mailing Address, Occupation and principal place of business, if any	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Rumor	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
9-10-75	J. J. Callagher Co., Inc. 5906 Montana Street Baltimore, Md. 20784	Electrical Work for Xerox Machine	X				X	\$ 150.00		
7-24-75	Business Machines of America 1507 K Street, N.W. Washington, D.C. 20036	Office Machines	X				X	110.25		
7-25-75								157.45		
8-25-75								110.25		
8-27-75	Savin Business Machines 1330 Parklawn Drive Rockville, Md. 20852	Installation and Rent for Electric Typewriter	X				X	1,475.25		
8-20-75	Decision Making Int'l 2709 N. Main Street Santa Ana, Ca. 92701	Survey Research Work	X				X	60,000.00		
9-3-75								12,500.00		
9-16-75								20,000.00		
8-27-75	Vern Hook Printing 827 Wilshire Blvd. Santa Monica, Ca. 90401	Printing Expense	X				X	293.62		
9-10-75	Krieger Reed Corp. 1007 Capouse Ave. Scranton, Pa. 18509	Campaign Buttons	X				X	270.00		

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SCHEDULE C

Other

ITEMIZED EXPENDITURES

Children for Reagan

7 7 0 4 0 0 1 0 8 7 6

Part No. 9

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

PAGE OF PART	PAYEE (Recipient of Payment) Full Name, Mailing Address, (Occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Runeff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
21-75 2-75	Greenfoot, Inc. 1019 17th Street, N.W. Washington, D.C. 20036	Office Rent	X				X	\$ 3,627.00 1,313.50		
5-75 10-75	Pitney Bowes Walnut & Pacific Stamford, Conn. 06904	Office Machine Rental	X				X	572.25 519.75		
3-75 9-75	Mallory Office Supply 732 9th Street, N.W. Washington, D.C. 20001	Office Supplies	X				X	25.06 166.93		
5-75	Baltimore's Forms 3132 Frederick Avenue Baltimore, Md. 21229	Fund Raising Stationery	X				X	500.48		
31-75	Jet Printing 2021 E Street, N.W. Washington, D.C. 20036	Printing	X				X	102.63		
8-75 26-75	Wandling Graphics 4226 Suitland Road #201 Suitland, Md. 20022	Art Design for Fund Raising Letterhead	X				X	152.50 95.00		

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SCHEDULE C

ITEMIZED EXPENDITURES

Citizens for Reagan

77040010877

Part No. 9

(Full Name of Candidate or Committee)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use for itemizing Part 6 or 9)

(Use separate page(s) for each numbered Part)

DATE OF EXPENDITURE (month, day, year)	PAYEE (Recipient of Payment) Full Name, Mailing Address, (occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Rumor	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
8-8-75	Craftsmen Printing 351 Maple Avenue West Vienna, Virginia 22180	Printing	X				X	\$ 190.32		
9-19-75	Envelopes, Inc. 120 N. Fayette Street Alexandria, Va. 22131	Envelopes	X				X	141.75		
7-21-75	C&P Telephone P. O. Box 2123 Washington, D.C. 20053	Office Telephone	X				X	2,725.00 525.00 429.48 622.55		
8-28-75	Hertz Corporation P. O. Box 26141 Oklahoma City, Oklahoma 73126	Auto Rental	X				X	130.59		

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SCHEDULE C IN-KIND CONTRIBUTIONS

ITEMIZED EXPENDITURES

77040010878

Part No. 10

(Full Name of Candidate or Committee)

(Use for itemizing Part 6 or 9)

SEE REVERSE SIDE FOR INSTRUCTIONS

(Use separate page(s) for each numbered Part)

DATE	PAYEE (Recipient of Payment) Full Name, Address, Occupation and principal place of business, if any)	PURPOSE OF EXPENDITURE (For communications media expenditures, also specify date(s) of use)	CHECK (✓) EXPENDITURE BY ELECTION					AMOUNT OF EXPENDITURE THIS PERIOD	ALLOCATE EXPENDITURES BY CANDIDATE (To be completed only by Committees supporting more than one candidate)	
			Primary	General	Special	Runoff	Caucus or Convention		Full Name, Congressional District (if applicable), State, and Party	Amount of Expenditure This Period
3-12-75	Dr. Perry Tambind Presbyterian Hospital Oklahoma City, Ok. 73102	Printing						\$ 127.00		
4-28-75	Andrew W. Green, Esq. 543 Lancaster Avenue Wynnewood, Pa. 19096	Pennsylvania Annotated Statutes						53.00		
8-17-75	Dr. J. Raymond Stacy 413 N.W. 12th Oklahoma City, Okla. 73103	Office supplies Stationery						160.58		
9-18-75	Mr. Hugh Ledbetter 1225 West Main Norman, Okla. 7306	Printing Bumper Stickers						60.26		
9-18-75	Mr. Ash Gockel 1208 Glenwood Oklahoma City, Okla. 73106	Postage						50.00		
9-26-75	Milan D. Bish P. O. Box 1365 Grand Island, Nebraska	Printing and Postage for Fund Raising						218.95		

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**SCHEDULE B  
DEBTS AND OBLIGATIONS**

Citizens for Reagan  
(Full Name of Committee)

Part No. 12  
(Use for itemizing Part 11 or 12)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
9-4-75	Amity Rubber Stamp Co. 1127 Ninth Street, N.W. Washington, D.C. 20001			6.62
9-30-75	B. E. S. T. P. O. Box B-P Newport Beach, Calif. 92664			272.75
9-10-75	Henry M. Buchanan, CPA 7979 Old Georgetown Road Bethesda, Maryland 20014			3,930.00
9-1-75	C&P Telephone Co. P. O. Box 2123 Washington, D.C.			2,029.20
8-13-75	Commercial Envelope 2915 Wilmarco Ave. Baltimore, Maryland 21223			16,466.90
8-13-75	Decision Making Information 2700 North Main Street, St. 333 Santa Ana, Calif. 92701	177,400.00	92,500.00	91,332.50
9-23-75	Greenhost, Inc. 1019 14th Street, N.W., Suite 210 Washington, D.C. 20036			11,875.00
1-23-75	JEM P.O. Box 417 Philadelphia, Pa. 19105			15.75
TOTAL THIS PERIOD (Last page of this Part only)				

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\* Carry outstanding balance over to appropriate page of summary.

**SCHEDULE E  
DEBTS AND OBLIGATIONS**

Citizens for Reagan

(Full Name of Committee)

Part No. 12

(Use for itemizing Part 11 or 12)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
9-10-75	Kenneth Frederick's Printing Service 2542 Midvale Avenue Los Angeles, Calif. 90064			124.18
9-8-75	Krieger-Reed 1007 Capouse Avenue Scranton, Pa. 18509			83.73
9-10-75	Leon Office Machines 625 H Street, N.W. Washington, D. C. 20001			194.25
9-17-75	Lynbird Air, Inc. Du Page County Airport West Chicago, Ill. 60185			389.35
8-7-75	The Mail Room, Inc. 9140 Euclid Court Manassas, Virginia 22110			2,359.11
9-8-75	Marriott Hotels, Inc. 333 Jefferson Davis Highway Arlington, Va. 22202			698.40
8-13-75	Omega List Company 301 Maple Avenue West, Suite 28 Vienna, Va. 22180			57,829.11
8-18-75	Opt-D Graphics, Inc. 2525 Lee Highway Arlington, Va. 22201			14.00
TOTALS THIS PERIOD (Including of this Part, 12)				

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**SCHEDULE E  
DEBTS AND OBLIGATIONS**

**Citizens for Reagan**  
(Full Name of Committee)

**Part No. 12**  
(Use for itemizing Part 11 or 12)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
8-10-75	Park Lane Press 1501 North Guilford Avenue Baltimore, Maryland 21202			267.00
9-22-75	Senator Paul Laxalt 326 Russell House Office Building Washington, D.C. 20510			463.60
9-12-75	Xerox 6800 Industrial Road Springfield, Va. 22151			539.29
9-8-75	Xerox 1616 N. Ft. Myer Drive Arlington, Va. 22209			314.51
9-23-75	Ellen A. Bales 1523 Corinth Avenue West Los Angeles, Ca. 90025			26.92
9-23-75	Leslie Carol Dutton 215 21st Place Santa Monica, Ca. 90402			55.79
9-15-75	Internal Revenue Service 1601 Roosevelt Boulevard Philadelphia, Pa. 19155			685.95
9-15-75	D.C. Treasurer Department of Finance and Revenue 300 Indiana Avenue, N.W. Washington, D.C. 20501			268.03
TOTALS THIS PERIOD (Carry over to appropriate part of summary)				

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Carry over totaling included on  
to appropriate part of summary.

**SCHEDULE E  
DEBTS AND OBLIGATIONS**

Citizens for Reagan  
(Full Name of Committee)

Part No. 12  
(Use for Itemizing Part 11 or 12)

**SEE REVERSE SIDE FOR INSTRUCTIONS**

(Use separate page(s) for each numbered Part)

Date Incurred (month, day, year)	Full Name, Mailing Address, and ZIP Code (occupation and principal place of business, if any)	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
9-15-75	Department of Taxation Administrative Services Division P. O. Box 1202 Richmond, Va. 23208			484.67
77010010882				

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TOTALS THIS PERIOD (Last page of this Part only) \$150,000.00 \$507,410.00 \$198,712.00



## FEDERAL ELECTION COMMISSION

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

October 8, 1975

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Honorable Ronald Reagan  
10960 Wilshire Boulevard  
Suite 812  
Los Angeles, CA 90024

Dear Governor Reagan:

The Commission is in receipt of the legal memorandum submitted by Loren Smith of Citizens for Reagan in response to the complaint in CA 021-75.

We note that you had previously authorized Citizens for Reagan to act as your campaign committee. Accordingly, we will assume that the Smith memorandum was submitted with your approval and that Mr. Smith is acting as your counsel in this matter. If you wish to advise us to the contrary, please do so within ten days from the receipt of this letter.

The Commission will send any further correspondence it deems necessary in this matter to Mr. Smith, with a copy to you.

Sincerely yours,

Stephen Schachman  
Assistant General Counsel

cc: Citizens for Reagan  
2021 L Street, N.W.  
Suite 340  
Washington, D. C. 20036

Attn: Loren A. Smith, Esq.

