

Browning

3



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 11 1977

Richard A. Viguerie Co.
7777 Leesburg Pike
Falls Church, VA 22043

Re: MUR 303 (76)

Dear Mr. Viguerie:

I am forwarding the enclosed complaint pursuant to Section 437g(a)(2) of the Federal Election Campaign Act of 1971, as amended, for your information. As shown by the attached copy of my letter to complainant, the Commission believes there is no reason to believe a violation of the Act has occurred and, accordingly, does not intend to investigate the matter any further.

Sincerely yours,

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Enclosure



770400:3217

77040016213

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

66

● **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:

Robert Thomson, Esq.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438235</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

K. Hollon

4. DATE OF DELIVERY POSTMARK

FEB 14 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GOP: 1976-O-203-456

TRANSMISSION COPY
OFFICE OF LEGAL COUNSEL

Attorney
Browning



FEDERAL ELECTION COMMISSION

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

Robert Thomson, Esq.
Preston, Thorgrimson, Ellis
Holman & Fletcher
1776 F Street, N.W.
Washington, D.C. 20006

FEB 11 1977

Re: MUR 303 (76)

Dear Mr. Thomson:

This refers to your complaint dated October 22, 1976, alleging certain violations of the Federal Election Campaign Laws relating to an unreasonable extension of credit by Richard A. Viguerie Company. The Commission has reviewed your allegations and has concluded that on the basis of your complaint there is no reason to believe that the statute has been violated.

Should additional information come to your attention which you believe establishes an apparent violation of the Act, please contact me. The attorney assigned to this matter was David R. Spiegel (telephone no. 202/382-4055). The file reference number is 303 (76).

Sincerely yours,

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
CARBON FILE COPY
DATE 11/11/77

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FEDERAL ELECTION COMMISSION

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

February 11, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

RE: Procedure for "Statement of Reasons For
Commission Action", and Statement of
Reasons for Commission Action in MUR 303 (76)

The above-mentioned documents were transmitted to the
Commissioners on February 10, 1977 at 9:00 a.m.

As of 10:00 a.m., February 11, 1977, no objections had
been received to either the Procedure or the actual Statement
of Reasons for Commission Action in MUR 303 (76).

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL



770400:5221

Marjorie Emmons

February 7, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Charles N. Steele
Re: Distribution of attached material to
Commissioners

Attached is a memo to the Commissioners dealing with certain situations where the Commission has determined to close the files on a MUR. The memo describes the procedure of circulating a statement of reasons for Commission actions with respect to a particular matter under review. The first MUR to be treated in this manner is MUR 303 (76) - thus, the Statement of Reasons for Commission Action for that case is also attached.

Would you please distribute to the Commissioners, as a non-agenda item, the attached materials on a non-objection basis. The memo and the Statement of Reasons for Commission Action for MUR 303 (76) should be kept together.

770400:5221

FEDERAL BUREAU OF INVESTIGATION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

MUR 303

Harper

February 7, 1977

MEMORANDUM TO: The Commission

FROM: Bill Oldaker *Bill*

SUBJECT: Statement of Reasons for Commission's Closing of MUR

In reviewing our recently closed compliance files prior to public disclosure, we have encountered a situation where our procedures for processing cases leave the Commission's disposition subject to legal attack. Recent cases (e.g., Goldberg v. Kelly 397 U.S. 254, 271 (1970), as cited in Norrison v. Brewer, 408 U.S. 471, 487 (1972); Dunlop v. Bachowski 421 U.S. 560, (1975)) require an agency to articulate the grounds for a discretionary dismissal of an action; otherwise the court will find that the minimum demands of administrative due process have not been met, and at the very least, remand for a statement of reasons.

In most cases where the Commission finds no reason to believe, it bases its actions on the General Counsel's report. In the instant case, the Commission rejected the General Counsel's recommendation; there is thus in the file no statement of reasons for the Commission's action

We propose to handle this problem in this case and in the future, by drafting a short statement of reasons for the Commission's action on the basis of the Commission's deliberations and circulate it for approval by Commissioners, on a non-agenda basis. Approval sheets with a signature line would be attached. Objections would be placed on the next agenda.

