



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF TCR # 503

Date Filmed _____ Camera No. --- 2

Camera No. _____

70040094100

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FEDERAL ELECTION COMMISSION
1125 K STREET NW
WASHINGTON, D.C. 20461

THIS IS THE END OF TCR # 503

Date Filmed 2/5/79 Camera No. --- 2

Operator GPC

70040094100

70040094100

FEDERAL ELECTION COMMISSION

Memo to OGC from Tom Hazelhurst

Memo to WCO from Anne Weissenborn

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

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

Signed Anne Weissenborn
date 1/12/79

FEC 9-21-77

79040094101



FEDERAL ELECTION COMMISSION

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

January 11, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
1750 Old Meadow Road
McLean, Virginia 22101

Re: MUR 503

Dear Mr. Heckman:

This is to inform you that the Federal Election Commission has voted to close the file in MUR 503.

Sincerely,

A handwritten signature in cursive script that reads "William C. Oldaker".

William C. Oldaker
General Counsel

cc: Thomas M. Davis III, Esquire

79040394102

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
1750 Old Meadow Road
McLean, Virginia 22101

Re: MUR 503

Dear Mr. Heckman:

This is to inform you that the Federal Election
Commission has voted to close the file in MUR 503.

Sincerely,

William C. Oldaker
General Counsel

cc: Thomas M. Davis III, Esquire

79040094103

AW
i/x/79

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Fund for a Conservative) MUR 503
Majority)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 5, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated December 26, 1978, regarding the above-captioned matter:

1. Send the letter to the Committee attached to the above-named report.
2. Close the file in this matter.

Voting for this determination were Commissioners Aikens, Springer, Tiernan, McGarry, and Harris.

Attest:

1/5/79
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 1-2-79, 2:45
Circulated on 48 hour vote basis: 1-3-79, 11:00

79040094101

January 2, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: NUR 503

Please have the attached General Counsel's Report
on NUR 503 distributed to the Commission on a 48 hour
tally basis.

Thank you.

79040094105

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
)
The Fund for a Conservative)
Majority)

79 JAN 2 P 2: 46
MUR 503

GENERAL COUNSEL'S REPORT

On May 17, 1978, the Commission found reasonable cause to believe that the Fund for a Conservative Majority ("the Committee") had violated 2 U.S.C. § 434b(9) and (13) by failing to identify, as independent, expenditures totaling \$39,655.26 made on behalf of the candidacy of Ronald Reagan and also that the Committee had violated 2 U.S.C. § 434(b)(2) by failing to report occupations and principal places of business of 53.5% of its itemizable contributors during the 1976 campaign. The Commission also voted to merge non-filer violations of this Committee with MUR 503 and to incorporate these violations into the proposed conciliation agreement. A proposed conciliation agreement was sent to the Committee and negotiations ensued. During the conciliation period, the Committee filed all missing monthly reports and also submitted information concerning the occupations and principal places of business for 39 additional contributors, thereby reducing its failure rate to 37.5%. Unsuccessful attempts were made to reach the remaining itemizable contributors.

The conciliation process also resulted in a revised conciliation agreement which was signed by the Committee on October 31, 1978, and approved by the Commission on November 21, 1978. This agreement provided for payment by the Committee of a \$3,000 civil penalty and for the submission by the Committee of amendments to its reports

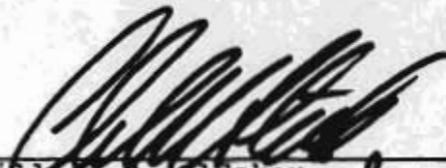
7 2 0 0 1 0 9 1 1 0 5

incorporating the newly acquired information on occupations and principal places of business of contributors cited above. Both a check for \$3,000 and the required amendments have now been submitted.