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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

9-26-75

OC 1975-40

John E. Chapoton, Esquire  
Vinson, Elkins, Searls, Connally & Smith  
First City National Bank Building  
Houston, Texas 77002

Dear Mr. Chapoton:

This letter is issued in response to yours of July 31, 1975, in which you request an opinion from the Commission as to whether the prohibition in 18 U.S.C. §610 against political contributions by a corporation applies to a nonprofit corporation (in the case of your inquiry, Vital Issues of America, Inc.) which will disseminate information on public issues and which may make contributions to the election of certain individuals of its choice.

Since it is not clear whether your organization is a political committee and thus comes within the scope of 2 U.S.C. §437f (a) the Commission does not believe a formal advisory opinion would be appropriate at this time. Nevertheless, because the Commission has concluded that your request does warrant a response, it has authorized me to issue this opinion.

Section 610 prohibits "any corporation whatever" (emphasis added) from making a "contribution or expenditure in connection with any election" to Federal office and prohibits a candidate, political committee or person from accepting such a contribution.

However, although these prohibitions plainly apply to contributions by nonprofit and profit-making corporations, the Commission has issued an advisory opinion indicating that in the case of committees created "expressly and exclusively to engage in political activities...and...incorporated for liability purposes only", the §610 prohibition does not apply. This type of corporation is essentially a political committee as defined by 18 U.S.C. §591(d). See Advisory Opinion 1975-16,

12/11  
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#4 in 40 FR 36242; see also, the historical analysis in United States v. CIO, 335 U.S. 106, 112, ff. (1948). Political committees which are incorporated for liability purposes are the only type of corporations exempt from the prohibitions of 18 U.S.C. §610.

In your case, it is unclear whether your corporation is a political committee as defined by the Act and, therefore, not subject to the prohibition of §610. We note that the bylaws of your corporation state that:

"The corporation [Vital Issues] shall also have the power to expend or contribute its income or principal in attempts to influence the selection, nomination, election or appointment of any individual, or individuals, to public office, if the Board of Trustees determines that such expenditures or contributions are in furtherance of the corporation's objective."

Needless to say if Vital Issues of America is a political committee, it is subject to all of the reporting requirements and the contribution and expenditure limitations set forth in United States Code, Titles 2 and 18.

On the other hand, we note that Vital Issues of America has filed a form with the Commission attempting to register as a §437a committee. This would appear to indicate that your organization views itself as a group "whose only connection with the elective process arises from completely non-partisan discussion on issues of public importance" (Buckley v. Valeo, \_\_\_ F. 2d \_\_\_, (D.C. Cir., Aug. 15, 1975), p. 1551). If this is the case, it is clear that the Buckley decision obviates the need for Vital Issues to register with the Commission since 18 U.S.C. 437a was therein declared unconstitutional. If that is the nature of the corporation, however, it would be subject to the prohibitions on contributions and expenditures set forth in §610. Vital Issues, may, however, set up a separate segregated political fund, as is permitted by §610. All individuals contributing to that fund would be subject to the limitations set forth in 18 U.S.C. §608(b), and the fund would be subject to the reporting requirements and the contribution and expenditure limitations of the Act.

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As stated earlier, this response constitutes an opinion of counsel to which the Commission has raised no objection. Because it is not a formal advisory opinion of the Commission, the presumption of compliance afforded by 2 U.S.C. §437(b) does not apply to this communication.

Sincerely yours,

JS/

John G. Murphy, Jr.  
General Counsel

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# Citizens for Reagan For President

 RECEIVED  
 FEDERAL ELECTION  
 COMMISSION

'75 SEP 17 PM 2:27

September 16, 1975

 Sen. Paul Laxalt  
 Chairman

 John P. Sears  
 Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

 Henry Buchanan  
 Treasurer

 Mr. Gordon A. McKay  
 Assistant Staff Director for  
 Disclosure and Compliance  
 Federal Election Commission  
 Washington, D. C. 20463

Dear Mr. McKay:

On behalf of "Citizens for Reagan", I take this opportunity to respond to your office's letter of the 3rd of September. We received that letter on the 5th. It forwarded to our Treasurer, Henry M. Buchanan, a copy of a complaint filed with the Commission by a James Horwitz. The letter gave our committee an opportunity to respond to the Commission concerning Mr. Horwitz's complaint.

The gist of the complaint concerns Mr. Horwitz's contention that the corporate advertisers for Governor Ronald Reagan's syndicated radio show are making corporate contributions to a federal campaign for the Presidency. 18 U.S.C. Sec. 610, of course, prohibits "any corporation whatever, or any labor organization to make a contribution or expenditure in connection with any election . ." This complaint thus raises the question of whether in advertising on Governor Reagan's syndicated radio program, "Viewpoint", a corporation has committed a violation of the federal criminal law.

Our committee is of the very firm belief that commercial sponsorship of Governor Reagan's syndicated radio show is in no way a contribution to any federal political campaign. This, I would wager to say, is also the firm belief of several hundred advertisers across the nation who daily associate themselves and their products publicly with the program via their advertising.

While our committee firmly believes that there is no merit to Mr. Horwitz's complaint, we recognize that no statute is self-evident. Particularly in the area of federal election law, where a new and comprehensive legal code is going into effect for the first time in 1975, the possible ambiguity of any law is present. Understanding this basic fact of statutory construction as well as the difficult job the Federal Election Commission has before it of ruling on literally hundreds of new issues raised by the 1974 amendments and the 1971 law,

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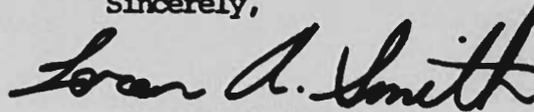
Mr. Gordon A. McKay  
Page 2  
September 16, 1975

we have felt it beneficial to the Commission's analysis of this complaint to prepare the attached legal memorandum on our position and reasoning. We hope the Commission will find it useful.

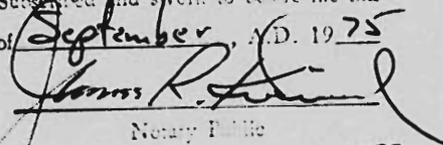
If we can provide any further information, please let us know. Please consider the attached Memorandum an integral part of our response to the Commission. This letter is being sent within the ten business days of the date of receipt specified in your letter to us.

With best wishes, I am

Sincerely,



Loren A. Smith  
General Counsel

Subscribed and sworn to before me this  
17<sup>th</sup> day of September, A.D. 19 75  
  
Notary Public

My Commission Expires January 1, 1976

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Citizens for Reagan was organized on July 15, 1975, filing its registration as a political committee with the Federal Election Commission nine days later on July 24, 1975. In a letter submitted by the committee with its registration Governor Ronald Reagan stated to the Chairman of the committee:

"...I want to inform you that I have not made up my mind whether to become an active Presidential candidate.... Meanwhile, I recognize that due to the technical requirements of the law (including the requirement for the designation of a principal campaign committee), the committee must file with the Federal Elections Commission as working on my behalf. I trust this letter will suffice as my consent for purposes of allowing you to do so."

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Since January 20, 1975, shortly after the expiration of his term as Governor of California, Ronald Reagan has appeared on and written a daily radio public affairs program syndicated on over 300 radio stations across the United States. <sup>1/</sup> In these programs Governor Reagan discusses and comments on every sort of public topic. The only general characteristics of the programs are a studious non-partisanship and a general philosophical perspective. The program, "Viewpoint," is generally sponsored by commercial business enterprises. There are over 300 stations which broadcast the show. The program is sold to radio stations via a producer-syndicator, O'Connor Creative Services, Inc. The stations, in turn, then find advertisers for the program. In one or two instances a wholesaling arrangement was worked out for one or two markets. "Viewpoint," has been sold in the same fashion as most other syndicated non-network programs.

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<sup>1/</sup> The former Governor also writes a weekly column, syndicated in over 200 newspapers across the United States, by the Copley News-Service.

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At the present time, and since he left the Office of Governor of California, Ronald Reagan has derived his principal source of income from his radio program, his speaking honorariums and his syndicated newspaper column. His principal occupation can only be characterized as a commentator or journalist. From the late 1950s through the early 1960s this was also his occupation. At that time he worked for General Electric as a public affairs spokesman.

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It seems clear on its face that prior to the organization of our committee, with Governor Reagan's written consent, there is no conceivable argument by which anyone could characterize corporate advertising on his radio program as corporate political contributions or expenditures for a federal election campaign. If this were not true then corporate sponsorship of any public affairs oriented programming would always be subject to this same charge. For, how can one individual be denied the airwaves because he is talked about as a possible candidate for public office? And if so, is not every articulate spokesman, from nightly news commentators to talk show hosts a potential candidate for federal office? There is, of course, no way in logic or fact to draw such distinctions short of barring every media commentator from ever running for federal office.

Thus we reach the crux of the complaint; did Governor Reagan's July 14, 1975, letter to Senator Paul Laxalt, consenting to the formation of Citizens for Reagan, convert normal corporate advertisers into illegal corporate contributors? Logic, constitutional principles, the history of American politics and the case law all argue for a resounding no.

It is first useful to turn to the language of the statutes involved in this question. We must look at 18 U.S.C. sections 591(e), (f) and 610. Together these sections define the conduct prohibited a corporation in

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connection with federal elections. The relevant portions of the sections are as follows: (emphasis added)

18 U.S.C. 591(e):

(e) 'contribution'--

(l) means a gift, subscription, loan, advance, or deposit of money or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business, which shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors), made for the purpose of influencing the nomination for election, or election, of any person to Federal office or for the purpose of influencing the results of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President of the United States;

\* \* \*

18 U.S.C. 591(f):

(f) 'expenditure'--

(l) means a purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business), made for the purpose of influencing the nomination for election, or election, of any person to Federal office or for the purpose of influencing the results of a primary held for the selection of delegates to a national nominating convention of a political party or for the expression of a preference for the nomination of persons for election to the office of President of the United States;

\* \* \*

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18 U.S.C. 610:

**Sec. 610. Contributions or expenditures by national banks, corporations or labor organizations**

It is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever, or any labor organization to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices, or for any candidate, political committee, or other person to accept or receive any contribution prohibited by this section.