If Commissioners have objections to this procedure, or to the attached statement of reason in MUR 303, we would be glad to put them on an agenda for discussion.

COMMISSION
FILE COPY
MUR 303

7704003522

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 303 (76)
Richard A. Viguerie & Co.)

STATEMENT OF REASONS FOR COMMISSION
ACTION

On December 29, 1976, the Commission, by a 4-0 vote, found no reason to believe a violation of the Federal Election Campaign Act of 1971, as amended, had occurred in the above-captioned matter.

Complainant alleged that Richard A. Viguerie & Co. had made an extension of credit outside the ordinary course of the corporation's business to a political committee, Committee for Responsible Youth Politics, thereby violating 2 U.S.C. §441b(a) by making a corporate contribution.

The Commission determined that there was insufficient evidence supporting the allegation of an illegal extension of credit where the debt owed to respondent by the Committee for Responsible Youth Politics was continually reduced by periodic payments. (\$34,800 of the original debt of \$46,569 was paid off as of August 31, 1976). The Commission noted that while the debtor committee had a declining balance in debts and an ascending balance of cash on hand, such evidence was not indicative of unusually lenient credit terms where the debtor was paying off the debt on a regular, periodic

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basis.

Moreover, the Commission found the existence of one overlapping employee, who worked for both the creditor and the debtor committee, not significant enough to show the extension of credit to be outside the ordinary course of business.

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FEDERAL RESERVE BANK
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OFFICE OF GENERAL COUNSEL

December 3, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS *MJE*
RE: MUR 297 (76) and MUR 303 (76)

The above mentioned MURs were transmitted to the Commissioners on December 2, 1976 at 12:30 p.m.

Your office was notified that as of 2:30 p.m. on December 3, 1976, no objections had been received on these MURs.

At 2:45 p.m., December 3, 1976, Commissioner Aikens submitted objections to both MUR 297 (76) and MUR 303 (76).

MUR 297 (76) and MUR 303 (76) will be placed on the Compliance Agenda for December 8, 1976.

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ATTORNEY GENERAL'S COMMISSION
GENERAL FILE COPY
OFFICE OF GENERAL COUNSEL

December 3, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS *MJE by me*
RE: MUR 297 (76) and MUR 303 (76)

The above mentioned MURs were transmitted to the Commissioners on December 2, 1976 at 12:30 p.m.

As of 2:30 p.m. on December 3, 1976, no objections have been received on these MURs.

objection Aikens on both 12-3-76

7704175227
FEDERAL COMMISSIONS
GENERAL FILE COPY
OFFICE OF GENERAL COUNSEL

DATE AND TIME OF TRANSMITTAL: 12-2-76
12:30

NO. MJR 303 (76)
REC'D: 10/26/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: National Committee for an Effective Congress

Respondent's Name: Richard A. Viguerie & Co.

Relevant Statute: 2 U.S.C. 441b(a)

Internal Reports Checked: National Conservative Political Action Committee; Committee for the Survival of a Free Congress; Committee for Responsible Youth Politics; Stanley Burger for Senate Committee.

Federal Agencies Checked: none

SUMMARY OF ALLEGATION

Complainant alleges that Richard A. Viguerie & Co. has made an extension of credit to CRYP outside the ordinary course of the corporation's business (see Proposed Regulations 114.10(a)), and, thus, an illegal corporate contribution under 2 U.S.C. §441b(a).

PRELIMINARY LEGAL ANALYSIS

Complainant argues that Richard A. Viguerie & Co., a political fund-raising operation specializing in the sale of printing, mailing, list rental and other direct mail services, has treated differently the debts of the Committee for Responsible Youth Politics (CRYP) from the debts of other political committees. This allegation arises from the fact that CRYP has run up a debt owed to Viguerie and Co. but has deferred payment of the debt at times when the committee had sufficient funds in its treasury to satisfy the debt. (continued)

RECOMMENDATION

Reason to believe a violation of 2 U.S.C. §441b(a) has occurred. A proposed notification including specific questions is attached.