Recommendations

1. Send the attached letter to the Committee.
2. Close the file in this matter.

26 December 1978
Date



 William C. Oldaker
 General Counsel *for WCU*

Attachments:

Letter to Heckman

7 9 0 1 0 0 9 4 1 0 7



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
1750 Old Meadow Road
McLean, Virginia 22101

Re: MUR 503

Dear Mr. Heckman:

This is to inform you that the Federal Election Commission has voted to close the file in MUR 503.

Sincerely,

William C. Oldaker
General Counsel

cc: Thomas M. Davis III, Esquire



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS
DATE: DECEMBER 18, 1978
SUBJECT: MUR 503 - Interim Conciliation Report
dated 12-12-78: Signed by GC
12-14-78; Received in OCS
12-15-78, 10:25

The above-named document was circulated on a 24
hour no-objection basis at 3:00, December 15, 1978.

The Commission Secretary's Office has received
no objections to the Interim Conciliation Report as of
4:00 this date.

70040094100

December 15, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa S. Carr
SUBJECT: MUR 503

Please have the attached Interim Council Report on
MUR 503 distributed to the Commission.

Thank you.

79040094110

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

December 12, 1978 78 DEC 15 A10: 25

In the Matter of)
)
)
Fund for a Conservative Majority }

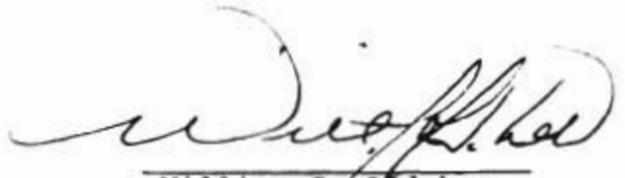
MUR 503

INTERIM CONCILIATION REPORT

79040094111

On November 21, 1978, the Commission voted to approve the revised conciliation agreement which had been signed by the Fund for a Conservative Majority ("the Committee"). One of the provisions of this agreement is that the Committee is to file an amended report within thirty days of the date the agreement was approved by the Commission, such report to show the name, address, amount of contribution(s), occupation and principal place of business of each contributor for whom the last two items of information have not yet been supplied by the Committee. The Committee has been informed that we expect to receive this amended report on or before December 21, 1978. Upon receipt of this report and assuming its adequacy, we will recommend that the file in this matter be closed.

12/14/78
Date



William C. Oldaker
General Counsel



600# 5908

THE FUND FOR A CONSERVATIVE MAJORITY

Political Director
Kenneth F. Boehm, Esq.

December 15, 1978

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

Re: MUR 503 (78)

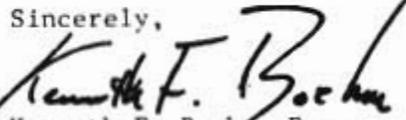
Dear Mrs. Weissenborn,

In accord with the provisions of the Conciliation Agreement in this case, I have prepared an amended report (enclosed) containing contributor information. The information is in the form prescribed by the July 1977 FEC memo to committee treasurers entitled "Submission of Comprehensive Amendments."

Letters were sent to all contributors for whom we lacked the required information. A sample of the letter is enclosed. To further encourage a response, individualized, addressed, postpaid, postal reply cards were made up for each contributor. Photocopies of the cards were enclosed in a letter sent to your office on August 22, 1978 by our attorneys. We will keep the post cards in our files if further verification is needed.

Five of the letters sent to contributors were returned by the post office as undeliverable. Copies of those letters are also in with our August 22 letter and the originals are likewise on file at our office.

Thank you for the professional and courteous manner in which your office has treated us in regard to this matter. Please contact me if there is anything further which must be completed.

Sincerely,

Kenneth F. Boehm, Esq.

cc: FCM Board
Sedam & Herge
enclosures

Chairman
Ron Robinson

Directors
John S. Buckley

Frank J. Donatelli

Jeffrey D. Kane

Robert Heckman

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THE FUND FOR A CONSERVATIVE MAJORITY

July 12, 1978

Mr. Ralph Stewart
Wall Street #1717
Seattle, WA 98121

Dear Mr. Stewart:

As you may know, the Federal Election Commission requires committees such as ours to request certain information from our contributors, i.e., address, occupation, and principal place of business.