\* \* \*

18 U.S.C. 610:

As used in this section, the phrase 'contribution or expenditure' shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business) to any candidate, campaign committee, or political party or organization, in connection with any election to any of the offices referred to in this section;

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Sec. 591 defines the applicable terminology of the relevant parts of Title 18 dealing with elections. As such when dealing with the phrase "contribution or expenditure" in sec. 610 we must look to those terms in sec. 591. In both sections, 591(e) and 591(f), the definition of a contribution or an expenditure includes the language "made for the purpose of influencing." This language is supplemented in sec. 610 by the additional qualifying language "in connection with." From the face of the statute it is clear that it was not the intent of Congress to prohibit any monetary transactions between corporations and individuals who might be candidates for federal office, but only to prohibit corporations from influencing the campaigns of federal candidates. If this were not so it could be cogently argued that no man who was not wealthy enough to live without income from some corporate business could ever legally run for federal office. If the receipt of personal income from a corporation, paid while an individual is a candidate for federal office, constitutes an illegal corporate contribution then we have limited the Presidency to men of independent wealth. Further, by the same logic, no Congressman, Senator or President might ever run for reelection without first resigning. For, if income from a radio show, while a candidate, constitutes an illegal corporate contribution why does not a President's \$200,000 federal salary constitute an illegal federal contribution?

Thus, it seems clear to us that the scope of sec. 610 is limited to those corporate or labor union contributions or expenditures that go to financing a political campaign. And, while any radio and TV appearances of any public figure, President Ford or Governor Reagan, Senator Jackson or Senator McGovern, may help or hurt them politically, those appearances cannot be classified as campaign appearances merely because the person who makes them is or may be a candidate.

A recent Advisory Opinion of the Commission has dealt with similar questions with respect to this problem. Advisory Opinion 1975-13: Legality

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of Presidential Candidate Receiving Travel Expenses From Corporations, (40 Fed. Reg. 36747, August 21, 1975). In this opinion the commission found that Senator Lloyd Bentsen, a declared candidate for the Democratic presidential nomination, would have been accepting illegal corporate campaign contributions within the meaning of sec. 610 if he had accepted travel expenses from the Chamber of Commerce to address a meeting of the Chamber in New York. A key element in the Commission's opinion seems to be the following language: "The Commission's opinion is that, once an individual has become a candidate for the Presidency, all speeches made before substantial numbers of people are presumably for the purpose of enhancing his candidacy...." (40 Fed. Reg. 36747, August 21, 1975).

77040010R95

There are several factors that distinguish the rather broad and general Bentsen opinion and its result from the fact situation in the instant complaint. First, Senator Bentsen is a declared candidate for the Presidency. The Communications Act of 1934, (47 U.S.C. Sec. 315), has always given this event critical significance for determining when the equal time provisions of that act come into play. Thus, if a person is not an announced candidate for political office no candidate or person may seek equal time for his appearance on TV or radio under the provisions of sec. 315.<sup>2/</sup>

<sup>2/</sup> It should be noted that the purpose of this section of The Communications Act of 1934, really is the same as the purpose behind the more recent federal election laws and also sec. 610. It is to insure that no individual running for office has a preferred access to money or its equivalent, like media time, except through individual merit or the support of a large segment of the population. Such is the essence of democracy. Many supporters mean many contributions. (Note 26 U.S.C. sec. 9001, et. seq.) Certain jobs mean that a candidate may be a jump ahead of his opponent in an election. The foremost of these, of course, is incumbency. A President has a much better chance of being reelected than a challenger has of being elected. Other positions, jobs or attributes such as media personality, writer, astronaut, sports celebrity, or war hero provide the kind of attention and image that gives a candidate an electoral advantage. This does not mean, however, that these jobs, which may greatly benefit a candidate's electibility, have ever been thought of as within the ambit of regulations like 18 U.S.C. sec. 610 or could they constitutionally be. See sections 73.120(a), 73.290(a) 73.590(a) and 73.657(a) of the Rules of the Federal Election Commission.

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Given the similar purposes of The Communication Act, sec. 315, and the provisions of the federal election laws in this area, it would indeed be anomolous if the Federal Election Commission found as a campaign activity broadcasting that was clearly not so considered by the Federal Communications Commission and clearly not within the coverage of sec. 315. Thus, the broadcaster-licensee would have to operate under two divergent standards for the very same practice. For the reporting purposes of 2 U.S.C. 433 and 434 these differences present no problem because the purposes of the statutes are different.

6 A second basic difference distinguishes the case of Senator  
9 Bentsen's Chamber speech from the sponsorship of Governor Reagan's  
8 radio program. The Senator was doing what candidates have traditionally  
0 done in campaigns for the Presidency, namely speaking before large groups  
- representing substantial segments of the voting community. On the other  
0 hand, Governor Reagan is continuing, after he has consented to allow a  
0 political committee to be formed in behalf of his candidacy, in the same job  
7 he has been doing for much of his working life. In the 1950s and early 1960s  
0 he was making numerous public appearances and talks on public affairs,  
7 full time, for General Electric. After his term as Governor ended in  
7 1974 he turned to the role of commentator and public spokesman, dealing  
with topics that concerned him. He is on record during his terms as  
Governor as expressing his intention to return to his commentator role  
after those terms. The very nature of these commentaries themselves  
distinguish this situation from the Bentsen one. In that case the Senator was  
to make one speech. It dealt, in the words of his lawyers with "the state  
of our nation's economy and on the crisis of confidence in government."  
(40 Fed. Reg. 30258, July 17, 1975). By contrast, Governor Reagan's programs  
deal with every type of topic, both issues relevant to the national political  
scene and others totally irrelevant to national political affairs but dealing

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with cultural, historical, or philosophical themes. They are precisely the kind of format that candidates have traditionally avoided, since they would put a candidate on record on every manner of question. They clearly do not have the focus or theme so characteristic of American electoral campaigns and campaign appearances.

A third distinguishing factor is the ultimate use to which it was proposed to put the funds in the Bentsen case as opposed to the advertising revenues of "Viewpoint." The money to be paid Senator Bentsen, which the Commission found would constitute an illegal corporate contribution, would be directed to pay travel expenses for Senator Bentsen. This is a very traditional and most basic cost of any campaign. On the otherhand, the advertising revenue from Governor Reagan's radio show goes not to any campaign expense but to radio stations who buy the show with the expectation of a profit. The radio station's payments, in turn, go to among others, Governor Reagan as purely personal income. And, as noted earlier, it is a substantial part of that personal income by which he earns his living.

A fourth distinction that is also quite important was indeed brought up by Mr. Horwitz in his complaint. Quoting from his letter of complaint to the Commission:

"In most political campaigns, candidates or their agents buy advertising time directly from radio stations. In this case, the stations have been buying the commentary from O'Connor Creative Services, Los Angeles; then the stations sell it to sponsors. It might very well call for the FCC to examine this rather unusual action with each station involved." (emphasis added.)

"Viewpoint" unlike political advertising for campaign or election purposes is not financed by the producers but rather by a large number of sponsors

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who quite obviously use their time to promote their products as commercial advertisers have traditionally done. The local Washington, D.C. advertiser of "Viewpoint", an auto dealer, uses the time he buys to sell cars, just as any other local advertiser uses purchased time to promote a product. Not only is this very different from the economic relationship which the prohibition against corporate or labor union donations was directed against, but it is even very different from the kind of institutional advertising by large corporations that may not have immediate economic aims.

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One further point might be made in this respect. It is a logical conclusion that this soon after Watergate hundreds of individual corporate and business sponsors would not have entered into buying advertising on "Viewpoint" if they had the slightest thought that what they might be doing is making an illegal corporate campaign contribution. On this question the Commission must certainly give weight, in its interpretation of what a newly amended law means, to the practice of the trade and the expectations of a large number of individuals financially involved. Our firm belief that sponsorship of and advertising on "Viewpoint" is in no regard an illegal contribution by a corporation is not merely grounded on logical and legal abstract reasoning but is related to the actual practice and considered belief of numerous individuals with a concrete interest.

Another point that throws light upon the instant question relates to the meaning of "candidate" under sections 2 U.S.C. sec. 431(b) and 18 U.S.C. sec. 591(b). Our political committee does not dispute the fact that for the purposes of filing and compliance with the provisions of the law Governor Reagan is a candidate and his campaign expenditure limitation is based upon our expenditures. Thus, the definitions of those sections can legitimately be considered to embrace those legitimate constitutional purposes of the law; i.e., to limit campaign expenditures, to require full

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contributor disclosure, to insure adequate campaign disclosure and to insure that corporations and labor unions do not use their economic influence to influence federal elections. However, a recent case, United States v. National Committee for Impeachment, 469 F.2d 1142 (2d Cir., 1972), narrowly limited the definition of the term "political committee" in sec. 431(d) and sec. 591(d) and made it clear that legitimate campaign regulations could not be made by expanded definition to infringe on basic First Amendment protections. Thus, the Court rejected the Government's effort to read National Committee into the definition of the section. It held that the only possible legitimate regulation allowed was of those groups (1) acting with the consent of a candidate, or (2) having as their major purpose the nomination or election of candidates. Any broader reading of the definition to include groups whose purpose was to take a stand on public issues would have intolerable consequences:

"On this basis every position on any issue, major or minor, taken by anyone would be a campaign issue and any comment upon it, say, a newspaper editorial or an advertisement would be subject to proscription unless the registration and disclosure regulations of the Act in question were complied with. Such a result would, we think, be abhorrent; the Government fails to point to a shred of evidence in the legislative history of the Act that would tend to indicate Congress wants to go so far. Any organization would be wary of expressing any viewpoint lest under the Act it be required to register, file reports, disclose its contributors, or the like...the dampening effect on First Amendment rights and the potential for arbitrary administrative action that would result from such a situation would be intolerable." (469 F.2d at 1142).

This reasoning is equally applicable to the definition of a "candidate."

It would clearly be intolerable, constitutionally, if the characterization

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of a definitional statute could deprive an individual of First, Fifth, and Fourteenth Amendment rights. In order to stand constitutionally "candidate" must be narrowly construed. Thus while it is certainly appropriate for the federal election laws to require a committee working for Governor Reagan's election to the Presidency to fully report in compliance with all Federal Election Commission standards, as we have done, and for all expenditures made by the committee to be fully attributable to Governor Reagan's campaign for the Presidency, should he decide to make such a race, it would not be constitutionally permissible for the law to inhibit the right to free expression and the right to earn a living in purposes not related to the campaign law or to a federal election. Thus Governor Reagan, a citizen who has merely given his consent for individuals working on his behalf to comply with the requirements of the law, and who does not consider himself a candidate for any federal office at this time, can be treated no differently, in respect to his radio show job, than any other citizen who is not a declared candidate for federal political office. If this were not so the definition of "candidate" would violate the First, Fifth and Fourteenth Amendment rights of Governor Reagan, "Viewpoint's" advertisers and the program's audience. The Federal Election Commission must, as the courts have always done, presume that the Congress of the United States wrote the law to be constitutional. Thus, a constitutional interpretation of sec. 610 must be chosen where at all reasonable. As Mr. Justice Frankfurter noted, speaking for the Court in United States v. International Union, 352 U.S. 567, 1 L.ed. 2d 563, 77 S. Ct. 529 (1957):

"the cardinal rule of construction, that where the language of an act will bear two interpretations, equally obvious, that one which is clearly in accordance with the provisions of the constitution is to be preferred." Knights Templars' & M. Life Indem. Co. v. Jarman, 187 U.S. 197, 205, 47 L.ed. 139, 145, 23 S. Ct. 108." (1L. 2d at 577).