FEDERAL ELECTION COMMISSION
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PRELIMINARY LEGAL ANALYSIS (continued)

Complainant's exhibit 1 shows that CRYP ran up a debt owed to Viguerie companies totalling \$46,569.19 over the period from Aug., 1973 to May 17, 1976. Complainant alleges that the balance until recently averaged approximately \$20,000 per month. Our analysis of the reports shows the following amounts owed to Viguerie as well as the amount of funds on hand at the end of each reporting period:

<u>Reporting Period Ending. . .</u>	<u>Outstanding Debt Owed to Viguerie</u>	<u>Cash on Hand Plus Total Receipts**</u>
Dec., 1974	\$19,921.56	unknown
Feb., 1975	\$18,921.56	\$5,413.88
June, 1975	\$19,169.84	\$1,633.37
Sept., 1975	\$17,719.84	\$3,995.45
Dec., 1975	\$16,299.19	\$8,066.17
March, 1976	\$16,399.19	\$1,712.65
April, 1976	\$15,399.19	\$21,664.98
May, 1976	\$16,269.19	\$18,442.84
June, 1976	\$12,769.19	\$16,700.40
July, 1976	\$11,769.19	\$10,578.69
Aug., 1976	\$11,769.19	\$12,580.36
Sept., 1976	\$10,269.19	\$25,951.52

****CAVEAT:**

No expenditures for each reporting period have been subtracted from this figure. In other words, the figure represents the amount of current receipts to be used for operating expenses and contributions to candidates. In order to determine whether CRYP had enough funds on hand during each reporting period to pay its outstanding obligation to Viguerie, one must subtract an estimated amount for operating expenses, e.g., rent, salaries, etc.

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Complainant notes that CRYP's treasury held enough funds to satisfy the Viguerie debt on several occasions. However, the committee chose not to pay the debt off, but rather to support various Federal candidates. The chart on page 2 shows that during the months of April, May, June, August and September, 1976, CRYP could have paid off its debt to Viguerie, assuming its operating costs were not too high.

In contrast to these rather large outstanding balances, complainant offers the examples of the debts owed to Viguerie by three other committees, the Committee for the Survival of a Free Congress, the National Conservative Political Action Committee and the Stanley C. Burger Committee. While the Burger reports are incomplete, our analysis of the reports of the Committee for the Survival of a Free Congress does show large obligations to the Viguerie operation during every reporting period - and in each case the entire debt was paid off by the end of that reporting period. National Conservative Political Action Committee's reports show that all Viguerie debts run up between March, 1975, and March, 1976, were completely paid off each reporting period. All debts run up between April, 1976, and August, 1976, were paid by the end of August, 1976 (suggesting a 90 day credit arrangement). The September, 1976, bills are still outstanding, but only amount to around \$5,000.

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An additional factor which contributes to the possibility that the Viguerie Company has treated CRYP more leniently than its other debtors is that the two groups have overlapping personnel. Morton Blackwell is chairman of CRYP, and is also an employee of the Viguerie Company, according to a Washington Post article of May 6, 1975.

In our opinion, the constant deferral of payment of debts owed by CRYP, considered together with the Blackwell connection, gives reason to believe the Viguerie corporation is treating CRYP differently than its other debtors, thereby causing a violation of 2 U.S.C. §441b(a).

FEDERAL RESERVE SYSTEM
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Thomson, Esq.
Preston, Thorgrimson, Ellis
Holman & Fletcher
1776 F Street, N.W.
Washington, D.C. 20006

Re: MUR 303 (76)

Dear Mr. Thomson:

We have completed a preliminary review of your complaint and have numbered it as MUR 303. Please refer to this number in any further correspondence. If you have any further evidence you wish to make available to us, please submit it within five days of your receipt of this letter.

Please note that 2 U.S.C. §437g(a)(3) enjoins any person from making public the fact of "any notification or investigation" by the Commission until the respondent agrees in writing to make public the investigation. Please do not hesitate to write or call if you have any further questions. The attorney assigned to this matter is David Spiegel (telephone no. 202/382-4055).

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Viguerie Co.
7777 Leesburg Pike
Falls Church, Virginia 22043

Re: MUR 303 (76)

Dear Mr. Viguerie:

This letter is to notify you that the Federal Election Commission has received a complaint against your company which alleges certain violations of the Federal Election Campaign Act of 1971, as amended (the Act). We have numbered this matter MUR 303 (76). A copy of the complaint is enclosed. The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441b(a).