Most often, however, our contributors neglect to provide any information beyond address; or else, we sometimes fail to transcribe accurately this information from the contribution envelope.

The Federal election laws require that we make a good faith effort to obtain this information. Recently the FEC has asked us to try to complete information on occupation and principal place of business that we omitted in some previous reports.

Accordingly, we are asking you to complete the enclosed postcard and return it as soon as possible listing your occupation and principal place of business. Whether by your choice or our mistake, we did not obtain this information when you made your generous contribution to us in August of 1976.

Thanks again for your tremendous support for our efforts. It is deeply appreciated.

Yours,

John S. Buckley
John S. Buckley
Executive Director

Enclosure

70040094113

Chairman
Ron Robinson

Executive Director
John S. Buckley

Directors
Frank J. Donatelli

Jeffrey D. Kane

Robert Heckman

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

APRIL REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

4/29/76	Mr. and Mrs. Joel Cousins 306 West Broadway Muskogee, Oklahoma	Stockbroker 213 N. 3rd Muskogee, Oklahoma
4/27/76	Mrs. St. John Garwood 1802 San Gabriel Street Austin, Texas 78701	Housewife

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THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

MAY REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

70040094115

5/13/76	Mr. Shelby Culborn Davis 70 Pine Street New York, New York 10009	Investment Banker 70 Pine Street New York, New York 10009
5/13/78	Mr. A. E. Findley P.O. Box 27785 Raleigh, North Carolina 27611	Retired
5/19/76	Mr. Louis T. Kraemer P.O. Box 10 Placentia, California 92670	Rancher 230 N. Angelina Drive Placentia, California 92670
5/19/76	Mr. M. E. Arnot P.O. Box 102 Eureka, California 95501	Retired
5/20/76	G. Howell Hight P.O. Box 12368 Dallas, Texas 75225	Investments
5/18/76	J. S. Hudnall 630 Citizens Bank Bldg. Tyler, Texas 75702	Geologist 630 Citizens Bank Bldg. Tyler, Texas 75702
5/18/76	Hugh E. Ledbetter P.O. Box 352 Norman, Oklahoma 73070	Geologist Norman, Oklahoma 73070
5/15/76	C. H. Johnson 390 W. Eight Street San Pedro, California 90731	Nurseryman 390 W. Eighth Street San Pedro, California 90731

MAY REPORT - Continued

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

7 0 0 1 0 0 9 4 1 1 6

5/25/76	Bryce L. Reynolds 20700 Prospect Road Saratoga, California 95070	Loan Agent Suburban Coastal Corp, 2655 Campus Drive San Mateo, California 94403
5/26/76	Theo N. Law 713 River Oaks Bank Tower Houston, Texas 77019	Investments (self-employed) (Ret.) 2001 Kirby Dr., Suite 713 Houston, Texas 77019
5/27/76	Homer N. Chapin 7 Hilltop Drive Wilbraham, Massachusetts 01095	Financial Consultant Springfield, Massachusetts
5/19/76	Mrs. Elizabeth B. Shand 6183 Balcom Canyon Road Moorpark, California 93021	Breeder of thoroughbred horses 6183 Balcom Canyon Road Moorpark, California 93021
5/21/76	Van Irvine Casper Town House Casper, Wyoming 82601	Rancher 1113 W. 25th Street Casper, Wyoming 82601
5/21/76	William Kleinhoff 10 Home Road Hatboro, Pennsylvania 19040	Executive VP H,P, Foley Co., 90 Rochelle Avenue Philadelphia, Pennsylvania 19128
5/15/76	Walter R. Beardsley 1127 Myrtle Street Elkhart, Indiana 46514	Chairman of the Board (Ret.) Miles Laboratories, Inc. 1127 Myrtle, St., P.O. Box 40 Elkhart, Indiana 46515
5/23/76	Louis J. Kocurek 400 Teravis Parkway San Antonio, Texas 78205	Investment (same)
5/23/76	Robert Lanman 1711 Alts Vista Munster, Indiana 46321	Engineer and Owner Hatady Machine Co., Inc. Lansing, Illinois 60438
5/22/76	Phil A. Gerhard 9229 Sunset Blvd Los Angeles, California 90060	Producer/Records 9229 Sunset Blvd., Suite 618 Los Angeles, California 90060

