



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20463

November 2, 1977

Mr. Peter F. Secchia
2833 Bonnell Ave., S.E.
Grand Rapids, Michigan 49506

Re: MUR 321(76)

Dear Mr. Secchia:

This is to notify you that the Commission is in receipt of your check for \$500.

Enclosed is a copy of the conciliation agreement signed by all parties. This copy is for you to keep for your own records.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosure

cc: T. Timothy Ryan, Jr.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
PETER F. SECCHIA

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)
)

MUR 321 (76)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found Reasonable Cause to Believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441a(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondent having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this case;

II. The Respondent has voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and has had reasonable opportunity to demonstrate that no action should be taken in this matter;

III. The pertinent facts in this matter are as follows:

A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Peter F. Secchia worked as a fundraiser and campaigner during the period of January, 1976, to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary Campaign. In addition, Peter F. Secchia led groups of individuals to Florida in February, 1976, and to Wisconsin in April, 1976, to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

(3) Peter F. Secchia notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

(4) Between the first week of May, 1976, and the final week of September, 1976, Peter F. Secchia's attorney, Stephen Mulder, contacted at least four attorneys in the office of the General Counsel and at least two individuals in the Information Division, regarding the reporting requirements established by the Act and the subject of independent expenditures.

(5) Peter F. Secchia, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976, and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure."

(6) During the month of May, 1976, when Peter F. Secchia made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure," Peter F. Secchia had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for

communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure." Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure."

(4) During the period of May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures," its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondent as "independent expenditures." These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondent's actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for personal contributions reported as independent expenditures.

G. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

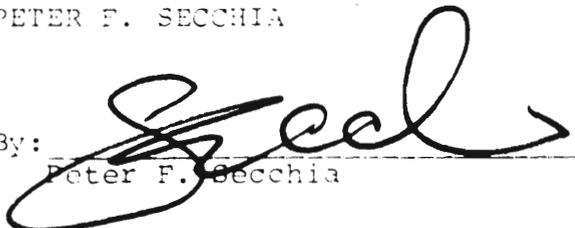
III. It is agreed that Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: 
William C. Oldaker
General Counsel

PETER F. SECCHIA

By: 
Peter F. Secchia

PETER J. SECCHIA

2833 BONNELL AVE., SE. GRAND RAPIDS, MICHIGAN 49506

October 25, 1977

Mr. David R. Spiegel
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 321 (76)

Dear Mr. Spiegel:

Enclosed is a copy of your letter to Mr. Ryan, stating the enclosed "Conciliation Agreement" should be signed by me, and returned to the Commission's Office of General Counsel.

Also enclosed is my check for \$500.00. This is being sent to you, hoping there will be no future legal expense (except for the charge for having Mr. Ryan read this letter).

Between the harrassment from your Agency, and the legal charges forwarded by Mr. Ryan, I have "yielded" purely under the burden of harrassment and personal financial discomfort.

Cordially,


Peter F. Secchia

PFS/jh
encl:

cc: Timothy Ryan, Jr.
Leonard Hoffius

PETER FINLEY SECCHIA
2833 BONNELL, SE.
GRAND RAPIDS, MICH. 49506

1071

10-23 1977 $\frac{74-2}{724}$

PAY TO THE
ORDER OF

U.S. TREASURY

\$500.00

FIVE HUNDRED & NO/100

DOLLARS



MICHIGAN NATIONAL BANK
OF GRAND RAPIDS
GRAND RAPIDS, MICHIGAN 49502

T.B.F.H.

⑆0224⑈0002⑆

259⑈200⑈5⑆



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20004

October 11, 1977

9:21

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7 03160

Mr. T. Timothy Ryan, Jr.
Loomis, Owen, Fellman & Coleman
2020 K Street, N.W.
Washington, D.C. 20006

Re: WCR 221 (76)

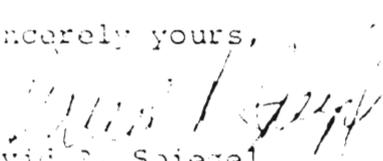
Dear Mr. Ryan:

In accordance with the provisions of 2 U.S.C. 3437g(a)(5)(A), I am enclosing a proposed conciliation agreement which was approved by the Commission on October 6, 1977.

If this agreement is satisfactory to your client, Mr. Secchia, please have him sign and return it to the Commission's Office of ~~General Counsel~~. He should also enclose a check for \$500 made out to the U.S. Treasury. After the agreement has been signed by the General Counsel, a copy will be sent to you.

If you have any questions, please call the attorney assigned to this case, Judy Browning.

Sincerely yours,


David R. Spiegel
Assistant General Counsel

Enclosure



Peter F. Secchia
2833 Bonnell Ave. SE
Grand Rapids, Mi. 49506

Mr. David R. Spiegel
Assistant General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20004

October 11, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. T. Timothy Ryan, Jr.
Loomis, Owen, Fellman & Coleman
2020 K Street, N.W.
Washington, D.C. 20006

Re: W/R 321 (76)

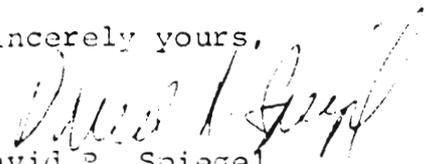
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If you have any questions, please call the attorney assigned to this case, Judy Browning.

Sincerely yours,


David R. Spiegel
Assistant General Counsel

Enclosure



MUR 321 (76) JB

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **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: T. Timothy Ryan
Loomis, Owen, Fellman & Coleman
2020 K St., N.W.
Washington, D.C. 20006

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	9254-25	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE _____ Addressed to _____ Authorized agent

4. DATE OF DELIVERY _____ POSTMARK _____

5. ADDRESS (Complete only if requested): _____

6. UNABLE TO DELIVER BECAUSE _____ CLERK'S INITIALS _____

OCT 18 1977

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
PETER F. SECCHIA

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MUR 321 (76)

CONCILIATION AGREEMENT

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NOW, THEREFORE, the Commission and the Respondent having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this case;

II. The Respondent has voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and has had reasonable opportunity to demonstrate that no action should be taken in this matter;

III. The pertinent facts in this matter are as follows:

A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Peter F. Secchia worked as a fundraiser and campaigner during the period of January, 1976, to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary campaign. In addition, Peter F. Secchia led groups of individuals to Florida in February, 1976, and to Wisconsin in April, 1976, to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

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(4) Between the first week of May, 1976, and the final week of September, 1976, Peter F. Secchia's attorney, Stephen Mulder, contacted at least four attorneys in the office of the General Counsel and at least two individuals in the Information Division, regarding the reporting requirements established by the Act and the subject of independent expenditures.

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B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondent as "independent expenditures." These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondent's actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g (a)(6)(B) for personal contributions reported as independent expenditures.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
PETER F. SECCHIA)

MUR 321 (76)

CERTIFICATION

1. Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 6, 1977, the Commission determined by a vote of 5-0 to approve the conciliation agreement submitted by the General Counsel in the above-captioned matter.

Commissioner Staebler was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

73040052751

September 29, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 321 Team #1

Please have the attached Memo on MUR 321 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of October 6, 1977.

Thank you.

78040062755



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The Commission
FROM: William C. Oldaker *WCO*
SUBJECT: MUR 321 (76) Conciliation Agreement

799400375

Attached hereto is the Conciliation Agreement in the above-referenced matter for ratification by the Commission. I recommend its approval by the Commission.

The Agreement contains an admission that the respondents made expenditures which were not "independent" within the meaning of 2 U.S.C. §431(p). Respondents further admit that their actions were in violation of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A), for which a civil penalty totalling \$500 will be paid.

In light of the alleged attempts respondent Secchia made to seek counsel on the legality of his activities and the extent of his cooperation with the Office of General Counsel, the total amount of the fine assessed is \$500 rather than a larger figure.



A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

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I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

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III. It is agreed that Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: _____
William C. Oldaker
General Counsel

790400175

PETER F. SECCHIA

By: _____
Peter F. Secchia

73040032763

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Counihan, Casey & Loomis)

2020 K Street, N.W.

Washington, D. C. 20006

202 296-5680

Donald M. Counihan

1917-1969

E. Riley Casey

1929-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

- John E. Loomis*
- Stephen F. Owen, Jr.*
- Steven John Fellman*
- Francis T. Coleman*
- William H. Hour*
- Fernald J. Jacobs*
- John R. Erickson*
- James E. Anderson*
- John C. Reynolds*
- Henry A. Hart*
- T. Timothy Ryan, Jr.*
- Donald L. Rosenthal*

September 13, 1977

Ms. Judy Browning, Esquire
 The Federal Election Commission
 1325 K Street, N.W.
 Washington, D. C. 20463

779680

RE: MUR 321(76)

Dear Judy:

Enclosed is the final draft of the Conciliation Agreement in the above-referenced matter. As agreed, the changes regarding contacts with the Commission staff and the Federal Election Campaign Act are included in this draft.

In particular, the provision regarding contacts with the Commission staff relates to the following conversations by Stephen Mulder, Mr. Secchia's attorney in Grand Rapids, Michigan:

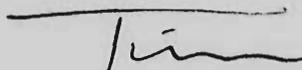
- (1) The first three weeks of May, 1976--
Duty Officers in the Information Division;
- (2) May 28, 1976-- Barry Shillito;
- (3) June 4, 1976-- Barry Shillito;
- (4) Various dates in July, 1976--
Dan Swillinger and Andrew Athy; and
- (5) Various dates in August and September, 1976--
Beth Fagan.

Ms. Judy Browning, Esquire
September 13, 1977
Page Two

Your assistance in this matter is greatly appreciated.
Hopefully, the Commission will act on this Conciliation
Agreement in the very near future.

Sincerely,

LOOMIS, OWEN, FELLMAN & COLEMAN



T. Timothy Ryan, Jr.

TTR:jr
Enclosure

cc: Mr. Peter F. Secchia
Leonard M. Hoffius, Esquire

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
FRIENDS OF THE FIRST FAMILY) MUR 321 (76)
and)
PETER F. SECCHIA)

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73040952767

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B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for communications urging the nomination of

Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure". Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure".

(4) During the period May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures", its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or

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authorization, at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and August 25, 1976, and promulgated on April 13, 1977.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondents as "independent expenditures". These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for personal contributions reported as independent expenditures.

G. Respondent, Peter F. Secchia, will pay a civil

penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS:

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

III. It is agreed that Respondents shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: _____
WILLIAM C. OLDAKER
General Counsel

7304003177

FRIENDS OF THE FROST FAMILY

By: PETER F. SECCHIA, Chairman

PETER F. SECCHIA

PETER F. SECCHIA, Individually

73040062772

LAW OFFICES

LOOMIS, OWEN, FELLMAN & COLEMAN

2020 K STREET, N. W.

WASHINGTON, D. C. 20006

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Ms. Judith Browning, Esquire
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

HAND DELIVERED

77 AUG 13 AM 51

COMMISSION

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1292
NRN

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Counihan, Casey & Loomis)

2120 K Street, N. W.

Washington, D. C. 20006

212 246-5680

Donald M. Counihan

1917-1969

E. Riley Casey

1923-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

John E. Loomis

Stephen F. Owen, Jr.

Steven John Fellman

Francis T. Coleman

William H. Howe

Fernald A. Jacobs

John R. Erickson

James E. Sanderson

John C. Reynolds

Henry J. Hart

T. Timothy Ryan, Jr.

Donald L. Rosenthal

August 18, 1977

Ms. Judy Browning
Federal Election Commission
1325 K Street, N. W.
Washington, D. C.

Re: MUR 321(76)

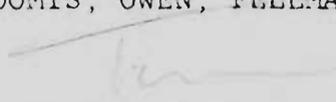
Dear Judy:

Enclosed are two copies of the Conciliation Agreement in the above-referenced matter. Your attention to this matter is greatly appreciated.

Best regards.

Very truly yours,

LOOMIS, OWEN, FELLMAN & COLEMAN


T. Timothy Ryan, Jr.

TTR/mmc
Enclosures

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	*	
	*	
FRIENDS OF THE FIRST FAMILY	*	MUR 321(76)
	*	
and	*	
	*	
PETER F. SECCHIA	*	

CONCILIATION AGREEMENT

2304000773

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found reasonable cause to believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation as provided in 2 U.S.C. §437g (a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this case;

II. The Respondents having voluntarily cooperated with the Commission in supplying all relevant information and records during the course of the investigation have had reasonable opportunity to demonstrate that no action should be taken in this matter;

September 23, 1976, while Respondent was making expenditures on behalf of the President Ford campaign which were characterized by Respondent in its report to the Commission as "independent expenditures", its Chairman, Peter P. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court stated that all expenditures made with the consent, cooperation, prearrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of the candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and promulgated on April 13, 1977.

C. The entire contents contained in reports filed with the

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Commission on May 28, July 9, and September 30, 1976 regarding the said \$1,204.79, \$19,758.64, and \$1,752.17 were mistakenly characterized by Respondents as "independent expenditures".

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted a technical violation of the contribution limits set forth in 2 U.S.C. §441a (1) (A).

F. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for personal contributions reported as independent expenditures.

G. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by the Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

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II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

FEDERAL ELECTION COMMISSION

By _____
William C. Oldaker, General Counsel

FRIENDS OF THE FIRST FAMILY

By _____
Peter F. Secchia, Chairman

PETER F. SECCHIA

Peter F. Secchia, Individually

7 8 3 4 0 0 5 1 7 8 1

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NRN

Law Offices

Loomis, Owen, Fellman & Coleman

(formerly Cunnihan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

Donald M. Cunnihan

1917-1969

E. Casey Casey

1929-1971

J. R. Pat Gorman

Eleanor F. Bennett

Counsel

*John E. Loomis
Stephen F. Owen, Jr.
Heron John Fellman
Francis T. Coleman
William H. Howe
Gerald A. Jacobs
John R. Erickson
James E. Anderson
John C. Reynolds
Henry A. Hart
T. Timothy Ryan, Jr.
Donald L. Rosenthal*

August 3, 1977

Ms. Judy Browning, Esquire
The Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

RE: MUR 321(76)

Dear Judy:

Enclosed is our counter-proposal in the above-referenced matter. If you have any suggested modifications to this conciliation agreement please contact me today before 3:30 P.M., if possible, since I will be out of the office until Monday after that time.

Many thanks for your continued cooperation and assistance in this matter.

Sincerely,

LOOMIS, OWEN, FELLMAN & COLEMAN



T. Timothy Ryan, Jr.

TTR:jr

Enclosure

cc: Mr. Leonard M. Hoffius, Esquire

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of *
*
FRIENDS OF THE FIRST FAMILY *
* MUR 321(76)
and *
*
PETER F. SECCHIA *

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found reasonable cause to believe that the Friends of the First Family, a registered political committee, and Peter F. Secchia, an individual and Chairman of that Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this case;

II. The Respondents having voluntarily cooperated with the Commission in supplying all relevant information and records during the course of the investigation have had reasonable opportunity to demonstrate that no action should be taken in this matter;

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III. The pertinent facts in this matter are as follows:

A. FRIENDS OF THE FIRST FAMILY.

1) Respondent is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

2) Respondent registered as a political committee with the Commission on June 1, 1976.

3) Respondent made disbursements in early June, 1976, in the aggregate amount of \$19,372.00 for communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an independent expenditure. Thereafter, in September of 1976, Respondent disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976 as an independent expenditure.

4) During the period May 10, 1976 through September 23, 1976, while Respondent was making expenditures on behalf of the President Ford campaign which were characterized by Respondent in its reports to the Commission as "independent expenditures", Respondent's Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee or its agents.

B. PETER F. SECCHIA.

1) Respondent, an individual, made a disbursement

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made an expenditure on behalf of the President Ford campaign which was characterized as an "independent expenditure", Respondent had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court stated that all expenditures made with the consent, cooperation, prearrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of the candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and promulgated on April 13, 1977.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976 regarding

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the said \$1,204.79 and \$19,372.00 were mistakenly characterized by Respondents as "independent expenditures".

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted a technical, although unintentional, violation of the contribution limits set forth in 2 U.S.C. §441a(1)(A).

F. Respondent, Friends of the First Family, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B).

G. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that Respondents shall have no more than

thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

FEDERAL ELECTION COMMISSION

By _____
William C. Oldaker, General Counsel

FRIENDS OF THE FIRST FAMILY

By _____
Peter F. Secchia, Chairman

Peter F. Secchia, Individually

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LAW OFFICES

LOOMIS, OWEN, FELLMAN & COLEMAN

2020 K STREET, N. W.

WASHINGTON, D. C. 20006

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MS. JUDY BROWNING, ESQUIRE
THE FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D. C. 20463

BY HAND

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Connerhan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

Donald M. Connerhan

1917-1969

E. Riley Casey

1923-1971

J. R. Pat Gorman

Edward F. Bennett

Counsel

- John S. Loomis
- Ralph F. Owen, Jr.
- Herbert John Fellman
- Francis J. Coleman
- William H. Howe
- Fredrick S. Jacobs
- John R. Erickson
- James E. Anderson
- John C. Reynolds
- Henry J. Hart
- T. Timothy Ryan, Jr.
- Donald L. Rosenthal

July 28, 1977

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

RE: MUR 321 (76)

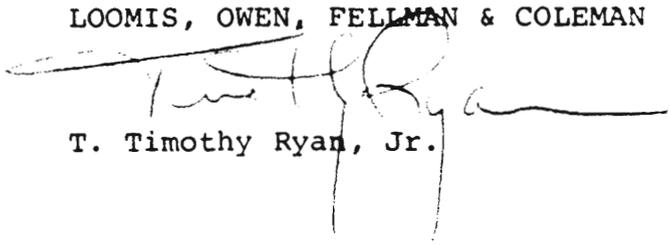
Dear Mr. Oldaker:

On behalf of Mr. Peter Secchia, we acknowledge receipt of your letter dated July 22, 1977, wherein you state that the Commission has determined that there is reasonable cause to believe that Mr. Secchia has committed a violation of 2 U.S.C. §441a(a) (1) (A) as affected by §441a(a) (7) (B) (1) of the Federal Election Campaign Act of 1971, as amended.

As noted during our previous conversations with Ms. Browning and Mr. Steel, we are prepared to meet as soon as possible to discuss a reasonable conciliation agreement.

Very truly yours,

LOOMIS, OWEN, FELLMAN & COLEMAN


 T. Timothy Ryan, Jr.

TTR: jr

cc: Mr. Peter Secchia

Law Offices

Loomis, Owen, Fellman & Coleman

2020 K Street, N. W.

Washington, D. C. 20006

William C. Oldaker, General Counsel

The Federal Election Commission

1325 K Street, N. W.

Washington, D. C. 20463



FEDERAL ELECTION COMMISSION

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

July 22, 1977

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On July 20, 1977, the Commission determined that there is reasonable cause to believe that you have committed a violation of 2 U.S.C. §441a(a)(1)(A) as affected by §441a(a)(7)(B)(1) of the Federal Election Campaign Act of 1971, as amended, by reporting expenditures made by yourself and the Friends of the First Family as independent. Specifically, this violation involves \$1752.17 paid for newspaper advertisements on May 11, 1976, and \$20,963.43 of expenditures made by the Friends of the First Family during the period June 1, 1976 through September 23, 1976.

The Commission has a duty to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Please advise me at your earliest opportunity whether you desire to conciliate in this matter. If you have any questions, please contact Judy Browning (telephone number 202/523-4073), the attorney assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

cc: Tim Ryan



JUL 22 1977

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: NUR 321 (76)

Dear Mr. Secchia:

On July 20, 1977, the Commission determined that there is reasonable cause to believe that you have committed a violation of 2 U.S.C. §441a(a)(1)(A) as affected by §441a(7)(B)(1) of the Federal Election Campaign Act of 1971, as amended, by reporting expenditures made by yourself and the Friends of the First Family as independent. Specifically, this violation involves \$1752.17 paid for newspaper advertisements on May 11, 1976, and \$20,963.43 of expenditures made by the Friends of the First Family during the period June 1, 1976 through September 23, 1976.

The Commission has a duty to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Please advise me at your earliest opportunity whether you desire to conciliate in this matter. If you have any questions, please contact Judy Browning (telephone number 202/523-4073), the attorney assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

cc: Tim, Ryan

JB
7-22-77

Browning:caw:7/21/77

78040032793

MUR 321 Browning

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Peter Secchia
2833 Pennell SE
Grand Rapids, Michigan

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
44367A

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 7-28-76 POSTMARK: GRAND RAPIDS MI

5. ADDRESS (Complete only if requested):
2833 Pennell SE
GR 49506

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS: [Signature]

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 20, 1977, the Commission determined by a vote of 5-0 to find Reasonable Cause to Believe a violation of 2 U.S.C. Section 441a(a)(1)(A) had been committed in the above-captioned matter. Voting for this determination were Commissioners Aikens, Staebler, Harris, Thomson, and Tiernan; Commissioner Springer was not present at the time of the vote.


Marjorie W. Emmons
Secretary to the Commission

1977 JUL 20 10 17 AM

July 15, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 321 (76)

Please have the attached General Counsel's Report
on MUR 321 (76) distributed to the Commission and
P
placed on the Agendatfor the Commission meeting of
July 20, 1977.

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In the Matter of)
)
)
Peter Secchia)

MUR 321 (76)

GENERAL COUNSEL'S REPORT

I. Allegations.

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This case concerns the question of whether certain expenditures made by respondent Peter Secchia and a committee organized and chaired by him, Friends of the First Family, were independent expenditures as reported by respondent, or whether they were instead contributions-in-kind to Gerald Ford. If the expenditures are found to be contributions-in-kind, a reporting violation (2 U.S.C. s.434(b) as affected by s.434(b)(13)) will have occurred. In addition, respondent and his committee will have violated 2 U.S.C. s.441a(a)(1)(A) as affected by s. 441a(a)(7)(B)(i) .

During the course of the investigation of this matter, evidence was uncovered which seemed to indicate that the Friends of the First Family, which had registered as a committee on June 1, 1976, was involved in the Ford campaign as early as March, 1976. Failure to register in a timely fashion is a violation of 2 U.S.C. s. 433(a).

II. Commission Action.

On December 2, 1976, the Commission found reason to believe a violation of 2 U.S.C. s.441a had occurred with respect to the expenditures made by respondent and Friends of the First Family which were reported as "independent." In a December 31, 1976, letter to the Commission, respondent's counsel set forth an

account of respondent's contacts with the President Ford Committee (PFC) both before and after he began making the allegedly independent expenditures.

Due to certain gaps in this account of respondent's relationship with the PFC, a second Commission inquiry was made in April, 1977, and after meeting with respondent's counsel and granting an extension of time in which to respond, a response to this second inquiry was received on June 20, 1977. The response included over 200 pages of documentation (correspondence and memoranda to the file) relating to campaign plans, solicitations, transfers, and reimbursements involving respondent, Friends of the First Family and the PFC.

III. Evidence.

1. Independent Expenditures.

On May 11, 1976, respondent placed newspaper advertisements costing \$1752.17 which advocated the election of Gerald Ford and were reported as independent expenditures. Subsequently, Friends of the First Family, a single-candidate political committee registered on June 1, 1976, which was organized and chaired by respondent, made expenditures of \$23,011.78 on behalf of the Ford campaign during the period June 1, 1976, through September 23, 1976, which it reported as "independent."

Prior to making these "independent" expenditures, in January, 1976, respondent had begun fundraising activities as "Solicitor no. 9806" for Ford's principal campaign committee, the PFC. In addition to his fundraising responsibilities, he initiated, organized, and helped implement a campaign tactic which he called "scatter blitzing" wherein he and groups of Grand Rapids, Michigan, citizens would

travel to a state where a primary election was about to be held and campaign on behalf of Ford. The particular states visited were apparently those suggested by President Ford or his campaign staff. These campaign "blitzes" would be paid for and to some extent coordinated with the PFC. Respondent would attempt to collect enough contributions for PFC on each "blitz" to cover the cost of the trips. (For a brief description of the scatter blitzes and their financial arrangements, see attached Documents #111 and #149.)

Respondent contends that he severed all ties with the PFC on May 10, 1976, shortly before he began making expenditures which he reported as independent. However, the nature of his earlier relationship with PFC, combined with the fact that he did have continued contacts with President Ford and the PFC staff after May 10, 1976, give rise to a presumption that any expenditures made by him and his Friends of the First Family committee were not independently made but were rather contributions-in-kind to Ford. (For a discussion of this presumption, see Legal Analysis below.)

In order to determine whether the evidence submitted by respondent rebuts the presumption that the expenditures in question were contributions-in-kind, it is necessary to describe in some detail the relationship he had with the PFC both before and after May 10, 1976, the date on which he allegedly severed ties with the PFC. That relationship seems best described by referring to copies of selected campaign-related correspondence which respondent submitted to the Commission.

Selected List of Pre-May 10, 1976, Communications:

- Document #37 (Jan. 14, 1976) PFC Office of Finance Chairman asks respondent to raise funds for the PFC.
- Document #53 ATTACHED (Mar.30, 1976) Respondent sends PFC staff campaign idea and leaves decision and further instructions up to PFC.
- Document #54 ATTACHED (Apr.12, 1976) Respondent refers to discussion with PFC personnel regarding the Texas campaign and mentions formulation of list of persons to help with the Indiana campaign.
- Document #55 (Apr.15, 1976) Respondent mentions to PFC Finance Chairman that he has been asked to round up \$250 contributions for matching fund purposes.
- Document #56 & #57 (Apr.19, 1976) Respondent sends PFC Midwest Coordinator a list of "Pertinent Names in Northern Indiana" to help with the Indiana campaign.
- Document #58 (April 23, 1976) Respondent asks PFC to advance money for the Indiana "blitz" requested by PFC Midwest Coordinator.
- Document #108 & #109 ATTACHED (Apr.26, 1976) Respondent contacts a fellow blitzer mentioning that the President has asked that they consider PFC Midwest Coordinator's request to blitz Indiana. Expenses will be paid by PFC and blitzers will raise an equal amount of contributions to cover PFC's payments.
- Document #59 ATTACHED (April 26, 1976) Respondent alerts PFC that they missed an opportunity to get Michigan people involved in a newspaper poll. Letter mentions names of various PFC personnel whom respondent attempted to contact.

Selected List of Communications from May 10, 1976, on:

- Document #62 ATTACHED (May 10, 1976) Respondent notifies PFC Midwestern Coordinator he is going to sever PFC ties and henceforth work independently.
- Document #64 & #65 ATTACHED (May 13, 1976) Memo to file from respondent noting that he has decided to work independently. Respondent notes he is to meet with White House Advance team to prepare for President's trip to Grand Rapids during the Tulip Festival. Respondent discusses appearances he has arranged for members of Pres. Ford's family.
- Document #66 ATTACHED (May 19, 1976) Respondent forwards check to White House since he may "no longer have any contact with President Ford committee."

- Document #67 & #68 ATTACHED (undated) Memo to the file from respondent noting problems he had had with PFC. This document notes a number of contacts and coordination between respondent and PFC staff.
- Document #70 ATTACHED (May 25, 1976) Letter to other persons who are working "independently" noting that a handful of delegates are needed, especially in Ohio and New Jersey, so a new Friends of the First Family is to be formed, and it will support the President in Ohio and New Jersey.
- Document #74 ATTACHED (June 7, 1976) Respondent writes to two "blitzers" to congratulate them on their recent trip and tells them he will notify the President of their success. A copy of the letter is sent to President Ford's secretary.
- Document #75 ATTACHED (June 15, 1976) Respondent writes to thank a contributor noting that he has discussed the contributor's help with the President.
- Document #76 ATTACHED (June 21, 1976) Respondent writes to thank a contributor noting he will be meeting with the President that week.
- Document #78 ATTACHED (July 12, 1976) Respondent writes PFC media manager Wilhite to thank him for meeting with respondent, and notes he is willing to give any support necessary if Wilhite will just call him.
- Document #80 ATTACHED (July 30, 1976) Respondent writes to Max Fisher mentioning he has just been in New York trying to arrange for production of a film for President Ford. Respondent notes he is no longer involved in independent committee activity and can now "talk to you at will." [Note, however, that Friends of the First Family reported making independent expenditures on behalf of Ford through Sept. 23, 1976.]
- Document #81 (Aug. 2, 1976) Respondent writes to thank a contributor to Friends of the First Family.
- Document #82 ATTACHED (Aug. 6, 1976) Letter from PFC staff to respondent confirming plans for him to make a speech in August at Republican Convention in Kansas City.
- Document #83 & #84/^{ATTACHED}(undated - apparently late August, 1976) Memo to the file from respondent discussing his indecision whether to remain "independent" or take part in a Detroit Salute to the President dinner. This memo also notes various contacts respondent had with the new PFC Director, President Ford, and Senator Dole during a post-convention meeting in Vail, Colorado.
- Document #86 (Aug. 31, 1976) Respondent writes PFC Director noting "if there is a spot for me within the system . . . I am at your command . . . just tell me what, when, and where." (Emphasis in original.)
- Document #88 ATTACHED (Sept. 8, 1976) Respondent writes First Lady telling her he is too closely connected to staff, committee, cabinet, and members of the President's family "to continue working independently."
- Document #89 ATTACHED (Sept. 9, 1976) Respondent writes to Max Fisher advising him he finds it impossible to sever his relationship with the Ford family and PFC, and thus he wishes to discontinue "the independent route."

-Document #93 (Sept. 28, 1976) PFC Director writes respondent thanking him for his Sept. 3, 1976, letter assessing the political climate in Mississippi.

Legal Analysis and Recommendation: During the period when most of respondent's and Friends of the First Family's "independent" activity was taking place, the 1976 amendments (specifically 2 U.S.C. §431(p) which defines "independent expenditures") and the Supreme Court decision in Buckley v. Valeo, 424 U.S. 1 (1976), specifically footnote 53 at 46-47) were in effect. The law as it applied to independent expenditures during the summer of 1976, then, spoke of independent expenditures as those expenditures which were made

Without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and which is not made in concert with, or at the request or suggestion of, any candidate or any authorized committee or agent of such candidate (2 U.S.C. §431(p))

and without

cooperation with or with the consent of a candidate, his agents, or an authorized committee of the candidate... (Buckley v. Valeo, id. at 47))

Subsequently, after the expenditures in question were made, the Commission printed in the Federal Register regulations which it had approved and submitted to Congress. The relevant portion of the regulations, 109.1(b)(4), states that a presumption is raised that an expenditure is not independent if the expender has been authorized to raise or expend funds or has received reimbursement from the candidate's committee.

In this case, respondent was authorized to raise and expend funds and was reimbursed by the PFC. While the regulations were not in effect at the time respondent made the questionable payments, the presumption set forth in regulation 109.1(b)(4) is an evidentiary one, based on the existence of a specific set of facts from which

can be drawn an inference that a particular expenditure is not independently made. The presumption that one who is a fundraiser for or has been reimbursed by a candidate's authorized committee cannot make an independent expenditure is within the realm of reasonable probability or certitude; thus, the 109.1(b)(4) presumption is an obvious and operative interpretation of the 1976 amendments to the Act and Buckley v. Valeo. While this presumption is rebuttable by respondent, the copies of correspondence and memoranda submitted by respondent strongly suggest that he did consult with President Ford and the PFC, and that he did have knowledge of campaign plans made available to him from the candidate and committee on which he was able to base decisions regarding the making of "independent" expenditures.

It is important to note that respondent's submission of documents does indicate that he was sincere in his desire to obey the Act. In his correspondence and memoranda he frequently mentioned that he had discussed with legal counsel the making of independent expenditures and was aware that they must be unauthorized and without coordination with the candidate or the PFC, and that contact with the PFC and President Ford was improper. Upon several occasions respondent warned the PFC fundraiser that he had "maxed out", i.e. met his contribution limits under the Act and asked to be taken off the list of potential contributors. Moreover, he warned others that they

should not exceed the \$1000 personal contribution limit and informed scatter blitzers that they could use the \$500 contribution exception for unreimbursed travel expenses.

In addition, respondent's December 31st response to the Commission plus the documents he submitted suggest that his relationship with the PFC was mainly one initiated and promoted by respondent and not the PFC. The scatter blitzing campaign tactic seems to have been a Secchia brainchild, without much input, direction or even recognition on the part of the PFC. Most of the correspondence is from respondent to the PFC staff rather than from the PFC staff to respondent. Respondent's repeated desire to stay within the bounds of the Act, and his confusion as to the state of the election law immediately before and after passage of the 1976 amendments would seem to mitigate the seriousness of the violation.

Recommendation: It is recommended that with regard to the independent expenditure violation (2 U.S.C. §441a(a)(1)(A)), a reasonable cause to believe finding be made, and a conciliation agreement admitting such a violation be entered into.

In addition, a §434b reporting violation has occurred with respect to expenditures reported as independent. No reason to believe finding was made as to that violation in the 48-hour report; however, this violation is a derivative one in that it is based on the same set of facts as is the 441a violation. Therefore, it is recommended that the Commission find reasonable cause to believe a 434b violation has occurred.

2. Failure to Register a Political Committee in a Timely Fashion.

During the course of the investigation of the independent expenditure matter, evidence was uncovered which seemed to indicate that the Friends of the First Family, which had registered as a committee on June 1, 1976, was involved in the Ford campaign as early as March, 1976. Correspondence and memoranda to the file from respondent used the name "Friends of the First Family" in the context of receiving contributions which were apparently then transferred to the PFC. Since, during the time of this activity, Friends of the First Family was not a registered political committee, a violation of 2 U.S.C. §433(a) was indicated.

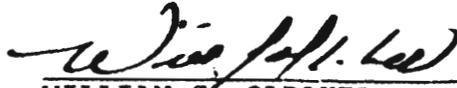
However, documents submitted to the Commission by respondent and a conversation with respondent's counsel suggest that "Friends" was only a loosely organized group of Grand Rapids citizens who did voluntary campaign work for the President by "scatter blitzing." The PFC made advances to cover transportation costs of the group, and then the volunteers reimbursed the PFC for these advances, usually in the amount of each volunteer's portion of the travel expenses. At first the group reimbursed the PFC by checks made out to the "Friends of the First Family," but this practice was quickly changed, and checks made out to the PFC were substituted.

Legal Analysis: The blitzers' reimbursing the PFC for travel advances would amount to an "unreimbursed payment for travel expenses made by an individual who on his own volunteers his personal services to a candidate," and thus would not fall within the definition of contribution or expenditure under the Act. (2 U.S.C. §431(e)(5)(D)). As a result, the definition of political committee would not apply to this group of volunteers (2 U.S.C. §431(d)).

The argument that respondent used "Friends" as an informal name for this voluntary group is supported by the fact that in the documents submitted by respondent, reference is made to other names used for the scatter blitzers, e.g., "Ford's Raiders," "Friends of the President," and still other names for special interest blitzers, e.g., "Bartenders for Ford," "Farmers for Ford," and "Democrats for Ford."