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To avoid constitutional difficulties "candidate" in sections 431(b) and 591(b) must be narrowly construed in light of the purposes of the relevant regulations.

In turning to the case law on 18 U.S.C. sec. 610 it becomes obvious that the constitutionality of the statute is intimately related to its construction. For, in the areas where electoral regulations intermesh with First Amendment rights the courts have been most cognizant of the tension between the goals of freedom and order. Recently the United States Court of Appeals (D.C. Circuit) held 2 U.S.C. 437a invalid on constitutional grounds. The Court stated:

"We therefore uphold the major disclosure provisions of the Act. Those thus far examined are carefully tailored to minimize intrusion upon interests sheltered by the First Amendment. They exact disclosure only when plainly and closely related to a substantial governmental interest long recognized by the courts: protection of the integrity of federal elections...."

The same cannot be said for section 308 of the Act, codified as 2 U.S.C. sec. 437a,..." (Buckley v. Valeo, Slip Opinion, Aug. 15, 1975, p. 1549).

And later on the Court noted:

"But section 437a is susceptible to a reading necessitating reporting by groups whose only connection with the elective process arises from completely nonpartisan public discussion of issues of public importance...." (Id., pp. 1550-1551).

And it further pointed out:

"The Supreme Court has indicated quite plainly that groups seeking only to advance discussion of public issues or to influence public opinion cannot be equated to groups whose relation to political processes is direct and intimate.... (R)ecently, in Mills v. Alabama, 384 U.S. 214 (1966), the Court struck down a state statute prohibiting publication of any newspaper editorial on election day despite its obvious propensity under ordinary conditions to sway the outcome of the election. Said the Court:

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Whatever differences may exist about interpretations of the First Amendment, there is practically universal agreement that a major purpose of that amendment was to protect the free discussion of governmental affairs. This of course includes discussions of candidates, structures and forms of government, the manner in which government is operated or should be operated, and all such matters relating to political processes." (Id., p. 1554).

Thus, statutes like 18 U.S.C. sec. 610 must be interpreted with an eye to their possible collateral effects on those rights guaranteed by the First Amendment. Such statutes will be upheld only so long as there is a direct and immediate relationship between the electoral process (a legitimate object of regulation) and the activity sought to be regulated. Such is clearly not the case when it comes to any hypothetical application of sec. 610 to corporate advertising on a show such as "Viewpoint."

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When dealing with the commercial support, through advertising, of a public affairs program like "Viewpoint," we are no longer dealing with the relatively limited electoral process which Congress may narrowly regulate. We are now talking about the great public debate that is the essence of any democracy. The topics discussed on "Viewpoint," like the topics discussed in school rooms, churches, newspaper editorials, books and on the street by the ordinary citizen, may have the most profound effect imaginable on the future of our country. "Ideas do have consequences," consequences of the most profound and powerful kind. They may totally shape the course of any election or even of any era, but they are totally beyond the power of the law to regulate. This is precisely so because they are so important. This is what the First Amendment is all about. Thus, to argue that corporate advertisement on the show violates sec. 610, because Governor Reagan's radio commentaries

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may have an effect on the election is like saying that because the majority controls the outcome of an election it is undemocratic to allow majorities! The First Amendment was enacted to protect the freedom of ideas because they have consequences. We must never use the argument that because such ideas have electoral consequences we must prohibit or limit their propagation. Such would be to stand the democratic ideal on its head.

In United States v. International Union, 352 U.S. 943, 1 L.ed. 2d 763, 77 S. Ct. 808, the Supreme Court dealt with the question of what constitutes a prohibited expenditure by a labor union under 18 U.S.C. sec. 610. In that case the union in question had apparently paid for TV time to advertise certain individuals' candidacies for Congress. The union was indicted by the United States Attorney and the District Court dismissed the indictment on the ground that it failed to state an offense. The government appealed directly to the Supreme Court which reversed the dismissal. In dealing with the basic purpose of the law Mr. Justice Frankfurter, speaking for the Court, noted of its predecessor statute: "This Act of 1907 was merely the first concrete manifestation of a continuing congressional concern for elections "free from the power of money." (1 L. ed. 2d at 569). And of the 1947 amendments to what is now sec. 610 the Court noted: "Shortly thereafter, Congress again acted to protect the political process from what it deemed to be the corroding effect of money employed in elections by aggregated power...." (1 L.ed. 2d at 573). And again the Court pointed out: "The evil at which Congress has struck in sec. 313 (now 610) is the use of corporation or union funds to influence the public at large to vote for a particular candidate or a particular party...." (1 L. ed. 2d at 576).

Thus the Supreme Court in upholding the statute's application in the International Union case was focusing on a very definite legislative

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purpose. This was directly related to active electioneering. And even so, it should be noted, three Justices (J. Douglas, C.J. Warren and J. Black) joined in Mr. Justice Douglas' dissent feeling that what the Court did "greatly impairs those rights. It sustains an indictment charging no more than the use of union funds for broadcasting television programs that urge and endorse the selection of certain candidates for the Congress..." (1 L. ed. 2d at 579).

Thus, substantial Supreme Court sentiment found even direct media electioneering by a union beyond what could constitutionally be prohibited by sec. 610.

Certainly, the sponsorship of or advertising on a radio program like "Viewpoint," which is scrupulously nonpartisan, and deals with general public affairs topics, can in no way be considered corporate campaign contributions simply because Governor Reagn is technically defined as a candidate by 18 U.S.C. sec. 591(b) or because he may incidentally gain a public benefit from his appearances.

In United States v. First National Bank of Cincinnati, 329 F. Supp. 1251 (1971), the Court further explored the goals of sec. 610.

"As this Court views the problem of regulating campaign financing, the goals of such regulation should be to promote an informed electorate, to insure that elected officials are responsive to the needs of the majority who elect them, and, as far as possible, to prevent elective office from becoming the exclusive prize of the influential or rich." (329 F. Supp. at 1254).

The Court went on to dismiss an indictment against defendant National Bank under sec. 610 in the following language:

"However, the Court determines that a prohibition of fully secured loans made at normal bank rates in the ordinary course of business places an unreasonable restraint on the First Amendment rights of individuals. Statutes restrictive of First Amendment rights or purporting to place limits on those rights must be narrowly drawn to meet the precise evil the legislature seeks to curb. United States v. C.I.O., supra, 335 U.S. at 141, 68 S. Ct. 1349, and cases cited therein. As applied to the defendant in this case, Section 610 is overbroad....

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Finally, the Court wants to make explicit that its holding with respect to the issue of overbreadth is predicated on the recognition that the right to associate and to use the assets of the individual members of the association to further the election of a candidate is a First Amendment right." (Id. at 1254).

In First National Bank the Court thus found that if sec. 610 made it illegal for a national bank to make a fully secured loan to an active candidate then as applied the section was unconstitutional. How much more unconstitutional would a court find sec. 610 if the Commission were to find that it prevented an individual, a candidate only for the purposes of compliance with the federal election laws, from obtaining advertising to express his nonpartisan views on public affairs and to economically support himself? We believe the question answers itself.

A very recent case, Ash v. Cort, 350 F. Supp. 227 (1972), rev. 496 F.2d 416 (9th Cir., 1974), rev. United States Supreme Court, Slip Opinion, June 17, 1975, may help illuminate the contours of sec. 610's prohibitions. In that case a corporation was sued by a stockholder as having violated sec. 610. The corporation had placed ads in various newspapers responding to the criticism of the business community by a presidential candidate. The corporation's ads did not mention any candidate by name. They were captioned "I say let's keep the campaign honest. Mobilize 'truth squads'..." (350 F Supp. at 233), and claimed to be reprints of a speech by the Chairman of the corporation.

The District Court found that corporation's ads, as a matter of law, were clearly not prohibited by the statute and granted the corporation's motion for summary judgment. The Court of Appeals disagreed, and reversed the decision. It, however, did agree with the District Court's basic position on what constitutes the type of prohibited conduct under sec. 610. The Court

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of Appeals, however, believed a jury question existed as to whether the corporation had or had not engaged in that type of conduct. The Court of Appeals noted:

"Thus, it appears that the district court was correct in concluding that Bethlehem's challenged expenditures are not proscribed unless they fall within sec. 591's definition of 'expenditure.'"

An integral part of sec. 591's definition of prohibited expenditures is the requirement that they be for the purpose of influencing someone's election to federal office--in other words, Sec. 591 requires a partisan purpose...." (496 F.2d at 425).

In a footnote on the same page the court went on to note:

"The definition of expenditure in Sec. 591 requires a partisan purpose; we assume here that where a communication is the expenditure's direct product, the partisan purpose must appear from the communication's content, viewed in light of surrounding circumstances." (Footnote 9., Id. at p. 425).

Thus, whether one looks to the District Court's opinion or to that of the Court of Appeals, the conclusion must be that in order for a corporation's public communications (and expenditures on behalf of them) through newspapers to violate sec. 610 they must clearly have a partisan purpose. And this, of course, was true even in the context of an ad clearly directed at a candidate during the heat of an election campaign. When seen in this light it becomes patently clear that those corporations that advertise on "Viewpoint," (an ongoing nonpartisan public affairs radio program, begun six months before any technical candidacy by Governor Reagan; and not directed towards any specific electoral personality or issue) are not in any sense violating sec. 610.

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It should be pointed out that the Supreme Court reversed the Court of Appeals in Ash v. Cort, supra. It found that the respondent-plaintiff did not have a cause of action as the Federal Election Commission had been created in the intervening time to deal with this type of problem and also that the statute suggested no private remedy to deal with violations of sec. 610. The Supreme Court did not reach the questions of the constitutionality of sec. 610 or of whether as a matter of law the corporation's actions did not violate the statute.