MAY REPORT - Continued

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

5/22/76	William McBride Love 8 Portland Place St. Louis, Missouri 63108	Investments 25 N. Brentwood Blvd. St. Louis, Missouri 63108
5/23/76	G. A. Buder, Jr. 7 No. 7th Street St. Louis, Missouri 63101	Attorney (same)
5/23/76	H. M. Kimball P.O. Box 56 Maringovin, Louisiana 70757	Exxon Distributor Box 56 Maringovin, Louisiana 70757
5/18/76	Grace Yount 301 West College Farmington, Missouri 63640	Retired
5/18/76	Mrs. E. B. Purcell 1818 Main Street Newberry, South Carolina 29108	Widow
5/18/76	H. N. Havis 1403 Doran Drive Odessa, Texas 78761	Farmer Seminole, Texas
5/18/76	R. L. Dunkelman 7810 Creswell Shreveport, LA 71106	Retired
5/19/76	Mrs. W. R. Peavey P.O. Box 395 Wells, Nevada 89935	Housewife
5/13/76	Henry C. Wood 70 Woodley Road Winnetka, Illinois 60093	Retired
5/8/76	Mrs. Maxy Pope Alles 1316 W. Haven Road San Marino, California 91108	None

79040094117

MAY REPORT - Continued

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

70040094113

5/18/76	J. Clarence Karcher 1740 Fidelity Union Tower 1507 Pacific Avenue Dallas, Texas	Retired Geophysicist
5/18/76	A. P. Carey 2519 Farrington Street Dallas, Texas 75207	Computer Engineer Cary Products Co. P.O. Drawer AC Hutchins, Texas 75141
5/18/76	Sam Noble P.O. Box 1486 Ardmore, Oklahoma 73501	Chairman of Board Noble Affiliates Lincoln Center
5/20/76	Kenneth A. Ford P.O. Box B Perryton, Texas 79070	Oil Field Service Perryton, Texas 79070
5/13/76	P. Widener 128 E. Vine Street Lexington, Kentucky 40507	Ranching - Oil & Gas P.O. Box 979 Sheridan, Wyoming 82801
5/13/76	Mrs. Edmee R. Morsman 40 Bridle Trail Darien, Connecticut 06820	Housewife
5/13/76	Miss Marie Kennedy Bryn Mawr Terrace Bryn Mawr, Pennsylvania 19010	None
5/22/76	Fred T. Hanson 316 Norris McCook, Nebraska 69001	Attorney 316 Norris McCook, Nebraska 69001

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

JUNE REPORT

ADD - Occupation/Principal Place of Business (Schedule A., Line 15a)

6/7/76	Mr. Beverly V. Thompson, Jr. P.O. Box 28938 Fort Worth, Texas 76128	Executive Texas Steel Company
6/2/76	Cecil Haden P.O. Box 3006 Houston, Texas 77001	President Bay-Houston Towing 2243 Milford Street Houston, Texas 77098