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

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact David R. Spiegel, telephone no. 202/382-4055, the attorney assigned to this case.

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OFFICE OF GENERAL COUNSEL



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

Sincerely yours,

John G. Murphy, Jr.
General Counsel

Enclosure

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OFFICE OF GENERAL COUNSEL
OFFICIAL FREE COPY
OFFICE OF GENERAL COUNSEL

LIST

1. Please supply copies of all documents governing the organization and operation of Richard A. Viguerie and Co., and any other political mailing services with which you are connected, i.e., services of which you have control or ownership. These documents should include, but not be limited to, by laws, charters, statements of organization, etc.

2. Identify all employees, including yourself, who have supervisory responsibilities with regard to carrying out any mailing services for the following committees: Committee for Responsible Youth Politics, National Conservative Political Action Committee, Committee for the Survival of a Free Congress. Describe the nature of these supervisory responsibilities. List the work addresses of these employees.

3. Describe in detail the responsibilities of Mr. Morton Blackwell with regard to any decision-making authority he may have over which clients your mailing services do business with and what the terms of the contracts with those clients will be. Specifically include a description of the role Mr. Blackwell might have played with regard to a contract for services with the Committee for Responsible Youth Politics.

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4. Identify the personnel on the following committees with whom your mailing services dealt in regard to contracts with those committees: Committee for Responsible Youth Politics, National Conservative Political Action Committee, Committee for the Survival of a Free Congress.

5. Send copies of all contracts with the three committees listed in number 4, above. Describe any agreements as to deferral of payment of debts with regard to these contracts. If such agreements are in writing, send copies.

6. List all services performed for the Committee for Responsible Youth Politics, the National Conservative Political Action Committee, and the Committee for the Survival of a Free Congress. Include the costs of such services, and the dates of payment. Send copies of any documents relating to the performance of those services, e.g., checks received, bills sent.

7. With respect to any mailing services performed for the three committees mentioned above in number 6, is the same mailing list used for all of the three committees, and, if not, how is a decision made to vary the lists for each committee?

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OFFICE OF GENERAL COUNSEL
OFFICE OF GENERAL COUNSEL

8. Are contributions to any of the political committees for whom you provide services sent directly to your mailing services rather than to the candidates or the committees for whom you solicit? If so, explain under what circumstances money is sent directly to your mailing services.

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FEDERAL ELECTION COMMISSION
OFFICIALS FILE COPY
OFFICE OF GENERAL COUNSEL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Thomson
Preston, Thorgrimson, Ellis,
Holman & Fletcher
1776 F Street, N.W.
Washington, D.C. 20006

11-2-76

Dear Mr. Thomson:

This is to acknowledge receipt of the NCEC complaints of October 22, 1976, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken.

Sincerely yours,

William C. Oldaker
Assistant General Counsel

JBrowning:pjg:11/1/76
cc: JB

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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MUR 303

RECEIVED
FEDERAL ELECTION
COMMISSION

CC # 916

LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.

WASHINGTON, D. C. 20006

1976 NOV 2 AM 9:04

AREA CODE 202
202-7600

SOLOMON GROSSBERG
IRVING B YOCHELSON
JULIUS I FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
LEONARD L. ROSENBERG
SHELTON M. BINSTOCK

ISADORE BRILL (1905-1964)

763350

October 28, 1976

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

Re: Richard A. Viguerie

Dear Mr. Oldaker:

There has been directed to our attention recent newspaper articles concerning a complaint submitted to the Commission by the National Committee for an Effective Congress, concerning our client, Richard A. Viguerie.

We are not familiar with nor have we in any way been advised of the nature of the complaint except through newspaper reports. We would appreciate your making available to us a copy of the complaint for our review.

We wish to inform the Commission of the desire of both Mr. Viguerie and ourselves to at all times fully assist and work with the Commission in furnishing such information as may be required to appropriately consider the matter.