In looking at other cases <sup>3/</sup> as well as those previously considered, it becomes abundantly clear that all the conduct considered violative of sec. 610, in the years of the statute's existence, has been directly and intimately, on its face, related to influencing an election in the immediate sense. As is only proper with a statute proscribing severe criminal penalties and fines the conduct and activities sought to be prohibited have been clearly delineated by the narrow limits of the term electoral process. This must not change if the application of sec. 610 is to remain constitutional.

In conclusion it seems to us after a review of the logic of the statutes, of the nature of Governor Reagan's radio show, "Viewpoint," of the most fundamental constitutional principles, of recent Federal Election Commission actions and of the case law on the subject only one conclusion is

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3/ United States v. C.I.O., 335 U.S. 106, 68 S. Ct. 1349, 92 L.ed. 1849 (1948), (union published paper which electioneered, found not violative of sec. 610 if in regular course of conduct); United States v. Painters' Local Union, 172 F.2d 854 (2d Cir.), (political ad in newspaper, and political ad on commercial radio, not violative of 610); United States v. Anchorage Central Labor Council, 193 F. Supp. 504 (1961), (unions' council had regular TV show, unclear where money from, election advocacy on show not violative of 610); United States v. Lewis Food Co., Inc., 236 F. Supp. 849 (1964), rev. 366 F.2d 710 (1966), (corporation put ads in newspapers before election rating each Congressman and Senator from California as to their votes for 'constitutional principles,' ad captioned 'Important Notice to Voters,' Dist. Ct. found no violation of 610 stated on these facts, Ct. App. found there to be a jury question on same facts).

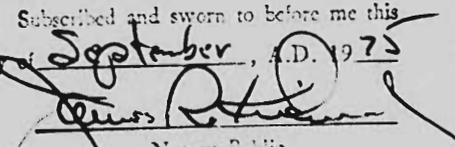
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possible: Mr. Horwitz' complaint is without merit. It is not a violation of 18 U.S.C. sec. 610 for a corporation or a labor union to advertise on Governor Reagan's syndicated radio show "Viewpoint." If this is so the same logic and arguments dictate that 18 U.S.C. sec. 608(b)(1) is not violated by such advertising. This Memorandum contains the position of Citizens for Reagan on the complaint filed with the Federal Election Commission by Mr. James Horwitz. Our committee would respectfully request that this Memorandum, along with the cover letter, be considered our committee's formal response to the Commission's letter of September 3, 1975, received September 5, 1975.

Submitted and verified under oath this 17th day of September, 1975, by Loren A. Smith, General Counsel of Citizens for Reagan, on behalf of the Committee.

  
Loren A. Smith

Subscribed and sworn to before me this  
17th day of September, A.D. 1975  
  
Notary Public

My Commission Expires January 1, 1976

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APPENDIX A

TABLE OF "VIEWPOINT" TOPICS

January 20, 1975 - August 18, 1975

Topics may appear at different times in different areas.

Week of 1/20/75:

Food Stamps  
Boondoggles  
Cuba  
Inflation & Paperwork Burden  
Consumer Protection Agency  
Ford's Energy Plan

1/28 - 2/6/75:

9 Unemployment #1  
0 Unemployment #2  
0 Unemployment #3  
0 Bureaucrats  
0 Civil Service  
0 Fair Trade Laws  
- Postal Service  
C Writing & Grammar

2/7 -26/75:

7 Voluntarism  
C Rocky's Story  
7 Inflation-Fighting Checklist  
7 Incredible Bread Machine  
7 Lq of Supply & Demand  
Surprise Tax Bill  
Capitalism  
Public Employee Strikes  
Supplies to South Vietnam  
Red China

2/14 - 3/11:

Mozart  
Delta Queen  
Cuba Documentary  
Farm Facts  
Tax Plan #1  
Tax Plan #2  
Tax Plan #3  
SALT II  
Crisis of Democracy  
Detente  
Peru  
Federal Budget

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3/12/75 - 3/27/75:

Price of Beef  
Land Planning  
Handcrafts  
National Debt  
West Germany  
Unemployment #1  
Unemployment #2  
Federal Spending  
HCIS/SISS  
Private Government  
N.H. Senate Seat  
Recession/Inflation

3/28 - 4/11/75:

C Vacation Residences Program  
I Oil Talk  
9 Regulate the Regulators  
O Cold Beer  
O The Superintendent's Dilemma  
I Federal Retirement Pensions  
O Easy Voting  
O Tiffany & Co.  
O Southeast Asia  
O Capital Punishment  
O Money Supply  
4 Energy Sources

4/14 - 5/5/75:

7 Abortion  
7 New Congress  
7 Energy #1  
7 Energy #2  
7 Portugal #1  
7 Portugal #2  
7 Campaign Law  
7 Indochina #1  
7 Indochina #2  
7 Welfare Reform #1  
7 Welfare Reform #2  
7 Welfare Reform #3  
7 Inventions  
7 Postal Feedback  
7 Satellite Communications

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5/6/75 - 5/21/75:

US Constitution  
USS Ingraham  
British Situations  
Government, Big vs. Small #1  
Government, Big vs. Small #2  
Peace  
Land Use Bill  
South Vietnam Aftermath  
Grapes  
Trade-in Freedom?  
Regulations' New Wave #1  
Regulations' New Wave

5/22-6/14/75:

Red Sea  
1 Portugal  
Recession's Cause  
- Adoption  
9 Government Computers  
UN  
0 Nuclear Power  
Washington Media  
- Italian Bureaucrats  
DeBolts

6/6 - 6/20/75:

4 More Boondoggles  
Truth in Spending  
0 Falling Dominoes  
Soviet Superiority  
7 Radical Chic Revisited  
7 Agency for Consumer Advocacy  
EPA  
Panama Canal  
Communism, the Disease  
George Meany & Economics  
Tax Loopholes

6/23 - 7/9/75:

Big Mo  
Cost Overruns  
Inflation as a Tax  
Button, Button  
Gun Control #1  
Gun Control #2  
Gun Control #2  
Business Profits: Myth/Reality  
Letter to the Editor

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6/23 - 7/9/75:

Malpractice  
Privacy  
Patriotism

Maureen Reagan (guest)  
Maureen Reagan (guest)  
Maureen Reagan (guest)

7/7 - 7/24/75:

Free Enterprise?  
Law & Order  
Polls on Government  
Pacific Legal Foundation  
M.I.A.  
Samizdat  
Congressional "Perks"  
Mariana Islands  
Stopping Vandalism  
Aquaculture  
Budget "Uncontrollables"  
Job-hunting

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7/25 - 8/11/75:

Chile  
UNICEF  
Socialized Medicine  
Health Care  
Phu Quoc  
CWEP  
Welfare Reform Corp. I  
Welfare Reform Corp. II  
Welfare Reform Corp. III  
Do Away With IRS?  
Turtles & Aquaculture  
Somalia

8/12 - 8/18/75:

Soviet Life  
World Affairs Report  
Why Don't They?  
ERA (RR)  
ERA (Maureen Reagan)

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## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

September 3, 1975

Certified Mail 438030  
Return Receipt Requested

Mr. James Horwitz, President  
 Valley Publication, Inc.  
 4616 West Magnolia Boulevard  
 Burbank, California 91505

Dear Mr. Horwitz:

This will acknowledge receipt of your complaint filed under the Federal Election Campaign Act, as amended, alleging violations of the Act by the Citizens for Reagan Committee, and Sections 608(b)(1) and 610 of Title 18, United States Code by sponsors of Mr. Reagan's radio commentaries.

A copy of your complaint has been forwarded to Mr. Reagan and Mr. Henry Buchanan, Treasurer of the Citizens for Reagan Committee. They have been requested to respond to the matters raised in your complaint within ten days after the receipt of their copy of your complaint. You will be supplied with copies of any responses they may make, and invited to make further comments if you desire.

In keeping with the provisions of Title 2, United States Code, Section 437g(a)(3) of the Act and our interim complaint procedure guideline, the complaint will not be made available for public inspection and no announcements will be made by this Office concerning the status of any inquiry or investigation which might ensue without the written consent of the person with respect to whom such inquiry or investigation is made.

Sincerely,

  
 Gordon Andrew McKay  
 Assistant Staff Director  
 for Disclosure and Compliance

GAM:vlf

cc: Ronald Reagan  
 Henry Buchanan

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PS Form 3811, Mar. 1975

REGISTERED MAIL, REGISTERED, INSURED AND CERTIFIED MAIL

2

● **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..... 15¢

Show to whom, date, & address of delivery.. 35¢

RESTRICTED DELIVERY.  
Show to whom and date delivered..... 65¢

RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:  
JAMES HORWITZ  
VALLEY PUBLICATIONS  
4616 W. MAGNOLIA  
BURBANK CAL

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438030	

(Also obtain signature of addressee.)

I have received the article described above.

SIGNATURE: *[Signature]*  Address of addressee: \_\_\_\_\_

DATE OF DELIVERY: SEP 5 1975

4. ADDRESS (Complete only if requested):  
MAGNOLIA PARK STATION  
3810 W. MAGNOLIA BLVD.  
BURBANK, CALIFORNIA  
P.O. BOX 1115

POST OFFICE: BURBANK, CA MAGNOLIA  
SEP 5 1975  
U.S. POSTAL SERVICE

2025-0-3811-00

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## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

September 3, 1975

Certified Mail 438032  
Return Receipt Requested

Mr. Henry Buchanan  
 Treasurer  
 Citizens for Reagan  
 2021 L Street, N.W.  
 Suite 340  
 Washington, D.C. 20036

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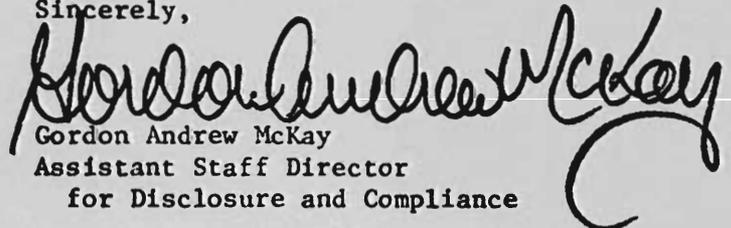
Dear Mr. Buchanan:

The Federal Election Commission has received a formal complaint from Mr. James Horwitz, President, Valley Publication, Inc. 4616 West Magnolia Boulevard, Burbank, California, duly filed under the Federal Election Campaign Act, as amended, alleging violations of the Act by the Citizens for Reagan Committee, and Sections 608(b)(1) and 610 of Title 18, United States Code by sponsors of Mr. Reagan's commentaries. A copy of that complaint is enclosed together with a copy of our letter of acknowledgement to the complainant.