On May 25, 1976, respondent wrote to some of his acquaintances noting his plans to "reform our 'Friends of the First Family Committee.' The necessary papers have been filed, and we will attempt to raise funds in this area to support the President in Ohio..." (See Document #70, ATTACHED.)

Recommendation: Since the name "Friends of the First Family" did not refer to a particular identifiable group of persons before June 1, 1976, and since the reimbursements to the PFC for travel expenses incurred by the group were not political contributions or expenditures, it is recommended that no violation of 2 U.S.C. §433(a) be found to have occurred.



WILLIAM C. OLDAKER
GENERAL COUNSEL

DATE: 7/14/77

7814177:807

March 30, 1976

Mr. Jack Stiles
President Ford Committee
1828 L NW
Washington D.C. 20036

Dear Jack:

Judge Cook dropped the enclosed "idea" at my house (for possible newspaper use outside of Michigan.

He, and the other Judges in town, keep turning down our request to travel with "The Friends of the First Family" due to "code of judicial ethics"...que serra, serra.

Since this is a decision that should be made by the National Committee, I leave it up to you to handle this in the manner you see fit. I would be glad to solicit names and arrange group photographs to be used for November.

This week in Wisconsin we are coming up with a new and innovative approach to "blitzing". We have had our precinct blitz...blitzed a mall...and have blitzed just about everything except the synagogues of 1939 Berlin.

Now we have something new--a "SCATTER BLITZ". While the caravan moves through Wisconsin, and a "ripe" market of bodies is spotted... our CB radios will call for a "scatter blitz". Everyone goes for a warm body, and returns to the convoy at a prearranged time and location. We will be beautiful! (I'm going after those "big-breasted" devils when I scatter.)

Cordially,

Peter F. Secchia

PFS/jh

cc: Mr. Stu Spencer

0653

dup.

April 12, 1976

Mr. Skip Watts
1828 L Street, N.W.
Suite 250
Washington, D.C. 20036

Dear Skip:

Per our discussion last Wednesday, nothing has been done regarding Texas. But at Jack Stiles request...a list has been formulated of those persons we feel could help in the northern counties of Indiana. I also have Mr. A. J. Dacio, President of Skyline Corporation (past "Kennedy for President" Chairman) waiting on the sidelines to sit down with John Holt. I was to hear from Jack or John Thursday or Friday before I leave town tomorrow on an extended trip. I have not heard, so I am off on business.

Our Regional Sales Manager on the East Coast was nominated for Vice Chairman of the Young Republicans in the Rowan-Hecklenburg County organization of North Carolina. He reportedly turned down the nomination, but has given me the following story:

"If anyone but the Governor were running President Ford's campaign a large percentage of the Reagan vote would have gone to Ford. Those who are running for the Governor's position (since he can't run) are also going against him on the Presidential issue"...and that, according to my man, is many, many, people.

Best of luck in Texas. You'll need it after last night's news that Connally is being considered for Vice President. That...combined with "Wisconsin was a mandate for Kissinger", should make your task very difficult. Que sera, sera!

Cordially,

Peter F. Secchia

PFS/jh

Dictated Friday - unsigned

0054

Re: Saturday is a Work Day

April 26, 1976

Mr. Stu Spencer
The President Ford Committee
1328 L, N.W.
Washington, D.C. 20036

Dear Stu:

Thought you might like this brought to your attention. On Saturday morning, April 24, the Detroit Free Press ran their questions in the "Sound Off" column. "The New York Times/CBS News poll shows that President Ford seems to have dispelled many of the doubts about his competence and abilities as a leader over the last three months. Has your confidence in the President increased lately?"

This is not a sample poll. Each time you telephone the number to vote "yes" ...your vote is recorded. If you care to make a comment you are allowed to do so on tape.

I tried to advise everyone and anyone that we needed people in Detroit to get involved. We could look bad in the Sunday paper.

There was no answer at the President Ford Committee in Washington; there was no way to locate Mr. Peter Fletcher of Michigan; so I made several calls from Grand Rapids myself. But because this was long distance, and because I did not want to become a high visible "friend", I finally contacted John Holt in Las Vegas.

Attached are the results. Later in the morning I received an answer at the office from his secretary, who said she had heard from Tim Austin at the White House (whom I had called earlier). At that time she had still done nothing. Maybe a little thing like this means nothing...but if so, they why are we printing positive comments in the "President Ford News" on what is being said in the newspaper, if we let something like this show so negative? Were we asleep?

Cordially,

Peter F. Secchia

cc: Mr. Skip Watts

PFS/j

*Who there can
enclosure?*

yes

Where was?

0059

May 10, 1976
Mr. John Holt
Midwestern Coordinator
President Ford Committee
1328 L N.W.
Washington, D.C. 20036

Dear John:

I'm sorry but it isn't working. I have decided to sever all ties with the President Ford Committee, and, therefore...have destroyed the donor cards, and will forward no more contributions.

The continual changing of course, the failure to return phone calls, the failure to release press on the previous blitzes, has convinced me that I must work independently--on my own.

Your handling a man who means an awful lot to me and my family. Working through you, and your committee, has been a complete disaster. Since I have "maxed" out on contributions, and just about reached my maximum "assumption of expense", I feel that anything accomplished by me from this point on should be done in the Reagan fashion as an "independent and unauthorized" person.

I am already enjoying my new stature. Solicitor No. 9806 is now a member of the great silent majority. Sorry it didn't work, and we will all know next Tuesday just how bad it was.

Cordially,

Peter

PFS/jh
cc: Mr. Max Fisher

0062

FEDERAL ELECTION COMMISSION

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

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

Signed Judith W Browne
date 11-4-77

The President will not be staying at my house because we really don't want really want to tie the association that close to me, and since I am now doing my independent action of which the President knows nothing...it is best that way. He has opted out for a quiet evening, and now we think that Jack might be coming in Monday so I have booked him on the Buck Matthews Show; Eye Witness this Noon; and quite possibly Calvin College. It would be nice if he got in Saturday night and went to the "Up With People" concert...the Hospital Benefit that will be there. But as the schedules change, i.e., the President is going to the Tulip Festival...no; the First Lady is going to the Tulip Festival...no; But Susan is going to the Tulip Festival...That all happened in the last three days, and I really don't know what is going to happen this weekend as of now.

The lady who posed as a UPI representative in the Holland area cannot be found. There is some question maybe she was a Reagan plant to get everyone excited that the President was coming back to the County that gave him his first plurality. But there is no way we will ever prove that...so all we are trying to do is appease the people at this point in time.

The greeting at the airport is not getting anything on the radio, and the committee that has been chosen to do so that I could low profile it, doesn't seem to understand that they have to call the newspaper and radio people...and kiss their fannies. We are going to have a difficult time getting a crown out unless they do that. The only other event going on Sunday is that VanderVeen is going to be at the CB radio picnic...so we can't very well take the First Lady down, without raining on his parade. So nothing is on the book for Sunday except possibly a visit to Uncle Roy...and some TV interviews. Yet...Mac MacLogan knew nothing about the TV interviews last night. I wonder why?

May 19, 1976

Ms. Mildred Leonard
Presidential Secretary
The White House
Washington, D.C. 20500

Dear Mildred:

Since I no longer have any contact with the "President Ford Committee"...would you please see that this check gets to the proper person?

Also enclosed is a letter from Tom Cox. He has requested that the President review his comments. Please have the President drop him a line acknowledging receipt of these comments.

Cordially,

Peter

PFS/jh
encl:

0066

PROBLEMS WITH THE PRESIDENT FORD CAMPAIGN COMMITTEE

EXAMPLES:

1. At my meeting with ROG MORTON and STU SPENCER, SENATOR GRIFFIN, etc., ROG MORTON gave us a phone number (a man in California by the name of CAULDER). He would be doing the same as our "Friends of the First Family Committee". After I left your office I planned to work in California, and later changed my mind...figuring I could work best in Ohio, where we had a close delegate race. I then found three districts where the Reagan people (and the PFC people) were asleep. It was decided to work these areas, and we began soliciting funds. Late in the campaign one of our local contributors wanted to put ads in California. I could not talk him into going to Ohio. I called Mr. CAULDER to give him the good news...only to find that 4 days prior to the election he had yet to raise his first dollar for his committee. At this point in time there was "zero" being planned as "independent and unauthorized" in the California primary.
2. MR. MORTON and MR. SPENCER also told me that the New Jersey proposition would be very difficult to control because Senator Case is so "far out" that most Republicans won't talk to him. When asked if there was anyone else we could work with...I was told: "Not really, we will just have to forget about that one."
3. Many times you told me STU SPENCER would be in touch. He has yet to call me. You have time to call me and ask me to do things...to thank me for what I have done. STU SPENCER only has time for people other than your people out there. Each time you told me he would be in touch I heard from a "third-level" secretary. Not even from his deputy.
4. When we decided to go to Florida we sent DON WIERINGA down to do the advance work. He sat in BILL ROBERTS' office for several hours, and was asked: "What are you doing down here? I don't have time to talk to you." DONALD called me and wanted to come right home.
5. On the Florida trip the President Ford Committee told us to go to the wrong cities. I was then asked to work with this same gentleman again in Wisconsin...I told them I would rather not.
6. We were to arrive in Florida to be met by buses and vans...there were neither. Someone had forgotten to coordinate. Someone was supposed to meet us at the plane so I could give him \$13,000 worth of contributions, so they might cover their instant goals because they were in trouble. No one met us at the plane.
7. Everywhere we went volunteers told us they had not been thanked, or had been improperly asked to work. Never did I hear the comment that there were "good people" involved in the PFC.

8. BILLY ZEOLI tells me he can't help us because you have asked him not to get involved.

9. On our Florida scatter blitz one of the homes we visited served orange juice...the press came...and the host was a Reagan supporter. A County Committee member who was a firm public supporter of Reagan! The PFC Committee had no idea what they were doing.

10. Your Finance Chairman in Kent County, PAUL GOEBEL, SR., failed to return my calls; was not available to help us; and as far as I know...did not raise a dollar in the County.

11. The afternoon of the Michigan primary your Kent County Chairman was at his cottage working on his cabin.

12. RALPH HAUENSTEIN spends a good part of his time in Europe. He volunteered to work with the American Nationals in Europe on "absentee" ballots on your behalf. He received very little cooperation...until I personally took him to your office, and told people who he was and what his idea was. No one seems to want any help.

13. Pages...typing pool...workers at the Kansas City Convention. Why not staff these with "scatter blitzers"...people who know how to "sell" Ford?

14. Secret Service can give out cuff lines and pendants to girls they meet in saloons, but I don't have any to give out to the people who really helped out with our independent and unauthorized committee. How can I get a supply?

15. We need one of the children for the Republican Picnic in Kent County on July 24 (tentative). Is this a possibility?

16. Discuss Mrs. Martin Booth's song, and my idea of having a "Michigan Night" in Washington.

17. Return of letters...terrible. The Mayor of East Grand Rapids tells me he has written you three times...receiving only one answer. I have brought other letters and handed them to Terry O'Donnell from old friends in the labor movement, minority, etc. I have had phone calls from Mexicans who have written and haven't received an answer. It's not the "old Jerry Ford policy", and it is very disconcerting.

18. On our first scatter blitz...People Magazine said they would come if they could get pictures of all three brothers. JIM had a golf match, and wouldn't take them out to the country club...DICK cancelled. TOM was all we had left. TOM did one fine job campaigning constantly...but the cooperation from JIM and DICK at this point was terrible. We later coerced DICK to come with us to Wisconsin. Toward the very end DICK, ELLEN, and JIM attended the Ohio blitz, along with DR. SWANSON... but it was almost too late. Their attendance early in the campaign would have given us national exposure, and equal time with the Jimmie Carter campaign. They had inches and inches of column space on their "friends"...while we had over 230 people in Wisconsin (including 100 teenagers). Jimmie Carter had less than that in Pennsylvania and received much better publicity.

0068

PETER J. SECCHIA

2833 BONNELL AVE. SE. GRAND RAPIDS, MICHIGAN 49506

May 25, 1976

TO: Mr. Jay VanAndel
Mr. Rich DeVos
Mr. Peter Cook
Mrs. Maryanne Keeler
Mr. Ralph Hauenstein
Mr. Dave Mehney
FR: Peter F. Secchia

Dear Mrs. Keeler and Gentlemen:

We are in the final inning of the ballgame. It's down to a matter of a handful of delegates. EVERY SINGLE DELEGATE MATTERS IN OHIO AND NEW JERSEY.

It is difficult to work with the California situation...so I have opted to reform our "Friends of the First Family Committee". The necessary papers have been filed, and we will attempt to raise funds in this area to support the President in Ohio, with the possibility of some activity in New Jersey.

We will place radio ads, newspaper ads, and a 5-minute video tape that Guy VanderJagt did for us. We think it is fantastic.

It is difficult to keep going back to the same well, so we will be running ads in the Grand Rapids Press attempting to solicit contributions from the people in the area to help support the President in these crucial primaries.

We will offer the alternative of privately placed, and independent ads... or lumping the contributions together so that those not wishing their names listed in the paper can be represented as Friends of the First Family Committee. We need all the help we can get. If you can contact anyone in any state who would be willing to help...we need that support. Please contact me at your convenience.

Cordially,

Peter F. Secchia

PFS/j

Thanks for
last week!
PFS

0070

PETER J. SECCHIO

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

June 7, 1976

TO: DON WIERINGA
JOHN DAMSTRA

Gentlemen:

From all reports the trip was fantastic! The President and his people are working their way up through the areas that you and the "scatter blitzers" hit. Tomorrow we will know how well we did...

The excitement and enthusiasm I observed in the groups returning leaves me very thankful that I can report to the President that it was through the efforts of both of you that made this the "biggest and best ever".

Thank you very much.

Peter

PFS/j

cc: Mildred Leonard

Telephone dictated...not signed

Mildred...Because of my independent and unauthorized committee I was unable to do anything with the "scatter blitzers"...once they had made contact with the President Ford Committee. A short note from the President to Don and John would do wonders. Don did the pre-advance work...John did all the administrative and paperwork.

PFS

0674

June 15, 1976

Mr. Rodney W. Markley, Jr.
Vice President
Washington Staff
Ford Motor Company
515 Connecticut Ave., N.W.
Washington, D.C. 20006

Dear Rodney:

Thanks a million for your help! Without you and two other people ... who "pitched in", it would have been virtually impossible to raise the funds that we did.

As it was, we won two of the three Reagan districts that we were after. This swing of six votes from the Reagan column to the Ford column could make the difference in Kansas City. In fact ... that 12 vote "swing" is now the entire lead currently held by the President.

We had a chance to win the third target district but Congressman Ashbrook came out with a radio campaign the weekend prior to the election, claiming that he had known Jerry Ford for 30 years, and that he was not qualified, capable, or intelligent enough to handle the Presidency. He is a very popular Congressman from his area, and yet we only lost that district by less than 1,000 votes.

There is also strong evidence to support the fact that our statewide newspaper and TV program helped win the "at-large" delegates. We did well.

As of this writing I am still \$4,700.00 shy of raising the total moneys needed to pay all expenses incurred. If you know anyone else willing to help us ... please give them a call.

The President and I discussed your support. He was informed that you were the only person in Washington, D.C. that I felt I could turn to.. You are good people!

Cordially,

Peter F. Secchia

PFS/j

Telephone dictated - not signed

0075

June 21, 1976

Mr. John T. Peterson
215 Commerce Building
5 Lyon St., N.W.
Grand Rapids, Michigan 49502

Dear Mr. Peterson:

Thank you for your recent contribution to the "Friends of the First Family Committee". Our Treasurer will be forwarding you a receipt.

We dedicated ourselves to three Congressional Districts in Ohio, supposedly in the Reagan column. We won two of these, and would have won the third (lost by 1,000 votes)....if Congressman Ashbrook had not come out with strong radio endorsements for Reagan, and criticizing the President.

These six delegates could be the difference. The President appreciated our efforts, and I meet with him this Wednesday to discuss the results.

Thank you.

Peter F. Sacchia

PFS/jh

0076

July 12, 1976

Mr. Clayton E. Wilhite
General Manager
Media Communications, Inc.
The President Ford Committee
1828 L Street, N.W.
Washington, D.C. 20036

Dear Clayt:

Thanks for taking some time out of your schedule to visit with Joan and me. Please give my best to all those working diligently to re-elect my good friend.

Should something come up where my support is needed...please call. I bumped into Stu Spencer and Dick Cheney last week, but did not get a chance to talk to them about this tape. It's all in your hands.

Peter

PFS/j

0878

F.C.F.C.
file.

July 30, 1976

Mr. Max Fisher
2210 Fisher Bldg.
Detroit, Michigan 48202

Dear Max:

I have just returned from 1-1/2 days in Manhattan in an attempt to put together a production unit to produce a film for the President.

Because of legal complications, and a complete lack of communication with the RNC, PFC, and others who would be able to arrange the scheduling, the projectionist, acoustics, etc., we have made the decision to drop the project.

Since I am no longer involved in this independent and unauthorized committee activity...I am now free to talk to you at will, and tell you of my interests "to get the man elected."

See You in Kansas City.

Cordially,

Peter

PFS?JH

0080

ES

K.C. file

President Ford Committee

1628 L STREET, N.W., SUITE 2-0, WASHINGTON, D.C. 20036 (202) 457-6400

August 6, 1976

Mr. Peter Secchia
Butterworth Hospital
100 Michigan, N. E.
Grand Rapids, Michigan 49503

Dear Peter:

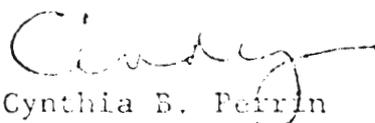
Just a note to again wish you luck and fast recovery with the broken leg and to confirm our conversation regarding the workshop.

The President Ford Workshop will be divided into four sections: The Individual, The Congressman, The Republican, and The President. We would like you to speak for fifteen minutes for the first section. This includes information on his schooling, his personal philosophy, his family and his goals in life. It is tentatively on schedule for Monday, August 16 at our Headquarters (the Kansas City Trade Mart, Broadway Street on the grounds of the Kansas City Municipal Airport, not KCI) for 1:30 until about 3:30 in the afternoon. Rob Kronman will be in touch with you regarding further details; if you need to reach us our main Kansas City number is 816-467-3691.

Five
Committees

Again, all best wishes and thanks for helping.

Sincerely,


Cynthia B. Ferrin

cc: Rob Kronman

0082

MEMO FOR FORD FILE

Tuesday night, August 24...Susan called. We chatted for a while and then she put the President on the line. He told me to take care of my leg...or he kick me in the "GDA". I told him that I had been invited out by Bob O'Dell to work on the "Salute to the President" dinner, and could not decide whether to do that...or my own independent thing, and that I would be in Vail

I decided to take Stephanie along to help with my socks, crutches, etc. We took off for Vail Thursday morning (26th), where we were picked up at the Vail-Eagle airport by a White House car and driven to the Lodge. There we sat waiting to hear from Red Cavaney or Terry O'Donnell, because I needed someone for Stephanie to play with. We went for a walk because our room wasn't ready...and bumped into the Weidenfelds, Jim Cavanaugh, and others from the White House staff. We chatted...and Sheila had to pick up Susan and take her to a UPI soccer game, so Sheila left her husband Ed with Stephanie and I at "Peppi's". Ed thought it would be best if I didn't go to the UPI soccer game since I shouldn't be someone of high visibility. Susan didn't want to go either, so she talked Sheila and Ed into going alone...and Susan took us to the ski shop to show us the dog that she and some of her friends had given a friend...went shopping...bought Stephanie a jacket...went over to the Wicked West (a store owned by friends of mine)...bought Susan a leather hat, whereupon the blond lady behind the counter said she would love to get Jack alone that night, since she had absolutely nothing to do and no place to sleep. Susan said the women were chasing Jack everywhere.

I then went to my room...changed clothes, and Stephanie and I went to dinner at Peppi's alone. We came back and went to sleep. It was a very difficult evening because I was exhausted from using crutches around town earlier.

The next morning I went to the meetings on "Salute to the President" dinner, and a decision could not be made between Max Fisher, Jay VanAndel, Jim Bourque and I whether we should go with this dinner in Detroit...or bring the President the following night. Terry O'Donnell advised me I would be seeing the President at 5:30 Friday evening, and I could discuss it at that time.

Red Cavaney sent an advance man over to pick up Stephanie, and she played while I was in meetings. That afternoon, Jim Baker, the new director of the Ford Committee...came down and said it very clear: "If you want to go to your independent thing...that's fine. It's up to you. If you want to work within the system...let me know. But if you do your own thing...forget about me, don't ever talk to me, I don't ever want to hear from you, and I won't return your calls." I sort of admired the strength the man displayed.

Stephanie return late, and we had to dress in a rush to get to the Vail "white house." We arrived just as the President was returning from golf. I went up the stairs, collected my breath, and presented him with my portfolio, along with a picture of Jack dumping confetti on the Texas delegation, and a one of the President we felt was very good. It was also interesting to note that the President read my pamphlet...set it down, and we discussed other issues rather than those in the pamphlet. Dick Cheney, Chief of Staff, also read it, and since it was a strong criticism of his abilities...it was wise that he was there.

Dr. Lucash came out of the bedroom and said that the First Lady was in very bad shape, and would not be going to dinner. This was the first social event that the Fords had

0083

planned with the Doles, and the President decided since he was late, he best get ready and take Susan. Susan couldn't go because she was under the hair dryer. So we went downstairs and talked to the Doles while the President got dressed. When he came downstairs he said that "Betty would like to see you in the morning...will you call?" So--Steph and I were then left standing in the road while the car that had delivered us was used in the motorcade for the Doles and the President as they went to a reception in Lionshead, Colorado. When the car returned to pick us up they told us that the reservations had been made for Stephanie and I to attend the same restaurant (I had asked the military aide to try to get us in since I was unable to get reservations since it was a theatre-supper club and I thought Stephanie might enjoy it.) We went down and began eating. Susan came in and chatted with us a while. When her father finally arrived...they sat down and had empty chairs at their table. The President walked over to my table and said..."Why don't you and Stephanie join us for dinner?" It was very nice of him to offer, and he not only invited us but helped me over with my crutches, and I sat next to Dole (on his right), Mrs. Dole on his left...the President, Susan, and Stephanie. We had a very enjoyable evening. Some of the things I heard that night that are very interesting is the fact that Sen. Dole loved my idea that he go to Philadelphia and show that the Ford administration is not down on big cities, and that the people of Philadelphia need to know that more conventions will not be cancelled, and that the Vice President can get up there very inexpensively. Sen. Dole did not really take to my idea of campaigning in motorhomes.

Sen. Dole did say he received a letter from Dick Nixon, who told him..."Always attack up...never attack horizontally." Which means he is telling Dole to attack Carter, and leave Mondale alone. The President replied..."Dick always had some shrewd political advice--follow it."

Since it was a supper-club performance, and the President arrived late...there wasn't much conversation before dinner, and immediately after dinner they were deluged for autographs, and I did not get to see him again.

The next morning the First Lady called and said that she had an interview with UPI, and AP...and had to do it because the AP lady had flown in 2 days prior and had just been waiting to conduct this interview. The First Lady wanted to have us up for lunch, but couldn't...so wanted us to come later that afternoon. We couldn't...our plane was leaving at 3:00. The First Lady said she really hurt herself by staying out on a picnic on the Island that Peppi and Sheicka had thrown early that week, because it got very cold after the sun went down. This cold really affected her neck, and Dr. Lucash said she was having spasms and it was very painful. Since she did not make dinner the night before she still was in pain Saturday morning when she called me. We had a long chat about the campaign, and she was very upset about the fact that if I did my own independent thing...that I wouldn't even be able to talk to her. She couldn't understand that. She talked to Stephanie a while and said "hello."

It is interesting to note that when Jimmie Carter is in front of the camera he picks up a small child, but when the President is at a private dinner surrounded by strangers with no photography available he invites a small child to sit at his table, and holds conversation with her, treats her like an equal...and was very polite to his broken leg buddy and his 9 yr. old daughter. Stephanie had her menu autographed by the President and Sen. Dole, and then we called the bellman at the Lodge. They picked us up and took us back to the hotel.

FEDERAL ELECTION COMMISSION

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

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

Signed

Judith W. Brown

date

11-4-77

September 9, 1976

Mr. Max Fisher
2210 Fisher Building
Detroit, Michigan 48202

Re: CAMPAIGN ACTIVITIES

Dear Max:

Since you and Jay are my friends, and have taught me many good principles these past few years...I want to advise you of a recent decision.

It is impossible to completely sever my relationship with the candidate, his committees, his family, and/or the White House. I receive daily phone calls from local citizens requesting letters, needing information, feeling slighted, wanting speakers, etc. It is virtually impossible to attempt to fulfill these requests without some type of contact from "within" the system. (In fact...the President called Sunday night just to "chat." How do you stop this?)

So, because of the inability to completely sever this relationship...I have reached the decision to work within the system the next few months, and discontinue the "independent" route.

During the primary I became disenchanted and, consequently, divorced myself from the President Ford Committee to be free to do my "own thing." Several weeks were wasted in an attempt to obtain information from the Federal Election Commission, incurring thousands of dollars in expenses ...only to receive contradictory answers. Now I am reading Mr. Colson's book, "Born Again", and fear the contradictory answers could, in turn, become "contradictory accusations."

Not wanting to embarrass the President, entail exorbitant legal expense, or be called before a Grand Jury...I am running "scared," and feel that any activity conducted in this manner has to come from someone more distant than I.

0089

April 26, 1976

TO: DON WIERINGA
FR: PETER F. SECCHIA
RE: INDIANA "SCATTER BLITZ"

The President has asked that we consider Mr. John Holt's request to "scatter blitz" the Northern Counties of Indiana on May 1.

You will call John Holt at the Indianapolis "President Ford Committee" office, and find out who the Republican contacts are in the Michigan City-South Bend-Elkhart area.

We will leave the Hospitality Inn parking lot at approximately 7:30 A.M. on May 1, and will work our way east from the Michigan City area. -- Remember the time change.

We would like to have three presentations of Michigan White Pine trees. I am sure Pete Sarantos, the Republican Mayor of Elkhart, would be glad to allow us to do a tree planting in one of the local parks.

At this point in time it looks as if we will have all three Ford brothers with us, and People Magazine.

We are not looking for a caravan as large as the one we took to Wisconsin. We hope to arrive with approximately 12 to 15 vehicles...all CB radio controlled.

Fred Gebauer will be in charge of the convoy, and has filed for the necessary licenses. His base station has been approved, and each of the cars will be a mobile attached to his base station. We must adhere to the etiquette and rules of CB broadcasting.

We will all take lunches, and eat at a park along the way. The President's brothers will be available for interviews during this lunch period. All other times the brothers will be campaigning with the others.

We want to do two precinct blitzes similar to the ones conducted in Madison.. with efficiently layed out and marked community maps to be passed out to each vehicle as it approaches the point of dispatch.

Don Pletcher, residence - (219) 262-1404...business (219) 773-7755, asked if he could "get involved"...he sure is. He is trying to find a rack truck that will travel with us, and have a Dixieland band, dressed in red, white, and blue, to play at each of our stops. We will take along two of the large Ford banners to put on either side of this truck, and Mr. Pletcher will attempt to decorate the balance of the truck so it will be an "attention-getter".

clay . 0108

Mr. Wieringa

-2-

April 26, 1976

We should have the word sometime this week on whether our friends from Holland, Michigan will join us to present tulip bulbs to our friends in Indiana. If not...we hope to give the Michigan Delicious apples, Michigan White Pine seedlings, buttons, bumper stickers, and other pertinent information concerning our friend "The President".

Attached is a copy of the Press Release mailed to all radio and TV stations, and newspapers in the area we intend to visit. We need immediate coverage. This is a media blitz.

When the contacts have been identified by John Holt...please work with them on setting up the precinct blitz, and call my office Friday with a detailed schedule of our itinerary. Please leave two 15-minute "fillers" in the schedule.

1. In the South Bend area, and
2. Later that afternoon.

We hope to use several "scatter blitz" fillers as we travel along. If there is time, we will stop and hit them all, or an apartment complex, for ten or 15 minutes...then off we go. It is important that we work on a tight schedule from beginning to end, but the "fillers" are of the utmost importance so we can play "hurry up - catch up".

Don Pletcher has been informed that we have a "0" budget. If he has to spend money, he will raise an equal amount in contributions to the "President Ford Committee", and give to me on May 1. We will then pay any of his expense through the Washington "President Ford Committee".

Bill Deitch, residence (219) 264-1870, business (219) 262-3611, has agreed to help by contacting some of his friends throughout the area, to arrange for the presentations that you need to get us media attention. Bill will also contact the Elkhart Truth, and has said he would guarantee a newspaper photographer to be wherever we are.

Vince Ford of WJVA in South Bend, Indiana, is an old friend of ours. Vince and his wife will join us in the caravan, and his handle is, ironically enough, "Mr. President". He will have his news people giving news spots this week, while visiting with us while we are in South Bend.

Bob Morris of Middlebury, Indiana, is President of Coachmen Homes, and a close personal friend, who has committed to help our man. Please contact him if we are going into his area. (219) 825-5814 - business.

No matter what towns in Northern Indiana the Committee decides we should "blitz"...please contact me via Mrs. Hodges immediately. We have friends in every one of those Northern communities.

To date we are undefeated. When we went to Florida the President was behind 2-1. When we went to Wisconsin there was some question...and we ended up winning every single district. Now...we are going to Indiana at the personal request of the President. We are his "good luck charm"...and "Betty and I hope you will be able to gather some of our friends to go down and help us." Here we go...or here we come, depending on where you are now while reading this memo. We need all your help.

dup. 0109

PRESS RELEASE

Grand Rapids friends of the Ford Family to campaign in Indiana Saturday. For the third time in as many months a group of Grand Rapids, Michigan, people who call themselves "The Friends of President Ford" will cavalcade to another state to campaign for their friend just prior to a primary election.

This time it will be for a full day of "scatter blitzing" across the northern tier of Indiana on Saturday, May 1, and once again the trip is being made at the suggestion of President Ford, who calls the group his "good luck" charm.

In the upcoming Indiana Primary President Ford considers himself the "underdog" just as he did in the Florida primary, and to a lesser degree...in the recent Wisconsin primary. In both of those states a visit by an eager group of enthusiastic "Ford friends" from his hometown was credited with whipping up local voters' enthusiasm, and contributed to a Ford victory over Ronald Reagan in the balloting.

Saturday's caravan will involve 20 to 30 automobiles and motor homes, most of them equipped with CitizenBand radios. More than 90 people hired a jet aircraft and spent a weekend in Florida, and almost 250 "Ford friends" travelled by car, motor home, and airplane, to Wisconsin to carry out the Wisconsin neighbor-to-neighbor campaign.

This Saturday the group will leave Grand Rapids Hospitality Inn parking lot at 8:00 A.M., and move in convoy to the Michigan City area of Indiana. From there they will work their way across Indiana, mostly along Route U.S. 20, stopping along the way at South Bend, Mishawaka, Elkhart and maybe side trips by part of the group to smaller nearby cities. As they have in the past, the "Ford friends" will present Michigan White Pine trees to City officials along the way, and will pass out apples, litter bags, buttons, bumper stickers, and brochures. Again they will use the "scatter blitz" technique they started on their first trip - at a given signal the whole convoy stops and everyone scatters through the immediate area shaking hands, ringing doorbells, and just telling everyone available about their friend Jerry Ford from Grand Rapids, who is on the ballot seeking to continue as President of the United States. Although some of the Ford family has met or travelled with the earlier two groups all three of the President's brothers have indicated that they will make the trip to Indiana Saturday.

No formal meals have been planned for this trip, and all participants will be encouraged to "brown bag" it and devote the time saved to additional campaigning. Plans are also underway for a local hamburger party when the group arrives back in Grand Rapids at approximately 9:00 P.M.

March 1, 1976

Mr. T. Timothy Ryan
Assistant General Counsel
President Ford Committee
1826 L Street, N.W.
Suite 250
Washington, D.C. 20034

Dear Tim:

Your letter of February 17, 1976 arrived in my office on the 24th. I have just returned from an extended trip to the south, and found it on my desk today (Sunday the 29th).

Since the PFC now paid for the plane...all contributions, whether for someone else's ticket, or a contribution from someone on the plane, will be considered a normal contribution and a standard donor card will be filled out for submission with the checks.

We are attempting to send out copies of your "Travel Expense Exclusion" form, and hope to have them returned to our Treasurer and kept in the records.

We were also told that someone would meet us in Florida to take our corrected checks made payable to the "President Ford Committee", but no one was there. John Damstra has been in touch with Mr. Moran of your office, and will meet with me this week. We returned all checks and were informed that the PFC would bill the Press directly, and that we would ask for contributions of any amount from those attending. This has been done, and now we will send out your forms.

The trip was a success, as indicated by the attached newspaper articles. We were the lead story in most of the local T.V. stations Sunday and Monday. The President and First Lady called my wife and me Sunday night and said they had already heard "nice things"...we hope it helps.

Peter F. Secchia

PFS/jh
encl:

0149

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Counihan, Casey & Loomis)

2121 K Street, N.W.

Washington, D. C. 20006

202-246-7680

Donald. W. Counihan

1917-1969

E. Riley Casey

1929-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

*John E. Loomis
Stephen F. Owen, Jr.
Heron John Fellman
Francis F. Coleman
William H. Hear
Ferdinand A. Jacobs
John R. Erickson
Thomas E. Anderson
John C. Reynolds
Henry J. Hart
T. Timothy Ryan, Jr.
Donald L. Rosenthal*

June 20, 1977

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

RE: MUR 321 (76)

Dear Charlie:

Enclosed is Mr. Secchia's response to Mr. Oldaker's letter requesting information and documents dated April 22, 1977, as amended by your letter of June 3, 1977.

As noted at our recent meeting, we would appreciate your immediate attention to this matter. A settlement of this case which is just and reasonable will most likely be attainable. In this regard, we would appreciate the opportunity to meet with you and your staff in the very near future to discuss same.

Very truly yours,

LOOMIS, OWEN, FELLMAN & COLEMAN


T. Timothy Ryan, Jr.

TTR:jr
Enclosures

cc: Mr. Peter Secchia
Leonard Hoffius, Esquire
Ms. Judy Browning, Esquire

CERTIFICATE OF SERVICE

I, THOMAS G. BEARDEN, hereby certify that on this, the 20th day of June, 1977, I personally filed with the Secretary of the Federal Election Commission, the response of Peter F. Secchia in MUR 321 (76). The response consists of a cover letter dated June 10, 1977, which is attached hereto, and 218 separate documents arranged chronologically by subject matter where possible, and numbered 1 through 218.

Thomas G. Bearden

JUN 20 1977

11 3 JUN 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. T. Timothy Ryan, Esq.
Counihan, Casey & Loomis
1000 Connecticut Ave., N.W.
Washington, D.C. 20036

Re: MUR 321 (76)

Dear Mr. Ryan:

Pursuant to our meeting with you and Mr. Anderson on Friday, May 27, 1977, and your request that we specify more precisely what items covered by paragraph 1, page 2, of the Commission's order are necessary for the Commission's present investigation, I think the following paragraph states substantially the information we need.