Very truly yours,

C. Richard Beyda

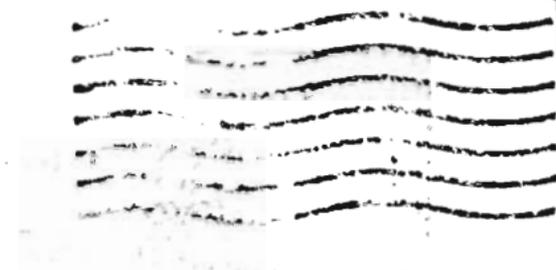
CRB:ka

FEDERAL ELECTION COMMISSION
OFFICIAL FILE 6577
OFFICE OF GENERAL COUNSEL

7704001523

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET N.W.
WASHINGTON, D.C. 20006



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

NOV 1 1976 4:53

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

OFFICE OF THE
GENERAL COUNSEL

NOV 1 1976

7714101101

MUR 303

LAW OFFICES
PRESTON, THORGRIMSON, ELLIS, HOLMAN & FLETCHER
1776 F STREET, N. W.
WASHINGTON, D. C. 20006
AREA CODE 202 331-1005

EMANUEL ROUVELAS
JONATHAN BLANK
ROBERT N. THOMSON
TOVAH THORSLUND
ARTHUR PANKOPF

2000 I. B. M. BUILDING
SEATTLE, WASHINGTON 98101
206-623-7580

October 22, 1976

The Honorable Vernon W. Thomson
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: MUR 303

Dear Chairman Thomson:

This is a complaint alleging that Richard A. Viguerie & Co., 777 Leesburg Pike, Falls Church, Virginia, a corporation registered in the Commonwealth of Virginia, has made contributions to the Committee for Responsible Youth Politics ("CRYP"), a registered political committee supporting Federal candidates, in violation of 2 U.S.C. §441b(a). The complaint is filed on behalf of the National Committee for an Effective Congress ("NCEC"), 505 C Street, N.E., Washington, D.C. 20002.

As indicated by Exhibit 1, Richard A. Viguerie & Co. has extended a line of credit to CRYP since 1973 with an outstanding balance that has averaged approximately \$20,000 each month until very recently. Complainant believes such extension of credit constitutes an illegal corporate contribution, since it is outside the ordinary course of the corporation's business. See, FEC proposed regulations, §114.10(a), 41 Fed. Reg. 35962 (August 25, 1976).

The following facts are presented for the Commission's consideration:

1. FEC reports filed by CRYP during the period in question indicate that the Committee on several occasions has had sufficient assets to repay the outstanding obligation to Richard A. Viguerie & Co. Instead, the Committee has contributed such assets to Federal candidates. Since the corporation is retained to provide direct mail fund-raising for CRYP, as indicated by

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FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

Exhibit 1, the corporation and its agents are well aware of the assets available to CRYP. Despite knowledge that available assets were being directed by CRYP for political contributions to Federal candidates, the corporation has continued to extend credit to the Committee unabated.

2. The corporation is not allowing other political committees for which it is doing direct mail fund-raising similar credit opportunities. The Commission's attention is directed particularly to reports filed by the Committee for the Survival of a Free Congress, the National Conservative Political Action Committee and the Stanley C. Burger Committee, all of which have been required to pay the corporation or its affiliates for their services on a reasonably current basis.

3. Another factor that may explain the generosity of the credit terms is that Mr. Morton Blackwell, an executive in the Viguerie corporation, is listed on CRYP's registration statement as its chairman.

4. As a political committee itself, complainant has some experience in purchasing goods and services from business enterprises. By any standard, the credit arrangement offered to CRYP by the Viguerie corporation is extremely generous. In arm's length transactions, businesses are reluctant to extend substantial credit to multi-candidate political committees because it is difficult to assign liability for unpaid debts to any individual and because the committees are often short-lived. The fact that there are such generous credit arrangements here suggests that the transaction is not at arm's length.

Complainant has presented evidence taken from the public record that, taken in the aggregate, provides sufficient reason for the Commission to believe a violation of 2 U.S.C. §441b(a) has occurred. Consequently, complainant believes the Commission has an obligation under 2 U.S.C. §437g to commence a formal investigation.

This complaint has not been filed at the request or suggestion of any candidate or on behalf of any candidate.