Any response to this complaint which you might choose to make, including corrections or amendments to your filings on the public record, should be received in this Office within ten business days after receipt of this letter.

In keeping with Title 2, United States Code, Section 437g(a)(3) and our interim complaint procedure guideline (Notice 1975-9, copy enclosed), the complaint will not be made available for public inspection and no announcements will be made by the Commission concerning the status of any inquiry or investigation which might ensue without the written consent of the person with respect to whom such inquiry or investigation is made.

Sincerely,



Gordon Andrew McKay  
 Assistant Staff Director  
 for Disclosure and Compliance

GAM:vlf

Enclosures as stated

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*Buchanan 21*

PS FORM 3811, Jan. 1978

MC 100V

RETURNED RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

① **SENDER:** Complete items 1, 2, and 3.  
Add your address in the "RETURN TO" area.

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

Show to whom and date delivered..... 15¢

Show to whom, date, & address of delivery.. 35¢

RESTRICTED DELIVERY.  
Show to whom and date delivered..... 65¢

RESTRICTED DELIVERY.  
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

**FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY**

3. ARTICLE DESCRIPTION: **OFFICE OF GENERAL COUNSEL**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438032	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent

*Maggi Buchan*

DATE OF DELIVERY POSTMARK

4. ADDRESS (Complete only if requested)

5. REASONABLE TO RETURN BECAUSE:

6. CARRIER'S INITIALS

☆ 670:100-0-200-017

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

September 3, 1975

Certified Mail 438031  
Return Receipt Requested

Mr. Ronald Reagan  
 10960 Wilshire Boulevard  
 Los Angeles, California 90020

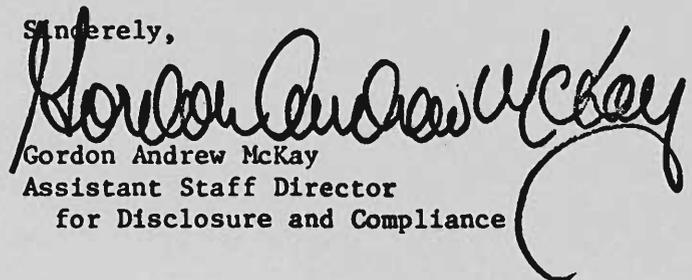
Dear Mr. Reagan:

The Federal Election Commission has received a formal complaint from Mr. James Horwitz, President, Valley Publication, Inc., 4616 West Magnolia Boulevard, Burbank, California, duly filed under the Federal Election Campaign Act, as amended, alleging violations of the Act by the Citizens for Reagan Committee and Sections 608(b)(1), and 610 of Title 18, United States Code by sponsors of your radio commentaries. A copy of that complaint is enclosed together with a copy of our letter of acknowledgement to the complainant.

Any response to this complaint which you might choose to make, including corrections or amendments to your filings on the public record, should be received in this Office within ten business days after receipt of this letter.

In keeping with Title 2, United States Code, Section 437g(a)(3) and our interim complaint procedure guideline (Notice 1975-9, copy enclosed), the complaint will not be made available for public inspection and no announcements will be made by the Commission concerning the status of any inquiry or investigation which might ensue without the written consent of the person with respect to whom such inquiry or investigation is made.

Sincerely,

  
 Gordon Andrew McKay  
 Assistant Staff Director  
 for Disclosure and Compliance

GAM:vlf

Enclosures as stated

FEDERAL ELECTION COMMISSION  
 OFFICIAL FILE COPY  
 OFFICE OF GENERAL COUNSEL

77040010917



**CITIZENS FOR PRESIDENT**  
**For President** COMMISSION

'75 AUG 19 AM 10:47

Sen. Paul Laxalt  
Chairman

John P. Sears  
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan  
Treasurer

August 13, 1975

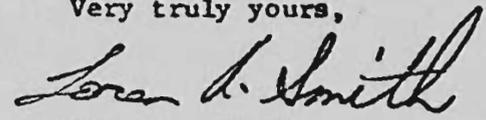
John Murphy, Esquire  
General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20005

Dear Mr. Murphy:

This letter is to clarify any confusion regarding any other political committees registered with the Commission supporting Governor Ronald Reagan for President.

We are the only political committee authorized by Governor Reagan. This was noted when we filed our registration with the Commission on July 24, 1975, with an attached letter from the Governor. We have no authorized subdivisions and have not authorized any other committees anywhere in the United States. When and if we do so authorize such efforts, we will file the information as an amendment to our Registration as required by law. Thank you.

Very truly yours,



Loren A. Smith  
General Counsel

LAS:jf

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FEDERAL ELECTION COMMISSION  
**OFFICIAL FILE COPY**  
OFFICE OF GENERAL COUNSEL

77040010919

Exh-D

## FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

August 11, 1975

Mr. James Horwitz, President  
Valley Publication, Inc.  
4616 West Magnolia Boulevard  
Burbank, California 91505

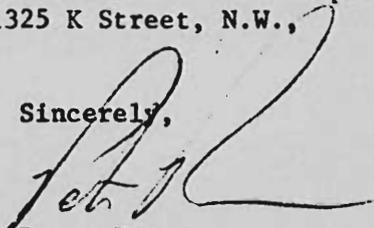
Dear Mr. Horwitz:

This is in response to your letter of July 28, 1975, which alleges apparent violations of the Federal Election Campaign Act in relation to Mr. Ronald Reagan, a radio commentary which was aired on approximately 320 stations, and the sponsors of his commentary.

Please be advised that, in keeping with our interim complaint procedure guideline (Notice 1975-9, copy enclosed), your letter cannot be considered as being a duly filed complaint under the provisions of Section 437 of the Federal Election Campaign Act of 1974. Your letter has not been signed, nor has it been properly notarized.

Should you wish to refile a signed and notarized copy of your letter, please be so kind as to address the correspondence to: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

Sincerely,



Peter Roman  
Chief, Audit and  
Investigation Division

PR:vlf

Enclosure as stated

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

77040010920

# Valley Publication, Inc.

4616 W. MAGNOLIA BLVD.

BURBANK, CALIFORNIA, 91505 '75

(213) 877-5643

RECEIVED  
 FEDERAL ELECTION  
 COMMISSION

GREEN  
 THE  
 LAWS...

AUG 29 AM 11:39  
 INDEPENDENT ENQUIRY  
 AND  
 INVESTIGATIVE REPORTING

July 28, 1975

Commission Chairman Thomas B. Curtis  
 Federal Election Commission  
 1325 "K" Street, N.W.  
 Washington D.C., 20005

Dear Mr. Curtis:

As a Los Angeles County Election Commissioner and a private citizen, I have studied the Federal Election Campaign Act in relation to Ronald Reagan, his radio commentary on 320 stations, and the sponsors of his commentary. In that regard, I file the following complaints:

770100109

He is in violation of not filing his "Off Year" contributions received and expenditures, due April 10th and July 10, 1975. He has legally qualified July 24, 1975 by his committee registering with your commission; but according to Title 2, Chapter 14, Section 431 (b) (2), "Candidate means an individual who seeks nomination for election.....if he has.....made expenditures, or has given his consent for any other person to.....make expenditures, with a view to bringing about his nomination for election, to such office." His daily radio commentary has been used as such a tool since the first of this year. (Chapter 14, Section 431 (f)(1)(A), regarding 'expenditure', would also apply)

The banks, labor organizations or corporations that are sponsoring his program, such as Joseph Coors, are in violation of Title 18, Chapter 29, Section 610. "It is unlawful for any national bank, or any corporation..... to make a contribution or expenditure in connection with any election....." "Every Corporation....which makes any contribution or an expenditure in violation of this section shall be fined not more than \$25,000....." If you rule that Reagan has been a candidate since Jan. 1, 1975, the corporations and banks have been in violations since then. If you don't agree, then they have been breaking the law since July 24th.

Any non-corporation business or individual that spends more than \$1,000 this year as a sponsor of his program is in violation of Title 18, Chapter 29, Section 608 (b)(1).

Every sponsor of Reagan's Commentary and/or every radio station that carries it, that hasn't filed reports is in violation, per Title 29, Chapter 14, Section 437a, "Any person who expends any funds.....for the purpose of influencing the outcome of an election, or who publishes or broadcasts to the public any material.....setting forth the candidates position on

FEDERAL ELECTION COMMISSION  
 OFFICIAL FILE COPY  
 OFFICE OF GENERAL COUNSEL

Commission Chairman Thomas B. Curtis  
Federal Election Commission  
July 28, 1975  
Page 2

any public issue,.....shall file reports with the Commission as if such person were a political committee....."

Furthermore, I request that you rule that the total amount expended by sponsors for his commentary be accumulated against his allowable \$10 million, nationwide, if he enters any primaries. (Title 18, Chapter 29, Section 608 (c)(1)(A)) Under the same section, the amount expended in each state for his program should be accumulated against the amount allowed in each state.

In most political campaigns, candidates or their agents buy advertising time directly from radio stations. In this case, the stations have been buying the commentary from O'Connor Creative Services, Los Angeles; then the stations sell it to sponsors. It might very well call for the FCC to examine this rather unusual action with each station involved.

Mr. Curtis, in the first year of existence for most of these campaign reform laws, it would be a travesty if you don't concur that Ronald Reagan is breaking part of the letter of the law, and is totally breaking the spirit of the law. No one will ever adhere to campaign laws if your commission doesn't start right off with tough enforcement.

Yours truly,

*James Horwitz*

James Horwitz  
President

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

cc: FCC.

TO 447 C  
(Individual)

TI

STATE OF CALIFORNIA }  
COUNTY OF *Los Angeles* } ss.

On *Aug. 25, 1975* before me, the undersigned, a Notary Public in and for said State, personally appeared *James Horwitz*

STAPLE HERE

\_\_\_\_\_ known to me

to be the person whose name *is* subscribed to the within instrument and acknowledged that *he* executed the same.

WITNESS my hand and official seal.

Signature *Vilma M. Crawford*

Name (Typed or Printed)

OFFICIAL SEAL  
VILMA M. CRAWFORD  
NOTARY PUBLIC-CALIFORNIA  
LOS ANGELES COUNTY  
My Commission Expires Dec. 8, 1976

(This area for official notarial seal)

770010922

HJ

VALLEY PUBLICATIONS INC.