- 1) Documents which deal with campaign plans, solicitations, transfers, or reimbursements of money to (or from) you, Friends of the Efrste family, or any group or political committee of which you were a member from (and to) the President Ford Committee staff or the White House staff during the period January 1, 1976, to the present. Specifically, please provide any correspondence, bills, or receipts relating to the above-mentioned activities.

In complying with this request, it might be helpful if you keep in mind the discussion we had on Friday with regard to our purposes in requesting this information. The Commission is interested in finding out facts concerning Mr. Secchia's relationship with the President Ford Committee, i.e., his authority to make campaign expenditures and plan campaign activity, and his right to reimbursement for his own campaign expenditures and those of other persons working with him, etc. In addition, we would like to know more about the activities of the Friends of the First Family, especially

RC 308 321

PS Form 3811, Mar. 1976
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:
Mr. T. Timothy Ryan, Esq.
1000 Connecticut Ave., N.W.
Washington, D.C. 20036

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945303	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY	POSTMARK
JUN 5 1977	

5. ADDRESS (Complete only if requested)

[Handwritten address]

6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

PETER J. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

June 10, 1977

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

Re: MUR 321 (76)

Dear Mr. Steele:

This letter is in response to Mr. Oldaker's correspondence dated April 22, 1977, as amended by your letter of June 3, 1977.

Your letters request certain information which I will respond to in the same order as requested:

A. REQUEST FOR INFORMATION

1. When did you begin your campaign activities for the President Ford Committee? What title did you have? Describe your duties.

Response:

After President Ford announced his intention to seek a full term in the presidency, I decided to assist in his campaign as a local volunteer worker, scatter-blitzing, and as a fund raiser, until May 1976. I never received any title from the President Ford Committee, nor was I assigned any specific duties, except raising funds.

2. Did you have authority to make expenditures on behalf of the President Ford Committee? If so, during what period of time did such authority exist?

Response:

No, except that I was given \$1500.00 to pay bills that were incurred by PFC agents for the November, 1976 "homecoming in Grand Rapids."

3. List the names of the persons who made up the group of volunteers called the "scatter blitzers" (referred to on page 1 of December 31st letter). What duties did these persons have?

FEDERAL ELECTION COMMISSION
COMMUNICATIONS SECTION
WASHINGTON, D.C. 20463

Response:

See attached Exhibit 1 (list of persons on Wisconsin and Florida "scatter blitzes"). Their duties were to smile, knock on doors, say hello, shake hands, and request support for President Ford.

4. List dates and parts of the country where you were involved in "scatter blitzing" for the Ford campaign.

Response:

February 21-22, 1976	-Florida
April 3- 4, 1976	-Wisconsin
May 2, 1976	-Indiana

5. Do you have any knowledge of a group called the Friends of the President? If so, provide the following information:

- a) When was the group organized?
- b) Who were the group's officers?
- c) What was the purpose of the group?
- d) Describe your relationship to the group.

Response:

I have never heard of a group called "Friends of the President".

6. In connection with the organization of Friends of the First Family:

- a) List the members of the Committee.

Response:

Peter F. Secchia and Jeff Davis.

- b) How many meetings of the Committee were held and on what dates?

Response:

The Committee held one organizational meeting on May 24, 1976.

- c) Please include a list of all meetings at which any business relating to contributions or expenditures on behalf of President Ford was discussed or transacted.

Response:

May 24, 1976; the Committee of two operated very informally and after its organizational meeting, conducted its business by telephone.

PAGE 3

- d) Did the Committee ever operate under a different name? If so, list the names the Committee used and note the time periods when those names were used.

Response:

No.

- e) Were there any other officers or personnel of this Committee aside from yourself and Mr. Jeff Davis? If so, please list their names and describe their duties.

Response:

No.

- f) Were any officers or personnel of the Committee other than yourself former "scatter-blitzers" or former workers for the President Ford Committee? If so, list these persons and describe their duties.

Response:

Jeff Davis. Scatter-blitz only. Duties same as response to No. 3 above.

COMMENT

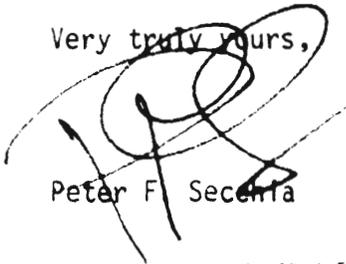
In 1974 a political committee had been formed by Grand Rapids citizens, also named "Friends of the First Family". The sole purpose of this committee was to support the candidacy of then Congressional candidate, Paul Goebel. Immediately after that election, the committee was dissolved.

Thereafter, in 1976, the decision was made to use the same name for our new committee because of its implied intimacy with the family of President Ford. The purpose of this new committee was to support the candidacy of Gerald Ford.

B. DOCUMENTS

You have also requested certain documents which deal generally with my activities during the 1976 election campaign. The enclosed documents are submitted in response to this request dated April 22, 1977, as amended on June 3, 1977.

Very truly yours,


Peter F. Secenta

CLERK OF HOUSE OF REPRESENTATIVES
LEGISLATIVE BUREAU
OFFICE OF GENERAL COUNSEL

5-12-77

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter F. Secchia
2833 Bonnell Avenue, S.E.
Grand Rapids, Michigan 49506

321

Re: MUR 320(76)

Dear Mr. Secchia:

We received today your letter of May 10, 1977, requesting a thirty-day extension of time in which to respond to the Commission's request for information of April 22, 1977.

Normally the Commission does not grant extensions of time in these matters. While we appreciate the fact that we made an earlier request for information from you on December 7, 1976, to which you responded on December 20, 1976, the Commission is of the understanding that the materials now requested are all available to you; therefore, we would appreciate your response to our present request for information promptly.

However, in light of the amount of material requested from you in our April 22, 1977, letter, we are willing to allow you an extension of time which would make the new due date May 31, 1977.

If we can be of any further help to you please do not hesitate to get in touch with Judy Browning, the attorney assigned to this matter (phone: 202/523-4075).

Sincerely,

William Oldaker
General Counsel

JBrowning/scc 5/12/77
cc:

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

7 9 9 4 1 0 5 : 8 4 1

Handwritten: MUR 321
MUR 321

FILE COPY

PETER J. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

MAY 10, 1977

JUDY BROWNING, ESQ.
FEDERAL ELECTION COMMISSION
1325 K STREET NW
WASHINGTON, D.C. 20463

RE: MUR 321 (76)

DEAR MS. BROWNING:

AFTER TALKING TO YOU LAST WEEK, I DICTATED A 5 PAGE LETTER. AFTER REVIEWING YOUR LETTER AND QUESTIONS...I NOTE IT IS GOING TO TAKE TIME TO GO THROUGH TO ASCERTAIN WHAT DOCUMENTS ARE AVAILABLE.

I WORKED ON THIS OVER THE WEEKEND, AND TODAY I MUST LEAVE ON A BUSINESS TRIP TO WISCONSIN. IT WILL BE IMPOSSIBLE TO MEET THE DEADLINE AS SET (15 DAYS).

IN OUR PREVIOUS CORRESPONDENCE, WE DISCUSSED THE FACT THAT LAST TIME YOU WANTED A 15 DAY ANSWER. I WORKED OVER THE ENTIRE CHRISTMAS HOLIDAYS, AND PRESENTED TO YOU ON TIME...THEN WAITED FOR FOUR MONTHS TO HEAR BACK. I HOPE THAT YOU WILL UNDERSTAND THAT MY SITUATION REQUIRES ME TO PAY THE GROCERY BILLS. MY WIFE IS IN THE PROCESS OF ORDERING FURNITURE...THEREFORE, PETER MUST DO HIS THING, AND TRY TO SELL SOME LUMBER IN WISCONSIN.

UPON MY RETURN, I WILL REVIEW THE DOCUMENTS THAT WIFE HAS GATHERED, AND FINALIZE THE LETTER FOR MAILING A WEEK FROM TODAY. HOPEFULLY IT WILL SATISFY YOUR REQUESTS. MAY I HAVE ANOTHER 30 DAYS?

THANKS FOR YOUR COOPERATION, AND I LOOK FORWARD TO SEEING YOU, OR HEARING FROM YOU. IT IS FUN TO WORK WITH A GOVERNMENT AGENCY, WHEN THERE IS A REAL PERSON THAT GOES WITH THE TITLE. HAVE A NICE DAY.

PETER

PFS/JH

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
DIVISION OF PUBLIC COUNSEL

JUDY BROWNING, ESG.
FEDERAL ELECTION COMMISSION
1325 K STREET NW
WASHINGTON, D.C. 20463

321

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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:

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	435533	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY: 12-23

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 14, 1977, the Commission adopted the recommendation of the General Counsel that the letter, requesting additional information, attached to the Memorandum to the Commission, dated April 12, 1977, regarding MUR 321 (76), be sent.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20543

April 15, 1977

MEMORANDUM TO: Charles Steele
FROM: Marjorie W. Emmons
SUBJECT: MUR 321 (76)

MWE

The above-mentioned document was transmitted to the Commissioners on April 13, 1977 at 9:00 a.m.

As of 10:00 a.m., April 15, 1977, no objections have been received regarding the staff recommendation in MUR 321 (76).

However, please note the attached questions submitted by Commissioner Aikens.





FEDERAL ELECTION COMMISSION

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

April 12, 1977

MEMORANDUM TO: The Commission
FROM: William Oldaker *W. Oldaker*
SUBJECT: MUR 321(76)

This case concerns the question of whether certain expenditures made by respondent Peter Secchia and a committee organized by him (Friends of the First Family) were independent expenditures as reported by respondent. Mr. Secchia's fundraising activities carried out for the President Ford Committee shortly before he began making allegedly independent expenditures caused the Commission on December 2, 1976, to find reason to believe a violation of 2 U.S.C. §441a(a)(1)(A) (as affected by 441a(a)(7)(B)(i)) had occurred.

In a December 31, 1976, letter to the Commission (attached), respondent's counsel set forth an account of Mr. Secchia's contacts with the President Ford Committee (PFC) both before and after he began making the allegedly independent expenditures on May 11, 1976.

In our opinion, the information in respondent's letter does not provide a sufficient basis upon which to close our investigation.

Secchia was an advance man and fundraiser for the Ford Campaign who worked in Florida and Wisconsin before those states held their primaries. Although he maintains that he received only \$2,500 from the PFC, reports filed with the Commission list him as having received more than that.

Secchia's contacts with the Ford campaign staff continued after he claims to have severed ties with the campaign organization and after he made so-called independent



expenditures. While he claims to have had no business contacts with PFC personnel during the period in which he was operating the Friends of the First Family, he attended certain PFC campaign meetings. He also admits to having had "social contacts with PFC personnel." It is unclear what connections other members of Friends of the First Family had with the Ford campaign staff.

In addition, certain correspondence and receipts were discovered during the Commission's on-site audit at PFC which seem to contradict respondent's account of the extent of reimbursements to him for campaign activities on behalf of PFC. This correspondence also conflicts with respondent's explanation of the dates of organization and the finances of Friends of the First Family.

Due to the inconclusive nature of the information provided by respondent's counsel, we recommend sending the attached follow-up letter and request for information. It may be necessary to take depositions after a response to this request for information has been received.



FEDERAL ELECTION COMMISSION

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

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

In furtherance of its investigation into the above-referenced matter, the Commission requests that you provide certain information in addition to that provided in your letter of December 31, 1976.

We would appreciate your response to the enclosed request for information and materials within 15 days of receipt of this letter, as well as your submission of any other factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Judy Browning (telephone 202-523-4178).

Sincerely yours,

William C. Oldaker
General Counsel

cc: T. Timothy Ryan
Leonard M. Hoffius, Jr.



REQUEST FOR INFORMATION

1. When did you begin your campaign activities for the President Ford Committee? What title did you have? Describe your duties.
2. Did you have authority to make expenditures on behalf of the President Ford Committee? If so, during what period of time did such authority exist?
3. List the names of the persons who made up the group of volunteers called the "scatter blitzers" (referred to on page 1 of December 31st letter). What duties did these persons have?
4. List dates and parts of the country where you were involved in "scatter blitzing" for the Ford campaign.
5. Do you have any knowledge of a group called the Friends of the President? If so, provide the following information:
 - a) When was the group organized?
 - b) Who were the group's officers?
 - c) What was the purpose of the group?
 - d) Describe your relationship to the group.
6. In connection with the organization of Friends of the First Family:
 - a) List the members of the Committee.
 - b) How many meetings of the Committee were held and on what dates?
 - c) Please include a list of all meetings at which any business relating to contributions or expenditures on behalf of President Ford was discussed or transacted.
 - d) Did the Committee ever operate under a different name? If so, list the names the Committee used and note the time periods when those names were used.
 - e) Were there any other officers or personnel of the Committee aside from yourself and Mr. Jeff Davis? If so, please list their names and describe their duties.
 - f) Were any officers or personnel of the Committee other than yourself former "scatter-blitzers" or former workers for the President Ford Committee? If so, list these persons and describe their duties.

Please provide the following original documents or copies thereof:

- 1) All correspondence, memoranda, invoices, bills, or other records of communications (including telephone logs) to (and from) you, Friends of the First Family, or any group or political committee of which you were a member from (and to) the President Ford Committee staff or the White House staff during the period January 1, 1976, to the present, including documents relating to your "scatter blitzing" activities. (Please include documents which deal with campaign plans, solicitations, transfers, or reimbursements of money to any of the individuals or groups named above.)
- 2) All checks and records of contributions transferred to the President Ford Committee by or on behalf of you, Friends of the First Family, or any group or political committee of which you were a member.
- 3) All documents relating to the organization of the Friends of the First Family Committee, including charter, minutes from meetings, correspondence of organizer(s). Include memoranda or any documents describing the meetings of the group.
- 4) Memoranda, correspondence, and communications relating to any Friends of the First Family solicitations for funds.
- 5) Records or minutes of the following meetings or discussions (if available):
 - a. Discussion with Mr. Kahle in May, 1976, (referred to in your December 31st letter, page 6);
 - b. Conversation with John Holt regarding use of PFC campaign material as copy for independent expenditure advertising, early May, 1976 (Dec. 31st letter, page 3);
 - c. Request to assist in housing White House staff, May 13, 1976 (Dec. 31st letter, page 3);
 - d. Strategy meeting in Washington to discuss the applicability of the Michigan strategy to California, May 21, 1976 (Dec. 31st letter, page 4);
 - e. Speech to volunteers at Republican convention, late August, 1976 (Dec. 31st letter, page 8);
 - f. PFC meeting in Vail, Colorado, late August, 1976 (Dec. 31st letter, page 6);

- g. Post-convention discussion with Mr. Baker regarding independent expenditures (Dec. 31st letter, page 6);
- h. Any discussions regarding advance activity for Ford's welcome home parade, October, 1976 (Dec. 31st letter, page 7).

*Law Offices**Counihan, Casey & Loomis**1000 Connecticut Avenue**Washington, D. C. 20036**202 296-5680*

December 31, 1976

77J026

John G. Loomis
Stephen F. Cunn, Jr.
Steven John Fellman
Francis T. Coleman
William H. Hesse
Jerald A. Jacobs
John B. Erickson
James E. Andersen
Louis J. Sperling
John C. Reynolds
Henry A. Hart

Donald M. Counihan
 1977-1969

E. Riley Casey
 1923-1971

J. R. Pat Gorman
Elmer F. Bennett
 Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Dear Mr. Murphy:

Re: MUR 321 (76)

This letter is in further response to your letter of December 7, 1976, which was received by Mr. Secchia on December 11, 1976. Thereafter, on December 20, 1976, counsel for Mr. Secchia, Clary, Nantz, Wood & Van Orden notified the attorney assigned to this matter, Mrs. Carol Darr, that because of the holidays and the retention of Counihan, Casey & Loomis, our response would not be forthcoming until December 31, 1976.

In keeping with this agreement, counsel for Mr. Secchia and the Friends of the First Family Committee (hereinafter referred to as the "Friends") met in Grand Rapids, Michigan, on Tuesday, December 28, 1976, to review the relevant facts and your request for pertinent information. Accordingly, the following relevant information based on the reports submitted to the Federal Election Commission (hereinafter referred to as "Commission"), pertinent letters, and our discussion with Mr. Secchia and Mr. Jeff Davis, Treasurer of the Friends, is submitted in order to demonstrate that Commission action should not be taken against Mr. Secchia or the Friends.

Preliminary Statement

Mr. Secchia, a Grand Rapids, Michigan, businessman, has for a number of years been a close personal friend of Gerald R. Ford and his family. Prior to the 1976 election campaign Mr. Secchia had not been involved in political activity nor had he financially supported any of Mr. Ford's previous congressional campaigns. However, after President Ford announced his intention to seek a full term in the presidency, Mr. Secchia decided to assist in his campaign as a volunteer worker and as an authorized fundraiser.

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Due to what he viewed as an apparent lack of "grass roots" political activity on behalf of the President during the first months of the campaign, Mr. Secchia and a number of other Grand Rapids residents formed a group of volunteers called the "Scatter Blitzers". The "Scatter Blitzers" was a group made up of Ford Supporters from Michigan who Mr. Secchia thought could best spread the word about the President's record and accomplishments in areas outside of his old Congressional District in Michigan. In this regard, Mr. Secchia led groups of individuals to Florida in late February and to Wisconsin on April 3 and 4, 1976, to campaign on behalf of Mr. Ford's candidacy. All expenses for these trips were either paid for by the President Ford Committee (hereinafter referred to as the "PFC") or absorbed by the specific individuals under the statutory travel exclusion set forth in 2 USC §421(F)(4)(E). The expenditure of funds was coordinated with the PFC as was all political activities during these trips.

Following the two "Scatter Blitzers" trips, Mr. Secchia became increasingly disillusioned with the campaign efforts of the PFC. Each of his previous trips had been marked by poor communications and a general lack of support from the national and local PFC. In addition, while campaigning in Wisconsin, Mr. Secchia was exposed to a number of newspaper advertisements paid for as independent expenditures by Ronald Reagan's Florida campaign chairman, Tommy Thomas. This method of supporting a candidate intrigued Mr. Secchia. Accordingly, he contacted his attorneys, Clary, Nantz, Wood & Van Orden regarding the legality of such expenditures. Counsel for Mr. Secchia informed him of the general state of confusion which existed in the election law since portions of the Federal election campaign laws had been found unconstitutional by the Supreme Court on January 30, 1976, in the case of Buckley v. Valeo, 424 U.S. 1 (1976). They further advised that the Federal Election Commission had only a 30-day period before its members would have to be selected by the President and approved by Congress so as to conform with the constitutional requirements. ^{1/}

^{1/} The Federal Election law amendments of 1976 which satisfied these requirements did not become effective until May 11, 1976.

Even though this state of confusion existed, Mr. Secchia decided that it was important that he and his wife undertake a limited independent campaign on behalf of the President. Thus, on May 10, 1976, Mr. Secchia informed Mr. John Holt, Midwestern Coordinator for the PFC, that:

"I'm sorry but it isn't working. I have decided to sever all ties with the President Ford Committee, and therefore . . . have destroyed the donor cards, and will forward no more contributions.

"The continual changing of course, the failure to return phone calls, the failure to release press on the previous blitzes, has convinced me that I must work independently -- on my own." (Exhibit A)

The next day, Mr. Secchia and his wife purchased local Michigan newspaper advertisements advocating the election of Mr. Ford. The cost of the advertising was \$1,752.17. Counsel for Mr. Secchia reported these expenditures to the Commission by telegram on May 13, 1976, by letter of May 14, 1976, and, thereafter, by filing an FEC Form 5 with the Commission setting forth such independent expenditures.

During the week prior to the Michigan primary, Mr. Secchia was in contact with Mr. David Mehney and Mr. Jay Van Andel of Grand Rapids regarding his advertisements and spoke generally with them about the subject of independent expenditures. An individual representing Mr. Kuhn of Detroit, Michigan, also contacted Mr. Secchia regarding independent expenditures at this time. During these conversations, Mr. Secchia explained his understanding of this most difficult subject and suggested that they each contact their own attorneys. At no time was Mr. Secchia solicited by the PFC or its agents regarding the independent expenditures. The only contact he had with the PFC prior to his independent expenditures was a phone conversation in early May, 1976, with Mr. Holt regarding the use of PFC campaign material as copy for his independent advertising. Holt suggested that this approach not be followed and the conversation was terminated.

On May 15 and 16, 1976, President Ford visited Michigan to campaign for the primary. A very popular local Tulip Festival was being held near Grand Rapids making it impossible for the White House Advance Team to obtain sufficient hotel rooms to house the White House staff and travelling press. Because of his close personal relationship with the President, Mr. Secchia was asked the evening of May 13, 1976, to assist in housing the White House staff. Since this was not per se political activity and he had not mentioned his independent expenditures to any

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White House officials, Mr. Secchia decided that he could assist the Advance Team in locating housing. Eventually, rooms were provided in area homes. The Secchia family itself lodged several White House staff members, and he and his neighbors hosted a pot luck luncheon for the staff and working press. The President briefly attended this luncheon. Mr. Secchia advised that his independent activity was not discussed while the White House staff was in his home.

After the President's overwhelming victory in the Michigan Primary, a meeting was convened on May 21, 1976, in Washington to discuss the applicability of the Michigan strategy to California. Mr. Secchia was invited to attend and to discuss his scatter blitzer concept. After much deliberation, he decided to accept the invitation in order to determine if some of the past problems which had plagued the PFC would continue. At the meeting which was attended by senior campaign and White House officials, Mr. Secchia suggested an increased use of the "Scatter Blitzer" concept and a number of other political strategies, all of which were rejected. As a result, Mr. Secchia decided to continue working on his own. The topic of the Michigan victory and the upcoming California primary dominated the meeting; and according to Mr. Secchia, there was no discussion of the Ohio primary. This meeting further reinforced Mr. Secchia's earlier decision that he would have nothing more to do with the PFC. At no time were Mr. Secchia's independent expenditures discussed at this meeting.

On May 24, 1976, Mr. Secchia began to work on the formation of a registered political committee to be called the "Friends"; and on that day met with Mr. Jeff Davis. At this meeting, it was decided that Mr. Secchia would be the Chairman and Mr. Davis would be the Treasurer of this Committee. An FEC Form 1, the Statement of Organization, was filed with the Commission on June 1, 1976.

During the period from May 7, 1976, to approximately June 1, 1976, counsel for Mr. Secchia contacted the Commission on numerous occasions to seek guidance concerning Mr. Secchia's independent activity. During this time the amendments to the Federal Election law were being promulgated and contradictory advice was given to Mr. Secchia's counsel by FEC personnel. Of special significant in this regard is a letter from Mr. Hoffins, Counsel to Mr. Secchia, dated May 14, 1976, the morning after the White House had asked Mr. Secchia for assistance in obtaining housing, wherein he noted:

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The telegram and letter [regarding Secchia's expenditures] comply with both the old and new version of the Act. As you may have noted, the enclosed sections have been substantially changed. The following phrase was added to 2 USC 434(e):

". . . a certification whether such independent expenditure is made in cooperation, consultation, or concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate . . ."

It is our opinion that your prior disaffiliation with any authorized committee sufficiently removed the newspaper ads from being considered in cooperation, consultation, or concert, etc. Moreover, such independent expenditures are a "one-shot" affair and should not be tainted by subsequent support of or contact with the candidate. [Emphasis added] (Exhibit B)

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The independent expenditures by the Friends, as noted in its FEC filings, were all made in connection with the June 2, 1976, Ohio primary save one expenditure for convention campaign buttons incurred in early August. Such expenditures amounted to approximately \$20,000.^{2/} According to Messrs. Secchia and Davis, as noted in Mr. Davis' statement to the Commission of November 20, 1976, none of the independent expenditures by the Friends were made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or authorized committee or their agents.

Although the Friends' final report to the Commission was not submitted until December 7, 1976, the committee's independent activity had ceased by mid-August, 1976. Mr. Secchia's contact with the President and the PFC, however, continued on a purely social basis except for a speech which he gave to a number of volunteers in Kansas City, a trip to Vail, Colorado after the convention to discuss with the Republican National Committee an RNC fundraiser and his advance activities the night before the general election.

^{2/} A number of the Committee's expenditures were mistakenly identified as independent expenditures on the Committee's final report filed on December 7, 1976. Specifically, the purchase of film footage for \$416.00 which was never utilized for any political purpose and the payment of legal fees which is an exempt expenditure.

The only exchanges which Mr. Secchia had with the PFC regarding his independent expenditures save the previously mentioned conversation with Mr. Holt was a discussion with Mr. Morton's assistant, Mr. Kahle in May of 1976 and a conversation after the convention with Mr. Morton's successor, Mr. Baker. During both of these conversations, Mr. Secchia informed them of his past independent activities; Mr. Kahle offered no encouragement or appreciation for his activities and Mr. Baker specifically informed Mr. Secchia that because of FEC guidelines, they should have no further contact regarding the political campaign.

Requested Information

Your letter of December 7, 1976, suggests that certain factual information be submitted in order to demonstrate that no action should be taken against Mr. Secchia. Accordingly, the following responses are submitted to your questions:

1. A description of [Mr. Secchia's] duties and the dates and location of [his] involvement with the President Ford Committee on both a paid and volunteer basis.

As set forth above, Mr. Secchia functioned as a volunteer campaign worker and fundraiser for the PFC during the initial stages of the primary campaign. Prior to his disassociation in May, 1976, Mr. Secchia directed and organized the "Scatter Blitz" trips to Florida and Wisconsin. The PFC issued Secchia \$2,500 for "Scatter Blitz" expenses which he gave another volunteer for payment of expenses incurred in Wisconsin. Mr. Secchia was never paid for his political activity nor was he an employee of the PFC. Mr. Secchia's only other involvement with the PFC or its agents were meetings attended in Washington, D.C., in late May, 1976, and in Vail, Colorado, in late August, 1976. Finally, Mr. Secchia assisted the White House Advance Team on November 1, 1976, for the President's visit to Grand Rapids. At no time, according to Mr. Secchia, did he cooperate, consult, or work in concert with the PFC or its agents with regard to his or the Friends independent expenditures. Moreover, none of his or the Friends' independent expenditures were made at the request or suggestion of the President, the PFC or its agents.

2. The particulars, including dates, of the purpose to which all monies disbursed to [Mr. Secchia] by the President Ford Committee were put.

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The only monies disbursed to Mr. Secchia was the previously mentioned \$2,500.00 for "Scatter Blitzzer" expenses in Wisconsin.

3. The last date on which you received monies from the President Ford Committee.

Other than the \$2,500.00 disbursed to Mr. Secchia, \$1,500.00 additional was received from a PFC agent just prior to the general election. On approximately October 29, 1976, Mr. Bill Nicholson, who was the lead advanceman in Grand Rapids, gave Mr. Secchia \$1,500.00 for advance expenses incurred for the President's welcome home parade.

4. The first dates of any activity or meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

The only meeting of the Friends took place on May 24, 1976, which was attended by Messrs. Secchia and Davis. On June 1, 1976, the formal documents setting forth the committee's officers were executed and filed with the Commission.

5. Describe any meetings or contacts [Mr. Secchia] has with David Mehney, Richard P. Kughn, Richard DeVos, or Jay Van Andel, all of Grand Rapids, Michigan, regarding the election effort of President Ford.

Mr. Secchia had the following meetings or contacts with the following individuals:

- (a) David Mehney:

Mr. Mehney is a neighbor and close friend of Mr. Secchia's. Thus, they had numerous contacts regarding the election effort over the past year. The only contacts, however, regarding independent expenditures were between May 11 - 13, 1976;

- (b) Richard P. Kughn:

No contact at any time;

- (c) Richard DeVos:

No contact at any time;

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(d) Jay Van Andel:

The only contact with Mr. Van Andel was in May, 1976, regarding independent expenditures. As noted previously, Mr. Secchia advised Mr. Van Andel to seek counsel from his own attorney.

6. Did [Mr. Secchia] or any member of the Friends of the First Family Committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of [his] committee? If so, describe the nature of all such contacts.

In late August, 1976, Mr. Secchia attended the Republican convention as a spectator. His only activity in Kansas City involving the PFC was a speech he gave to a volunteer group called the "Presidentials" regarding his "Scatter Blitz" trips. All other subsequent contact with the President, the PFC, or their agents were social in nature save the previously mentioned advance activities at the end of October, 1976.

Applicable Law

Your letter of December 7, 1976, requests certain pertinent information from Mr. Secchia in order to demonstrate that no action should be taken by the Commission against him. The letter also states that your inquiry relates to the possible violation of Section 441a(a)(7)(B)(i) of Title 2, United States Code. This definitional section, administered and primarily enforced by the Commission, provides:

"(B)(i) expenditures made by any person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate." (Emphasis added).

The section was not incorporated into the Federal Election Campaign laws until the 1976 amendments were passed by Congress and signed into law by the President. The amendments did not become effective until May 11, 1976.

It is important to note at this juncture of your inquiry that this provision had no corresponding or specifically related counterpart provision under the Federal Election Campaign

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Act Amendments of 1974 (P.L. 93-443). In fact, the only provision under the 1974 Amendments to the Federal Election Campaign Act of 1971, which addressed the question of independent expenditures was Section 608(e) of Title 18, United States Code, which provided:

"(e) Expenditure relative to clearly identified candidate.

(1) No person may make any expenditure (other than an expenditure made by or on behalf of a candidate within the meaning of subsection (c)(2)(B) relative to a clearly identified candidate during a calendar year which, when added to all other expenditures made by such person during the year advocating the election of defeat of such candidate, exceeds \$1,000.

(2) For purposes of paragraph (1) --

(A) "clearly identified" means --

- (i) the candidate's name appears,
- (ii) a photograph or drawing of the candidate appears; or
- (iii) the identity of the candidate is apparent by unambiguous reference."

Section 608(e) is the same provision of the 1974 amendments which the Court found fraught with vagueness in Buckley v. Valeo, supra. Thus, the Court noted in footnote 53 of its Buckley decision that an independent expenditure would be considered a contribution if the costs were incurred at ". . . the request or consent of the candidate or his agent". Citing the Senate Report regarding this provision, the Court further stated:

"The Senate Report addresses the issue in greater detail. It provides an example illustrating the distinction between "authorized or requested" expenditures excluded from §608(e)(1) and independent expenditures governed by §608(e)(1):

'[A] person might purchase billboard advertisements endorsing a candidate. If he does so completely on his own, and not at the request or suggestion of the candidate or his agent's [sic] that would constitute an 'independent expenditure on behalf of a candidate' under section 614(c) of the bill. The person

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making the expenditure would have to report it as such.

'However, if the advertisement was placed in cooperation with the candidate's campaign organization, then the amount would constitute a gift by the supporter and expenditure by the candidate--just as if there had been a direct contribution enabling the candidate to place the advertisement, himself. It would be so reported by both.' S. Rep. No. 93-689, p.18 (1974)"

Faced with this climate of vagueness and uncertainty, the Commission unanimously adopted on May 28, 1976, a "Policy Statement" on the subject of independent expenditures. This Policy Statement, received by counsel for Mr. Secchia during the third week of June, 1976, vastly expands the previously cited Court language and states:

"It is further the view of the Commission that expenditures made on behalf of a clearly identified candidate by or through any person who is, or has been, authorized to raise or expend funds; who is, or has been, an officer of an authorized committee of that candidate; or who is, or has been, received any form of compensation or reimbursement from the candidate, the candidate's committee or agent is presumptively not independent, see §109.1(b)(4) of the proposed regulations."

The Commission also noted in its release of May 28, 1976, regarding the Policy Statement that it was,

". . . being issued on an interim basis for guidance to candidates and committees pending final promulgation of the regulations".

The regulations, including this provision, were not published in the Federal Register as proposed regulations until August 25, 1976; and, to the Commissions' great chagrin, the regulations "died" before the 30-day statutory review period by Congress could elapse.^{3/}

^{3/} It is important to recognize that a quite legitimate argument can be made that for all practical purposes the Commission is without regulations at this time.

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The aforementioned historical review of this controversial provision is not presented to confuse the issue here, rather its purpose is to illustrate the state of confusion which existed at the time Mr. Secchia and the Friends undertook their independent expenditures. All independent expenditures according to Mr. Secchia and Mr. Davis, save the \$105.41 purchase of campaign buttons, were incurred prior to receipt of the Commission's Policy Statement on such expenditures. Accordingly, neither Mr. Secchia, the Friends, nor their counsel were aware of the presumption of non-independence established by the Commission in its guidelines or in its subsequent regulations. Moreover, as previously noted, the Commission itself had provided contrary advice on this subject to Mr. Secchia's counsel on a number of occasions.

In sum, it is submitted that neither Mr. Secchia nor the Friends expended any monies independently on behalf of Mr. Ford's campaign which were in contravention of the Federal election campaign laws, regulations, or guidelines which were legally in force at the time such expenditures were incurred. Moreover, as previously stated, Mr. Secchia did not cooperate, consult, or work in concert with the President, the PFC, or its agents regarding any of his or the Friends independent expenditures and neither the President nor his principal campaign committee or agents requested or suggested at any time that such expenditures be undertaken.

Conclusion

Based on the facts presented herein and the applicable statutory provisions, it is hereby submitted that no action should be taken by the Commission regarding this matter. In addition, we request that this matter remain confidential in accordance with 2 USC Section 437g(a)(3).

Sincerely,

COUNIHAN, CASEY & LOOMIS

Timothy Ryan
T. Timothy Ryan

COUNSEL FOR MR. SECCHIA:

CLARY, NANTS, WOOD &
VAN ORDEN

for *Timothy Ryan*
Leonard M. Hoffius, Jr.

for *Timothy Ryan*
Steven Mulder

7 9 0 4 1 0 3 8 6 8

May 10, 1975
Mr. John Holt
Midwestern Coordinator
President Ford Committee
1028 L.H.H.
Washington, D.C. 20036

Dear John:

I'm sorry but it isn't working. I have decided to sever all ties with the President Ford Committee, and, therefore...have destroyed the donor cards, and will forward no more contributions.

The continual changing of course, the failure to return phone calls, the failure to release press on the previous blitzes, has convinced me that I must work independently--on my own.

Your handling a man who means an awful lot to me and my family. Working through you, and your committee, has been a complete disaster. Since I have "maxed" out on contributions, and just about reached my maximum "assumption of expense", I feel that anything accomplished by me from this point on should be done in the Reagan fashion as an "independent and unauthorized" person.

I am already enjoying my new stature. Solicitor No. 9805 is now a member of the great silent majority. Sorry it didn't work, and we will all know next Tuesday just how bad it was.