Very truly yours,

PRESTON, THORGRIMSON,
ELLIS, HOLMAN & FLETCHER

By


Robert Thomson
Counsel to NCEC

RT:mlp

7704001534

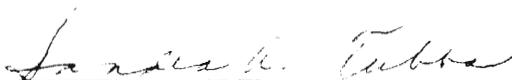
HAROLD P. WOLFF alleges and swears that he is an employee and agent of the National Committee for an Effective Congress, that he is fully authorized to sign and swear to this complaint, that he has read the assertions and allegations contained therein, and that to the best of his belief and knowledge, they are true and correct.



HAROLD P. WOLFF
National Committee for An
Effective Congress

77040715241
On this *22nd* day of *October*, 1976, before me the undersigned, a Notary Public in and for the District of Columbia, duly commissioned and sworn, personally appeared Harold P. Wolff, to me known to be the individual described in and who executed for foregoing instrument and acknowledged to me that he signed the same as his free and voluntary act and deed for the uses and purposes therein mentioned.

Witness my hand and official seal affixed hereto the day and year in this certificate first above written.



NOTARY PUBLIC, in and for
the District of Columbia.

My Commission Expires June 30, 1979

SECTION
COPY
COUNSEL

Exhibit 1

Line Numbers 25 and/or 26 of FEC Form 3

(Use separate schedule(s) for each numbered line).

(see instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee For Responsible Youth Politics				
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
John C. Blackwell-Chairman 4 North 17th Street Arlington, Virginia 22201 Various expenses incurred in behalf of CRYP	7-2-75	1,969.36	-0-	1,969.36
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Richard A. Viguerie Company 77 Leesburg Pike Arls Church, Virginia 22043 Printing, Mailing, List Rental, & Other Direct Mail Expenses	12-1-74	19,844.73	3,495.59	16,349.19
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
National Cons. Political Action Comm. 1111 W. Ft. Myer Drive, Suite 906 Arlington, Va. 22209	3/29/76	1,300.00	-0-	1,300.00
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Name, mailing address and ZIP code, and nature of contribution	Date (month, day, year)	\$	\$	\$
Total for this period (this page) (left column) ▶		\$	\$	\$
Total for this period (last page this line number only) ▶		23,114.14	3,495.59	19,618.55
Total outstanding balance only, to top separate line of summary.				

RECEIVED
OFFICIAL FILE COPY
OFFICE OF SENATOR COUNSEL

Schedule C
 Federal Election Commission
 2325 K Street, N.W.
 Washington, D.C. 20463

Line Numbers 23 and/or 28 of F&C Form 3
 (See Instructions on back)

File copies submitted for each numbered line.

7 6 0 3 2 0 8 3 4 5 7

Name of Candidate or Committee in full	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics Full Name, mailing address and ZIP code and nature of obligation: Richard A. Vignerie Co. 7777 Leesburg Pike Falls Church, VA 22043	Date (month, day, year) 11, 12/74 3/75 \$ 19,921.56 218.28 \$ 20,139.84	\$ 1,000.00	\$ 19,169.84
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Subtotals this period this page (optional)	\$	\$	\$
Total this period (last page this line number only)	\$ 20,169.84	\$ 1,000.00	\$ 19,169.84

FEDERAL ELECTION COMMISSION
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 OFFICE OF GENERAL COUNSEL

* Carry outstanding balance only, to appropriate line of summary.

Line Numbers 25 and/or 26 of FEC Form 3

7/1/75-9/30/75

These amounts contributed for each
 numbered line
CORRECTION

(See Instructions on back)

Name of Candidate or Committee in full Committee for Responsible Youth Politics	Amount of Original Debt, Contract, Agree- ment, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Full Name, mailing address and ZIP code, and nature of obligation Richard A. Venerie & Co. 7777 Leesburg Pike Falls Church, VA 22043	Date (month, day, year) Forward: 3-31-75 6-15-75	\$ \$ 45,221.56 213.28 50.00	\$ \$ \$
Full Name, mailing address and ZIP code, and nature of obligation Printing, Mailing, List Rental and other Direct Mail Services	Date (month, day, year)	\$ 45,519.84	\$ 27,800.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Subtotals this period (this page) (up to line 26) ▶	\$	\$	\$
Total this period (last page this line number only) ▶	\$ 45,519.84	\$ 27,800.00	\$ 17,719.84