70040094119

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

JULY REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

79040094120

7/13/76	E. T. Turner Rural Delivery Syosset, New York 11791	Retired
7/21/76	C. F. Davidson 639 Fairview Road Clarks Summit, Pennsylvania 18411	Farmer 639 Fairview Road Clarks Summit, Pennsylvania 18411
7/23/76	Paul L. Fentress Box 1173 Palm Beach, Florida 33480	Self-Employed Box 1173 Palm Beach, Florida 33480
7/1/76	E. A. Louis 645 N. Wren Palatine, Illinois 60067	Airline Pilot U.A.L., O'Hare Field Chicago, Illinois 60666
7/15/76	James N. Landrum 4622 Northwest Highway Dallas, Texas 75220	Self-Employed 1011 Merchantile Dallas Bldg. Dallas, Texas 74201
7/22/76	R. B. Masterson Box 13 Guthrie, Texas 79236	Rancher Box 13 Guthrie, Texas 79236
7/12/76	L. J. King 65 Tejor Denver, Colorado 80217	Food Chain Executive Denver, Colorado 80217
7/27/76	Miss Ethel Pew Roberta Road & Morris Ave Bryn Mawr, Pennsylvania 19010	Retired

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

AUGUST REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

8/17/76	C. G. Remington 520 Everglades Isle Palm Beach, Florida 33486	Treasurer Siekler Music, Inc. 4001 Broadway W. Palm Beach, Florida 33407
8/17/76	Grace Yount 301 W. College Farmington, Missouri	Retired
8/26/76	Mrs. Maxy Pope Alles 1316 W. Haven Road San Marino, California 91108	None
8/26/76	W. G. Reed 2210 Seattle Bldg. Seattle, Washington 98104	Retired

79040094121

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1976 Additional Information

SEPTEMBER REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

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9/13/76	K. C. Livermote 4389 Clover Street Honeoye Falls, New York 14472	Seedgrower/dealer Honeoye Falls, New York 14472
9/16/76	C. F. Davidson, Jr. 639 Fairview Road Clarks Summit, Pennsylvania 18411	Farmer 639 Fairview Road Clarks Summit, Pennsylvania 18411
9/1/76	Mrs. Virginia Cone Route 1, Box 58A Mill Spring, North Carolina 28756	Retired
9/1/76	J. Carl De La Court, Jr. 100 Beach Road Juniter, Florida 33458	Retired
9/14/76	James Hoffman 517 Third Avenue, N.E. Oelwein, Iowa 50662	Factory Worker John Deere Waterloo Tractor Works Waterloo, Iowa 50704
9/1/76	Philip N. Fortin P.O. Box 1555 Billings, Montana 58103	Investments Billings, Montana
9/1/76	Michael A. Cordner 1188 Tulip Lane Rockford, Illinois 61107	Engineer Sundstrand Corp. Rockford, Illinois
9/13/76	H. M. Kinball Box 56 Marringovin, Louisiana 70757	Exxon Distributor Marringovin, Louisiana 70757
9/1/76	E. Bardwell 626 N. Fuller Avenue Hollywood, California 90046	Retired

SEPTEMBER REPORT - Continued

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

9/13/76	John R. Cohill 425 California Street San Francisco, California 94104	Engineering Consultant 425 California Street San Francisco, California 94104
9/13/76	W. K. McNeilly 270 27th Avenue San Francisco, California 94121	Senior Financial Analyst Chevron U.S.A., Inc.
9/16/76	P. E. Letchworth 37 Park Way Piedmont, California 94611	Retired
9/16/76	Charles L. Smith 503 Fall River Road Houston, Texas 77024	Executive Bogota, Colombia

79040094123

THE FUND FOR A CONSERVATIVE MAJORITY

1750 Old Meadow Road
McLean, Virginia 22101

1977 Additional Information

APRIL 10 QUARTERLY REPORT

ADD - Occupation/Principal Place of Business (Schedule A, Line 15a)

3/18/77	Mr. Curtis Katz 45 East 55th Street New York, New York 10022	Lawyer
2/3/77	Charles L. Smith 503 Fall River Road Houston, Texas 77024	Executive Bogota, Colombia

79040094124



FEDERAL ELECTION COMMISSION

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

November 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building
Box 17416
Washington, D.C. 20041

Re: MUR 503

Dear Mr. Heckman:

On November 21, 1978, the Federal Election Commission agreed to accept the conciliation agreement with the Fund for a Conservative Majority which you signed on October 31, 1978. Enclosed are a copy of the signed agreement and a copy of the certification of the Commission's acceptance of this agreement.