Cordially,

Peter

FFS/jn
cc: Mr. Max Fisher

Exhibit A

Nov 14, 1976

PERSONAL AND
CONFIDENTIAL

Mr. Peter S. Perchia
Universal Forest Products, Inc.
11-5 West Main Street, N. I.
Grand Rapids, Michigan 49503

Dear Peter:

Inclosed are copies of a letter and the contents of a telegram sent to the Federal Election Commission. Also enclosed is a copy of several subsections of the new Act as amended by Senator Griffith's office. His office will forward a separate letter in a few days.

After our discussion of a revelation there is a document, Steve called called the Federal Election Commission to check on the question you raise regarding whether the fee should be paid only because the amount of each campaign was less than \$1,000.00, although totaling more than \$1,000.00. They stated that the Act did apply to such a situation and they further advised that when within the fifteen day period before an election, reporting with the FEC should be by telegram and followed by a more complete FEC form or letter where appropriate. In order to be as safe as possible, Steve decided to send a telegram.

The telegram and letter comply with both the old and new versions of the Act. As you may have noted, the enclosed sections have been substantially changed. The following change was added to 2 USC 434(e):

" . . . a certification whether such independent expenditure is made in cooperation, consultation or concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate"

Exhibit B

78940013861

Mr. Peter F. Secchia
May 14, 1976
Page Two

It is our opinion that your prior disaffiliation with any authorized committee sufficiently removed the newspaper ads from being considered in cooperation, consultation or concert, etc. Moreover, such independent expenditures are a "one-shot" affair and should not be tainted by subsequent support of or contact with the candidate.

Very truly yours,

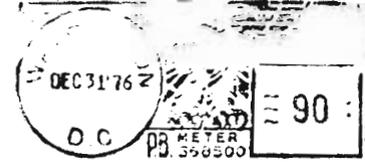
Leonard M. Roffius, Jr.

LM/lag
Enc.

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LAW OFFICES
COUNIHAN, CASEY & LOOMIS
1000 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036

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1976-03
11

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



CLARY, NANTZ, WOOD & VAN CORDEN



TO: [Illegible]
FROM: [Illegible]
[Illegible]

[Illegible text]

CLARY, NANTZ, WOOD & VAN ORDEN
ATTORNEYS AT LAW
700 COMMERCE BUILDING
GRAND RAPIDS, MICHIGAN 49503

December 20, 1976

JACK H. CLARY
RICHARD M. VAN ORDEN
DORIS W. NANTZ
DORIS E. WOOD
LEONARD M. HOFFIUS, JR.
RICHARD J. HAYDEN
ROBERT W. WHITE
DONALD M. BALLEW
STEPHEN G. BRASHER
THOMAS J. JOHNSON
DAVID R. FLORENTHIN
STEPHEN J. MOLDER
LEONARD W. ...

TELEPHONE 601-459-1481

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

[REDACTED]

701282

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

Attention: Ms. Carol Darr

Re: MUR 321 (76)
(Peter F. Secchia)

Dear Ms. Darr:

This letter is in response to the Federal Election Commission's letter dated December 7, 1976, and received by Mr. Secchia on December 11, 1976.

As attorneys for Mr. Secchia, please be advised we have retained Attorney T. Timothy Ryan, and the Washington, D.C. law firm of Counihan, Casey & Loomis, as co-counsel in this matter.

I am advised by Mr. Ryan that he spoke with you and with David Spiegle of your office on December 17, 1976, and advised of his retention in this matter.

This office has commenced assembling the extensive materials, information and documents requested; however, due to Mr. Ryan's temporary absence from Washington and the Christmas holidays, we find it impossible to comply with the ten day time limitation.

We will be meeting with Mr. Ryan the week of December 27 and will make a formal and appropriate response by December 31, 1976.

If this is not acceptable to you, please advise.

Very truly yours,

CLARY, NANTZ, WOOD & VAN ORDEN

Leonard M. Hoffius, Jr.

LMH/lmg

cc: Mr. David Spiegle
Mr. Peter F. Secchia
Mr. T. Timothy Ryan

CLARY, NANTZ, WOOD & VAN ORDEN

Mr. David Spicic
Federal Election Commission
1125 F Street, N. W.
Washington, D.C. 20463

file copy



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.
WASHINGTON, D.C. 20563

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 07 1976

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On the basis of information obtained in the normal course of our supervisory responsibilities, the Commission found reason to believe that you may have violated §441a(a)(7)(B)(i) of the Federal Election Campaign Act of 1971, as amended, which states that:

expenditure made by any person in cooperation, consultation, or concert, with, or at the request or suggestion, of a candidate, his authorized political committee or their agents shall be considered to be a contribution to such candidate.

Your prior relationship to the President Ford Committee and their disbursement of money to you causes reason to believe that your individual expenditures and those of the Friends of the First Family Committee may not have been independent within the meaning of §431(p). This finding is based on a review of the reports filed by you individually for independent expenditures, the President Ford Committee, and the Friends of the First Family Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material, such as copies of cancelled checks, receipts, or affidavits, which you believe will document the following:



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

1. A description of your duties and the dates and location of your involvement with the President Ford Committee on both a paid and volunteer basis;

2. The particulars, including dates, of the purposes to which all monies disbursed to you by the President Ford Committee were put;

3. The last date on which you received monies from the President Ford Committee;

4. The first dates of any activity of meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

5. Describe any meetings or contact you may have had with David Mahney, Richard P. Kughn, Richard DeVos, or Jay VanAndel, all of Grand Rapids, Michigan, regarding the election effort for President Ford;

6. Did you or any member of the Friends of the First Family committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of your committee? If so, describe the nature of all such contacts.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Carol Darr (telephone no. 202/332-4041), the attorney assigned to this matter.

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.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

GC 321

PS Form 3811, Mar. 1976

● **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:
Letter Sample

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438432	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY	POSTMARK
	170 11 1976

5. ADDRESS (Complete only if requested)

2833 [unclear]

6. UNABLE TO DELIVER BECAUSE	CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 2, 1976, the Commission determined by a vote of 4-0 that there was reason to believe a violation of §441a(a)(7)(B)(i) had been committed in the above-captioned matter. Commissioners Staebler and Tiernan were not present at the time of the vote.

Marjorie W. Emmons
Secretary to the Commission

December 2, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS *Mrs. E. J. Emmons*
RE: MUR 319 (76); MUR 321 (76); and MUR 332 (76)

The above mentioned MURs were transmitted to the Commissioners on November 30, 1976 at 3:30 p.m.

All three MURs have received objections.

MURs 319 (76) and 321 (76) have been placed on the Compliance Agenda for the meeting on December 2, 1976.

MUR 332 (76) has been placed on the Compliance Agenda for the meeting on December 8, 1976.

DATE AND TIME OF TRANSMITTAL: NOV 13 1976
3:30

Murphy
NO. MUR 321 (76)
REC'D: 10/1/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Initiated internally

Respondent's Name: Peter Secchia

Relevant Statute: \$411a(a)(7)(B)(i)

Internal Reports Checked: reports filed by PFC, Secchia & Friends of First Family

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

Mr. Secchia's prior relationship with the PFC and their disbursement of money to him constitute reason to believe that his subsequent expenditures were not independent. Peter Secchia received \$7,500 in disbursements from the PFC, the last of which occurred on May 4, 1976 for \$5,000. One week later, on May 11, 1976 Secchia placed \$1,572.17 worth of newspaper ads in Michigan "independently." Three weeks after the \$5,000 disbursement, Secchia reported to the Federal

PRELIMINARY LEGAL ANALYSIS (See continuation sheet)

Secchia's independent "expenditures", both individually and as chairman of "Friends of the First Family," within a month after he received \$5,000 from the PFC causes reason to believe that his expenditures may have been "in cooperation, consultation, or concert, with, or at the request or suggestion of a candidate, his authorized political committees, or their agents," and thus considered a contribution to the candidate. Such a contribution would place Secchia in excess of his \$1,000 limitation, which he had already contributed.

RECOMMENDATION

Reason to believe violation of \$411a(a)(7)(B)(i); send attached letter.

Date of Next Commission Review: _____

CONTINUATION SHEET

SUMMARY OF ALLEGATION

Election Commission as Chairman of the "Friends of the First Family," an "independent" committee which has spent approximately \$43,000.

Mr. Secchia had already contributed up to his \$1,000 limit.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On the basis of information obtained in the normal course of our supervisory responsibilities, the Commission found reason to believe that you may have violated §441a(a)(7)(B)(i) of the Federal Election Campaign Act of 1971, as amended, which states that:

expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion, of a candidate, his authorized political committee or their agents shall be considered to be a contribution to such candidate.

Your prior relationship to the President Ford Committee and their disbursement of money to you causes reason to believe that your individual expenditures and those of the Friends of the First Family Committee may not have been independent within the meaning of §431(p). This finding is based on a review of the reports filed by you individually for independent expenditures, the President Ford Committee, and the Friends of the First Family Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material, such as copies of cancelled checks, receipts, or affidavits, which you believe will document the following:

1. The particulars, including dates of the purposes to which all monies disbursed to you by the President Ford Committee were put;



2. The last date on which you have received monies from the President Ford Committee;

3. The first date of any activity or meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

4. Describe your relationship with David Mehney, Richard P. Kughn, Richard DeVos, or Jay Van Andel, all of Grand Rapids, Michigan. Have you met with them or had any contact with them regarding the election effort for President Ford.

5. Did you or any member of your committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of your committee? If so, describe the nature of all such contacts.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Carol Darr (telephone no. 202/382-4041), the attorney assigned to this matter.

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.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel



FEDERAL ELECTION COMMISSION

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

October 1, 1976

MEMORANDUM

TO: Al Keema
FROM: Ernest Swiger, *ES*
Ronald Krouse, *RK*
SUBJECT: Analysis of 434(e) Filers Supporting Ford

In the course of analyzing the reports of both the 434(e) filers in support of President Ford and the reports of the PFC, we have noticed that Mr. Peter Secchia has been active in several capacities. We have found that Mr. Secchia has received compensation of \$7,500 from the PFC, as well as made independent expenditures of \$1,752. Further, as Chairman of the Friends of the First Family, he has supervised the receipt and expenditure of \$43,000 by this unauthorized committee. This activity raises questions about the status of Mr. Secchia's "independence," as well as that of the unauthorized Friends of the First Family committee.

The significant element in what will be described below is the fact that on three occasions Mr. Secchia received payments or reimbursements from the PFC. On March 27, he received a payment of \$2,500 for "Other," which according to the PFC Schedule B printout was itemized on Line 20, "Operating Expenditures." On the same day, he received a \$2,500 advance which was listed on the printout as Schedule B, line 22, "Fundraising Expenditures." This entry appeared as follows:

Advance - State Fund	\$2,500 CR
Advance - State Fund	\$2,500

Both of these payments are in the May 10, 1976 report. In the June 10 report, Mr. Secchia received a \$2,500 advance for "Travel and Related Expenditures" on May 4. This was listed as a line 20 expenditure.



Mr. Secchia advised FEC by telegram of his \$2,500 independent expenditure for newspaper ads placed in three Michigan papers on May 11. The Form 5 which he filed late in May detailed only \$1,572.17 in independent expenditures. Section 109.1(b)(4)(1)(B) of the Regulations specifies that a person who "is, or has been, receiving any form of compensation or reimbursements from the candidate, the candidate's committee or agent," is not acting independently since such expenditure would be deemed to be made in cooperation or in consultation with the candidate or authorized committee. It would thus appear that Mr. Secchia's independent expenditure should be regarded as an in-kind contribution.

It should be noted that Mr. David Mehney reported that he and his wife shared the costs of two of Mr. Secchia's three ads, and that Mr. Mehney and his wife spent \$2,449.46. If Mr. Secchia's status to make independent expenditures is questionable, this would cast some doubt on Mr. Mehney's independence as well. There are other interesting circumstances surrounding these newspaper ads. The attached chart lists, by date, the independent expenditures made for such ads, made by five men from Grand Rapids. It should be noted that there is no duplication among these ads, which suggests coordination. Though this is circumstantial evidence, a review of the ads in question might be undertaken to note any similarities.

Mr. Secchia as Chairman of the Friends of the First Family committee has raised and spent an aggregate of \$43,000 through this unauthorized committee. Again, his connection with the PFC would jeopardize the unauthorized, independent status of the committee. Further, this would raise the possibility that between the independent expenditures and the contributions to Friends of the First Family, Mr. Secchia has violated the contribution limits.

We would be pleased to discuss this with you in detail, and, if referred to the Investigation Section, to advise them of the related research we have done on this topic.

May 11

Midland Daily News
Lansing State Journal
Flint Journal

Flint Journal
Lansing State Journal
Jackson Citizen Patriot

McHenry reported that
he shared the cost of
the Flint and Lansing
ads with Scaccia.

May 16

Battle Creek
Grand Rapids

May 17

Greenville
Ionia
Beaton Harbor
Port Huron
Potoskey
Kalamazoo
Mount Pleasant
Cadillac

May 17

Ann Arbor
Bay City
Flint
Grand Rapids
Jackson
Kalamazoo
Muskegon
Saginaw
Detroit
Midland
Traverse City
Holland
Sault St. Marie
Lansing

De Vos and Van Andel

These ads
also appeared
in these papers
on May 15

December 17, 1976

76 DEC 22 PM 1:07

Mr. Vernon W. Thomson, Commissioner
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: RAS0262BF

Dear Commissioner Thomson:

It is regretted that the enclosed reports could not be submitted earlier. While our initial reports were all timely filed, we were advised subsequent to their submission that the Commission's system had been computerized. Since our reports included some information with overlapping dates, it was necessary for us to re-do our July 10 Quarterly Report and our Termination Report. These are herewith enclosed.

It has always been our desire to be cooperative and in total compliance with the spirit and letter of the Law. Indeed, as our reports list, over \$1,600 was invested by us in legal counsel to be as certain as possible that we complied fully. However, since the Friends of the First Family Committee was dissolved on September 23, 1976, I have not had funds for legal advice or assistance.

Because of the above, and the need to conduct my own personal business and the lack of FEC forms until after November 10, these reports are delayed. My sincere apologies accompany this letter.

I have studied the reporting instructions conscientiously and am confident that our reports are now in the order which your staff has requested. In fact, except for a couple of minor instances of misunderstanding, our original reports were factually correct. Your staff has been helpful in pointing out how we could be most accurate, and the enclosed reports now reflect changes or amendments in those few spots where we had not fully comprehended instructions or misinterpreted information previously.

Our first report should stand as filed (the 30th day report following the primary election of 6/8/76 in the state of Ohio, covering the period from May 27 through June 23.)

Our two subsequent reports are superseded by the enclosed. Those earlier reports from us, the July 10 report & our first termination report, should therefore be destroyed; since those herewith contain the same information, essentially, except in the form directed by your staff and in proper form for computerization without overlapping of dates.

I trust that this satisfactorily clears up all prior questions. Thank you for your patience and consideration; and should further information be needed, I shall attempt to respond promptly.

Sincerely,


J. A. Davis

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

RECEIVED
 FEDERAL ELECTION
 COMMISSION

NOV 22 1976 1:07

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed</p> <p>Friends of the First Family Committee</p> <p>(b) Address (number and street)</p> <p>Box 504</p> <p>(c) City, State and ZIP code</p> <p>Rockford, MI 49341</p>	<p>2 Identification Number</p> <p>C00022590</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election?</p> <p>Ohio Primary on 6/8/76 <small>(general, primary, runoff) (date)</small></p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input checked="" type="checkbox"/> Amendment For July 10 (c) <input checked="" type="checkbox"/> July 10 Quarterly Report <small>(Which report) (date)</small></p> <p>(b) <input type="checkbox"/> April 10 Quarterly Report (d) <input type="checkbox"/> October 10 Quarterly Report</p> <p>(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ <small>(primary, general or convention) (date)</small></p> <p>(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ <small>(primary, general or convention) (date)</small></p> <p>(e) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report _____ <small>(Month)</small></p> <p>(g) <input type="checkbox"/> Termination Report</p>	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period. From June 29 Through June 30, 1976

	Column A This Period	Column B Calendar Year-To-Date
Section A - Cash Balance Summary		
6 Cash on hand January 1, 1976		\$ --
7 Cash on hand at beginning of reporting period	\$ 3,881.36	
8 Total receipts (from line 19)	\$ None	\$ 28,665.00
(a) Subtotal (Add lines 7 and 8)	\$ 3,881.36	\$ 28,665.00
9 Total expenditures (From line 25)	\$ None	\$ 24,783.64
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 3,881.36	\$ 3,881.36
11 Contributed items on hand to be liquidated (attach itemized list)		\$ None

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

Jeff B. Davis *Jeff B. Davis* November 20, 1976
(Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate) (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or 5441, (See reverse side of form)

Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM June 29	TO June 30, 7
	Column A This Period	Column B Calendar year to date
PART I - RECEIPTS		
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	\$ None	
(b) Unitemized	\$ None	
(c) Sales and Collections Included Above List by event on memo Schedule D (\$)		
(d) Subtotal of contributions and other income	\$ None	\$ 17,665.00
18 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ None	
(b) Unitemized	\$ None	
(c) Subtotal of loans and loan repayments received	\$ None	\$ 10,000.00
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$ None	
(b) Unitemized	\$ None	
(c) Subtotal of refunds, rebates, returns	\$ None	\$ None
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$ None	
(b) From Other Committees (Itemize on Schedule A Regardless of Amount)	\$ None	
(c) Subtotal of transfers in	\$ None	\$ 1,000.00
19 Total Receipts	\$ None	\$ 28,665.00
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures)		
(a) Itemized (use Schedule B)	\$ None	
(b) Unitemized	\$ None	
(c) Subtotal of operating expenditures	\$ None	\$ 19,758.61
21 Independent Expenditures (use Schedule E)	\$ None	\$
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ None	
(b) Unitemized	\$ None	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ None	\$ 5,025.00
23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt: Fundraising, Legal and Accounting Expenditures		
(a) Itemized (use Schedule B)	\$ --	
(b) Unitemized	\$ --	
(c) Subtotal of fundraising expenditures	\$ --	\$ --
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$ None	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ None	
(c) Subtotal of transfers out	\$ None	\$ None
25 Total Expenditures	\$ None	\$ 24,783.61
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$ None	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$ 6,099.33	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$ None	
29 Transfers In (from line 18(c))	\$ None	
30 Net Receipts (subtract line 29 from line 28)	\$ None	
31 Total Expenditures (from line 25)	\$ None	
32 Transfers out (from line 24(c))	\$ None	
33 Net Expenditures (Subtract line 32 from line 31)	\$ None	

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (see instructions on back)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt
Friends of the First Family			
Full Name, mailing address and ZIP code Civic Trust 80, Santa Fe Employees Good Gov't Fund 80 East Jackson Street Chicago, IL 60604 Principal place of business See attached memo of explanation.		6/28/76	Amount of each receipt from previous previous period. \$500.00 previously reported.
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$500.00			
Full Name, mailing address and ZIP code National Steel Political Action Fund, H. A. Lidtke, Treas. 2800 Grant Building Pittsburgh, PA 15219 Principal place of business See attached memo of explanation.		6/7/76	Amount of each receipt from previous previous period. \$500.00 previously reported.
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$500.00			
Full Name, mailing address and ZIP code _____ Principal place of business _____			Amount of each receipt this period
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code _____ Principal place of business _____			Amount of each receipt this period
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code _____ Principal place of business _____			Amount of each receipt this period
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code _____ Principal place of business _____			Amount of each receipt this period
Occupation <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Subtotal of receipts this page (optional) ▶			\$
previous Total this period (last page this line number only) ▶			\$ 1,000.00

Memo of explanation concerning items in attached Schedule A:

This is to amend an entry which appeared in our initial report covering the period May 27-June 28, 1976.

It has been brought to our attention by the Federal Election Commission that two receipts previously listed by us as "Contributions" on Line 15 of FEC Form 3 should properly have been reported as "Transfers in" on Line 18.

We have therefore made that adjustment herein.

On the Detailed Summary Schedule of Receipts & Expenditures (Page 2) of FEC Form 3, we have reduced Line 15 by \$1,000 from the previously reported \$18,665.00 to a corrected \$17,665.00, and we have increased Line 18 from the previously reported none to \$1,000.00. This covers the two contributions of \$500 each from the groups listed on the attached.

Please note: Total receipts remain at \$28,665.00 for this period, since this does not represent a new receipt but only a correction in previous reporting, as explained above and advised by the Commission.

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see Instructions on back)

Page 1 of 1 for

LINE NUMBER 20

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Insight, Inc.
P. O. Box 585
Rockford, MI 49341

Purpose of Expenditure

Please see attached
sheet for amendment
to our initial report
covering May 27-June 28.

Date (month,
day, year)

Amount of each expendi-
ture this period

(Not appli-
cable)

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Subtotal of expenditures this page (optional)



\$

Total this period (last page this line number only)



\$

Memo of explanation regarding attached Schedule B:

This is to amend an item which appeared in our initial report covering the period May 27-June 28, 1976.

In this report, it was erroneously stated in Paragraph 2. of a listing of expenditures for space in newspapers that an advertisement had been placed in the Newark Advocate, Newark, New Jersey, on the dates of June 4 and 7. New Jersey should be changed to read correctly as the Newark Advocate, Newark, Ohio.

The dates and amounts were correctly stated, but no ads were placed in newspapers in New Jersey by this committee at any time.

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3**

(see instructions on back)

Page 1 of 1 for

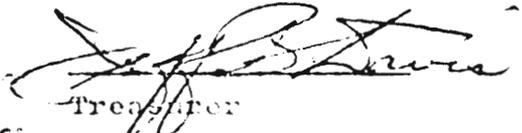
LINE NUMBER 26

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

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
Friends of the First Family				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Peter F. Secchia 2833 Bonnell, SE Grand Rapids, MI 49506	5/27/76	\$5,000 loan	None	\$5,000.00
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Insight, Inc. P.O. Box 585 Rockford, MI 49341	6/25/76	\$1,099.38	None	\$1,099.38
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) only		\$	\$	\$
Total this period (last page (this line number) only)		\$ 6,099.38	\$	\$ 6,099.38
Carry outstanding balance only to appropriate next summary				

November 20, 1976

Under penalty of perjury, I certify that the expenditures reported herein, all of which were independent, were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution or republication in whole or in part of any broadcast or any written, graphic or other form of campaign materials prepared by the candidate, his campaign committee or their agents.



Treasurer

Friends of the First Family
Rockford, Michigan

STATE OF MICHIGAN)
COUNTY OF ROCKFORD)
SUBSCRIBED AND SWORN TO BEFORE ME
THIS 19TH DAY OF DEC. 1976
Ronald J. Hunt
NOTARY PUBLIC
COMMISSION EXPIRES

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with both the one election and to obtain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed</p> <p style="font-size: 1.2em; font-weight: bold;">Friends of the First Family</p> <p>(b) Address (number and street) P. O. Box 504</p> <p>(c) City, State and ZIP code Rockford, IL 60341</p>	<p>2 Identification Number 000000590</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election? Ohio Primary on 10/10/76 (general, primary, runoff) (date)</p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input checked="" type="checkbox"/> Amendment For <u>Termination</u> (c) <input type="checkbox"/> July 10 Quarterly Report (Which report) (date)</p> <p>(b) <input type="checkbox"/> April 10 Quarterly Report</p> <p>(d) <input type="checkbox"/> October 10 Quarterly Report</p> <p>(e) <input type="checkbox"/> January 31 Year End Report</p> <p>(f) <input type="checkbox"/> Monthly Report (Month)</p> <p>(g) <input checked="" type="checkbox"/> Termination Report</p> <p>(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)</p> <p>(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)</p>	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From July 1, 1976 Through September 30, 1976

Section A - Cash Balance Summary

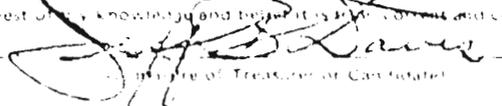
	Column A This Period	Column B Calendar Year To Date
6 Cash on hand January 1, 1976		\$ None
7 Cash on hand at beginning of reporting period	\$ 3,381.56	
8 Total receipts (from line 19)	\$ 4,745.10	\$ 22,410.10
(a) Subtotal (Add lines 7 and 8)	\$ 8,126.66	\$ 22,410.10
9 Total expenditures (from line 25)	\$ 8,126.66	\$ 33,410.10
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ None	\$ None
11 Contributed items on hand to be liquidated (attach itemized list)	\$	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)

12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

JERRY M. Davis
 (Typed Name of Treasurer or Candidate)


 (Signature of Treasurer or Candidate)

December 7, 1976
 (Date)

Note: Failure to file this report, or filing it in an incorrect format, may subject the person signing this Report to the penalties of 2 U.S.C. 4379 or 4443, unless the person signs a waiver.

For further
 information
 Contact:

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

Any information reported herein may not be copied for sale or used by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

Name of Candidate or Committee Friends of the First Family	REPORT COVERING THE PERIOD	
	FROM July 1	TO August 31, 1976
PART I - RECEIPTS	Column A This Period	Column B Calendar year to date
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	\$ 3,675.00	
(b) Unitemized	\$ 55.00	
(c) Sales and Collections Included Above List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions and other income	\$ 3,730.00	\$ 21,375.00
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ --	
(b) Unitemized	\$ --	
(c) Subtotal of loans and loan repayments received	\$ --	\$ 10,000.00
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$ 1,015.18	
(b) Unitemized	\$ --	
(c) Subtotal of refunds, rebates, returns	\$ 1,015.18	\$ 1,015.18
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$ --	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$ --	
(c) Subtotal of transfers in	\$ --	\$ 1,000.00
19 Total Receipts	\$ 4,745.18	\$ 23,390.18
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$ --	
(b) Unitemized	\$ --	
(c) Subtotal of operating expenditures	\$ --	\$ --
21 Independent Expenditures (use Schedule E)	\$ 3,253.14	\$ 33,117.73
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ 5,077.50	
(b) Unitemized	\$ --	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 5,077.50	\$ 10,110.50
23 For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$ --	
(b) Unitemized	\$ --	
(c) Subtotal of fundraising expenditures	\$ --	\$ --
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$ --	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ 225.00	
(c) Subtotal of transfers out	\$ 225.00	\$ 225.00
25 Total Expenditures	\$ 8,626.54	\$ 33,342.73
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$ --	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$ 4,745.18	
29 Transfers In (from line 18(c))	\$ 1,000.00	
30 Net Receipts (subtract line 29 from line 28)	\$ 3,745.18	
31 Total Expenditures (from line 25)	\$ 8,626.54	
32 Transfers out (from line 24(b))	\$ 225.00	
33 Net Expenditures (subtract line 32 from line 31)	\$ 8,401.54	

**Itemized Receipts,
 Contributions, Ticket Purchases, Loans,
 Rebates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**
 (see instructions on back)

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt at this period
Friends of the First Family			
Full Name, mailing address and ZIP code Thomas S. Fox 83 Monroe, NW Grand Rapids, MI 49502		8/13/76	\$ 50.00
Principal place of business Fox Jewelers Grand Rapids, MI	Occupation Executive Vice President <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 450.00		
Full Name, mailing address and ZIP code Peter N. Wege 2754 Pioneer Club Road, SE Grand Rapids, MI 49506		7/1/76 8/13/76	\$100.00 25.00
Principal place of business Steelcase, Inc. 1120 36th St., SE Grand Rapids, MI 49506	Occupation Exec. Corporate Secretary <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 125.00		
Full Name, mailing address and ZIP code Peter C. Cook 2660 28th Street, SE Grand Rapids, MI 49506		8/13/76	\$1,000.00
Principal place of business Import Motors, Limited Grand Rapids, MI	Occupation President <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000.00		
Full Name, mailing address and ZIP code Mrs. Peter C. Cook 2152 Osceola Drive, SE Grand Rapids, MI 49506		8/13/76	\$1,000.00
Principal place of business	Occupation Homemaker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000.00		
Full Name, mailing address and ZIP code Louise S. Keeler 2525 Indian Trail Road, SE Grand Rapids, MI 49506		9/17/76	\$1,000.00
Principal place of business	Occupation Homemaker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code Edsko Hekman P.O. Box 171 Spring Lake, MI 49456		9/28/76	\$ 500.00
Principal place of business	Occupation Retired <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		
Subtotal of receipts this page (not total)			▶ \$ 3,675.00
Total this period (last page this line number only)			▶ \$ 3,675.00

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20461

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 1 for

LINE NUMBER 17

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Insight Advertising & Public Relations
PO Box 585
Rockford, MI 49341

Date (month,
day, year)

8/3/76

Amount of each
receipt this period

\$1015.18

Principal place of business

Above

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$

Total this period (last page this line number only) Attached memo explains rebate. ▶ \$ 1,015.18

Memo of explanation regarding rebate itemized on attached Schedule A:

The Friends of the First Family Committee's agreement with Insight Advertising and Public Relations was that the Committee would pay the aforesaid Agency for newspaper space purchased on its behalf at each paper's net rate plus a 7 $\frac{1}{2}$ % commission, plus production costs.

Through Agency clerical oversight, a 15% commission rather than the agreed upon percentage was originally billed to the Committee. This rebate, therefore, represents a 7 $\frac{1}{2}$ % reduction in the gross rate expenditure of \$13,535.07 for newspaper space as reported in Schedule A.

Essentially, it is a credit extended by Insight Advertising to the Friends of the First Family Committee to correct the earlier overbilling error by the Agency.

Newspaper space costs were itemized in our initial report covering the period from May 27 through June 20, 1976.

Schedule B

July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 22

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Peter F. Secchia
3153 Three Mile Road, NE
Grand Rapids, MI 49505

Purpose of Expenditure

Loan repayment
including interest

Date (month, day, year)

8/13/76
9/23/76

Amount of each expenditure this period

\$3,037.50
2,040.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶

\$5,077.50

Total this period (last page this line number only) ▶

\$5,077.50

Schedule B

July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 24

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Sawyer for Congress Committee
 549 Ottawa, NW
 Grand Rapids, MI 49502

Purpose of Expenditure To liqui
 date balance of
 Committee funds &
 support Harold Sawyer,
 Repub. candidate for
 Congress, Mich. 5th Dist.

Date (month,
 day, year)
 9/28/76

Amount of each expendi-
 ture this period
 \$ 295.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Subtotal of expenditures this page (optional) ▶ \$ 295.00

Total this period (last page this line number only) ▶ \$ 295.00

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3**

(See Instructions on back)

Page 1 of 1 for

LINE NUMBER 27

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

Name of Candidate or Committer in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of the First Family				
Full Name, mailing address and ZIP code, and nature of obligation Peter F. Secchia 2833 Bonnell, SE Grand Rapids, MI 49506	Date (month, day, year) 9/28/76	\$ \$5,000 loan plus interest	\$ 5,000.00 plus int.	\$ -0-
Full Name, mailing address and ZIP code, and nature of obligation Insight, Inc. P. O. Box 585 Rockford, MI 49341	Date (month, day, year) 9/23/76	\$ \$1,099.38	\$ 1,099.38	\$ 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) (optional)		\$ 6,099.38	\$ 6,099.38	\$ -0-
Total this period (last page this line number only)		\$ 6,099.38	\$ 6,099.38	\$ -0-

Carry outstanding balance only, to appropriate line of summary

Schedule E

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Independent Expenditures
for Line 21 F.E.C. Form 3**

Page 1 of 1 Pages

(See reverse side for instructions)

Name of Candidate or Committee in full Friends of the First Family	Id. No. C00022590
Full Name, mailing address and ZIP code P.O. Box 504 Rockford, MI 49341	Is This a Separate Report by a Committee Filing on F.E.C. Form 3A? NO

Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
WOTV, Nine-Life Broadcast 120 College, SE Grand Rapids, MI 49502	Purchase of film print footage of G.R. Ford, for possible TV use. (Later lost & not used)	9/23/76	\$415.00	In support of Gerald R. Ford for Pres. of US
Clary, Wanta, Wood & Van Orden, Attorneys at Law 700 Commerce Building Grand Rapids, MI 49502	Legal services for filing of required reports, advice, etc.	7/30/76	\$1,632.35	In support of Gerald R. Ford for Pres. of US
Harry A. Baker Co. 1110 Monroe, NE Grand Rapids, MI 49503	Campaign buttons	9/7/76	\$105.41	In support of Gerald R. Ford for Pres. of US
Insight Advertising & Public Relations P.O. Box 588 Rockford, MI 49341	Newspaper ad production costs	9/23/76	\$1,092.38	In support of Gerald R. Ford for Pres. of U.

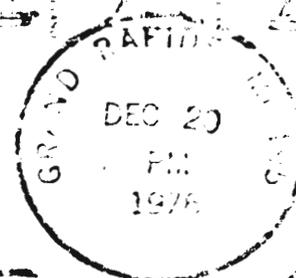
(a) Subtotal of Itemized Independent Expenditures	\$ 3,253.14
(b) Subtotal of Unitemized Independent Expenditures	\$ ---
(c) Total Independent Expenditures	\$ 3,253.14

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the purchase, dissemination, distribution or publication in whole or in part of any campaign material prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 17TH day of DEC, 19 76
My Commission Expires December 7, 1976
Ronald J. Stewart
ROTARY PUBLIC

Jeff Betavia
Signature

December 7, 1976
Date



11:57



INSIGHT INC.

Mr. Vernon M. Thomson
Commissioner
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

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FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 321

Date Filmed 7/25/79 Camera No. --- 2

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SECRET



FEDERAL ELECTION COMMISSION

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

November 2, 1977

Mr. Peter F. Secchia
2833 Bonnell Ave., S.E.
Grand Rapids, Michigan 49506

Re: MUR 321(76)

Dear Mr. Secchia:

This is to notify you that the Commission is in receipt of your check for \$500.

Enclosed is a copy of the conciliation agreement signed by all parties. This copy is for you to keep for your own records.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: T. Timothy Ryan, Jr.



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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
PETER F. SECCHIA

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)
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)

MUR 321 (76)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found Reasonable Cause to Believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441a(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondent having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this case;

II. The Respondent has voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and has had reasonable opportunity to demonstrate that no action should be taken in this matter;

III. The pertinent facts in this matter are as follows:

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A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Peter F. Secchia worked as a fundraiser and campaigner during the period of January, 1976, to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary campaign. In addition, Peter F. Secchia led groups of individuals to Florida in February, 1976, and to Wisconsin in April, 1976, to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

(3) Peter F. Secchia notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

(4) Between the first week of May, 1976, and the final week of September, 1976, Peter F. Secchia's attorney, Stephen Mulder, contacted at least four attorneys in the office of the General Counsel and at least two individuals in the Information Division, regarding the reporting requirements established by the Act and the subject of independent expenditures.

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(5) Peter F. Secchia, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976, and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure."

(6) During the month of May, 1976, when Peter F. Secchia made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure," Peter F. Secchia had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for

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communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure." Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure."

(4) During the period of May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures," its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

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B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondent as "independent expenditures." These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondent's actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g (a)(6)(B) for personal contributions reported as independent expenditures.