FEDERAL ELECTION COMMISSION
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 OFFICE OF GENERAL COUNSEL

Reporting of
 Federal Election Commission
 1200 M Street, N.W.
 Washington, D.C. 20543

Use Schedule 3B and/or 3C of Form 1

See instructions on back

(see instructions on back)

773034238342611

Name of Candidate or Committee in full Committee for Responsible Youth Politics	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Full Name, mailing address and ZIP code, and nature of obligation Morton C. Blackwell 3128 No. 17th Street Arlington, VA 22201	Date (month, day, year) 7/2/75	\$ 1,969.36	\$ - 1,969.36
Full Name, mailing address and ZIP code, and nature of obligation Richard A. Viguerie & Co. 7777 Leesburg Pike Falls Church, VA 22043	Date (month, day, year) 11,12/74 3/75 8/75	\$ 17,921.56 248.28 50.00 <u>20,219.84</u>	\$ 2,500.00 17,719.84
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$
Subtotal this period this page (optional) ▶	\$	\$	\$
Total this period (last page this line number only) ▶	22,169.20	2,500.00	19,689.20

FEDERAL ELECTION COMMISSION
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 OFFICE OF GENERAL COUNSEL

* Carry outstanding balance only, to appropriate line of summary.

Module C
 July 1976
 Federal Election Commission
 1100 K Street, N.W.
 Washington, D.C. 20463

Line Numbers 25 and/or 26 of FEC Form 3

(Use separate schedule for each numbered line).

(See instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Morton C. Elackwell 3128 No. 17th Street, Arlington, VA 22201	7/2/75	1,969.36	-	1,969.36
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	11,12/74 3,8/75 12/75	19,921.56 298.28 79.35	4,000.00	16,299.19
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
		20,277.29		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		22,268.55	4,000.00	18,268.55

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* Carry outstanding balance only, to appropriate line of summary.

730177847

Name of Candidate or Committee in full
Committee for Responsible Youth Politics

Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of The Period
Richard A. Viguerie Co. 7777 Leesburg Pike Falls Church, VA 22043	11, 12/74	\$ 19,921.56	\$	\$
	3, 8, 12/75	377.63		
	3/76	100.00		
		<u>20,399.19</u>	4,000.00	16,399.19

Morton C. Blackwell 3128 No. 17th Street Arlington, VA 22201	7/2/75	\$ 1,969.36	-	\$ 1,969.36
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National Conservative Political Action Committee 2911 N. Fort Myer Dr., Suite 906 Arlington, VA 22209	3/29/76	\$ 1,300.00	-	\$ 1,300.00
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		\$	\$	\$
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		\$	\$	\$
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		\$	\$	\$
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		\$	\$	\$
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		\$	\$	\$
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FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

Totals this period this page (optional)	▶	\$ 23,668.55	\$ 4,000.00	\$ 19,668.55
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Carry outstanding balance only, to appropriate line of summary.

Name of Candidate or Committee in full	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics Full Name, mailing address and ZIP code, and nature of obligation: Richard A. Vickarick Co. 7777 Leesburg Pike Falls Church, VA 22043	Date (month, day, year) 11/76 1/76 4/76 \$ 20,377.19	\$ 5,000.00	\$ 15,377.19
Full Name, mailing address and ZIP code, and nature of obligation: Morton C. Blackwell 3128 North 17th Street Arlington, VA 22201	Date (month, day, year) 7/75 \$ 1,969.36	\$ -	\$ 1,969.36
Full Name, mailing address and ZIP code, and nature of obligation: 1215	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation: 10	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation: 770	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation: 770	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation: 770	Date (month, day, year)	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation: 770	Date (month, day, year)	\$	\$
Subtotals this period this page (optional)	\$	\$	\$
Total this period (last page this line number only)	\$ 22,368.55	\$ 5,000.00	\$ 17,368.55

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*Carry outstanding balance only, to appropriate line of summary.