4616 W. MAGNOLIA BLVD.

P. O. BOX 1115

BURBANK, CALIF. 91505

AIR MAIL

FEDERAL ELECTION  
COMMISSION

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

75 AUG 29 AM 10:28

RETURN RECEIPT  
REQUESTED

REGISTERED  
NO. 25392

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

AIR MAIL

7-7 0 1 0 0 1 0 9 2 3

# Valley Publication, Inc.

4816 W. MAGNOLIA BLVD.

BURBANK, CALIFORNIA, 91506

(213) 781-5440

RECEIVED  
FEDERAL ELECTION  
COMMISSION



AUG 4 AM 10:50

Dedicated to  
"INDEPENDENT INQUIRY  
AND  
INVESTIGATIVE REPORTING"

July 28, 1975

Commission Chairman Thomas B. Curtis  
Federal Election Commission  
1325 "K" Street, N.W.  
Washington D.C., 20005

**FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL**

Dear Mr. Curtis:

As a Los Angeles County Election Commissioner and a private citizen, I have studied the Federal Election Campaign Act in relation to Ronald Reagan, his radio commentary on 320 stations, and the sponsors of his commentary. In that regard, I file the following complaints:

77010010924

He is in violation of not filing his "Off Year" contributions received and expenditures, due April 10th and July 10, 1975. He has legally qualified July 24, 1975 by his committee registering with your commission; but according to Title 2, Chapter 14, Section 431 (b) (2), "Candidate means an individual who seeks nomination for election.....if he has.....made expenditures, or has given his consent for any other person to.....make expenditures, with a view to bringing about his nomination for election, to such office." His daily radio commentary has been used as such a tool since the first of this year. (Chapter 14, Section 431 (f)(1)(A), regarding 'expenditure', would also apply)

The banks, labor organizations or corporations that are sponsoring his program, such as Joseph Coors, are in violation of Title 18, Chapter 29, Section 610. "It is unlawful for any national bank, or any corporation..... to make a contribution or expenditure in connection with any election....." "Every Corporation.....which makes any contribution or an expenditure in violation of this section shall be fined not more than \$25,000....." If you rule that Reagan has been a candidate since Jan. 1, 1975, the corporations and banks have been in violations since then. If you don't agree, then they have been breaking the law since July 24th.

Any non-corporation business or individual that spends more than \$1,000 this year as a sponsor of his program is in violation of Title 18, Chapter 29, Section 608 (b)(1).

Every sponsor of Reagan's Commentary and/or every radio station that carries it, that hasn't filed reports is in violation, per Title 2, Chapter 14, Section 437a, "Any person who expends any funds.....for the purpose of influencing the outcome of an election, or who publishes or broadcasts to the public any material.....setting forth the candidates position on

Commission Chairman Thomas B. Curtis  
Federal Election Commission  
July 28, 1975  
Page 2

any public issue,.....shall file reports with the Commission as if such person were a political committee....."

Furthermore, I request that you rule that the total amount expended by sponsors for his commentary be accumulated against his allowable \$10 million, nationwide, if he enters any primaries. (Title 18, Chapter 29, Section 608 (c)(1)(A)) Under the same section, the amount expended in each state for his program should be accumulated against the amount allowed in each state.

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In most political campaigns, candidates or their agents buy advertising time directly from radio stations. In this case, the stations have been buying the commentary from O'Connor Creative Services, Los Angeles; then the stations sell it to sponsors. It might very well call for the FCC to examine this rather unusual action with each station involved.

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Mr. Curtis, in the first year of existence for most of these campaign reform laws, it would be a travesty if you don't concur that Ronald Reagan is breaking part of the letter of the law, and is totally breaking the spirit of the law. No one will ever adhere to campaign laws if your commission doesn't start right off with tough enforcement.

Yours truly,

7  
7  
James Horwitz  
President

cc: FCC  
KABC  
L.A. Registrar-Recorder  
Calif. Sec. of State  
Ronald Reagan  
Joseph Coors Co.

HJH/et

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

VALLEY PUBLICATIONS INC.

4616 W. MAGNOLIA BLVD.

P. O. BOX 1115

BURBANK, CALIF. 91507

601001

**NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES**

Commission Chairman Thomas B. Curtis  
Federal Election Commission  
1325 "K" Street, N.W.  
Washington D.C., 20005

ELIZON 123

75 AUG 4 AM 10:10

FEDERAL ELECTION  
COMMISSION

**RETURN RECEIPT  
REQUESTED**

REGISTERED  
NO. 27373

OFFICE OF GENERAL COUNSEL

COMPTROLLER GENERAL OF THE UNITED STATES

U.S. GENERAL ACCOUNTING OFFICE  
Washington, D.C.

RECEIVED  
FEDERAL ELECTION  
COMMISSION

REGISTRATION FORM AND STATEMENT OF ORGANIZATION  
FOR A '75 JUL 24 PM 12:21  
COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT  
OF THE UNITED STATES AND ANTICIPATING CONTRIBUTIONS OR EXPENDITURES  
IN EXCESS OF \$1,000 IN ANY CALENDAR YEAR

REQUIREMENTS FOR REGISTRATION OF POLITICAL COMMITTEES

(In accordance with the provisions of the Federal Election Campaign Act of 1971, P.L. 92-225)

SEE APPROPRIATE SUPERVISORY OFFICER'S MANUAL FOR ADDITIONAL  
REGULATIONS AND INSTRUCTIONS

A. The treasurer of each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President shall file with the Comptroller General of the United States a Registration Form and Statement of Organization, within 10 days after its organization, or, if later, 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President. Each such committee in existence on April 7, 1972 shall file a Registration Form and Statement of Organization with the Comptroller General on or before April 17, 1972. Note: If the committee also supports a candidate for the U.S. Senate, a similar statement must be filed with the Secretary of the Senate, and if the committee supports a candidate for the U.S. House of Representatives a similar statement must be filed with the Clerk of the House of Representatives.

B. A copy of this statement shall be filed with the Secretary of State (or, if there is no Office of Secretary of State, the equivalent State officer) of the appropriate State.

C. A copy of this statement shall be preserved by the treasurer of the political committee for a period of not less than four (4) years.

D. Any change or correction of information previously submitted in a Registration Form and Statement of Organization shall be reported to the Comptroller General within ten (10) days following the change or correction. Such amendments to the statement shall contain the date, identity of the committee, the changed or corrected information appropriately identified, and shall be verified by the oath or affirmation of the person filing such information, taken before any officer authorized to administer the oaths.

E. Any committee which, after having filed one or more Registration Form and Statement of Organization, disbands or determines it will no longer receive contributions or make expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall so notify the Comptroller General. Such notification shall be verified by the oath or affirmation of the person filing it, taken before any officer authorized to administer the oaths, and such notification shall include a statement as to the disposition of residual funds if the committee is disbanding.

1. Full name of committee: CITIZENS FOR REAGAN  
Mailing address and ZIP code: 2021 L. St., N.W./Suite 340/Washington, D.C. 20036

Date of this registration: July 24, 1975

2. Affiliated or connected organizations: None. (But note enclosed letter of authorization)

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
RECEIVED GENERAL COUNSEL

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

3. Area, Scope and Jurisdiction of the Committee:  
(a) Will this committee operate in more than one State? Yes.  
(b) Will it operate on a statewide basis in one State? Yes.  
(c) Will it primarily support candidates seeking State or local office? No.  
(d) Will it support a candidate for the office of President or Vice President in an aggregate amount in excess of \$1,000 during the calendar year? Yes.

77010027

**CITIZENS FOR REAGAN**

(Full Name of Committee)

4. (a) If the committee is supporting individual candidates for the office of President or Vice President, list each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District	Party
Ronald Reagan	10960 Wilshire Blvd. Los Angeles, California Suite 812 90024	Office of President of the United States	Republican

(b) List by name, address, office sought, and party affiliation, any candidate for other Federal office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
N/A			

(c) List by name, address, office sought, and party affiliation, any candidate for any other public office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought	Party
N/A			

5. If this committee is supporting the entire ticket of a party, give name of party: N/A

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Mr. Henry Buchanan	7979 Old Georgetown Rd. Suite 311 Bethesda, Md. 20014	Treasurer <b>FEDERAL ELECTION COMMISSION OFFICIAL FILE COPY OFFICE OF GENERAL COUNSEL</b>

7. List by name, address and position, other principal officers of the committee, including officers and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
Sen. Paul Laxalt	326 Russell Senate Office Building, Washington, D.C. 20510	Chairman
John P. Sears	2021 L. St., N.W. Suite 340 Washington, D.C. 20036	Executive Vice Chairman

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

77010010028

8. Does this committee plan to stay in existence beyond the current calendar year? YES. If so how long? November, 1978

9. In the event of dissolution, what disposition will be made of residual funds? To the Republican National Committee to the extent permitted by law.

10. List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
National Savings & Trust Co.	1700 K Street, N.W. Washington, D.C. 20006

11. List all reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports: None currently.

77040010929

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

FEDERAL ELECTION COMMISSION  
**OFFICIAL FILE COPY**  
OFFICE OF GENERAL COUNSEL  
85.

State of \_\_\_\_\_  
County of \_\_\_\_\_

I, Henry Buchanan, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.  
(Full Name of Treasurer of Political Committee)

Henry M. Buchanan  
(Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 24th day of July, A.D. 1975

Myrtle D. Jones  
(Notary Public)  
My commission expires May 4, 1978

[SEAL]

Return completed form and attachments to:  
Office of Federal Elections  
U.S. General Accounting Office  
441 G Street, NW.  
Washington, D.C. 20548

COMPTROLLER GENERAL OF THE UNITED STATES

U.S. GENERAL ACCOUNTING OFFICE

Washington, D.C.