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G. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS

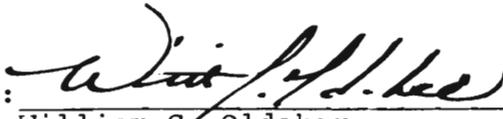
I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

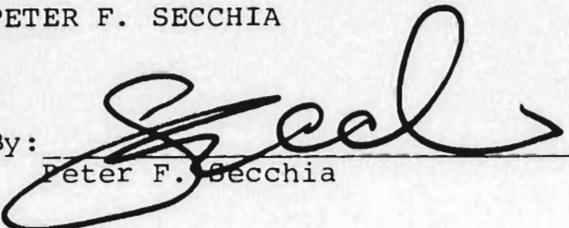
III. It is agreed that Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this 2 day of November, 1977.

THE FEDERAL ELECTION COMMISSION

By: 
William C. Oldaker
General Counsel

PETER F. SECCHIA

By: 
Peter F. Secchia

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PETER F. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

October 25, 1977

Mr. David R. Spiegel
Assistant General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 321 (76)

Dear Mr. Spiegel:

Enclosed is a copy of your letter to Mr. Ryan, stating the enclosed "Conciliation Agreement" should be signed by me, and returned to the Commission's Office of General Counsel.

Also enclosed is my check for \$500.00. This is being sent to you, hoping there will be no future legal expense (except for the charge for having Mr. Ryan read this letter).

Between the harrassment from your Agency, and the legal charges forwarded by Mr. Ryan, I have "yielded" purely under the burden of harrassment and personal financial discomfort.

Cordially,


Peter F. Secchia

PFS/jh
encl:

cc: Timothy Ryan, Jr.
Leonard Hoffius

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PETER FINLEY SECCHIA

2833 BONNELL, SE.

GRAND RAPIDS, MICH. 49506

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10-23 1977 $\frac{74-2}{724}$

PAY TO THE
ORDER OF

U.S. TREASURY

\$500.00

Five Hundred & No/100

DOLLARS



MICHIGAN NATIONAL BANK
OF GRAND RAPIDS
GRAND RAPIDS, MICHIGAN 49502

MEMO T.B.F.H.

①:0724①①0002①:

259①①2①0①①9①①

Acc # 1952



FEDERAL ELECTION COMMISSION

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

October 11, 1977
11:09:21

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

703160

Mr. T. Timothy Ryan, Jr.
Loomis, Owen, Fellman & Coleman
2020 K Street, N.W.
Washington, D.C. 20006

Re: MUR 321 (76)

Dear Mr. Ryan:

In accordance with the provisions of 2 U.S.C. §437g(a)(5)(A), I am enclosing a proposed conciliation agreement which was approved by the Commission on October 6, 1977.

If this agreement is satisfactory to your client, Mr. Secchia, please have him sign and return it to the Commission's Office of General Counsel. He should also enclose a check for \$500 made out to the U.S. Treasury. After the agreement has been signed by the General Counsel, a copy will be sent to you.

If you have any questions, please call the attorney assigned to this case, Judy Browning.

Sincerely yours,

David R. Spiegel
Assistant General Counsel

Enclosure



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Peter F. Secchia
2833 Bonnell Ave. SE
Grand Rapids, Mi. 49506

AM 9:15

Mr. David R. Spiegel
Assistant General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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

October 11, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. T. Timothy Ryan, Jr.
Loomis, Owen, Fellman & Coleman
2020 K Street, N.W.
Washington, D.C. 20006

Re: MUR 321 (76)

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If you have any questions, please call the attorney assigned to this case, Judy Browning.

Sincerely yours,

David R. Spiegel
Assistant General Counsel

Enclosure

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MUR 321 (76) JB

78 Form 3811, Rev. 1975
RETURN RECEIVED REGISTERED MAIL
LIVE COULD CERTIFIED MAIL

● **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: T. Timothy Ryan
 Loomis, Owen, Fellman & Coleman
 2020 K St., N.W.
 Washington, D.C. 20006

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 438186 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: *POST* | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

78043P13601

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
PETER F. SECCHIA

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)

MUR 321 (76)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found Reasonable Cause to Believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441a(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondent having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this case;

II. The Respondent has voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and has had reasonable opportunity to demonstrate that no action should be taken in this matter;

III. The pertinent facts in this matter are as follows:

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(5) Peter F. Secchia, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976, and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure."

(6) During the month of May, 1976, when Peter F. Secchia made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure," Peter F. Secchia had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for

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communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure." Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure."

(4) During the period of May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures," its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

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B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondent as "independent expenditures." These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondent's actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g (a)(6)(B) for personal contributions reported as independent expenditures.

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G. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

III. It is agreed that Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: _____
William C. Oldaker
General Counsel

PETER F. SECCHIA

By: _____
Peter F. Secchia

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
PETER F. SECCHIA)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 6, 1977, the Commission determined by a vote of 5-0 to approve the conciliation agreement submitted by the General Counsel in the above-captioned matter.

Commissioner Staebler was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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September 29, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 321 Team #1

Please have the attached Memo on MUR 321 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of October 6, 1977.

Thank you.

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *WCO*

SUBJECT: BUR 321(76) Conciliation Agreement

Attached hereto is the Conciliation Agreement in the above-referenced matter for ratification by the Commission. I recommend its approval by the Commission.

The Agreement contains an admission that the respondents made expenditures which were not "independent" within the meaning of 2 U.S.C. §431(p). Respondents further admit that their actions were in violation of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A), for which a civil penalty totalling \$500 will be paid.

In light of the alleged attempts respondent Secchia made to seek counsel on the legality of his activities and the extent of his cooperation with the Office of General Counsel, the total amount of the fine assessed is \$500 rather than a larger figure.



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
PETER F. SECCHIA

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MUR 321 (76)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found Reasonable Cause to Believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441a(a) (1) (A);

NOW, THEREFORE, the Commission and the Respondent having duly entered into conciliation as provided in 2 U.S.C. §437g(a) (5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this case;

II. The Respondent has voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and has had reasonable opportunity to demonstrate that no action should be taken in this matter;

III. The pertinent facts in this matter are as follows:

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A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Peter F. Secchia worked as a fundraiser and campaigner during the period of January, 1976, to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary campaign. In addition, Peter F. Secchia led groups of individuals to Florida in February, 1976, and to Wisconsin in April, 1976, to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

(3) Peter F. Secchia notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

(4) Between the first week of May, 1976, and the final week of September, 1976, Peter F. Secchia's attorney, Stephen Mulder, contacted at least four attorneys in the office of the General Counsel and at least two individuals in the Information Division, regarding the reporting requirements established by the Act and the subject of independent expenditures.

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(5) Peter F. Secchia, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976, and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure."

(6) During the month of May, 1976, when Peter F. Secchia made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure," Peter F. Secchia had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for

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communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure." Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure."

(4) During the period of May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures," its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

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B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondent as "independent expenditures." These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondent's actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g (a)(6)(B) for personal contributions reported as independent expenditures.

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G. Respondent will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g (a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS:

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

III. It is agreed that Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: _____
William C. Oldaker
General Counsel

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PETER F. SECCHIA

By: _____
Peter F. Secchia

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Law Offices

Loomis, Owen, Fellman & Coleman

(formerly Counihan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

Donald M. Counihan

SEP 13 1977

E. Riley Casey

1923-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

- John S. Loomis*
- Stephen F. Owen, Jr.*
- Harvey John Fellman*
- Francis T. Coleman*
- William H. Howe*
- Ferdinand A. Jacobs*
- John R. Erickson*
- James E. Anderson*
- John C. Reynolds*
- Henry A. Hart*
- T. Timothy Ryan, Jr.*
- Donald L. Resenthal*

September 13, 1977

Ms. Judy Browning, Esquire
 The Federal Election Commission
 1325 K Street, N.W.
 Washington, D. C. 20463

RE: MUR 321(76)

Dear Judy:

Enclosed is the final draft of the Conciliation Agreement in the above-referenced matter. As agreed, the changes regarding contacts with the Commission staff and the Federal Election Campaign Act are included in this draft.

In particular, the provision regarding contacts with the Commission staff relates to the following conversations by Stephen Mulder, Mr. Secchia's attorney in Grand Rapids, Michigan:

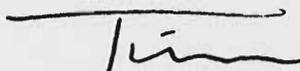
- (1) The first three weeks of May, 1976--
Duty Officers in the Information Division;
- (2) May 28, 1976-- Barry Shillito;
- (3) June 4, 1976-- Barry Shillito;
- (4) Various dates in July, 1976--
Dan Swillinger and Andrew Athy; and
- (5) Various dates in August and September, 1976--
Beth Fagan.

Ms. Judy Browning, Esquire
September 13, 1977
Page Two

Your assistance in this matter is greatly appreciated.
Hopefully, the Commission will act on this Conciliation
Agreement in the very near future.

Sincerely,

LOOMIS, OWEN, FELLMAN & COLEMAN



T. Timothy Ryan, Jr.

TTR:jr
Enclosure

cc: Mr. Peter F. Secchia
Leonard M. Hoffius, Esquire

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
FRIENDS OF THE FIRST FAMILY) MUR 321(76)
and)
PETER F. SECCHIA)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found Reasonable Cause to Believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this case;

II. The Respondents have voluntarily cooperated with the Commission in supplying information and records as requested during the course of the investigation and have had reasonable opportunity to demonstrate that no action should be taken in this matter;

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III. The pertinent facts in this matter are as follows

A. PETER F. SECCHIA

(1) Peter F. Secchia, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Peter F. Secchia worked as a fundraiser and campaigner during the period January, 1976, to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary campaign. In addition, Peter F. Secchia led groups of individuals to Florida in February, 1976, and to Wisconsin in April, 1976, to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

(3) Peter F. Secchia notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

(4) Between the first week of May, 1976, and the final week of September, 1976, Peter F. Secchia's attorney contacted the office of the General Counsel and at least two individuals in the Information Division, regarding the reporting requirements established by the Act and the subject of independent expenditures.

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(5) Peter F. Secchia, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976, and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure".

(6) During the month of May, 1976, when Peter F. Secchia made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure", Peter F. Secchia had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

(1) Friends of the First Family is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

(2) Friends of the First Family registered as a political committee with the Commission on June 1, 1976. Its chairman was Peter F. Secchia, who acted on behalf of the Committee.

(3) Friends of the First Family made disbursements in early June, 1976, in the aggregate amount of \$19,758.64 for communications urging the nomination of

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Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure". Thereafter, in September of 1976, Friends of the First Family disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976, as an "independent expenditure".

(4) During the period May 10, 1976, through September 23, 1976, when Friends of the First Family was making expenditures on behalf of the President Ford campaign which were characterized by Friends of the First Family in its report to the Commission as "independent expenditures", its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee, or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court noted that all expenditures made with the consent, cooperation, pre-arrangement, or

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authorization, at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of a candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in the 1976 Amendments to the Federal Election Campaign Act, as codified in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and August 25, 1976, and promulgated on April 13, 1977.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976, regarding the \$1,204.79, \$19,758.64 (expenditures made by Friends of the First Family), and \$1,752.17 (expenditures made by Peter F. Secchia in his individual capacity), were characterized by Respondents as "independent expenditures". These expenditures are not "independent" within the meaning of 2 U.S.C. §431(p).

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted violations of the contribution limits set forth in 2 U.S.C. §441a(a)(1)(A).

F. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for personal contributions reported as independent expenditures.

G. Respondent, Peter F. Secchia, will pay a civil

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penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS:

I. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1), concerning the matters at issue herein, or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

III. It is agreed that Respondents shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day _____, 1977.

THE FEDERAL ELECTION COMMISSION

By: _____
WILLIAM C. OLDAKER
General Counsel

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FRIENDS OF THE FIRST FAMILY

By: PETER F. SECCHIA, Chairman

PETER F. SECCHIA

PETER F. SECCHIA, Individually

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LAW OFFICES
LOOMIS, OWEN, FELLMAN & COLEMAN

2020 K STREET, N. W.

WASHINGTON, D. C. 20006

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Ms. Judith Browning, Esquire
The Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

HAND DELIVERED

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COMMUNICATIONS SECTION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of *
*
FRIENDS OF THE FIRST FAMILY * MUR 321(76)
*
and *
*
PETER F. SECCHIA *

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found reasonable cause to believe that Peter F. Secchia, an individual and Chairman of the Friends of the First Family Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation as provided in 2 U.S.C. §437g (a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this case;

II. The Respondents having voluntarily cooperated with the Commission in supplying all relevant information and records during the course of the investigation have had reasonable opportunity to demonstrate that no action should be taken in this matter;

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III. The pertinent facts in this matter are as follows:

A. PETER F. SECCHIA

1) Respondent, an individual, made a disbursement on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

2) Respondent worked as a fundraiser and campaigner for the Ford Presidential Primary campaign during the period January, 1976 to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential Primary campaign. In addition, Respondent led groups of individuals to Florida in February, 1976 and to Wisconsin in April, 1976 to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

3) Respondent notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

4) On a number of occasions, Respondent or his attorney contacted the Commission for advice regarding the types of activity, including "independent expenditures", which were acceptable under the Act.

5) Respondent, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated

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May 13, 1976 and then by a report filed with the Commission on May 28, 1976. This disbursement was identified as an "independent expenditure".

6) During the month of May, 1976, while Respondent made an expenditure on behalf of the President Ford Primary campaign which was characterized as an "independent expenditure", Respondent had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

B. FRIENDS OF THE FIRST FAMILY

1) Respondent is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

2) Respondent registered as a political committee with the Commission on June 1, 1976. It's Chairman was Peter F. Secchia, who acted on behalf of the Committee.

3) Respondent made disbursements in early June, 1976 in the aggregate amount of \$19,758.64 for communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an "independent expenditure". Thereafter, in September of 1976, Respondent disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976 as an "independent expenditure".

4) During the period May 10, 1976 through

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September 23, 1976, while Respondent was making expenditures on behalf of the President Ford campaign which were characterized by Respondent in its report to the Commission as "independent expenditures", its Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act, although made public on May 26, 1976, were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court stated that all expenditures made with the consent, cooperation, prearrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of the candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and promulgated on April 13, 1977.

C. The entires contained in reports filed with the

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Commission on May 28, July 9, and September 30, 1976 regarding the said \$1,204.79, \$19,758.64, and \$1,752.17 were mistakenly characterized by Respondents as "independent expenditures".

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted a technical violation of the contribution limits set forth in 2 U.S.C. §441a (1)(A).

F. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for personal contributions reported as independent expenditures.

G. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B) for contributions made by the Friends of the First Family which were reported as independent expenditures.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute civil action for relief in the United States District Court for the District of Columbia.

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II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

FEDERAL ELECTION COMMISSION

By _____
William C. Oldaker, General Counsel

FRIENDS OF THE FIRST FAMILY

By _____
Peter F. Secchia, Chairman

PETER F. SECCHIA

Peter F. Secchia, Individually

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Law Offices

Loomis, Owen, Fellman & Coleman

(formerly Counihan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

*John E. Loomis
Stephen F. Owen, Jr.
Steven John Fellman
Francis T. Coleman
William H. Howe
Jerald A. Jacobs
John R. Erickson
James E. Anderson
John C. Reynolds
Henry A. Hart
T. Timothy Ryan, Jr.
Donald L. Rosenthal*

*Donald M. Counihan
1917-1969*

*E. Riley Casey
1923-1971*

*J. R. Pat Gorman
Elmer F. Bennett
Counsel*

August 3, 1977

Ms. Judy Browning, Esquire
The Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

RE: MUR 321 (76)

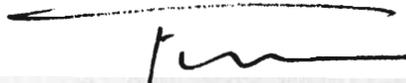
Dear Judy:

Enclosed is our counter-proposal in the above-referenced matter. If you have any suggested modifications to this conciliation agreement please contact me today before 3:30 P.M., if possible, since I will be out of the office until Monday after that time.

Many thanks for your continued cooperation and assistance in this matter.

Sincerely,

LOOMIS, OWEN, FELLMAN & COLEMAN



T. Timothy Ryan, Jr.

TTR:jr

Enclosure

cc: Mr. Leonard M. Hoffius, Esquire

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of *
*
FRIENDS OF THE FIRST FAMILY *
* MUR 321(76)
and *
*
PETER F. SECCHIA *

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter referred to as the "Commission") pursuant to information obtained in the normal course of its supervisory responsibilities, and after investigation the Commission having found reasonable cause to believe that the Friends of the First Family, a registered political committee, and Peter F. Secchia, an individual and Chairman of that Committee (hereinafter referred to as the "Respondents"), violated 2 U.S.C. §441(a)(1)(A);

NOW, THEREFORE, the Commission and the Respondents having duly entered into conciliation as provided in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this case;

II. The Respondents having voluntarily cooperated with the Commission in supplying all relevant information and records during the course of the investigation have had reasonable opportunity to demonstrate that no action should be taken in this matter;

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III. The pertinent facts in this matter are as follows:

A. FRIENDS OF THE FIRST FAMILY.

1) Respondent is a political committee which made disbursements on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

2) Respondent registered as a political committee with the Commission on June 1, 1976.

3) Respondent made disbursements in early June, 1976, in the aggregate amount of \$19,372.00 for communications urging the nomination of Gerald R. Ford for President in the Ohio and New Jersey primaries. This aggregate amount was disclosed in a report filed with the Commission on July 9, 1976, as an independent expenditure. Thereafter, in September of 1976, Respondent disbursed an additional \$1,204.79 which was disclosed in a report filed with the Commission on September 30, 1976 as an independent expenditure.

4) During the period May 10, 1976 through September 23, 1976, while Respondent was making expenditures on behalf of the President Ford campaign which were characterized by Respondent in its reports to the Commission as "independent expenditures", Respondent's Chairman, Peter F. Secchia, had contacts of a campaign nature with representatives of Gerald Ford's campaign committee or its agents.

B. PETER F. SECCHIA.

1) Respondent, an individual, made a disbursement

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on behalf of the candidacy of Gerald R. Ford for the Republican Party nomination to the office of President of the United States.

2) Respondent worked as a fundraiser and campaigner for the Ford Presidential campaign during the period January, 1976 to May, 1976. He was designated "Solicitor Number 9806" by the President Ford Committee, and was authorized by that Committee to solicit contributions for the Ford Presidential campaign. In addition, Respondent led groups of individuals to Florida in February, 1976 and to Wisconsin in April, 1976 to campaign on behalf of Mr. Ford's candidacy. Some of the expenses for these trips were paid for and coordinated by the President Ford Committee.

3) Respondent notified the Midwestern Coordinator for the President Ford Committee on May 10, 1976, that he was severing all ties with that Committee.

4) On numerous occasions, Respondent or his attorney contacted the Commission for advice regarding the types of activity, including "independent expenditures", which were acceptable under the Act.

5) Respondent, on May 11, 1976, made a disbursement in the amount of \$1,752.17 for newspaper advertisements urging the election of Gerald R. Ford in the Michigan primary. This amount was first disclosed to the Commission by telegram dated May 13, 1976 and then by a report filed with the Commission on May 29, 1976. This disbursement was identified as an "independent expenditure".

6) During the month of May, 1976, while Respondent

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made an expenditure on behalf of the President Ford campaign which was characterized as an "independent expenditure", Respondent had contacts of a campaign nature with Gerald Ford's campaign committee or its agents.

WHEREFORE, Respondents and the Commission agree that:

A. It is acknowledged that the 1976 primary and general elections were the first such elections to be governed by the Federal Election Campaign Act, as amended; that portions of the previous campaign act had been found unconstitutional by the Supreme Court in Buckley v. Valeo, 424 U.S. 1 (1976), and that the regulations implementing the Act were not promulgated by the Commission until April 13, 1977 (42 FR 19324).

B. In Buckley v. Valeo, 424 U.S. 1, 46-47, n. 53, (Jan. 30, 1976), the Supreme Court stated that all expenditures made with the consent, cooperation, prearrangement, or authorization, or at the request, or suggestion of, or under the control of a candidate, his agents, or an authorized committee of the candidate, are contributions under the Act rather than independent expenditures. This construction is reflected in 2 U.S.C. §431(p) and §109.1(b)(4) of the Commission's Regulations which were printed in the Federal Register on May 26, 1976, and promulgated on April 13, 1977.

C. The entries contained in reports filed with the Commission on May 28, July 9, and September 30, 1976 regarding

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the said \$1,204.79 and \$19,372.00 were mistakenly characterized by Respondents as "independent expenditures".

D. Each of said entries shall be amended to indicate that the disbursements were, in fact, contributions-in-kind to the President Ford Committee.

E. Respondents' actions constituted a technical, although unintentional, violation of the contribution limits set forth in 2 U.S.C. §441a(1)(A).

F. Respondent, Friends of the First Family, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B).

G. Respondent, Peter F. Secchia, will pay a civil penalty in the amount of Two Hundred Fifty Dollars (\$250.00) pursuant to 2 U.S.C. §437g(a)(6)(B).

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that Respondents shall have no more than

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thirty (30) days from the date this agreement becomes effective to comply with and to implement the requirements contained herein, and will so notify the Commission.

WITNESS the hands and seals of the parties hereto this _____ day of _____, 1977.

FEDERAL ELECTION COMMISSION

By _____
William C. Oldaker, General Counsel

FRIENDS OF THE FIRST FAMILY

By _____
Peter F. Secchia, Chairman

Peter F. Secchia, Individually

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LAW OFFICES

LOOMIS, OWEN, FELLMAN & COLEMAN

2020 K STREET, N. W.

WASHINGTON, D. C. 20006

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MS. JUDY BROWNING, ESQUIRE
THE FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D. C. 20463

BY HAND

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Counihan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

Donald M. Counihan

1917-1969

E. Riley Casey

1923-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

- John E. Loomis
- Ralphon F. Owen, Jr.
- Steven John Fellman
- Francis T. Coleman
- William H. Howe
- Jerald A. Jacobs
- John R. Erickson
- James E. Anderson
- John C. Reynolds
- Henry S. Hart
- T. Timothy Ryan, Jr.
- Donald L. Rusenthal

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July 28, 1977

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

RE: MUR 321 (76)

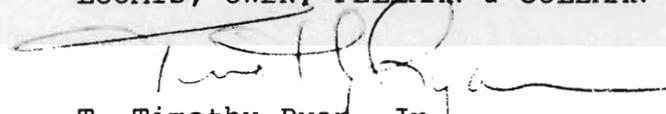
Dear Mr. Oldaker:

On behalf of Mr. Peter Secchia, we acknowledge receipt of your letter dated July 22, 1977, wherein you state that the Commission has determined that there is reasonable cause to believe that Mr. Secchia has committed a violation of 2 U.S.C. §441a(a)(1)(A) as affected by §441a(a)(7)(B)(1) of the Federal Election Campaign Act of 1971, as amended.

As noted during our previous conversations with Ms. Browning and Mr. Steel, we are prepared to meet as soon as possible to discuss a reasonable conciliation agreement.

Very truly yours,

LOOMIS, OWEN, FELLMAN & COLEMAN



T. Timothy Ryan, Jr.

TTR:jr

cc: Mr. Peter Secchia

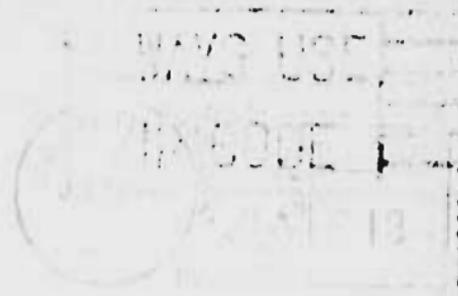
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Law Offices

Loomis, Owen, Fellman & Coleman

2020 K Street, N. W.

Washington, D. C. 20006



William C. Oldaker, General Counsel

The Federal Election Commission

1325 K Street, N. W.

Washington, D. C. 20463

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FEDERAL ELECTION COMMISSION

Correspondence
from respondent
to various Ford staffers

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

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

Signed Judith W Brownie
date 11-4-77

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

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

July 22, 1977

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On July 20, 1977, the Commission determined that there is reasonable cause to believe that you have committed a violation of 2 U.S.C. §441a(a)(1)(A) as affected by §441a(a)(7)(B)(1) of the Federal Election Campaign Act of 1971, as amended, by reporting expenditures made by yourself and the Friends of the First Family as independent. Specifically, this violation involves \$1752.17 paid for newspaper advertisements on May 11, 1976, and \$20,963.43 of expenditures made by the Friends of the First Family during the period June 1, 1976 through September 23, 1976.

The Commission has a duty to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Please advise me at your earliest opportunity whether you desire to conciliate in this matter. If you have any questions, please contact Judy Browning (telephone number 202/523-4073), the attorney assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

cc: Tim Ryan



73040113643

JUL 22 1977

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On July 20, 1977, the Commission determined that there is reasonable cause to believe that you have committed a violation of 2 U.S.C. §441a(a)(1)(A) as affected by §441a(a)(7)(B)(1) of the Federal Election Campaign Act of 1971, as amended, by reporting expenditures made by yourself and the Friends of the First Family as independent. Specifically, this violation involves \$1752.17 paid for newspaper advertisements on May 11, 1976, and \$20,963.43 of expenditures made by the Friends of the First Family during the period June 1, 1976 through September 23, 1976.

The Commission has a duty to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Please advise me at your earliest opportunity whether you desire to conciliate in this matter. If you have any questions, please contact Judy Browning (telephone number 202/523-4073), the attorney assigned to this case.

Sincerely,

William C. Oldaker
General Counsel

cc: Tim Ryan

JB
7-22-77

Browning:caw:7/21/77

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MUR 321 Browning

78 Form 3811, Rev. 10/76

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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:
 Peter Secchia
 2833 Connet, SE
 Grand Rapids, Michigan

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 1943678 |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 07-28-77
 SIGNATURE: Peter Secchia

5. ADDRESS (Complete only if requested)
 2833 Paynell SE
 GR 49508



6. UNABLE TO DELIVER BECAUSE:

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 20, 1977, the Commission determined by a vote of 5-0 to find Reasonable Cause to Believe a violation of 2 U.S.C. Section 441a(a)(1)(A) had been committed in the above-captioned matter. Voting for this determination were Commissioners Aikens, Staebler, Harris, Thomson, and Tiernan; Commissioner Springer was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

730400, 2793

July 15, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 321 (76)

Please have the attached General Counsel's Report
on MUR 321 (76) distributed to the Commission and
P
placed on the Agendatfor the Commission meeting of
July 20, 1977.

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In the Matter of)
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)
Peter Secchia)

MUR 321 (76)

GENERAL COUNSEL'S REPORT

I. Allegations.

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This case concerns the question of whether certain expenditures made by respondent Peter Secchia and a committee organized and chaired by him, Friends of the First Family, were independent expenditures as reported by respondent, or whether they were instead contributions-in-kind to Gerald Ford. If the expenditures are found to be contributions-in-kind, a reporting violation (2 U.S.C. s.434(b) as affected by s.434(b)(13)) will have occurred. In addition, respondent and his committee will have violated 2 U.S.C. s.441a(a)(1)(A) as affected by s. 441a(a)(7)(B)(i) .

During the course of the investigation of this matter, evidence was uncovered which seemed to indicate that the Friends of the First Family, which had registered as a committee on June 1, 1976, was involved in the Ford campaign as early as March, 1976. Failure to register in a timely fashion is a violation of 2 U.S.C. s. 433(a).

II. Commission Action.

On December 2, 1976, the Commission found reason to believe a violation of 2 U.S.C. s.441a had occurred with respect to the expenditures made by respondent and Friends of the First Family which were reported as "independent." In a December 31, 1976, letter to the Commission, respondent's counsel set forth an

account of respondent's contacts with the President Ford Committee (PFC) both before and after he began making the allegedly independent expenditures.

Due to certain gaps in this account of respondent's relationship with the PFC, a second Commission inquiry was made in April, 1977, and after meeting with respondent's counsel and granting an extension of time in which to respond, a response to this second inquiry was received on June 20, 1977. The response included over 200 pages of documentation (correspondence and memoranda to the file) relating to campaign plans, solicitations, transfers, and reimbursements involving respondent, Friends of the First Family and the PFC.

III. Evidence.

1. Independent Expenditures.

On May 11, 1976, respondent placed newspaper advertisements costing \$1752.17 which advocated the election of Gerald Ford and were reported as independent expenditures. Subsequently, Friends of the First Family, a single-candidate political committee registered on June 1, 1976, which was organized and chaired by respondent, made expenditures of \$23,011.78 on behalf of the Ford campaign during the period June 1, 1976, through September 23, 1976, which it reported as "independent."

Prior to making these "independent" expenditures, in January, 1976, respondent had begun fundraising activities as "Solicitor no. 9806" for Ford's principal campaign committee, the PFC. In addition to his fundraising responsibilities, he initiated, organized, and helped implement a campaign tactic which he called "scatter blitzing" wherein he and groups of Grand Rapids, Michigan, citizens would

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travel to a state where a primary election was about to be held and campaign on behalf of Ford. The particular states visited were apparently those suggested by President Ford or his campaign staff. These campaign "blitzes" would be paid for and to some extent coordinated with the PFC. Respondent would attempt to collect enough contributions for PFC on each "blitz" to cover the cost of the trips. (For a brief description of the scatter blitzes and their financial arrangements, see attached Documents #111 and #149.)

Respondent contends that he severed all ties with the PFC on May 10, 1976, shortly before he began making expenditures which he reported as independent. However, the nature of his earlier relationship with PFC, combined with the fact that he did have continued contacts with President Ford and the PFC staff after May 10, 1976, give rise to a presumption that any expenditures made by him and his Friends of the First Family committee were not independently made but were rather contributions-in-kind to Ford. (For a discussion of this presumption, see Legal Analysis below.)

In order to determine whether the evidence submitted by respondent rebuts the presumption that the expenditures in question were contributions-in-kind, it is necessary to describe in some detail the relationship he had with the PFC both before and after May 10, 1976, the date on which he allegedly severed ties with the PFC. That relationship seems best described by referring to copies of selected campaign-related correspondence which respondent submitted to the Commission.

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Selected List of Pre-May 10, 1976, Communications:

- Document #37 (Jan. 14, 1976) PFC Office of Finance Chairman asks respondent to raise funds for the PFC.
- Document #53 ATTACHED (Mar.30, 1976) Respondent sends PFC staff campaign idea and leaves decision and further instructions up to PFC.
- Document #54 ATTACHED (Apr.12, 1976) Respondent refers to discussion with PFC personnel regarding the Texas campaign and mentions formulation of list of persons to help with the Indiana campaign.
- Document #55 (Apr.15, 1976) Respondent mentions to PFC Finance Chairman that he has been asked to round up \$250 contributions for matching fund purposes.
- Document #56 & #57 (Apr.19, 1976) Respondent sends PFC Midwest Coordinator a list of "Pertinent Names in Northern Indiana" to help with the Indiana campaign.
- Document #58 (April 23, 1976) Respondent asks PFC to advance money for the Indiana "blitz" requested by PFC Midwest Coordinator.
- Document #108 & #109 ATTACHED (Apr.26, 1976) Respondent contacts a fellow blitzer mentioning that the President has asked that they consider PFC Midwest Coordinator's request to blitz Indiana. Expenses will be paid by PFC and blitzers will raise an equal amount of contributions to cover PFC's payments.
- Document #59 ATTACHED (April 26, 1976) Respondent alerts PFC that they missed an opportunity to get Michigan people involved in a newspaper poll. Letter mentions names of various PFC personnel whom respondent attempted to contact.

Selected List of Communications from May 10, 1976, on:

- Document #62 ATTACHED (May 10, 1976) Respondent notifies PFC Midwestern Coordinator he is going to sever PFC ties and henceforth work independently.
- Document #64 & #65 ATTACHED (May 13, 1976) Memo to file from respondent noting that he has decided to work independently. Respondent notes he is to meet with White House Advance team to prepare for President's trip to Grand Rapids during the Tulip Festival. Respondent discusses appearances he has arranged for members of Pres. Ford's family.
- Document #66 ATTACHED (May 19, 1976) Respondent forwards check to White House since he may "no longer have any contact with President Ford committee."

-Document #93 (Sept. 28, 1976) PFC Director writes respondent thanking him for his Sept. 3, 1976, letter assessing the political climate in Mississippi.

Legal Analysis and Recommendation: During the period when most of respondent's and Friends of the First Family's "independent" activity was taking place, the 1976 amendments (specifically 2 U.S.C. §431(p) which defines "independent expenditures") and the Supreme Court decision in Buckley v. Valeo, 424 U.S. 1 (1976), specifically footnote 53 at 46-47) were in effect. The law as it applied to independent expenditures during the summer of 1976, then, spoke of independent expenditures as those expenditures which were made

Without cooperation or consultation with any candidate or any authorized committee or agent of such candidate and which is not made in concert with, or at the request or suggestion of, any candidate or any authorized committee or agent of such candidate (2 U.S.C. §431(p))

and without

cooperation with or with the consent of a candidate, his agents, or an authorized committee of the candidate... (Buckley v. Valeo, id. at 47))

Subsequently, after the expenditures in question were made, the Commission printed in the Federal Register regulations which it had approved and submitted to Congress. The relevant portion of the regulations, 109.1(b)(4), states that a presumption is raised that an expenditure is not independent if the expender has been authorized to raise or expend funds or has received reimbursement from the candidate's committee.

In this case, respondent was authorized to raise and expend funds and was reimbursed by the PFC. While the regulations were not in effect at the time respondent made the questionable payments, the presumption set forth in regulation 109.1(b)(4) is an evidentiary one, based on the existence of a specific set of facts from which

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can be drawn an inference that a particular expenditure is not independently made. The presumption that one who is a fundraiser for or has been reimbursed by a candidate's authorized committee cannot make an independent expenditure is within the realm of reasonable probability or certitude; thus, the 109.1(b)(4) presumption is an obvious and operative interpretation of the 1976 amendments to the Act and Buckley v. Valeo. While this presumption is rebuttable by respondent, the copies of correspondence and memoranda submitted by respondent strongly suggest that he did consult with President Ford and the PFC, and that he did have knowledge of campaign plans made available to him from the candidate and committee on which he was able to base decisions regarding the making of "independent" expenditures.

It is important to note that respondent's submission of documents does indicate that he was sincere in his desire to obey the Act. In his correspondence and memoranda he frequently mentioned that he had discussed with legal counsel the making of independent expenditures and was aware that they must be unauthorized and without coordination with the candidate or the PFC, and that contact with the PFC and President Ford was improper. Upon several occasions respondent warned the PFC fundraiser that he had "maxed out", i.e. met his contribution limits under the Act and asked to be taken off the list of potential contributors. Moreover, he warned others that they

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should not exceed the \$1000 personal contribution limit and informed scatter blitzers that they could use the \$500 contribution exception for unreimbursed travel expenses.