76030085050

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics				
Full Name, mailing address and ZIP code, and nature of obligation Richard A. Vignerie Co. 7777 Leesburg Pike Falls Church, VA 22043	Date (month, day, year) 11/74 thru 4/75 5/75	\$ 20,399.19 870.00 <u>21,269.19</u>	\$ 5,000.00	\$ 16,269.19
Full Name, mailing address and ZIP code, and nature of obligation Morton C. Blackwell 3128 North 17th Street Arlington, VA 22201	Date (month, day, year) 7/75	\$ 1,969.36	\$ -	\$ 1,969.36
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		23,238.55	5,000.00	18,238.55

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*Carry outstanding balance only, to appropriate line of summary.

Line Numbers 25 and/or 26 of FEC Form 3

(Use separate schedule(s) for each numbered line).

10-10-76

(see instructions on back)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Richard A. Vigierie Co. 7777 Leesburg Pike Falls Church, VA 22043	* 8-23-73 to 5-17-76	* 46,569.19	35,300.00	10,269.19
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Morton C. Blackwell 3128 North 17th Street Arlington, VA 22201	9-30-76	2,115.93	-	2,115.93
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Reimbursement of Expenses - Travel, Phone, Meals, Lodging.				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Martin Advertising Co. 8320 Old Courthouse Rd., Vienna, VA 22180	9-20-76	1,180.66	-	1,180.66
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Preparation, writing, mailing and other Direct Mail services.				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)		\$	\$	\$
Total this period (last page this line number only)		\$ 49,865.98	\$ 36,300.00	\$ 13,565.98

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* Carry outstanding balance only, to appropriate line of summary.

Line Numbers 25 and/or 26 of FEC Form 3

(see instructions on back)

(Use separate schedule(s) for each numbered line.)

10-10-76

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Richard A. Viguerie & Co. 7777 Leesburg Pike Falls Church, VA 22043	8-23-73	8,000.00		
	8-30-73	2,926.62		
	9-6-73	3,812.66		
	9-12-73	4,778.00		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Printing, Mailing, List Rental and other Direct Mail services.	9-20-73	328.86		
	10-5-73	325.76		
	10-12-73	2.66		
	10-12-73	50.00		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	10-25-73	29.79		
	10-31-73	15.21		
	12-20-73	179.20		
	12-21-73	102.74		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	12-31-73	6.00		
	12-31-73	209.84		
	1-11-74	139.07		
	1-31-74	5.57		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	2-14-74	319.44		
	3-11-74	2,309.31		
	3-11-74	1,544.42		
	3-11-74	1,665.85		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	3-14-74	5,113.79		
	3-14-74	255.25		
	3-21-74	19.71		
	3-21-74	2,810.58		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	3-29-74	6,916.82		
	4-4-74	104.50		
	4-4-74	2,408.34		
	4-30-74	2.19		
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
	4-30-74	623.97		
	6-27-74	50.00		
	8-8-74	37.63		
	9-13-74	50.00		
Subtotals (this period this page optional)	12-20-74	\$ 76.78	\$	\$
Total this period (last page this line number only)		45,221.56	25,300.00	19,921.56

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* Carry outstanding balance only, to appropriate line of summary.

Line Numbers 25 and/or 26 of FEC Form 3

LINE NUMBER 26

(Use separate schedule for each numbered line).

thru 7/31/76

(see instructions on back)

Name of Candidate or Committee in full	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	10-10-76 Outstanding Balance at Close of This Period
Committee for Responsible Youth Politics Full Name, mailing address and ZIP code, and nature of obligation Richard A. Viguerie & Co. 7777 Icesburg Pike Falls Church, VA 22043	Date (month, day, year) \$ Forward.... \$ 45,221.56 3-31-75 248.28 8-15-75 50.00 12-31-75 79.35	\$ \$	\$ \$
Full Name, mailing address and ZIP code, and nature of obligation Printing, Mailing, List Rental and other Direct Mail services	Date (month, day, year) 3-22-76 50.00 3-31-76 50.00 5-17-76 870.00	\$ \$	\$ \$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$ 46,569.19	\$ 34,800.00	\$ 11,769.19
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year) \$	\$	\$
Subtotals this period (this page) (optional)	\$	\$	\$
Total this period (last page this line number only)	\$	\$	\$

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