COPY

1000  
RN361011 A050175 005

REGISTRATION FORM AND STATEMENT OF ORGANIZATION

FOR A COMMITTEE

SUPPORTING ANY CANDIDATE(S) FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT OF THE UNITED STATES AND ANTICIPATING CONTRIBUTIONS OR EXPENDITURES IN EXCESS OF \$1,000 IN ANY CALENDAR YEAR

REQUIREMENTS FOR REGISTRATION OF POLITICAL COMMITTEES

(In accordance with the provisions of the Federal Election Campaign Act of 1971, P.L. 92-200)

SEE APPROPRIATE SUPERVISORY OFFICER'S MANUAL FOR ADDITIONAL REGULATIONS AND INSTRUCTIONS

A. The treasurer of each political committee which anticipates receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President shall file with the Comptroller General of the United States a Registration Form and Statement of Organization, within 10 days after its organization, or, if later, 10 days after the date on which it has information which causes the committee to anticipate it will receive contributions or make expenditures in excess of \$1,000 any portion of which will be expended for the purpose of influencing the nomination or election of candidates for the office of President or Vice President. Each such committee in existence on April 7, 1972 shall file a Registration Form and Statement of Organization with the Comptroller General on or before April 17, 1972. Note: If the committee also supports a candidate for the U.S. Senate, a similar statement must be filed with the Secretary of the Senate, and if the committee supports a candidate for the U.S. House of Representatives a similar statement must be filed with the Clerk of the House of Representatives.

B. A copy of this statement shall be filed with the Secretary of State (or, if there is no Office of Secretary of State, the equivalent State officer) of the appropriate State.

C. A copy of this statement shall be preserved by the treasurer of the political committee for a period of not less than four (4) years.

D. Any change or correction of information previously submitted in a Registration Form and Statement of Organization shall be reported to the Comptroller General within ten (10) days following the change or correction. Such amendments to the statement shall contain the date, identity of the committee, the changed or corrected information appropriately identified, and shall be verified by the oath or affirmation of the person filing such information, taken before any officer authorized to administer the oaths.

E. Any committee which, after having filed one or more Registration Form and Statement of Organization, disbands or determines it will no longer receive contributions or make expenditures during the calendar year in an aggregate amount exceeding \$1,000 shall so notify the Comptroller General. Such notification shall be verified by the oath or affirmation of the person filing it, taken before any officer authorized to administer the oaths, and such notification shall include a statement as to the disposition of residual funds if the committee is disbanding.

1. Full name of committee: CITIZENS FOR REAGAN

Mailing address and ZIP code: c/o Eagan 94-23 108th Street  
Richmond Hill, New York 11419

Date of this registration: May 1, 1975

2. Affiliated or connected organizations:

Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
NONE		

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

3. Area, Scope and Jurisdiction of the Committee:

- (a) Will this committee operate in more than one State? No
- (b) Will it operate on a statewide basis in one State? No - Queens County, N.Y.
- (c) Will it primarily support candidates seeking State or local office? \_\_\_\_\_
- (d) Will it support a candidate for the office of President or Vice President in an aggregate amount in excess of \$1,000 during the calendar year? Yes

**for Reagan**

(Full Name of Committee)

The committee is supporting individual candidates for the office of President of the United States. List each candidate by name, address, office sought, and party affiliation:

Full names of candidates	Mailing address and ZIP code	State and Congressional District
Delegates to 1976 Republican National Convention pledged to Ronald Reagan	Names & addresses of delegates have not yet been determined	6CD, 7 CD, 8CD, 9CD, 10CD, N.Y.S.

(b) List by name, address, office sought, and party affiliation, any candidate for other office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought
None		

(c) List by name, address, office sought, and party affiliation, any candidate for any other office that this committee is supporting:

Full names of candidates	Mailing address and ZIP code	Office sought
None		

5. If this committee is supporting the entire ticket of a party, give name of party: N/A

6. Identify by name, address and position, the committee's custodian of books and accounts:

Full name	Mailing address and ZIP code	Committee title or position
Donna Schwarz	192-12 39th Avenue Flushing, New York 11358	Secretary & Treasurer

7. List by name, address and position, other principal officers of the committee, including officers and members of the finance committee, if any:

Full name	Mailing address and ZIP code	Committee title or position
James E. Eagan	94-23 108th Street Richmond Hill, New York 11419	

FEDERAL ELECTION COMMISSION  
OFFICIAL FILE COPY  
OFFICE OF GENERAL COUNSEL

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

Committee plan to stay in existence beyond the current calendar year? Yes If so how  
all 1976 N.Y. State Primary Election

event of dissolution, what disposition will be made of residual funds? residual funds  
be contributed to the 1976 Republican Presidential Nominee.

List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
National Bank of North America	160 Broadway New York, New York 10038

11. List all reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports:

Report title	Dates required to be filed	Name and position of recipient	Mailing address and ZIP code
State law does not cover filing of reports for federal candidates, copies of same are filed pursuant to federal law with State Board of Elections	as per federal law	State Board of Elections	194 Washington Ave. Albany, N.Y. 12225

\*Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate box above when information is continued on separate page(s).

State of NEW YORK  
 County of NEW YORK SS.

I, Donna Schwarz, being duly sworn, depose (affirm) and say that the information in this Registration Form and Statement of Organization is complete, true, and correct.

Donna Schwarz  
 (Signature of Treasurer of Political Committee)

Subscribed and sworn to (affirmed) before me this 1<sup>st</sup> day of May, A.D. 19 75.

MARY E. EAGAN  
 NOTARY PUBLIC, State of New York  
 No. 41-1062305  
 Qualified in Queens County  
 Commission Expires March 30, 1977

Mary E. Eagan  
 My commission expires March 30, 19 77

[SEAL]

FEDERAL ELECTION COMMISSION  
 OFFICIAL FILE COPY  
 OFFICE OF GENERAL COUNSEL

Return completed form and attachments to:  
 Office of Federal Elections  
 U.S. General Accounting Office  
 441 G Street, NW.  
 Washington, D.C. 20548

REPORT COVERING PERIOD FROM March 21, 1975 THROUGH June 30, 1975

	Column A— This period	Column B— Calendar year to date
<b>A—RECEIPTS:</b>		
Individual contributions:		
a. Itemized (use schedule A*).....	\$ 270.38	
b. Unitemized.....	\$	
Total individual contributions	\$	\$ 270.38
Part 2. Sales and collections:		
Itemize (use schedule B*).....	\$ 40.90	\$ 40.90
Part 3. Loans received:		
a. Itemized (use schedule A*).....	\$	
b. Unitemized.....	\$	
Total loans received	\$ -0-	\$ -0-
Part 4. Other receipts (refunds, rebates, interest, etc.):		
a. Itemized (use schedule A*).....	\$	
b. Unitemized.....	\$	
Total other receipts	\$ -0-	\$ -0-
Part 5. Transfers in:		
Itemize all (use schedule A*).....	\$ -0-	\$ -0-
TOTAL RECEIPTS	\$ 311.28	\$ 311.38
<b>SECTION B—EXPENDITURES:</b>		
Part 6. Communications media expenditures:		
Itemize all (use schedule C*).....	\$ -0-	\$ -0-
Part 7. Expenditures for personal services, salaries, and reimbursed expenses:		
a. Itemized (use schedule D*).....	\$	
b. Unitemized.....	\$	
Total expenditures for personal services, salaries, and reimbursed expenses	\$ -0-	\$ -0-
Part 8. Loans made:		
a. Itemized (use schedule D*).....	\$	
b. Unitemized.....	\$	
Total loans made	\$ -0-	\$ -0-
Part 9. Other expenditures:		
a. Itemized (use schedule C*).....	\$ 307.50	
b. Unitemized.....	\$	
Total other expenditures	\$	\$ 307.50
Part 10. Transfers out:		
Itemize all (use schedule D*).....	\$	\$
TOTAL EXPENDITURES	\$ 307.50	\$ 307.50
<b>SECTION C—CASH BALANCES:</b>		
Cash on hand at beginning of reporting period.....	\$ 0.00	
Add total receipts (section A above).....	\$ 311.28	
Subtotal.....	\$ 311.28	
Subtract total expenditures (section B above).....	\$ 307.50	
Cash on hand at close of reporting period.....	\$ 3.78	
<b>SECTION D—DEBTS AND OBLIGATIONS:</b>		
Part 11. Debts and obligations owed to the committee (use schedule E*).....	\$ 0.00	
Part 12. Debts and obligations owed by the committee (use schedule E*).....	\$ 0.00	

\*Schedules are to be used only when itemization is required. (See each Schedule for instructions.) When itemization is unnecessary for a given Part, the total of any amounts for that Part is to be entered as a lump sum on the "Unitemized" line of the appropriate Part of the Summary Report. The word "None" should be entered on any line of the Summary Report when no amount is being reported.

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**RONALD REAGAN**

SUITE 812  
10860 WILSHIRE BOULEVARD  
LOS ANGELES, CALIFORNIA 90024  
213 / 477-8281

July 14, 1975

The Honorable Paul Laxalt  
Member, United States Senate  
Senate Office Building  
Washington, D. C. 20500

Dear Paul:

I am writing this letter in response to your decision to chair the "Citizens for Reagan" committee. I deeply appreciate your action, but I want to inform you that I have not made up my mind whether to become an active Presidential candidate. I expect to make this decision before the end of the year.

Meanwhile, I recognize that due to the technical requirements of the law (including the requirement for the designation of a principal campaign committee), the committee must file with the Federal Elections Commission as working on my behalf. I trust this letter will suffice as my consent for purposes of allowing you to do so.

Sincerely,



RONALD REAGAN

FEDERAL ELECTION COMMISSION  
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OFFICE OF GENERAL COUNSEL

77040010934

FEDERAL ELECTION COMMISSION

1. Memo from D. Spiegel to S. Schachman, 12-18-75
2. Report of the Audit and Investigation Division on ~~Citizens for Reagan Committee, 12-4-75 (Agenda Item)~~
3. Press Memo from B. Fiske, 10-31-75
4. Memo to file, 10-29-75
5. ~~Memo from D. Spiegel from Murphy (draft), 10-16-75~~
6. Memo from V. Sterling to S. Schachman (no date)
7. Memo from D. Spiegel to Murphy/Schachman/Oldaker, 9-29-75
8. ~~Memo to file from Schachman, 9-12-75~~
9. Memo from V. Sterling to Schachman, 9-9-75
10. Memo from Schachman to Sterling, 9-2-75
11. ~~Memo from Kammerer to Schachman, (no date)~~
12. Section 437d(a)(1) questions for Reagan (draft), no date.

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):

- |                                     |   |                                     |  |
|-------------------------------------|---|-------------------------------------|--|
| <input type="checkbox"/>            | (1) Classified Information                                | <input type="checkbox"/>            | (6) Personal privacy                             |
| <input type="checkbox"/>            | (2) Internal rules and practices                          | <input checked="" 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

Kurt Bulchart

date

10/3/77

77040010935.