In addition, respondent's December 31st response to the Commission plus the documents he submitted suggest that his relationship with the PFC was mainly one initiated and promoted by respondent and not the PFC. The scatter blitzing campaign tactic seems to have been a Secchia brainchild, without much input, direction or even recognition on the part of the PFC. Most of the correspondence is from respondent to the PFC staff rather than from the PFC staff to respondent. Respondent's repeated desire to stay within the bounds of the Act, and his confusion as to the state of the election law immediately before and after passage of the 1976 amendments would seem to mitigate the seriousness of the violation.

Recommendation: It is recommended that with regard to the independent expenditure violation (2 U.S.C. §441a(a)(1)(A)), a reasonable cause to believe finding be made, and a conciliation agreement admitting such a violation be entered into.

In addition, a §434b reporting violation has occurred with respect to expenditures reported as independent. No reason to believe finding was made as to that violation in the 48-hour report; however, this violation is a derivative one in that it is based on the same set of facts as is the 441a violation. Therefore, it is recommended that the Commission find reasonable cause to believe a 434b violation has occurred.

2. Failure to Register a Political Committee in a Timely Fashion.

During the course of the investigation of the independent expenditure matter, evidence was uncovered which seemed to indicate that the Friends of the First Family, which had registered as a committee on June 1, 1976, was involved in the Ford campaign as early as March, 1976. Correspondence and memoranda to the file from respondent used the name "Friends of the First Family" in the context of receiving contributions which were apparently then transferred to the PFC. Since, during the time of this activity, Friends of the First Family was not a registered political committee, a violation of 2 U.S.C. §433(a) was indicated.

However, documents submitted to the Commission by respondent and a conversation with respondent's counsel suggest that "Friends" was only a loosely organized group of Grand Rapids citizens who did voluntary campaign work for the President by "scatter blitzing." The PFC made advances to cover transportation costs of the group, and then the volunteers reimbursed the PFC for these advances, usually in the amount of each volunteer's portion of the travel expenses. At first the group reimbursed the PFC by checks made out to the "Friends of the First Family," but this practice was quickly changed, and checks made out to the PFC were substituted.

Legal Analysis: The blitzers' reimbursing the PFC for travel advances would amount to an "unreimbursed payment for travel expenses made by an individual who on his own volunteers his personal services to a candidate," and thus would not fall within the definition of contribution or expenditure under the Act. (2 U.S.C. §431(e)(5)(D)). As a result, the definition of political committee would not apply to this group of volunteers (2 U.S.C. §431(d)).

The argument that respondent used "Friends" as an informal name for this voluntary group is supported by the fact that in the documents submitted by respondent, reference is made to other names used for the scatter blitzers, e.g., "Ford's Raiders," "Friends of the President," and still other names for special interest blitzers, e.g., "Bartenders for Ford," "Farmers for Ford," and "Democrats for Ford."

On May 25, 1976, respondent wrote to some of his acquaintances noting his plans to "reform our 'Friends of the First Family Committee.' The necessary papers have been filed, and we will attempt to raise funds in this area to support the President in Ohio..." (See Document #70, ATTACHED.)

Recommendation: Since the name "Friends of the First Family" did not refer to a particular identifiable group of persons before June 1, 1976, and since the reimbursements to the PFC for travel expenses incurred by the group were not political contributions or expenditures, it is recommended that no violation of 2 U.S.C. §433(a) be found to have occurred.

William C. Oldaker
WILLIAM C. OLDAKER
GENERAL COUNSEL

DATE: 7/14/77

7304172807

March 30, 1976

Mr. Jack Stiles
President Ford Committee
1828 L NW
Washington D.C. 20036

Dear Jack:

Judge Cook dropped the enclosed "idea" at my house (for possible newspaper use outside of Michigan.

He, and the other Judges in town, keep turning down our request to travel with "The Friends of the First Family" due to "code of judicial ethics"...que serra, serra.

Since this is a decision that should be made by the National Committee, I leave it up to you to handle this in the manner you see fit. I would be glad to solicit names and arrange group photographs to be used for November.

This week in Wisconsin we are coming up with a new and innovative approach to "blitzing". We have had our precinct blitz...blitzed a mall...and have blitzed just about everything except the synagogues of 1939 Berlin.

Now we have something new--a "SCATTER BLITZ". While the caravan moves through Wisconsin, and a "ripe" market of bodies is spotted... our CB radios will call for a "scatter blitz". Everyone goes for a warm body, and returns to the convoy at a prearranged time and location. We will be beautiful! (I'm going after those "big-breasted" devils when I scatter.)

Cordially,

Peter F. Secchia

PFS/jh

cc: Mr. Stu Spencer

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dup.

April 12, 1976

Mr. Skip Watts
1828 L Street, N.W.
Suite 250
Washington, D.C. 20036

Dear Skip:

Per our discussion last Wednesday, nothing has been done regarding Texas. But at Jack Stiles request...a list has been formulated of those persons we feel could help in the northern counties of Indiana. I also have Mr. A. J. Decio, President of Skyline Corporation (past "Kennedy for President" Chairman) waiting on the sidelines to sit down with John Holt. I was to hear from Jack or John Thursday or Friday before I leave town tomorrow on an extended trip. I have not heard, so I am off on business.

Our Regional Sales Manager on the East Coast was nominated for Vice Chairman of the Young Republicans in the Rowan-Mecklenburg County organization of North Carolina. He reportedly turned down the nomination, but has given me the following story:

"If anyone but the Governor were running President Ford's campaign a large percentage of the Reagan vote would have gone to Ford. Those who are running for the Governor's position (since he can't run) are also going against him on the Presidential issue"...and that, according to my man, is many, many, people.

Best of luck in Texas. You'll need it after last night's news that Connally is being considered for Vice President. That...combined with "Wisconsin was a mandate for Kissinger", should make your task very difficult. Que sera, sera!

Cordially,

Peter F. Secchia

PFS/jh

Dictated Friday - unsigned

dep. 0054

FEDERAL ELECTION COMMISSION

Correspondence of May 13, 1976

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):

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

Signed

Judith W Browney

date

11-4-77

The President will not be staying at my house because we really don't want really want to tie the association that close to me, and since I am now doing my independent action of which the President knows nothing...it is best that way. He has opted out for a quiet evening, and now we think that Jack might be coming in Monday so I have booked him on the Buck Matthews Show; Eye Witness this Noon; and quite possibly Calvin College. It would be nice if he got in Saturday night and went to the "Up With People" concert...the Hospital Benefit that will be there. But as the schedules change, i.e., the President is going to the Tulip Festival...no; the First Lady is going to the Tulip Festival...no; But Susan is going to the Tulip Festival...That all happened in the last three days, and I really don't know what is going to happen this weekend as of now.

The lady who posed as a UPI representative in the Holland area cannot be found. There is some question maybe she was a Reagan plant to get everyone excited that the President was coming back to the County that gave him his first plurality. But there is no way we will ever prove that...so all we are trying to do is appease the people at this point in time.

The greeting at the airport is not getting anything on the radio, and the committee that has been chosen to do so that I could low profile it, doesn't seem to understand that they have to call the newspaper and radio people...and kiss their fannies. We are going to have a difficult time getting a crown out unless they do that. The only other event going on Sunday is that VanderVeen is going to be at the CB radio picnic...so we can't very well take the First Lady down, without raining on his parade. So nothing is on the book for Sunday except possibly a visit to Uncle Roy...and some TV interviews. Yet...Mac MacLogan knew nothing about the TV interviews last night. I wonder why?

dep. 0065

May 19, 1976

Ms. Mildred Leonard
Presidential Secretary
The White House
Washington, D.C. 20500

Dear Mildred:

Since I no longer have any contact with the "President Ford Committee"...would you please see that this check gets to the proper person?

Also enclosed is a letter from Tom Cox. He has requested that the President review his comments. Please have the President drop him a line acknowledging receipt of these comments.

Cordially,

Peter

PFS/jh
encl:

dup. 0066

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PROBLEMS WITH THE PRESIDENT FORD CAMPAIGN COMMITTEE

EXAMPLES:

1. At my meeting with ROG MORTON and STU SPENCER, SENATOR GRIFFIN, etc., ROG MORTON gave us a phone number (a man in California by the name of CAULDER). He would be doing the same as our "Friends of the First Family Committee". After I left your office I planned to work in California, and later changed my mind...figuring I could work best in Ohio, where we had a close delegate race. I then found three districts where the Reagan people (and the PFC people) were asleep. It was decided to work these areas, and we began soliciting funds. Late in the campaign one of our local contributors wanted to put ads in California. I could not talk him into going to Ohio. I called Mr. CAULDER to give him the good news...only to find that 4 days prior to the election he had yet to raise his first dollar for his committee. At this point in time there was "zero" being planned as "independent and unauthorized" in the California primary.
2. MR. MORTON and MR. SPENCER also told me that the New Jersey proposition would be very difficult to control because Senator Case is so "far out" that most Republicans won't talk to him. When asked if there was anyone else we could work with...I was told: "Not really, we will just have to forget about that one."
3. Many times you told me STU SPENCER would be in touch. He has yet to call me. You have time to call me and ask me to do things...to thank me for what I have done. STU SPENCER only has time for people other than your people out there. Each time you told me he would be in touch I heard from a "third-level" secretary. Not even from his deputy.
4. When we decided to go to Florida we sent DON WIERINGA down to do the advance work. He sat in BILL ROBERTS' office for several hours, and was asked: "What are you doing down here? I don't have time to talk to you." DONALD called me and wanted to come right home.
5. On the Florida trip the President Ford Committee told us to go to the wrong cities. I was then asked to work with this same gentleman again in Wisconsin...I told them I would rather not.
6. We were to arrive in Florida to be met by buses and vans...there were neither. Someone had forgotten to coordinate. Someone was supposed to meet us at the plane so I could give him \$13,000 worth of contributions, so they might cover their instant goals because they were in trouble. No one met us at the plane.
7. Everywhere we went volunteers told us they had not been thanked, or had been improperly asked to work. Never did I hear the comment that there were "good people" involved in the PFC.

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8. BILLY ZEOLI tells me he can't help us because you have asked him not to get involved.
9. On our Florida scatter blitz one of the homes we visited served orange juice...the press came....and the host was a Reagan supporter. A County Committee member who was a firm public supporter of Reagan! The PFC Committee had no idea what they were doing.
10. Your Finance Chairman in Kent County, PAUL GOEBEL, SR., failed to return my calls; was not available to help us; and as far as I know...did not raise a dollar in the County.
11. The afternoon of the Michigan primary your Kent County Chairman was at his cottage working on his cabin.
12. RALPH HAUENSTEIN spends a good part of his time in Europe. He volunteered to work with the American Nationals in Europe on "absentee" ballots on your behalf. He received very little cooperation...until I personally took him to your office, and told people who he was and what his idea was. No one seems to want any help.
13. Pages...typing pool...workers at the Kansas City Convention. Why not staff these with "scatter blitzers"...people who know how to "sell" Ford?
14. Secret Service can give out cuff lines and pendants to girls they meet in saloons, but I don't have any to give out to the people who really helped out with our independent and unauthorized committee. How can I get a supply?
15. We need one of the children for the Republican Picnic in Kent County on July 24 (tentative). Is this a possibility?
16. Discuss Mrs. Martin Booth's song, and my idea of having a "Michigan Night" in Washington.
17. Return of letters...terrible. The Mayor of East Grand Rapids tells me he has written you three times...receiving only one answer. I have brought other letters and handed them to Terry O'Donnell from old friends in the labor movement, minority, etc. I have had phone calls from Mexicans who have written and haven't received an answer. It's not the "old Jerry Ford policy", and it is very disconcerting.
18. On our first scatter blitz...People Magazine said they would come if they could get pictures of all three brothers. JIM had a golf match, and wouldn't take them out to the country club...DICK cancelled. TOM was all we had left. TOM did one fine job campaigning constantly...but the cooperation from JIM and DICK at this point was terrible. We later coerced DICK to come with us to Wisconsin. Toward the very end DICK, ELLEN, and JIM attended the Ohio blitz, along with DR. SWANSON... but it was almost too late. Their attendance early in the campaign would have given us national exposure, and equal time with the Jimmie Carter campaign. They had inches and inches of column space on their "friends"...while we had over 230 people in Wisconsin (including 100 teenagers). Jimmie Carter had less than that in Pennsylvania and received much better publicity.

dep. 0068

PETER J. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

May 25, 1976

TO: Mr. Jay VanAndel
Mr. Rich DeVos
Mr. Peter Cook
Mrs. Maryanne Keeler
Mr. Ralph Hauenstein
Mr. Dave Mehney
FR: Peter F. Secchia

Dear Mrs. Keeler and Gentlemen:

We are in the final inning of the ballgame. It's down to a matter of a handful of delegates. EVERY SINGLE DELEGATE MATTERS IN OHIO AND NEW JERSEY.

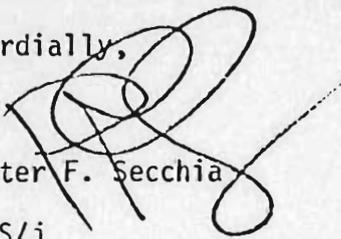
It is difficult to work with the California situation...so I have opted to reform our "Friends of the First Family Committee". The necessary papers have been filed, and we will attempt to raise funds in this area to support the President in Ohio, with the possibility of some activity in New Jersey.

We will place radio ads, newspaper ads, and a 5-minute video tape that Guy VanderJagt did for us. We think it is fantastic.

It is difficult to keep going back to the same well, so we will be running ads in the Grand Rapids Press attempting to solicit contributions from the people in the area to help support the President in these crucial primaries.

We will offer the alternative of privately placed, and independent ads... or lumping the contributions together so that those not wishing their names listed in the paper can be represented as Friends of the First Family Committee. We need all the help we can get. If you can contact anyone in any state who would be willing to help...we need that support. Please contact me at your convenience.

Cordially,


Peter F. Secchia

PFS/j

Thanks for
last week!


dup 0070

PETER J. SECCHIO

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

June 7, 1976

TO: DON WIERINGA
JOHN DAMSTRA

Gentlemen:

From all reports the trip was fantastic! The President and his people are working their way up through the areas that you and the "scatter blitzers" hit. Tomorrow we will know how well we did...

The excitement and enthusiasm I observed in the groups returning leaves me very thankful that I can report to the President that it was through the efforts of both of you that made this the "biggest and best ever".

Thank you very much.

Peter

PFS/j

cc: Mildred Leonard

Telephone dictated...not signed

Mildred...Because of my independent and unauthorized committee I was unable to do anything with the "scatter blitzers"...once they had made contact with the President Ford Committee. A short note from the President to Don and John would do wonders. Don did the pre-advance work...John did all the administrative and paperwork.

PFS

0074

June 15, 1976

Mr. Rodney W. Markley, Jr.
Vice President
Washington Staff
Ford Motor Company
315 Connecticut Ave., N.W.
Washington, D.C. 20006

Dear Rodney:

Thanks a million for your help! Without you and two other people ... who "pitched in", it would have been virtually impossible to raise the funds that we did.

As it was, we won two of the three Reagan districts that we were after. This swing of six votes from the Reagan column to the Ford column could make the difference in Kansas City. In fact ... that 12 vote "swing" is now the entire lead currently held by the President.

We had a chance to win the third target district but Congressman Ashbrook came out with a radio campaign the weekend prior to the election, claiming that he had known Jerry Ford for 30 years, and that he was not qualified, capable, or intelligent enough to handle the Presidency. He is a very popular Congressman from his area, and yet we only lost that district by less than 1,000 votes.

There is also strong evidence to support the fact that our statewide newspaper and TV program helped win the "at-large" delegates. We did well.

As of this writing I am still \$4,700.00 shy of raising the total moneys needed to pay all expenses incurred. If you know anyone else willing to help us ... please give them a call.

The President and I discussed your support. He was informed that you were the only person in Washington, D.C. that I felt I could turn to.. You are good people!

Cordially,

Peter F. Secchia

PFS/j

Telephone dictated - not signed

0075

June 21, 1976

Mr. John T. Peterson
215 Commerce Building
5 Lyon St., N.W.
Grand Rapids, Michigan 49502

Dear Mr. Peterson:

Thank you for your recent contribution to the "Friends of the First Family Committee". Our Treasurer will be forwarding you a receipt.

We dedicated ourselves to three Congressional Districts in Ohio, supposedly in the Reagan column. We won two of these, and would have won the third (lost by 1,000 votes)....if Congressman Ashbrook had not come out with strong radio endorsements for Reagan, and criticizing the President.

These six delegates could be the difference. The President appreciated our efforts, and I meet with him this Wednesday to discuss the results.

Thank you.

Peter F. Secchia

PFS/jh

dup. 0076

July 12, 1976

Mr. Clayton E. Wilhite
General Manager
Media Communications, Inc.
The President Ford Committee
1828 L Street, N.W.
Washington, D.C. 20036

Dear Clayt:

Thanks for taking some time out of your schedule to visit with Joan and me. Please give my best to all those working diligently to re-elect my good friend.

Should something come up where my support is needed...please call. I bumped into Stu Spencer and Dick Cheney last week, but did not get a chance to talk to them about this tape. It's all in your hands.

Peter

PFS/j

dup. 0078

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FCF file

July 30, 1976

Mr. Max Fisher
2210 Fisher Bldg.
Detroit, Michigan 48202

Dear Max:

I have just returned from 1-1/2 days in Manhattan in an attempt to put together a production unit to produce a film for the President.

Because of legal complications, and a complete lack of communication with the RNC, PFC, and others who would be able to arrange the scheduling, the projectionist, acoustics, etc., we have made the decision to drop the project.

Since I am no longer involved in this independent and unauthorized committee activity...I am now free to talk to you at will, and tell you of my interests "to get the man elected."

See You in Kansas City.

Cordially,

Peter

PFS?JH

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K.C. file

President Ford Committee

1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

August 6, 1976

Mr. Peter Secchia
Butterworth Hospital
100 Michigan, N. E.
Grand Rapids, Michigan 49503

Dear Peter:

Just a note to again wish you luck and fast recovery with the broken leg and to confirm our conversation regarding the workshop.

The President Ford Workshop will be divided into four sections: The Individual, The Congressman, The Republican, and The President. We would like you to speak for fifteen minutes for the first section. This includes information on his schooling, his personal philosophy, his family and his goals in life. It is tentatively on schedule for Monday, August 16 at our Headquarters (the Kansas City Trade Mart, Broadway Street on the grounds of the Kansas City Municipal Airport, not KCI) for 1:30 until about 3:30 in the afternoon. Rob Kronman will be in touch with you regarding further details; if you need to reach us our main Kansas City number is 816-467-3691.

Again, all best wishes and thanks for helping.

Sincerely,
Cynthia B. Perrin
Cynthia B. Perrin

cc: Rob Kronman

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MEMO FOR FORD FILE

Tuesday night, August 24...Susan called. We chatted for a while and then she put the President on the line. He told me to take care of my leg...or he kick me in the "GDA". I told him that I had been invited out by Bob O'Dell to work on the "Salute to the President" dinner, and could not decide whether to do that...or my own independent thing, and that I would be in Vail

I decided to take Stephanie along to help with my socks, crutches, etc. We took off for Vail Thursday morning (26th), where we were picked up at the Vail-Eagle airport by a White House car and driven to the Lodge. There we sat waiting to hear from Red Cavaney or Terry O'Donnell, because I needed someone for Stephanie to play with. We went for a walk because our room wasn't ready...and bumped into the Weidenfelds, Jim Cavanaugh, and others from the White House staff. We chatted...and Sheila had to pick up Susan and take her to a UPI soccer game, so Sheila left her husband Ed with Stephanie and I at "Peppi's". Ed thought it would be best if I didn't go to the UPI soccer game since I shouldn't be someone of high visibility. Susan didn't want to go either, so she talked Sheila and Ed into going alone...and Susan took us to the ski shop to show us the dog that she and some of her friends had given a friend...went shopping...bought Stephanie a jacket...went over to the Wicked West (a store owned by friends of mine)...bought Susan a leather hat, whereupon the blond lady behind the counter said she would love to get Jack alone that night, since she had absolutely nothing to do and no place to sleep. Susan said the women were chasing Jack everywhere.

I then went to my room...changed clothes, and Stephanie and I went to dinner at Peppi's alone. We came back and went to sleep. It was a very difficult evening because I was exhausted from using crutches around town earlier.

The next morning I went to the meetings on "Salute to the President" dinner, and a decision could not be made between Max Fisher, Jay VanAndel, Jim Bourque and I whether we should go with this dinner in Detroit...or bring the President the following night. Terry O'Donnell advised me I would be seeing the President at 5:30 Friday evening, and I could discuss it at that time.

Red Cavaney sent an advance man over to pick up Stephanie, and she played while I was in meetings. That afternoon, Jim Baker, the new director of the Ford Committee...came down and said it very clear: "If you want to go to your independent thing...that's fine. It's up to you. If you want to work within the system...let me know. But if you do your own thing...forget about me, don't ever talk to me, I don't ever want to hear from you, and I won't return your calls." I sort of admired the strength the man displayed.

Stephanie return late, and we had to dress in a rush to get to the Vail "white house." We arrived just as the President was returning from golf. I went up the stairs, collected my breath, and presented him with my portfolio, along with a picture of Jack dumping confetti on the Texas delegation, and a one of the President we felt was very good. It was also interesting to note that the President read my pamphlet...set it down, and we discussed other issues rather than those in the pamphlet. Dick Cheney, Chief of Staff, also read it, and since it was a strong criticism of his abilities...it was wise that he was there.

Dr. Lucash came out of the bedroom and said that the First Lady was in very bad shape, and would not be going to dinner. This was the first social event that the Fords had

0083

planned with the Doles, and the President decided since he was late, he best get ready and take Susan. Susan couldn't go because she was under the hair dryer. So we went downstairs and talked to the Doles while the President got dressed. When he came downstairs he said that "Betty would like to see you in the morning...will you call?" So--Steph and I were then left standing in the road while the car that had delivered us was used in the motorcade for the Doles and the President as they went to a reception in Lionshead, Colorado. When the car returned to pick us up they told us that the reservations had been made for Stephanie and I to attend the same restaurant (I had asked the military aide to try to get us in since I was unable to get reservations since it was a theatre-supper club and I thought Stephanie might enjoy it.) We went down and began eating. Susan came in and chatted with us a while. When her father finally arrived...they sat down and had empty chairs at their table. The President walked over to my table and said..."Why don't you and Stephanie join us for dinner?" It was very nice of him to offer, and he not only invited us but helped me over with my crutches, and I sat next to Dole (on his right), Mrs. Dole on his left...the President, Susan, and Stephanie. We had a very enjoyable evening. Some of the things I heard that night that are very interesting is the fact that Sen. Dole loved my idea that he go to Philadelphia and show that the Ford administration is not down on big cities, and that the people of Philadelphia need to know that more conventions will not be cancelled, and that the Vice President can get up there very inexpensively. Sen. Dole did not really take to my idea of campaigning in motorhomes.

Sen. Dole did say he received a letter from Dick Nixon, who told him..."Always attack up...never attack horizontally." Which means he is telling Dole to attack Carter, and leave Mondale alone. The President replied..."Dick always had some shrewd political advice--follow it."

Since it was a supper-club performance, and the President arrived late...there wasn't much conversation before dinner, and immediately after dinner they were deluged for autographs, and I did not get to see him again.

The next morning the First Lady called and said that she had an interview with UPI, and AP...and had to do it because the AP lady had flown in 2 days prior and had just been waiting to conduct this interview. The First Lady wanted to have us up for lunch, but couldn't...so wanted us to come later that afternoon. We couldn't...our plane was leaving at 3:00. The First Lady said she really hurt herself by staying out on a picnic on the Island that Peppi and Sheicka had thrown early that week, because it got very cold after the sun went down. This cold really affected her neck, and Dr. Lucash said she was having spasms and it was very painful. Since she did not make dinner the night before she still was in pain Saturday morning when she called me. We had a long chat about the campaign, and she was very upset about the fact that if I did my own independent thing...that I wouldn't even be able to talk to her. She couldn't understand that. She talked to Stephanie a while and said "hello."

It is interesting to note that when Jimmie Carter is in front of the camera he picks up a small child, but when the President is at a private dinner surrounded by strangers with no photography available he invites a small child to sit at his table, and holds conversation with her, treats her like an equal...and was very polite to his broken leg buddy and his 9 yr. old daughter. Stephanie had her menu autographed by the President and Sen. Dole, and than we called the bellman at the Lodge. They picked us up and took us back to the hotel.

FEDERAL ELECTION COMMISSION

[Handwritten text, mostly illegible]

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

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

Signed *Judith W Brownie*
date 11-4-77

FEC 9-21-77

79741382
10010001

September 9, 1976

Mr. Max Fisher
2210 Fisher Building
Detroit, Michigan 48202

Re: CAMPAIGN ACTIVITIES

Dear Max:

Since you and Jay are my friends, and have taught me many good principles these past few years...I want to advise you of a recent decision.

It is impossible to completely sever my relationship with the candidate, his committees, his family, and/or the White House. I receive daily phone calls from local citizens requesting letters, needing information, feeling slighted, wanting speakers, etc. It is virtually impossible to attempt to fulfill these requests without some type of contact from "within" the system. (In fact...the President called Sunday night just to "chat." How do you stop this?)

So, because of the inability to completely sever this relationship...I have reached the decision to work within the system the next few months, and discontinue the "independent" route.

During the primary I became disenchanted and, consequently, divorced myself from the President Ford Committee to be free to do my "own thing." Several weeks were wasted in an attempt to obtain information from the Federal Election Commission, incurring thousands of dollars in expenses ...only to receive contradictory answers. Now I am reading Mr. Colson's book, "Born Again", and fear the contradictory answers could, in turn, become "contradictory accusations."

Not wanting to embarrass the President, entail exorbitant legal expense, or be called before a Grand Jury...I am running "scared," and feel that any activity conducted in this manner has to come from someone more distant than I.

dup 0089

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April 26, 1976

TO: DON MIERINGA
FR: PETER F. SECCHIA
RE: INDIANA "SCATTER BLITZ"

The President has asked that we consider Mr. John Holt's request to "scatter blitz" the Northern Counties of Indiana on May 1.

You will call John Holt at the Indianapolis "President Ford Committee" office, and find out who the Republican contacts are in the Michigan City-South Bend-Elkhart area.

We will leave the Hospitality Inn parking lot at approximately 7:30 A.M. on May 1, and will work our way east from the Michigan City area. -- Remember the time change.

We would like to have three presentations of Michigan White Pine trees. I am sure Pete Sarantos, the Republican Mayor of Elkhart, would be glad to allow us to do a tree planting in one of the local parks.

At this point in time it looks as if we will have all three Ford brothers with us, and People Magazine.

We are not looking for a caravan as large as the one we took to Wisconsin. We hope to arrive with approximately 12 to 15 vehicles...all CB radio controlled.

Fred Gebauer will be in charge of the convoy, and has filed for the necessary licenses. His base station has been approved, and each of the cars will be a mobile attached to his base station. We must adhere to the etiquette and rules of CB broadcasting.

We will all take lunches, and eat at a park along the way. The President's brothers will be available for interviews during this lunch period. All other times the brothers will be campaigning with the others.

We want to do two precinct blitzes similar to the ones conducted in Madison.. with efficiently layed out and marked community maps to be passed out to each vehicle as it approaches the point of dispatch.

Don Pletcher, residence - (219) 262-1404...business (219) 773-7755, asked if he could "get involved"...he sure is. He is trying to find a rack truck that will travel with us, and have a Dixieland band, dressed in red, white, and blue, to play at each of our stops. We will take along two of the large Ford banners to put on either side of this truck, and Mr. Pletcher will attempt to decorate the balance of the truck so it will be an "attention-getter".

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copy . 0108

April 26, 1976

We should have the word sometime this week on whether our friends from Holland, Michigan will join us to present tulip bulbs to our friends in Indiana. If not...we hope to give the Michigan Delicious apples, Michigan White Pine seedlings, buttons, bumper stickers, and other pertinent information concerning our friend "The President".

Attached is a copy of the Press Release mailed to all radio and TV stations, and newspapers in the area we intend to visit. We need immediate coverage. This is a media blitz.

When the contacts have been identified by John Holt...please work with them on setting up the precinct blitz, and call my office Friday with a detailed schedule of our itinerary. Please leave two 15-minute "fillers" in the schedule.

1. In the South Bend area, and
2. Later that afternoon.

We hope to use several "scatter blitz" fillers as we travel along. If there is time, we will stop and hit them all, or an apartment complex, for ten or 15 minutes...then off we go. It is important that we work on a tight schedule from beginning to end, but the "fillers" are of the utmost importance so we can play "hurry up - catch up".

Don Pletcher has been informed that we have a "0" budget. If he has to spend money, he will raise an equal amount in contributions to the "President Ford Committee", and give to me on May 1. We will then pay any of his expense through the Washington "President Ford Committee".

Bill Deitch, residence (219) 264-1870, business (219) 262-3611, has agreed to help by contacting some of his friends throughout the area, to arrange for the presentations that you need to get us media attention. Bill will also contact the Elkhart Truth, and has said he would guarantee a newspaper photographer to be wherever we are.

Vince Ford of WJVA in South Bend, Indiana, is an old friend of ours. Vince and his wife will join us in the caravan, and his handle is, ironically enough, "Mr. President". He will have his news people giving news spots this week, while visiting with us while we are in South Bend.

Bob Morris of Middlebury, Indiana, is President of Coachmen Homes, and a close personal friend, who has committed to help our man. Please contact him if we are going into his area. (219) 825-5814 - business.

No matter what towns in Northern Indiana the Committee decides we should "blitz"...please contact me via Mrs. Hodges immediately. We have friends in every one of those Northern communities.

To date we are undefeated. When we went to Florida the President was behind 2-1. When we went to Wisconsin there was some question...and we ended up winning every single district. Now...we are going to Indiana at the personal request of the President. We are his "good luck charm"...and "Betty and I hope you will be able to gather some of our friends to go down and help us." Here we go...or here we come, depending on where you are now while reading this memo. We need all your help.

0109

PRESS RELEASE

Grand Rapids friends of the Ford Family to campaign in Indiana Saturday. For the third time in as many months a group of Grand Rapids, Michigan, people who call themselves "The Friends of President Ford" will cavalcade to another state to campaign for their friend just prior to a primary election.

This time it will be for a full day of "scatter blitzing" across the northern tier of Indiana on Saturday, May 1, and once again the trip is being made at the suggestion of President Ford, who calls the group his "good luck" charm.

In the upcoming Indiana Primary President Ford considers himself the "underdog" just as he did in the Florida primary, and to a lesser degree...in the recent Wisconsin primary. In both of those states a visit by an eager group of enthusiastic "Ford friends" from his hometown was credited with whipping up local voters' enthusiasm, and contributed to a Ford victory over Ronald Reagan in the balloting.

Saturday's caravan will involve 20 to 30 automobiles and motor homes, most of them equipped with CitizenBand radios. More than 90 people hired a jet aircraft and spent a weekend in Florida, and almost 250 "Ford friends" travelled by car, motor home, and airplane, to Wisconsin to carry out the Wisconsin neighbor-to-neighbor campaign.

This Saturday the group will leave Grand Rapids Hospitality Inn parking lot at 8:00 A.M., and move in convoy to the Michigan City area of Indiana. From there they will work their way across Indiana, mostly along Route U.S. 20, stopping along the way at South Bend, Mishawaka, Elkhart and maybe side trips by part of the group to smaller nearby cities. As they have in the past, the "Ford friends" will present Michigan White Pine trees to City officials along the way, and will pass out apples, litter bags, buttons, bumper stickers, and brochures. Again they will use the "scatter blitz" technique they started on their first trip - at a given signal the whole convoy stops and everyone scatters through the immediate area shaking hands, ringing doorbells, and just telling everyone available about their friend Jerry Ford from Grand Rapids, who is on the ballot seeking to continue as President of the United States. Although some of the Ford family has met or travelled with the earlier two groups all three of the President's brothers have indicated that they will make the trip to Indiana Saturday.

No formal meals have been planned for this trip, and all participants will be encouraged to "brown bag" it and devote the time saved to additional campaigning. Plans are also underway for a local hamburger party when the group arrives back in Grand Rapids at approximately 9:00 P.M.

dup. 0111

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March 1, 1976

Mr. T. Timothy Ryan
Assistant General Counsel
President Ford Committee
1828 L Street, N.W.
Suite 250
Washington, D.C. 20034

Dear Tim:

Your letter of February 17, 1976 arrived in my office on the 24th. I have just returned from an extended trip to the south, and found it on my desk today (Sunday the 29th).

Since the PFC now paid for the plane...all contributions, whether for someone else's ticket, or a contribution from someone on the plane, will be considered a normal contribution and a standard donor card will be filled out for submission with the checks.

We are attempting to send out copies of your "Travel Expense Exclusion" form, and hope to have them returned to our Treasurer and kept in the records.

We were also told that someone would meet us in Florida to take our corrected checks made payable to the "President Ford Committee", but no one was there. John Damstra has been in touch with Mr. Moran of your office, and will meet with me this week. We returned all checks and were informed that the PFC would bill the Press directly, and that we would ask for contributions of any amount from those attending. This has been done, and now we will send out your forms.

The trip was a success, as indicated by the attached newspaper articles. We were the lead story in most of the local T.V. stations Sunday and Monday. The President and First Lady called my wife and me Sunday night and said they had already heard "nice things"...we hope it helps.

Peter F. Secchia

PFS/jh
encl:

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7304002331

Law Offices

Loomis, Owen, Fellman & Coleman

(Formerly Counihan, Casey & Loomis)

2020 K Street, N. W.

Washington, D. C. 20006

202 296-5680

Donald M. Counihan

1917-1969

E. Riley Casey

1923-1971

J. R. Pat Gorman

Elmer F. Bennett

Counsel

John E. Loomis

Stephen F. Owen, Jr.

Steven John Fellman

Francis T. Coleman

William H. Howe

Jerald S. Jacobs

John R. Erickson

James E. Anderson

John C. Reynolds

Henry S. Hart

T. Timothy Ryan, Jr.

Donald L. Rosenthal

June 20, 1977

7 2 0 4 0 1 1 3 3 8 2
7 3 0 4 0 0 2 8 6
Charles N. Steele, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 321 (76)

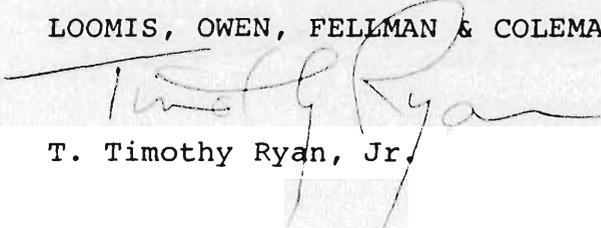
Dear Charlie:

Enclosed is Mr. Secchia's response to Mr. Oldaker's letter requesting information and documents dated April 22, 1977, as amended by your letter of June 3, 1977.

As noted at our recent meeting, we would appreciate your immediate attention to this matter. A settlement of this case which is just and reasonable will most likely be attainable. In this regard, we would appreciate the opportunity to meet with you and your staff in the very near future to discuss same.

Very truly yours,

LOOMIS, OWEN, FELLMAN & COLEMAN


T. Timothy Ryan, Jr.

TTR:jr
Enclosures

cc: Mr. Peter Secchia
Leonard Hoffius, Esquire
Ms. Judy Browning, Esquire

CERTIFICATE OF SERVICE

I, THOMAS G. BEARDEN, hereby certify that on this, the 20th day of June, 1977, I personally filed with the Secretary of the Federal Election Commission, the response of Peter F. Secchia in MUR 321 (76). The response consists of a cover letter dated June 10, 1977, which is attached hereto, and 218 separate documents arranged chronologically by subject matter where possible, and numbered 1 through 218.

Thomas G. Bearden
Thomas G. Bearden

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17 JUN 20 P 4: 01

Received by Andy Bronnig
At: Henry Simmons
(Documents 1- 218)

14 8 JUN 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. T. Timothy Ryan, Esq.
Counihan, Casey & Loomis
1000 Connecticut Ave., N.W.
Washington, D.C. 20036

Re: MUR 321 (76)

Dear Mr. Ryan:

Pursuant to our meeting with you and Mr. Anderson on Friday, May 27, 1977, and your request that we specify more precisely what items covered by paragraph 1, page 2, of the Commission's order are necessary for the Commission's present investigation, I think the following paragraph states substantially the information we need.

- 1) Documents which deal with campaign plans, solicitations, transfers, or reimbursements of money to (or from) you, Friends of the First family, or any group or political committee of which you were a member from (and to) the President Ford Committee staff or the White House staff during the period January 1, 1976, to the present. Specifically, please provide any correspondence, bills, or receipts relating to the above-mentioned activities.

In complying with this request, it might be helpful if you keep in mind the discussion we had on Friday with regard to our purposes in requesting this information. The Commission is interested in finding out facts concerning Mr. Secchia's relationship with the President Ford Committee, i.e., his authority to make campaign expenditures and plan campaign activity, and his right to reimbursement for his own campaign expenditures and those of other persons working with him, etc. In addition, we would like to know more about the activities of the Friends of the First Family, especially

regarding its functions before it registered with the Commission on June 1, 1976, and Mr. Secchia's relationship to it.

We would appreciate your response to the request for information and materials within 10 days of receipt of this letter. If you have any questions, please contact Judy Browning (telephone no. 202/523-4075), the attorney assigned to this matter.

Sincerely,

Charles N. Steele
Associate General Counsel

cc: Peter Secchia

JBrowning:caw:6/3/77

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FC 308 321

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● **SENDER:** Complete steps 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 80¢

2. ARTICLE ADDRESSED TO:
Mr. T. Timothy Ryan, Esq.
1000 Connecticut Ave., N.W.
Washington, D.C. 20036

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	993303	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

4. DATE OF DELIVERY	POSTMARK
MAY 2 1977	

5. ADDRESS (Complete as requested)
2020-K-4, NW

6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

PETER J. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

June 10, 1977

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

Re: MUR 321 (76)

Dear Mr. Steele:

This letter is in response to Mr. Oldaker's correspondence dated April 22, 1977, as amended by your letter of June 3, 1977.

Your letters request certain information which I will respond to in the same order as requested:

A. REQUEST FOR INFORMATION

1. When did you begin your campaign activities for the President Ford Committee? What title did you have? Describe your duties.

Response:

After President Ford announced his intention to seek a full term in the presidency, I decided to assist in his campaign as a local volunteer worker, scatter-blitzing, and as a fund raiser, until May 1976. I never received any title from the President Ford Committee, nor was I assigned any specific duties, except raising funds.

2. Did you have authority to make expenditures on behalf of the President Ford Committee? If so, during what period of time did such authority exist?

Response:

No, except that I was given \$1500.00 to pay bills that were incurred by PFC agents for the November, 1976 "homecoming in Grand Rapids."

3. List the names of the persons who made up the group of volunteers called the "scatter blitzers" (referred to on page 1 of December 31st letter). What duties did these persons have?

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
WASHINGTON, D.C. 20463
JUN 14 1977

Response:

See attached Exhibit 1 (list of persons on Wisconsin and Florida "scatter blitzes"). Their duties were to smile, knock on doors, say hello, shake hands, and request support for President Ford.

- 4. List dates and parts of the country where you were involved in "scatter blitzing" for the Ford campaign.

Response:

February 21-22, 1976	-Florida
April 3- 4, 1976	-Wisconsin
May 2, 1976	-Indiana

- 5. Do you have any knowledge of a group called the Friends of the President? If so, provide the following information:

- a) When was the group organized?
- b) Who were the group's officers?
- c) What was the purpose of the group?
- d) Describe your relationship to the group.

Response:

I have never heard of a group called "Friends of the President".

- 6. In connection with the organization of Friends of the First Family:

- a) List the members of the Committee.

Response:

Peter F. Secchia and Jeff Davis.

- b) How many meetings of the Committee were held and on what dates?

Response:

The Committee held one organizational meeting on May 24, 1976.

- c) Please include a list of all meetings at which any business relating to contributions or expenditures on behalf of President Ford was discussed or transacted.

Response:

May 24, 1976; the Committee of two operated very informally and after its organizational meeting, conducted its business by telephone.

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 OFFICE OF GENERAL COUNSEL

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- d) Did the Committee ever operate under a different name? If so, list the names the Committee used and note the time periods when those names were used.

Response:

No.

- e) Were there any other officers or personnel of this Committee aside from yourself and Mr. Jeff Davis? If so, please list their names and describe their duties.

Response:

No.

- f) Were any officers or personnel of the Committee other than yourself former "scatter-blitzers" or former workers for the President Ford Committee? If so, list these persons and describe their duties.

Response:

Jeff Davis. Scatter-blitz only. Duites same as response to No. 3 above.

COMMENT

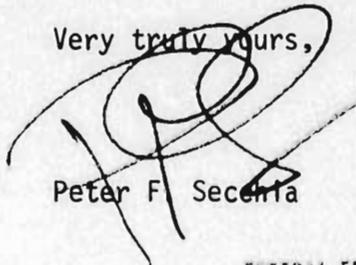
In 1974 a political committee had been formed by Grand Rapids citizens, also named "Friends of the First Family". The sole purpose of this committee was to support the candidacy of then Congressional candidate, Paul Goebel. Immediately after that election, the committee was dissolved.

Thereafter, in 1976, the decision was made to use the same name for our new committee because of its implied intimacy with the family of President Ford. The purpose of this new committee was to support the candidacy of Gerald Ford.

B. DOCUMENTS

You have also requested certain documents which deal generally with my activities during the 1976 election campagin. The enclosed documents are submitted in response to this request dated April 22, 1977, as amended on June 3, 1977.

Very truly yours,



Peter F. Secor

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

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May 19, 1976

MEMORANDUM TO: Drew McKay
THROUGH: William Oldaker
FROM: David R. Spiegel
SUBJECT: Peter and Joan Secchia

This attached letter is intended as a report of independent expenditures made on behalf of a Federal candidate. I am transferring it to your division for appropriate treatment.

Attachment

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5-12-77

Mr. Peter F. Secchia
2833 Bonnell Avenue, S.E.
Grand Rapids, Michigan 49506

Re: MUR 320(76)

Dear Mr. Secchia:

We received today your letter of May 10, 1977, requesting a thirty-day extension of time in which to respond to the Commission's request for information of April 22, 1977.

Normally the Commission does not grant extensions of time in these matters. While we appreciate the fact that we made an earlier request for information from you on December 7, 1976, to which you responded on December 20, 1976, the Commission is of the understanding that the materials now requested are all available to you; therefore, we would appreciate your response to our present request for information promptly.

However, in light of the amount of material requested from you in our April 22, 1977, letter, we are willing to allow you an extension of time which would make the new due date May 31, 1977.

If we can be of any further help to you please do not hesitate to get in touch with Judy Browning, the attorney assigned to this matter (phone: 202/523-4075).

Sincerely,

William Oldaker
General Counsel

JBrowning/scc 5/12/77
cc:

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

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NRN 321

FILE COPY

PETER J. SECCHIA

2833 BONNELL AVE., S.E. GRAND RAPIDS, MICHIGAN 49506

MAY 10, 1977

JUDY BROWNING, ESQ.
FEDERAL ELECTION COMMISSION
1325 K STREET NW
WASHINGTON, D.C. 20463

RE: MUR 321 (76)

DEAR MS. BROWNING:

AFTER TALKING TO YOU LAST WEEK, I DICTATED A 5 PAGE LETTER. AFTER REVIEWING YOUR LETTER AND QUESTIONS...I NOTE IT IS GOING TO TAKE TIME TO GO THROUGH TO ASCERTAIN WHAT DOCUMENTS ARE AVAILABLE.

I WORKED ON THIS OVER THE WEEKEND, AND TODAY I MUST LEAVE ON A BUSINESS TRIP TO WISCONSIN. IT WILL BE IMPOSSIBLE TO MEET THE DEADLINE AS SET (15 DAYS).

IN OUR PREVIOUS CORRESPONDENCE, WE DISCUSSED THE FACT THAT LAST TIME YOU WANTED A 15 DAY ANSWER. I WORKED OVER THE ENTIRE CHRISTMAS HOLIDAYS, AND PRESENTED TO YOU ON TIME...THEN WAITED FOR FOUR MONTHS TO HEAR BACK. I HOPE THAT YOU WILL UNDERSTAND THAT MY SITUATION REQUIRES ME TO PAY THE GROCERY BILLS. MY WIFE IS IN THE PROCESS OF ORDERING FURNITURE...THEREFORE, PETER MUST DO HIS THING, AND TRY TO SELL SOME LUMBER IN WISCONSIN.

UPON MY RETURN, I WILL REVIEW THE DOCUMENTS THAT WIFE HAS GATHERED, AND FINALIZE THE LETTER FOR MAILING A WEEK FROM TODAY. HOPEFULLY IT WILL SATISFY YOUR REQUESTS. MAY I HAVE ANOTHER 30 DAYS?

THANKS FOR YOUR COOPERATION, AND I LOOK FORWARD TO SEEING YOU, OR HEARING FROM YOU. IT IS FUN TO WORK WITH A GOVERNMENT AGENCY, WHEN THERE IS A REAL PERSON THAT GOES WITH THE TITLE. HAVE A NICE DAY.

Peter
PETER
PFS/JH

Dictated by Mr. Secchia and
Signed in his absence by his
Secretary to prevent delay in mailing

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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10:20

JUDY BROWNING, ESQ.
FEDERAL ELECTION COMMISSION
1325 K STREET NW
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 14, 1977, the Commission adopted the recommendation of the General Counsel that the letter, requesting additional information, attached to the Memorandum to the Commission, dated April 12, 1977, regarding MUR 321 (76), be sent.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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

April 15, 1977

MEMORANDUM TO: Charles Steele
FROM: Marjorie W. Emmons *MWE*
SUBJECT: MUR 321 (76)

The above-mentioned document was transmitted to the Commissioners on April 13, 1977 at 9:00 a.m.

As of 10:00 a.m., April 15, 1977, no objections have been received regarding the staff recommendation in MUR 321 (76).

However, please note the attached questions submitted by Commissioner Aikens.



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FEDERAL ELECTION COMMISSION

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

April 12, 1977

MEMORANDUM TO: The Commission

FROM: William Oldaker *W.O.*

SUBJECT: MUR 321(76)

This case concerns the question of whether certain expenditures made by respondent Peter Secchia and a committee organized by him (Friends of the First Family) were independent expenditures as reported by respondent. Mr. Secchia's fundraising activities carried out for the President Ford Committee shortly before he began making allegedly independent expenditures caused the Commission on December 2, 1976, to find reason to believe a violation of 2 U.S.C. §441a(a)(1)(A) (as affected by 441a(a)(7)(B)(i)) had occurred.

In a December 31, 1976, letter to the Commission (attached), respondent's counsel set forth an account of Mr. Secchia's contacts with the President Ford Committee (PFC) both before and after he began making the allegedly independent expenditures on May 11, 1976.

In our opinion, the information in respondent's letter does not provide a sufficient basis upon which to close our investigation.

Secchia was an advance man and fundraiser for the Ford Campaign who worked in Florida and Wisconsin before those states held their primaries. Although he maintains that he received only \$2,500 from the PFC, reports filed with the Commission list him as having received more than that.

Secchia's contacts with the Ford campaign staff continued after he claims to have severed ties with the campaign organization and after he made so-called independent



expenditures. While he claims to have had no business contacts with PFC personnel during the period in which he was operating the Friends of the First Family, he attended certain PFC campaign meetings. He also admits to having had "social contacts with PFC personnel." It is unclear what connections other members of Friends of the First Family had with the Ford campaign staff.

In addition, certain correspondence and receipts were discovered during the Commission's on-site audit at PFC which seem to contradict respondent's account of the extent of reimbursements to him for campaign activities on behalf of PFC. This correspondence also conflicts with respondent's explanation of the dates of organization and the finances of Friends of the First Family.

Due to the inconclusive nature of the information provided by respondent's counsel, we recommend sending the attached follow-up letter and request for information. It may be necessary to take depositions after a response to this request for information has been received.

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FEDERAL ELECTION COMMISSION

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

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

In furtherance of its investigation into the above-referenced matter, the Commission requests that you provide certain information in addition to that provided in your letter of December 31, 1976.

We would appreciate your response to the enclosed request for information and materials within 15 days of receipt of this letter, as well as your submission of any other factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The attorney assigned to this matter is Judy Browning (telephone 202-523-4178).

Sincerely yours,

William C. Oldaker
General Counsel

cc: T. Timothy Ryan
Leonard M. Hoffius, Jr.



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REQUEST FOR INFORMATION

1. When did you begin your campaign activities for the President Ford Committee? What title did you have? Describe your duties.
2. Did you have authority to make expenditures on behalf of the President Ford Committee? If so, during what period of time did such authority exist?
3. List the names of the persons who made up the group of volunteers called the "scatter blitzers" (referred to on page 1 of December 31st letter). What duties did these persons have?
4. List dates and parts of the country where you were involved in "scatter blitzing" for the Ford campaign.
5. Do you have any knowledge of a group called the Friends of the President? If so, provide the following information:
 - a) When was the group organized?
 - b) Who were the group's officers?
 - c) What was the purpose of the group?
 - d) Describe your relationship to the group.
6. In connection with the organization of Friends of the First Family:
 - a) List the members of the Committee.
 - b) How many meetings of the Committee were held and on what dates?
 - c) Please include a list of all meetings at which any business relating to contributions or expenditures on behalf of President Ford was discussed or transacted.
 - d) Did the Committee ever operate under a different name? If so, list the names the Committee used and note the time periods when those names were used.
 - e) Were there any other officers or personnel of the Committee aside from yourself and Mr. Jeff Davis? If so, please list their names and describe their duties.
 - f) Were any officers or personnel of the Committee other than yourself former "scatter-blitzers" or former workers for the President Ford Committee? If so, list these persons and describe their duties.

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Please provide the following original documents or copies thereof:

1) All correspondence, memoranda, invoices, bills, or other records of communications (including telephone logs) to (and from) you, Friends of the First Family, or any group or political committee of which you were a member from (and to) the President Ford Committee staff or the White House staff during the period January 1, 1976, to the present, including documents relating to your "scatter blitzing" activities. (Please include documents which deal with campaign plans, solicitations, transfers, or reimbursements of money to any of the individuals or groups named above.)

2) All checks and records of contributions transferred to the President Ford Committee by or on behalf of you, Friends of the First Family, or any group or political committee of which you were a member.

3) All documents relating to the organization of the Friends of the First Family Committee, including charter, minutes from meetings, correspondence of organizer(s). Include memoranda or any documents describing the meetings of the group.

4) Memoranda, correspondence, and communications relating to any Friends of the First Family solicitations for funds.

5) Records or minutes of the following meetings or discussions (if available):

- a. Discussion with Mr. Kahle in May, 1976, (referred to in your December 31st letter, page 6);
- b. Conversation with John Holt regarding use of PFC campaign material as copy for independent expenditure advertising, early May, 1976 (Dec. 31st letter, page 3);
- c. Request to assist in housing White House staff, May 13, 1976 (Dec. 31st letter, page 3);
- d. Strategy meeting in Washington to discuss the applicability of the Michigan strategy to California, May 21, 1976 (Dec. 31st letter, page 4);
- e. Speech to volunteers at Republican convention, late August, 1976 (Dec. 31st letter, page 8);
- f. PFC meeting in Vail, Colorado, late August, 1976 (Dec. 31st letter, page 6);

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- g. Post-convention discussion with Mr. Baker regarding independent expenditures (Dec. 31st letter, page 6);
- h. Any discussions regarding advance activity for Ford's welcome home parade, October, 1976 (Dec. 31st letter, page 7).

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CC# 1190

Law Offices

Counihan, Casey & Loomis

1000 Connecticut Avenue
Washington, D. C. 20036
202 296-5680

Donald M. Counihan
1917-1969
E. Riley Casey
1929-1971

John G. Loomis
Stephen F. Cavan, Jr.
Steven John Fellman
Francis T. Coleman
William H. Howe
Jerald A. Jacobs
John R. Erickson
James E. Andersen
Louis J. Sperling
John C. Reynolds
Henry A. Hart

December 31, 1976

J. R. Pat Gorman
Elmer F. Bennett
Counsel

77J026

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Dear Mr. Murphy:

Re: MUR 321 (76)

This letter is in further response to your letter of December 7, 1976, which was received by Mr. Secchia on December 11, 1976. Thereafter, on December 20, 1976, counsel for Mr. Secchia, Clary, Nantz, Wood & Van Orden notified the attorney assigned to this matter, Mrs. Carol Darr, that because of the holidays and the retention of Counihan, Casey & Loomis, our response would not be forthcoming until December 31, 1976.

In keeping with this agreement, counsel for Mr. Secchia and the Friends of the First Family Committee (hereinafter referred to as the "Friends") met in Grand Rapids, Michigan, on Tuesday, December 28, 1976, to review the relevant facts and your request for pertinent information. Accordingly, the following relevant information based on the reports submitted to the Federal Election Commission (hereinafter referred to as "Commission"), pertinent letters, and our discussion with Mr. Secchia and Mr. Jeff Davis, Treasurer of the Friends, is submitted in order to demonstrate that Commission action should not be taken against Mr. Secchia or the Friends.

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Preliminary Statement

Mr. Secchia, a Grand Rapids, Michigan, businessman, has for a number of years been a close personal friend of Gerald R. Ford and his family. Prior to the 1976 election campaign Mr. Secchia had not been involved in political activity nor had he financially supported any of Mr. Ford's previous congressional campaigns. However, after President Ford announced his intention to seek a full term in the presidency, Mr. Secchia decided to assist in his campaign as a volunteer worker and as an authorized fundraiser.

Due to what he viewed as an apparent lack of "grass roots" political activity on behalf of the President during the first months of the campaign, Mr. Secchia and a number of other Grand Rapids residents formed a group of volunteers called the "Scatter Blitzers". The "Scatter Blitzers" was a group made up of Ford Supporters from Michigan who Mr. Secchia thought could best spread the word about the President's record and accomplishments in areas outside of his old Congressional District in Michigan. In this regard, Mr. Secchia led groups of individuals to Florida in late February and to Wisconsin on April 3 and 4, 1976, to campaign on behalf of Mr. Ford's candidacy. All expenses for these trips were either paid for by the President Ford Committee (hereinafter referred to as the "PFC") or absorbed by the specific individuals under the statutory travel exclusion set forth in 2 USC §421(F)(4)(E). The expenditure of funds was coordinated with the PFC as was all political activities during these trips.

Following the two "Scatter Blitzers" trips, Mr. Secchia became increasingly disillusioned with the campaign efforts of the PFC. Each of his previous trips had been marked by poor communications and a general lack of support from the national and local PFC. In addition, while campaigning in Wisconsin, Mr. Secchia was exposed to a number of newspaper advertisements paid for as independent expenditures by Ronald Reagan's Florida campaign chairman, Tommy Thomas. This method of supporting a candidate intrigued Mr. Secchia. Accordingly, he contacted his attorneys, Clary, Nantz, Wood & Van Orden regarding the legality of such expenditures. Counsel for Mr. Secchia informed him of the general state of confusion which existed in the election law since portions of the Federal election campaign laws had been found unconstitutional by the Supreme Court on January 30, 1976, in the case of Buckley v. Valeo, 424 U.S. 1 (1976). They further advised that the Federal Election Commission had only a 30-day period before its members would have to be selected by the President and approved by Congress so as to conform with the constitutional requirements. 1/

1/ The Federal Election law amendments of 1976 which satisfied these requirements did not become effective until May 11, 1976.

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Even though this state of confusion existed, Mr. Secchia decided that it was important that he and his wife undertake a limited independent campaign on behalf of the President. Thus, on May 10, 1976, Mr. Secchia informed Mr. John Holt, Midwestern Coordinator for the PFC, that:

"I'm sorry but it isn't working. I have decided to sever all ties with the President Ford Committee, and therefore . . . have destroyed the donor cards, and will forward no more contributions.

"The continual changing of course, the failure to return phone calls, the failure to release press on the previous blitzes, has convinced me that I must work independently -- on my own." (Exhibit A)

The next day, Mr. Secchia and his wife purchased local Michigan newspaper advertisements advocating the election of Mr. Ford. The cost of the advertising was \$1,752.17. Counsel for Mr. Secchia reported these expenditures to the Commission by telegram on May 13, 1976, by letter of May 14, 1976, and, thereafter, by filing an FEC Form 5 with the Commission setting forth such independent expenditures.

During the week prior to the Michigan primary, Mr. Secchia was in contact with Mr. David Mehney and Mr. Jay Van Andel of Grand Rapids regarding his advertisements and spoke generally with them about the subject of independent expenditures. An individual representing Mr. Kughn of Detroit, Michigan, also contacted Mr. Secchia regarding independent expenditures at this time. During these conversations, Mr. Secchia explained his understanding of this most difficult subject and suggested that they each contact their own attorneys. At no time was Mr. Secchia solicited by the PFC or its agents regarding the independent expenditures. The only contact he had with the PFC prior to his independent expenditures was a phone conversation in early May, 1976, with Mr. Holt regarding the use of PFC campaign material as copy for his independent advertising. Holt suggested that this approach not be followed and the conversation was terminated.

On May 15 and 16, 1976, President Ford visited Michigan to campaign for the primary. A very popular local Tulip Festival was being held near Grand Rapids making it impossible for the White House Advance Team to obtain sufficient hotel rooms to house the White House staff and travelling press. Because of his close personal relationship with the President, Mr. Secchia was asked the evening of May 13, 1976, to assist in housing the White House staff. Since this was not per se political activity and he had not mentioned his independent expenditures to any

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White House officials, Mr. Secchia decided that he could assist the Advance Team in locating housing. Eventually, rooms were provided in area homes. The Secchia family itself lodged several White House staff members, and he and his neighbors hosted a pot luck luncheon for the staff and working press. The President briefly attended this luncheon. Mr. Secchia advised that his independent activity was not discussed while the White House staff was in his home.

After the President's overwhelming victory in the Michigan Primary, a meeting was convened on May 21, 1976, in Washington to discuss the applicability of the Michigan strategy to California. Mr. Secchia was invited to attend and to discuss his scatter blitzer concept. After much deliberation, he decided to accept the invitation in order to determine if some of the past problems which had plagued the PFC would continue. At the meeting which was attended by senior campaign and White House officials, Mr. Secchia suggested an increased use of the "Scatter Blitzer" concept and a number of other political strategies, all of which were rejected. As a result, Mr. Secchia decided to continue working on his own. The topic of the Michigan victory and the upcoming California primary dominated the meeting; and according to Mr. Secchia, there was no discussion of the Ohio primary. This meeting further reinforced Mr. Secchia's earlier decision that he would have nothing more to do with the PFC. At no time were Mr. Secchia's independent expenditures discussed at this meeting.

On May 24, 1976, Mr. Secchia began to work on the formation of a registered political committee to be called the "Friends"; and on that day met with Mr. Jeff Davis. At this meeting, it was decided that Mr. Secchia would be the Chairman and Mr. Davis would be the Treasurer of this Committee. An FEC Form 1, the Statement of Organization, was filed with the Commission on June 1, 1976.

During the period from May 7, 1976, to approximately June 1, 1976, counsel for Mr. Secchia contacted the Commission on numerous occasions to seek guidance concerning Mr. Secchia's independent activity. During this time the amendments to the Federal Election law were being promulgated and contradictory advice was given to Mr. Secchia's counsel by FEC personnel. Of special significant in this regard is a letter from Mr. Hoffius, Counsel to Mr. Secchia, dated May 14, 1976, the morning after the White House had asked Mr. Secchia for assistance in obtaining housing, wherein he noted:

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The telegram and letter [regarding Secchia's expenditures] comply with both the old and new version of the Act. As you may have noted, the enclosed sections have been substantially changed. The following phrase was added to 2 USC 434(e):

". . . a certification whether such independent expenditure is made in cooperation, consultation, or concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate . . ."

It is our opinion that your prior disaffiliation with any authorized committee sufficiently removed the newspaper ads from being considered in cooperation, consultation, or concert, etc. Moreover, such independent expenditures are a "one-shot" affair and should not be tainted by subsequent support of or contact with the candidate. [Emphasis added] (Exhibit B)

The independent expenditures by the Friends, as noted in its FEC filings, were all made in connection with the June 2, 1976, Ohio primary save one expenditure for convention campaign buttons incurred in early August. Such expenditures amounted to approximately \$20,000.^{2/} According to Messrs. Secchia and Davis, as noted in Mr. Davis' statement to the Commission of November 20, 1976, none of the independent expenditures by the Friends were made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or authorized committee or their agents.

Although the Friends' final report to the Commission was not submitted until December 7, 1976, the committee's independent activity had ceased by mid-August, 1976. Mr. Secchia's contact with the President and the PFC, however, continued on a purely social basis except for a speech which he gave to a number of volunteers in Kansas City, a trip to Vail, Colorado after the convention to discuss with the Republican National Committee an RNC fundraiser and his advance activities the night before the general election.

^{2/} A number of the Committee's expenditures were mistakenly identified as independent expenditures on the Committee's final report filed on December 7, 1976. Specifically, the purchase of film footage for \$416.00 which was never utilized for any political purpose and the payment of legal fees which is an exempt expenditure.

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The only exchanges which Mr. Secchia had with the PFC regarding his independent expenditures save the previously mentioned conversation with Mr. Holt was a discussion with Mr. Morton's assistant, Mr. Kahle in May of 1976 and a conversation after the convention with Mr. Morton's successor, Mr. Baker. During both of these conversations, Mr. Secchia informed them of his past independent activities; Mr. Kahle offered no encouragement or appreciation for his activities and Mr. Baker specifically informed Mr. Secchia that because of FEC guidelines, they should have no further contact regarding the political campaign.

Requested Information

Your letter of December 7, 1976, suggests that certain factual information be submitted in order to demonstrate that no action should be taken against Mr. Secchia. Accordingly, the following responses are submitted to your questions:

1. A description of [Mr. Secchia's] duties and the dates and location of [his] involvement with the President Ford Committee on both a paid and volunteer basis.

As set forth above, Mr. Secchia functioned as a volunteer campaign worker and fundraiser for the PFC during the initial stages of the primary campaign. Prior to his disassociation in May, 1976, Mr. Secchia directed and organized the "Scatter Blitz" trips to Florida and Wisconsin. The PFC issued Secchia \$2,500 for "Scatter Blitz" expenses which he gave another volunteer for payment of expenses incurred in Wisconsin. Mr. Secchia was never paid for his political activity nor was he an employee of the PFC. Mr. Secchia's only other involvement with the PFC or its agents were meetings attended in Washington, D.C., in late May, 1976, and in Vail, Colorado, in late August, 1976. Finally, Mr. Secchia assisted the White House Advance Team on November 1, 1976, for the President's visit to Grand Rapids. At no time, according to Mr. Secchia, did he cooperate, consult, or work in concert with the PFC or its agents with regard to his or the Friends independent expenditures. Moreover, none of his or the Friends' independent expenditures were made at the request or suggestion of the President, the PFC or its agents.

2. The particulars, including dates, of the purpose to which all monies disbursed to [Mr. Secchia] by the President Ford Committee were put.

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The only monies disbursed to Mr. Secchia was the previously mentioned \$2,500.00 for "Scatter Blitzzer" expenses in Wisconsin.

3. The last date on which you received monies from the President Ford Committee.

Other than the \$2,500.00 disbursed to Mr. Secchia, \$1,500.00 additional was received from a PFC agent just prior to the general election. On approximately October 29, 1976, Mr. Bill Nicholson, who was the lead advanceman in Grand Rapids, gave Mr. Secchia \$1,500.00 for advance expenses incurred for the President's welcome home parade.

4. The first dates of any activity or meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

The only meeting of the Friends took place on May 24, 1976, which was attended by Messrs. Secchia and Davis. On June 1, 1976, the formal documents setting forth the committee's officers were executed and filed with the Commission.

5. Describe any meetings or contacts [Mr. Secchia] has with David Mehney, Richard P. Kughn, Richard DeVos, or Jay Van Andel, all of Grand Rapids, Michigan, regarding the election effort of President Ford.

Mr. Secchia had the following meetings or contacts with the following individuals:

- (a) David Mehney:

Mr. Mehney is a neighbor and close friend of Mr. Secchia's. Thus, they had numerous contacts regarding the election effort over the past year. The only contacts, however, regarding independent expenditures were between May 11 - 13, 1976;

- (b) Richard P. Kughn:

No contact at any time;

- (c) Richard DeVos:

No contact at any time;

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(d) Jay Van Andel:

The only contact with Mr. Van Andel was in May, 1976, regarding independent expenditures. As noted previously, Mr. Secchia advised Mr. Van Andel to seek counsel from his own attorney.

6. Did [Mr. Secchia] or any member of the Friends of the First Family Committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of [his] committee? If so, describe the nature of all such contacts.

In late August, 1976, Mr. Secchia attended the Republican convention as a spectator. His only activity in Kansas City involving the PFC was a speech he gave to a volunteer group called the "Presidentials" regarding his "Scatter Blitz" trips. All other subsequent contact with the President, the PFC, or their agents were social in nature save the previously mentioned advance activities at the end of October, 1976.

Applicable Law

Your letter of December 7, 1976, requests certain pertinent information from Mr. Secchia in order to demonstrate that no action should be taken by the Commission against him. The letter also states that your inquiry relates to the possible violation of Section 441a(a)(7)(B)(i) of Title 2, United States Code. This definitional section, administered and primarily enforced by the Commission, provides:

"(B)(i) expenditures made by any person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate." (Emphasis added).

The section was not incorporated into the Federal Election Campaign laws until the 1976 amendments were passed by Congress and signed into law by the President. The amendments did not become effective until May 11, 1976.

It is important to note at this juncture of your inquiry that this provision had no corresponding or specifically related counterpart provision under the Federal Election Campaign.

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Act Amendments of 1974 (P.L. 93-443). In fact, the only provision under the 1974 Amendments to the Federal Election Campaign Act of 1971, which addressed the question of independent expenditures was Section 608(e) of Title 18, United States Code, which provided:

"(e) Expenditure relative to clearly identified candidate.

(1) No person may make any expenditure (other than an expenditure made by or on behalf of a candidate within the meaning of subsection (c)(2)(B) relative to a clearly identified candidate during a calendar year which, when added to all other expenditures made by such person during the year advocating the election of defeat of such candidate, exceeds \$1,000.

(2) For purposes of paragraph (1) --

(A) "clearly identified" means --

- (i) the candidate's name appears,
- (ii) a photograph or drawing of the candidate appears; or
- (iii) the identity of the candidate is apparent by unambiguous reference."

Section 608(e) is the same provision of the 1974 amendments which the Court found fraught with vagueness in Buckley v. Valeo, *supra*. Thus, the Court noted in footnote 53 of its Buckley decision that an independent expenditure would be considered a contribution if the costs were incurred at ". . . the request or consent of the candidate or his agent". Citing the Senate Report regarding this provision, the Court further stated:

"The Senate Report addresses the issue in greater detail. It provides an example illustrating the distinction between "authorized or requested" expenditures excluded from §608(e)(1) and independent expenditures governed by §608(e)(1):

'[A] person might purchase billboard advertisements endorsing a candidate. If he does so completely on his own, and not at the request or suggestion of the candidate or his agent's [sic] that would constitute an 'independent expenditure on behalf of a candidate' under section 614(c) of the bill. The person

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making the expenditure would have to report it as such.

'However, if the advertisement was placed in cooperation with the candidate's campaign organization, then the amount would constitute a gift by the supporter and expenditure by the candidate--just as if there had been a direct contribution enabling the candidate to place the advertisement, himself. It would be so reported by both.' S. Rep. No. 93-689, p.18 (1974)"

Faced with this climate of vagueness and uncertainty, the Commission unanimously adopted on May 28, 1976, a "Policy Statement" on the subject of independent expenditures. This Policy Statement, received by counsel for Mr. Secchia during the third week of June, 1976, vastly expands the previously cited Court language and states:

"It is further the view of the Commission that expenditures made on behalf of a clearly identified candidate by or through any person who is, or has been, authorized to raise or expend funds; who is, or has been, an officer of an authorized committee of that candidate; or who is, or has been, received any form of compensation or reimbursement from the candidate, the candidate's committee or agent is presumptively not independent, see §109.1(b)(4) of the proposed regulations."

The Commission also noted in its release of May 28, 1976, regarding the Policy Statement that it was,

". . . being issued on an interim basis for guidance to candidates and committees pending final promulgation of the regulations".

The regulations, including this provision, were not published in the Federal Register as proposed regulations until August 25, 1976; and, to the Commissions' great chagrin, the regulations "died" before the 30-day statutory review period by Congress could elapse.^{3/}

^{3/} It is important to recognize that a quite legitimate argument can be made that for all practical purposes the Commission is without regulations at this time.

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The aforementioned historical review of this controversial provision is not presented to confuse the issue here, rather its purpose is to illustrate the state of confusion which existed at the time Mr. Secchia and the Friends undertook their independent expenditures. All independent expenditures according to Mr. Secchia and Mr. Davis, save the \$105.41 purchase of campaign buttons, were incurred prior to receipt of the Commission's Policy Statement on such expenditures. Accordingly, neither Mr. Secchia, the Friends, nor their counsel were aware of the presumption of non-independence established by the Commission in its guidelines or in its subsequent regulations. Moreover, as previously noted, the Commission itself had provided contrary advice on this subject to Mr. Secchia's counsel on a number of occasions.

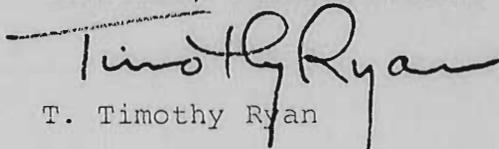
In sum, it is submitted that neither Mr. Secchia nor the Friends expended any monies independently on behalf of Mr. Ford's campaign which were in contravention of the Federal election campaign laws, regulations, or guidelines which were legally in force at the time such expenditures were incurred. Moreover, as previously stated, Mr. Secchia did not cooperate, consult, or work in concert with the President, the PFC, or its agents regarding any of his or the Friends independent expenditures and neither the President nor his principal campaign committee or agents requested or suggested at any time that such expenditures be undertaken.

Conclusion

Based on the facts presented herein and the applicable statutory provisions, it is hereby submitted that no action should be taken by the Commission regarding this matter. In addition, we request that this matter remain confidential in accordance with 2 USC Section 437g(a)(3).

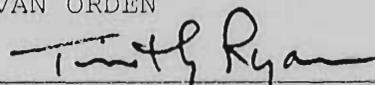
Sincerely,

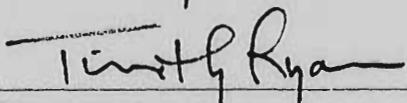
COUNIHAN, CASEY & LOOMIS


T. Timothy Ryan

COUNSEL FOR MR. SECCHIA:

CLARY, NANTZ, WOOD &
VAN ORDEN

for 
Leonard M. Hoffius, Jr.

for 
Steven Mulder

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78040032862

May 10, 1976
Mr. John Holt
Midwestern Coordinator
President Ford Committee
1328 L N.W.
Washington, D.C. 20036

Dear John:

I'm sorry but it isn't working. I have decided to sever all ties with the President Ford Committee, and, therefore...have destroyed the donor cards, and will forward no more contributions.

The continual changing of course, the failure to return phone calls, the failure to release press on the previous blitzes, has convinced me that I must work independently--on my own.

Your handling a man who means an awful lot to me and my family. Working through you, and your committee, has been a complete disaster. Since I have "maxed" out on contributions, and just about reached my maximum "assumption of expense", I feel that anything accomplished by me from this point on should be done in the Reagan fashion as an "independent and unauthorized" person.

I am already enjoying my new stature. Solicitor No. 9806 is now a member of the great silent majority. Sorry it didn't work, and we will all know next Tuesday just how bad it was.

Cordially,

Peter

PFS/jh
cc: Mr. Max Fisher

Exhibit A

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78040052863

May 14, 1976

PERSONAL AND
CONFIDENTIAL

Mr. Peter F. Scaccia
Universal Forest Products, Inc.
3153 Three Mile Road, N. E.
Grand Rapids, Michigan 49505

Dear Peter:

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78040052864
Inclosed are copies of a letter and the contents of a telegram sent to the Federal Election Commission. Also enclosed is a copy of several subsections of the new Act as provided by Senator Griffin's office. His office will forward the entire Act in a few days.

After our telephone conversation Thursday afternoon, Steve again called the Federal Election Commission to check on the question you raised concerning whether the Act should not apply because the sum spent at each newspaper was less than \$1,000.00, although totaling greater than \$1,000.00. They stated that the Act did apply to such a situation; and, they further advised that when within the fifteen day period before an election, reporting with the FEC should be by telegram and followed by a more complete FEC form or letter where appropriate. In order to be as safe as possible, Steve decided to send a telegram.

The telegram and letter comply with both the old and new versions of the Act. As you may have noted, the enclosed sections have been substantially changed. The following phrase was added to 2 USC 434(e):

". . . a certification whether such independent expenditure is made in cooperation, consultation or concert with or at the request or suggestion of any candidate or any authorized committee or agent of such candidate . . ."

Exhibit B

MM. Peter F. Secchia
May 14, 1976
Page Two

It is our opinion that your prior disaffiliation with any authorized committee sufficiently removed the newspaper ads from being considered in cooperation, consultation or concert, etc. Moreover, such independent expenditures are a "one-shot" affair and should not be tainted by subsequent support of or contact with the candidate.

Very truly yours,

Leonard M. Hoffius, Jr.

LMH/lmg
Enc.

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LAW OFFICES
COUNIHAN, CASEY & LOGGIS
1000 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036

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AIC-11



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

CERTIFIED
No. 489895
MAIL

CC # 1173
MUR 321

CLARY, NANTZ, WOOD & VAN ORDEN
ATTORNEYS AT LAW
700 COMMERCE BUILDING
GRAND RAPIDS, MICHIGAN 49503

SECTION
76 DEC 27 AM 10:15

December 20, 1976

JACK R. CLARY
RICHARD M. VAN ORDEN
PHILIP W. NANTZ
PHILIP F. WOOD
LEONARD M. HOFFIUS, JR.
RICHARD J. RANKIN
ROBERT W. WHITE
DONALD M. BAILEY
GREGORY G. PRASHER
THOMAS L. DRENTH
DAVID R. FERNSTRUM
STEPHEN J. MULDER
LEO H. LITOWICH

TELEPHONE 616 • 459-9487

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

764295

Attention: Ms. Carol Darr

Re: MUR 321 (76)
(Peter F. Secchia)

Dear Ms. Darr:

This letter is in response to the Federal Election Commission's letter dated December 7, 1976, and received by Mr. Secchia on December 11, 1976.

As attorneys for Mr. Secchia, please be advised we have retained Attorney T. Timothy Ryan, and the Washington, D.C. law firm of Counihan, Casey & Loomis, as co-counsel in this matter.

I am advised by Mr. Ryan that he spoke with you and with David Spiegle of your office on December 17, 1976, and advised of his retention in this matter.

This office has commenced assembling the extensive materials, information and documents requested; however, due to Mr. Ryan's temporary absence from Washington and the Christmas holidays, we find it impossible to comply with the ten day time limitation.

We will be meeting with Mr. Ryan the week of December 27 and will make a formal and appropriate response by December 31, 1976.

If this is not acceptable to you, please advise.

Very truly yours,

CLARY, NANTZ, WOOD & VAN ORDEN

Leonard M. Hoffius, Jr.

LMH/lmg
cc: Mr. David Spiegle
Mr. Peter F. Secchia
Mr. T. Timothy Ryan

730407:857

CLARY, NANTZ, WOOD & VAN ORDEN

ATTORNEYS AT LAW

700 COMMERCE BUILDING

GRAND RAPIDS, MICHIGAN 49503

CERTIFIED

No. 571763

MAIL

DEC 27 11 11 AM '78
FEDERAL ELECTION COMMISSION
1325 K STREET, N. W.
WASHINGTON, D.C. 20463

Attention: Ms. Carol Darr

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CLARY, NANTZ, WOOD & VAN ORDEN
ATTORNEYS AT LAW
700 COMMERCE BUILDING
GRAND RAPIDS, MICHIGAN 49503

CC 1160
MUR 321
x1622

DEC 27 10:22

December 20, 1976

TELEPHONE 616 • 459-9487

JACK R. CLARY
RICHARD M. VAN ORDEN
PHILIP W. NANTZ
PHILIP F. WOOD
LEONARD M. HOFFIUS, JR.
RICHARD J. RANKIN
ROBERT W. WHITE
DONALD M. BAILEY
GREGORY G. PRASHER
THOMAS L. DRENTH
DAVID R. FERNSTRUM
STEPHEN J. MULDER
LEO H. LITOWICH

~~761263~~

761263

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Attention: Ms. Carol Darr

Re: MUR 321 (76)
(Peter F. Secchia)

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If this is not acceptable to you, please advise.

Very truly yours,

CLARY, NANTZ, WOOD & VAN ORDEN

Leonard M. Hoffius, Jr.

LMH/lmg

cc: Mr. David Spiegle
Mr. Peter F. Secchia
Mr. T. Timothy Ryan

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CLARY, NANTZ, WOOD & VAN ORDEN

ATTORNEYS AT LAW

200 COMMERCIAL BUILDING

GRAND RAPIDS, MICHIGAN 49503

RECEIVED
MAY 19 1968

RECEIVED
MAY 19 1968

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

7874772877

file copy



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 07 1976

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

On the basis of information obtained in the normal course of our supervisory responsibilities, the Commission found reason to believe that you may have violated §441a(a)(7)(B)(i) of the Federal Election Campaign Act of 1971, as amended, which states that:

expenditure made by any person in cooperation, consultation, or concert, with, or at the request or suggestion, of a candidate, his authorized political committee or their agents shall be considered to be a contribution to such candidate.

Your prior relationship to the President Ford Committee and their disbursement of money to you causes reason to believe that your individual expenditures and those of the Friends of the First Family Committee may not have been independent within the meaning of §431(p). This finding is based on a review of the reports filed by you individually for independent expenditures, the President Ford Committee, and the Friends of the First Family Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material, such as copies of cancelled checks, receipts, or affidavits, which you believe will document the following:



FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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1. A description of your duties and the dates and location of your involvement with the President Ford Committee on both a paid and volunteer basis;

2. The particulars, including dates, of the purposes to which all monies disbursed to you by the President Ford Committee were put;

3. The last date on which you received monies from the President Ford Committee;

4. The first dates of any activity of meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

5. Describe any meetings or contact you may have had with David Mehney, Richard P. Kughn, Richard DeVos, or Jay Van Andel, all of Grand Rapids, Michigan, regarding the election effort for President Ford;

6. Did you or any member of the Friends of the First Family committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of your committee? If so, describe the nature of all such contacts.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Carol Darr (telephone no. 202/382-4041), the attorney assigned to this matter.

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.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

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66 321

SALES TAX TIME MAIL 24
RETURN TO SENDER
YOUR MAILBOX MAY BE OPENED BY THE POST OFFICE TO VERIFY DELIVERY INFORMATION

● **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... YZ 65¢
- RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Peter Bentia

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

1938/32

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

[Signature]

DATE OF DELIVERY

12-11-76

5. ADDRESS (Complete only if requested)

2833 Bunnell

6. UNABLE TO DELIVER BECAUSE:

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DEC 11 1976
ST. LOUIS, MO.

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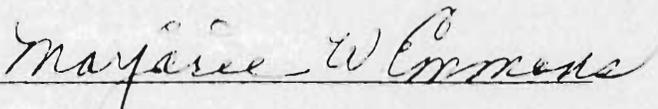
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Peter Secchia)

MUR 321 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 2, 1976, the Commission determined by a vote of 4-0 that there was reason to believe a violation of §441a(a)(7)(B)(i) had been committed in the above-captioned matter. Commissioners Staebler and Tiernan were not present at the time of the vote.


Secretary to the Commission

79040113730
79040032871

December 2, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS *MJE. by mee*
RE: MUR 319 (76); MUR 321 (76); and MUR 332 (76)

The above mentioned MURs were transmitted to the Commissioners on November 30, 1976 at 3:30 p.m.

All three MURs have received objections.

MURs 319 (76) and 321 (76) have been placed on the Compliance Agenda for the meeting on December 2, 1976.

MUR 332 (76) has been placed on the Compliance Agenda for the meeting on December 8, 1976.

7 9 0 4 0 1 1 3 7 3 0 1
7 3 0 4 0 0 5 2 8 7 ;

Murphy
MUR 321 (76)

NO.

10/1/76

DATE AND TIME OF TRANSMITTAL: NOV 30 1976

3:30

REC'D:

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Initiated internally

Respondent's Name: Peter Secchia

Relevant Statute: §411a(a)(7)(B)(i)

Internal Reports Checked: reports filed by PFC, Secchia & Friends of First Family

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

Mr. Secchia's prior relationship with the PFC and their disbursement of money to him constitute reason to believe that his subsequent expenditures were not independent. Peter Secchia received \$7,500 in disbursements from the PFC, the last of which occurred on May 4, 1976 for \$5,000. One week later, on May 11, 1976 Secchia placed \$1,572.17 worth of newspaper ads in Michigan "independently." Three weeks after the \$5,000 disbursement, Secchia reported to the Federal

PRELIMINARY LEGAL ANALYSIS (See continuation sheet)

Secchia's independent "expenditures", both individually and as chairman of "Friends of the First Family," within a month after he received \$5,000 from the PFC causes reason to believe that his expenditures may have been "in cooperation, consultation, or concert, with, or at the request or suggestion of a candidate, his authorized political committees, or their agents," and thus considered a contribution to the candidate. Such a contribution would place Secchia in excess of his \$1,000 limitation, which he had already contributed.

RECOMMENDATION

Reason to believe violation of §411a(a)(7)(B)(i); send attached letter.

Date of Next Commission Review: _____

CONTINUATION SHEET

SUMMARY OF ALLEGATION

Election Commission as Chairman of the "Friends of the First Family," an "independent" committee which has spent approximately \$43,000.

Mr. Secchia had already contributed up to his \$1,000 limit.

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Peter Secchia
2833 Bonnell, S.E.
Grand Rapids, Michigan 49506

Re: MUR 321 (76)

Dear Mr. Secchia:

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Your prior relationship to the President Ford Committee and their disbursement of money to you causes reason to believe that your individual expenditures and those of the Friends of the First Family Committee may not have been independent within the meaning of §431(p). This finding is based on a review of the reports filed by you individually for independent expenditures, the President Ford Committee, and the Friends of the First Family Committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal material, such as copies of cancelled checks, receipts, or affidavits, which you believe will document the following:

1. The particulars, including dates of the purposes to which all monies disbursed to you by the President Ford Committee were put;



2. The last date on which you have received monies from the President Ford Committee;

3. The first date of any activity or meeting by the Friends of the First Family Committee, including any activity before Committee filed with the Federal Election Commission.

4. Describe your relationship with David Mehney, Richard P. Kughn, Richard DeVos, or Jay Van Andel, all of Grand Rapids, Michigan. Have you met with them or had any contact with them regarding the election effort for President Ford.

5. Did you or any member of your committee have any contact with individuals associated with President Ford, his authorized committees or agents, at any time subsequent to the formation of your committee? If so, describe the nature of all such contacts.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Carol Darr (telephone no. 202/382-4041), the attorney assigned to this matter.

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.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

780400387



FEDERAL ELECTION COMMISSION

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

October 1, 1976

MEMORANDUM

TO: Al Keema
FROM: Ernest Swiger *ES*
Ronald Krouse *RK*
SUBJECT: Analysis of 434(e) Filers Supporting Ford

In the course of analyzing the reports of both the 434(e) filers in support of President Ford and the reports of the PFC, we have noticed that Mr. Peter Secchia has been active in several capacities. We have found that Mr. Secchia has received compensation of \$7,500 from the PFC, as well as made independent expenditures of \$1,752. Further, as Chairman of the Friends of the First Family, he has supervised the receipt and expenditure of \$43,000 by this unauthorized committee. This activity raises questions about the status of Mr. Secchia's "independence," as well as that of the unauthorized Friends of the First Family committee.

The significant element in what will be described below is the fact that on three occasions Mr. Secchia received payments or reimbursements from the PFC. On March 27, he received a payment of \$2,500 for "Other," which according to the PFC Schedule B printout was itemized on Line 20, "Operating Expenditures." On the same day, he received a \$2,500 advance which was listed on the printout as Schedule B, line 22, "Fundraising Expenditures." This entry appeared as follows:

Advance - State Fund	\$2,500 CR
Advance - State Fund	\$2,500

Both of these payments are in the May 10, 1976 report. In the June 10 report, Mr. Secchia received a \$2,500 advance for "Travel and Related Expenditures" on May 4. This was listed as a line 20 expenditure.

73040051381



May 11

Secchia

Midland Daily News
Lansing State Journal
Flint Journal

McHenry

Flint Journal
Lansing State Journal
Jackson Citizen Patriot

McHenry reported that
he shared the cost of
the Flint and Lansing
ads with Secchia.

May 16

Kuehner

7374005
Battle Creek
Grand Rapids

May 17

Kuehner

83
Greenville
Ionia
Seaton Harbor
Port Huron
Petoskey
Kalamazoo
Mount Pleasant
Cadillac

May 17

De Vos and Vanden

Ann Arbor
Bay City
Flint
Grand Rapids
Jackson
Kalamazoo
Muskegon
Saginaw
Detroit
Midland
Traverse City
Holland
Sault St. Marie
Lansing

These ads
also appeared
in these papers
on May 15

December 17, 1976

DEC 23 11 1:07

Mr. Vernon M. Thomson, Commissioner
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: RAS0262BF

Dear Commissioner Thomson:

It is regretted that the enclosed reports could not be submitted earlier. While our initial reports were all timely filed, we were advised subsequent to their submission that the Commission's system had been computerized. Since our reports included some information with overlapping dates, it was necessary for us to re-do our July 10 Quarterly Report and our Termination Report. These are herewith enclosed.

It has always been our desire to be cooperative and in total compliance with the spirit and letter of the Law. Indeed, as our reports list, over \$1,600 was invested by us in legal counsel to be as certain as possible that we complied fully. However, since the Friends of the First Family Committee was dissolved on September 23, 1976, I have not had funds for legal advice or assistance.

Because of the above, and the need to conduct my own personal business and the lack of FEC forms until after November 10, these reports are delayed. My sincere apologies accompany this letter.

I have studied the reporting instructions conscientiously and am confident that our reports are now in the order which your staff has requested. In fact, except for a couple of minor instances of misunderstanding, our original reports were factually correct. Your staff has been helpful in pointing out how we could be most accurate, and the enclosed reports now reflect changes or amendments in those few spots where we had not fully comprehended instructions or misinterpreted information previously.

Our first report should stand as filed (the 30th day report following the primary election of 6/8/76 in the state of Ohio, covering the period from May 27 through June 28.)

Our two subsequent reports are superseded by the enclosed. Those earlier reports from us, the July 10 report & our first termination report, should therefore be destroyed; since those herewith contain the same information, essentially, except in the form directed by your staff and in proper form for computerization without overlapping of dates.

I trust that this satisfactorily clears up all prior questions. Thank you for your patience and consideration; and should further information be needed, I shall attempt to respond promptly.

Sincerely,

J. Edgar Davis

7304003138

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

RECEIVED
 FEDERAL ELECTION
 COMMISSION

NOV 22 1976 1:07

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed</p> <p>Friends of the First Family Committee</p> <p>(b) Address (number and street)</p> <p>Box 504</p> <p>(c) City, State and ZIP code</p> <p>Rockford, MI 49341</p>	<p>2 Identification Number</p> <p>C00022590</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election?</p> <p>Ohio Primary on 6/8/76</p> <p style="font-size: small;">(general, primary, runoff) (date)</p> <p>(e) <input type="checkbox"/> January 31 Year End Report</p> <p>(f) <input type="checkbox"/> Monthly Report (Month)</p> <p>(g) <input type="checkbox"/> Termination Report</p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input checked="" type="checkbox"/> Amendment For July 10 (Which report) (c) <input checked="" type="checkbox"/> July 10 Quarterly Report</p> <p>(b) <input type="checkbox"/> April 10 Quarterly Report (d) <input type="checkbox"/> October 10 Quarterly Report</p> <p>(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____</p> <p style="font-size: small;">(primary, general or convention) (date)</p> <p>(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____</p> <p style="font-size: small;">(primary, general or convention) (date)</p>	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From **June 29** Through **June 30, 1976**

	Column A This Period	Column B Calendar Year-To-Date
Section A - Cash Balance Summary		
6 Cash on hand January 1, 1976		\$ --
7 Cash on hand at beginning of reporting period	\$ 3,881.36	
8 Total receipts (from line 19)	\$ None	\$ 28,665.00
Subtotal (Add lines 7 and 8)	\$ 3,881.36	\$ 28,665.00
9 Total expenditures (From line 25)	\$ None	\$ 24,783.64
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 3,881.36	\$ 3,881.36
11 Contributed items on hand to be liquidated (attach itemized list)		\$ None

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

Jeff B. Davis
 (Typed Name of Treasurer or Candidate)

Jeff B. Davis
 (Signature of Treasurer or Candidate)

November 20, 1976
 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

For further information Contact:



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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures (Page 2)

Name of Candidate or Committee	REPORT COVERING THE PERIOD FROM: June 29 TO: June 30, 76	
	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	\$	None
(b) Unitemized	\$	None
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions and other income	\$	None
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	None
(b) Unitemized	\$	None
(c) Subtotal of loans and loan repayments received	\$	None
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$	None
(b) Unitemized	\$	None
(c) Subtotal of refunds, rebates, returns	\$	None
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	None
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	None
(c) Subtotal of transfers in	\$	None
19 Total Receipts	\$	\$ 17,665.00
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	None
(b) Unitemized	\$	None
(c) Subtotal of operating expenditures	\$	None
21 Independent Expenditures (use Schedule E)	\$	None
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	None
(b) Unitemized	\$	None
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	None
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	None
(b) Unitemized	\$	None
(c) Subtotal of fundraising expenditures	\$	None
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	None
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	None
(c) Subtotal of transfers out	\$	None
25 Total Expenditures	\$	\$ 19,758.61
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	None
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	6,099.38
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	None
29 Transfers In (from line 18(a))	\$	None
30 Net Receipts (Subtract line 29 from line 28)	\$	None
31 Total Expenditures (from line 25)	\$	None
32 Transfers out (from line 24(a))	\$	None
33 Net Expenditures (Subtract line 32 from line 31)	\$	None

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 15 and 18.

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

Name of Candidate or Committee in full Friends of the First Family		
Full Name, mailing address and ZIP code Civic Trust 80, Santa Fe Employees Good Gov't Fund 80 East Jackson Street Chicago, IL 60604	Date (month, day, year) 6/28/76	Amount of each receipt this period previous period. \$500.00 previously reported.
Principal place of business See attached memo of explanation.	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code National Steel Political Action Fund, H. A. Lidtke, Treas. 2800 Grant Building Pittsburgh, PA 15219	Date (month, day, year) 6/7/76	Amount of each receipt this period previous period. \$500.00 previously reported.
Principal place of business See attached memo of explanation.	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$ 500.00		
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed	
Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional) ▶		\$
previous Total this period (last page this line number only) ▶		\$ 1,000.00

Memo of explanation concerning items in attached Schedule A:

This is to amend an entry which appeared in our initial report covering the period May 27-June 28, 1976.

It has been brought to our attention by the Federal Election Commission that two receipts previously listed by us as "Contributions" on Line 15 of FEC Form 3 should properly have been reported as "Transfers in" on Line 18.

We have therefore made that adjustment herein.

On the Detailed Summary Schedule of Receipts & Expenditures (Page 2) of FEC Form 3, we have reduced Line 15 by \$1,000 from the previously reported \$18,665.00 to a corrected \$17,665.00, and we have increased Line 18 from the previously reported None to \$1,000.00. This covers the two contributions of \$500 each from the groups listed on the attached.

Please note: Total receipts remain at \$28,665.00 for this period, since this does not represent a new receipt but only a correction in previous reporting, as explained above and advised by the Commission.

730417033

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 20

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Insight, Inc.
P. O. Box 585
Rockford, MI 49341

Purpose of Expenditure

Please see attached
sheet for amendment
to our initial report
covering May 27-June 28.

Date (month,
day, year)

Amount of each expendi-
ture this period

(Not appli-
cable)

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Subtotal of expenditures this page (optional) ▶

\$

Total this period (last page this line number only) ▶

\$

79040110763

Memo of explanation regarding attached Schedule B;

This is to amend an item which appeared in our initial report covering the period May 27-June 28, 1976.

In this report, it was erroneously stated in Paragraph 2. of a listing of expenditures for space in newspapers that an advertisement had been placed in the Newark Advocate, Newark, New Jersey, on the dates of June 4 and 7. New Jersey should be changed to read correctly as the Newark Advocate, Newark, Ohio.

The dates and amounts were correctly stated, but no ads were placed in newspapers in New Jersey by this committee at any time.

7974775183

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3**

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 26

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

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
Friends of the First Family				
Full Name, mailing address and ZIP code, and nature of obligation Peter F. Secchia 2833 Bonnell, SE Grand Rapids, MI 49506	Date (month, day, year) 5/27/76	\$ \$5,000 loan	\$ None	\$ \$5,000.00
Full Name, mailing address and ZIP code, and nature of obligation Insight, Inc. P.O. Box 585 Rockford, MI 49341	Date (month, day, year) 6/25/76	\$ \$1,099.38	\$ None	\$ \$1,099.38
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)		\$ 6,099.38	\$	\$ 6,099.38
Carry outstanding balance only, to appropriate line of summary.				

November 20, 1976

Under penalty of perjury, I certify that the expenditures reported herein, all of which were independent, were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution or republication in whole or in part of any broadcast or any written, graphic or other form of campaign materials prepared by the candidate, his campaign committee or their agents.

[Signature]
Treasurer
Friends of the First Family
Rockford, Michigan

STATE OF MICHIGAN } SS
COUNTY OF KENT }
SUBSCRIBED AND SWORN TO BEFORE ME
THIS 17TH DAY OF DEC. 1976
[Signature]
Notary Public, Kent County, Mich.
My commission expires Feb. 26, 1979.
COMMISSION EXPIRES

7 9 0 4 0 0 3 3 8

Report of Receipts and Expenditures for a Candidate or Committee Supporting any Candidate(s) for Nomination or Election to Federal Office

FEDERAL ELECTION COMMISSION
 RECEIVED

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

<p>1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed</p> <p style="font-size: 1.2em; font-weight: bold;">Friends of the First Family</p> <p>(b) Address (number and street) P. O. Box 504</p> <p>(c) City, State and ZIP code Rockford, MI 49341</p>	<p>2 Identification Number C00022590</p> <p>3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If "Yes," for which election? <u>Ohio Primary</u> on <u>6/8/76</u> <small>(general, primary, runoff) (date)</small></p>
<p>4 Type of Report (Check appropriate box and complete, if applicable)</p> <p>(a) <input checked="" type="checkbox"/> Amendment For <u>termination</u> (c) <input type="checkbox"/> July 10 Quarterly Report <small>(Which report) (date)</small></p> <p>(b) <input type="checkbox"/> April 10 Quarterly Report (d) <input type="checkbox"/> October 10 Quarterly Report</p> <p>(e) <input type="checkbox"/> January 31 Year End Report (f) <input type="checkbox"/> Monthly Report <small>(Month)</small></p> <p>(g) <input checked="" type="checkbox"/> Termination Report</p> <p>(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ <small>(primary, general or convention) (date)</small></p> <p>(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ <small>(primary, general or convention) (date)</small></p>	

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From July 1, 1976 Through September 23, 1976.

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
6 Cash on hand January 1, 1976		\$ None
7 Cash on hand at beginning of reporting period	\$ 3,881.36	
8 Total receipts (from line 19)	\$ 4,745.18	\$ 33,410.18
(a) Subtotal (Add lines 7 and 8)	\$ 8,626.54	\$ 33,410.18
9 Total expenditures (From line 25)	\$ 8,626.54	\$ 33,410.18
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ None	\$ None
11 Contributed items on hand to be liquidated (attach itemized list)	\$	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$	\$
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.

Jeff E. Davis
(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

December 7, 1976
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or 5441j. (See reverse side of form)

For further information contact: Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Any information reported herein may not be copied for sale or use by any person for purpose of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures
 (Page 2)

Name of Candidate or Committee Friends of the First Family	REPORT COVERING THE PERIOD FROM: July 1 TO: Sept 28 '76	
	Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS		
15 Contributions and other Income:		
(a) Itemized (use Schedule A)	\$ 3,675.00	
(b) Unitemized	\$ 55.00	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions and other income	\$ 3,730.00	\$ 21,395.00
16 Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$ --	
(b) Unitemized	\$ --	
(c) Subtotal of loans and loan repayments received	\$ --	\$ 10,000.00
17 Refunds, Rebates, Returns Received:		
(a) Itemized (use Schedule A)	\$ 1,015.18	
(b) Unitemized	\$ --	
(c) Subtotal of refunds, rebates, returns	\$ 1,015.18	\$ 1,015.18
18 Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$ --	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$ --	
(c) Subtotal of transfers in	\$ --	\$ 1,000.00
19 Total Receipts	\$ 4,745.18	\$ 33,410.18
PART II - EXPENDITURES		
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
21 Independent Expenditures (use Schedule E)	\$ 3,253.14	\$ 23,011.78
22 Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$ 5,077.50	
(b) Unitemized	\$ --	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 5,077.50	\$ 10,102.50
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
24 Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$ --	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$ 295.90	
(c) Subtotal of transfers out	\$ 295.90	\$ 295.90
25 Total Expenditures	\$ 8,626.54	\$ 33,410.18
PART III - DEBTS AND OBLIGATIONS		
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$ --	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
28 Total Receipts (from line 19)	\$	
29 Transfers In (from line 18(a))	\$	
30 Net Receipts (Subtract line 29 from line 28)	\$	
31 Total Expenditures (from line 25)	\$	
32 Transfers out (from line 24(a))	\$	
33 Net Expenditures (Subtract line 32 from line 31)	\$	

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see Instructions on back)

Page 1 of 1 for

LINE NUMBER 15

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

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
Friends of the First Family Full Name, mailing address and ZIP code Thomas S. Fox 83 Monroe, NW Grand Rapids, MI 49502 Principal place of business Fox Jewelers Grand Rapids, MI Occupation Executive Vice President <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 450.00		8/13/76	\$ 50.00
Full Name, mailing address and ZIP code Peter M. Wege 2754 Pioneer Club Road, SE Grand Rapids, MI 49506 Principal place of business Steelcase, Inc. 1120 36th St., SE Grand Rapids, MI 49506 Occupation Exec. Corporate Secretary <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 125.00		7/1/76 8/13/76	\$100.00 25.00
Full Name, mailing address and ZIP code Peter C. Cook 2660 28th Street, SE Grand Rapids, MI 49506 Principal place of business Import Motors, Limited Grand Rapids, MI Occupation President <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000.00		8/13/76	\$1,000.00
Full Name, mailing address and ZIP code Mrs. Peter C. Cook 152 Osceola Drive, SE Grand Rapids, MI 49506 Principal place of business Occupation Homemaker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000.00		8/13/76	\$1,000.00
Full Name, mailing address and ZIP code Louise S. Keeler 2525 Indian Trail Road, SE Grand Rapids, MI 49506 Principal place of business Occupation Homemaker <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 1,000.00		9/17/76	\$1,000.00
Full Name, mailing address and ZIP code Edsko Hickman P.O. Box 174 Spring Lake, MI 49456 Principal place of business Occupation Retired <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$ 500.00		9/28/76	\$ 500.00
Subtotal of receipts this page (optional)		▶	\$ 3,675.00
Total this period (last page this line number only)		▶	\$ 3,675.00

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 1 for

LINE NUMBER 17

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

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
Friends of the First Family		8/3/76	\$1015.18
Full Name, mailing address and ZIP code Insight Advertising & Public Relations PO Box 585 Rockford, MI 49341			
Principal place of business	Occupation		
Above	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
.	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
.	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
.	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
.	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code			
Principal place of business	Occupation		
.	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional) ▶			\$
Total this period (last page this line number only) Attached memo explains rebate. ▶			\$ 1,015.18

Schedule B

July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Unitemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 22

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Peter F. Secchia
 3153 Three Mile Road, NE
 Grand Rapids, MI 49505

Purpose of Expenditure

Loan repayment
 including interest

Date (month,
 day, year)

8/13/76
 9/28/76

Amount of each expendi-
 ture this period

\$3,037.50
 2,040.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
 day, year)

Amount of each expendi-
 ture this period

Subtotal of expenditures this page (optional) ▶ \$5,077.50

Total this period (last page this line number only) ▶ \$5,077.50

Schedule B

July 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 24

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

Name of Candidate or Committee in full

Friends of the First Family

Full Name, mailing address and ZIP code

Sawyer for Congress Committee
 549 Ottawa, NW
 Grand Rapids, MI 49502

Purpose of Expenditure

To liquidate balance of Committee funds & support Harold Sawyer, Repub. candidate for Congress, Mich. 5th Dist.

Date (month, day, year)

9/28/76

Amount of each expenditure this period

\$ 295.90

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (optional) ▶ \$ 295.90

Total this period (last page this line number only) ▶ \$ 295.90

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Debts and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3**

Page 1 of 1 for

LINE NUMBER 27

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

(see instructions on back)

Name of Candidate or Committer in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Friends of the First Family				
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Peter F. Secchia 2833 Bonnell, SE Grand Rapids, MI 49506	9/28/76	\$5,000 loan plus interest	5,000.00 plus int.	-0-
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Insight, Inc. P. O. Box 585 Rockford, MI 49341	9/23/76	\$1,099.38	1,099.38	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)	\$	\$	\$
Subtotals this period this page (optional)		\$ 6,099.38	\$ 6,099.38	\$ -0-
Total this period (last page this line number only)		\$ 6,099.38	\$ 6,099.38	\$ -0-

Carry outstanding balance only, to appropriate line of summary.

**Itemized Independent Expenditures
 for Line 21 F.E.C. Form 3**

(See reverse side for instructions)

Name of Candidate or Committee in full Friends of the First Family	Id. No. C00022590
Full Name, mailing address and ZIP code P.O. Box 504 Rockford, MI 49341	Is This a Separate Report by a Committee Filing on FEC Form 3A? <u>NO</u>

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year

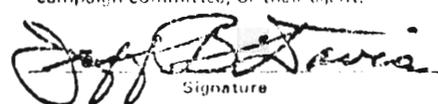
Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
WOTV, Time-Life Broadcast 120 College, SE Grand Rapids, MI 49502	Purchase of film print footage of G.R. Ford, for possible TV use. (Later lost & not used)	9/23/76	\$416.00	In support of Gerald R. Ford for Pres. of US
Clary, Nantz, Wood & Van Orden, Attorneys at Law 700 Commerce Building Grand Rapids, MI 49502	Legal services for filing of required reports, advice, etc.	7/30/76	\$1,632.35	In support of Gerald R. Ford for Pres. of US
Harry A. Baker Co. 1110 Monroe, NW Grand Rapids, MI 49503	Campaign buttons	9/7/76	\$105.41	In support of Gerald R. Ford for Pres. of US
Insight Advertising & Public Relations CP.O. Box 585 Rockford, MI 49341	Newspaper ad production costs	9/23/76	\$1,099.38	In support of Gerald R. Ford for Pres. of US

(a) Subtotal of Itemized Independent Expenditures	\$ 3,253.14
(b) Subtotal of Unitemized Independent Expenditures	\$ ---
(c) Total Independent Expenditures	\$ 3,253.14

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 17TH day of DEC, 19 76.
 My Commission Expires _____

 NOTARY PUBLIC


 Signature

December 7, 1976
 Date

GRAND RAPIDS,
DEC 20
MI 495

GRAND RAPIDS,
DEC 20
PM
MI 495

GRAND RAPID
DEC 20
PM
1976
MI 495

POSTAGE WILL BE PAID BY ADDRESSEE
POSTAL SERVICE
PERMIT NO. 13
GRAND RAPIDS, MI 495

11:07



INSIGHT, INC.

Mr. Vernon W. Thomson
Commissioner
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

78040052901



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 321

Date Filmed 7/25/79 Camera No. --- 2

Cameraman JPC

1-9-8-10-11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100