We draw your attention to the language of paragraph E, page 3, of the agreement which provides that the Committee will file an amended report within thirty days of the date this agreement was approved by the Commission, such amendment to show the name, address, amount of contribution, and the occupation and principal place of business of contributors for which information with regard to occupation and principal place of business was omitted in the Committee's initial reports for the period covered by the Commission's audit of the Committee's records. The file in this matter cannot be closed until the requirements of this provision of the conciliation agreement have been met. We will expect to receive this amendment on or before December 21, 1978.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III, Esquire

7 2 1 4 6 0 4 0 6 2

AW MUR 503

PS Form 3811, Apr 1977 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 c
 Show to whom, date, and address of delivery c
 RESTRICTED DELIVERY Show to whom and date delivered c
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$..... (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Robert Heckman

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 438470

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 11/30/78

5. ADDRESS: (Complete only if requested)

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



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building
Box 17416
Washington, D.C. 20041

11/24/78

Re: MUR 503

Dear Mr. Heckman:

On November , 1978, the Federal Election Commission agreed to accept the conciliation agreement with the Fund for a Conservative Majority which you signed on October 31, 1978. Enclosed are a copy of the signed agreement and a copy of the certification of the Commission's acceptance of this agreement.

We draw your attention to the language of paragraph E, page 3, of the agreement which provides that the Committee will file an amended report within thirty days of the date this agreement was approved by the Commission, such amendment to show the name, address, amount of contribution, and the occupation and principal place of business of contributors for which information with regard to occupation and principal place of business was omitted in the Committee's initial reports for the period covered by the Commission's audit of the Committee's records. The file in this matter cannot be closed until the requirements of this provision of the conciliation agreement have been met. We will expect to receive this amendment on or before December , 1978.

Sincerely,

W

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III, Esquire

79040094127

Ad
11/22/78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

79040021133
This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") has violated 2 U.S.C. §434(a), §434(b)(2), §434(b)(9) and (13):

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

B. The Respondent failed to include in its initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted, and was reduced to 37.5% on August 22, 1978.

C. The Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. § 434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978, had not yet supplied this missing information with regard to 53.5% of such contributors. On August 22, 1978, the failure rate was reduced to 37.5%.

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. § 434(b)(2).

29040094129

E. That Respondent will file an amended report within thirty (30) days of the date this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business of each contributor. If any of the required information is not available, the amended report will indicate why it was not available.

F. That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20 and June 20, 1978, and the year-end report due January 31, 1978.

G. That failures on the part of the Respondent to file monthly reports and a year-end report in a timely fashion constitute violations of 2 U.S.C. § 434(a).

H. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

I. That Respondent will pay a civil penalty in the amount of Three Thousand Dollars, (\$3000), pursuant to 2 U.S.C. § 437g (a) (5) (B).

V. General Conditions

A. 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.

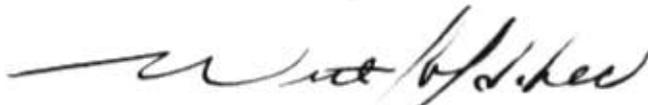
79040094130

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a) (5) (A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

11/24/78
Date


William C. Oldaker
General Counsel
Federal Election Commission

10/31/78
Date


Robert Heckman
Treasurer
Fund for a Conservative
Majority

7 9 0 4 0 9 9 4 1 3 1

November 16, 1978

MEMORANDUM TO: Marge Hanson.
FROM: Elissa T. Garr
SUBJECT: MUR 503

Please have the attached General Counsel's Report on MUR 503 distributed to the Commission on a 48 hour tally basis.

Thank you.

7 9 0 4 0 0 9 4 1 3 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 503 (78)
Fund for A Conservative Majority)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 21, 1978, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated November 7, 1978, regarding the above-captioned matter:

1. Give final approval to the revised conciliation agreement signed by the Committee which is attached to the above-named report.
2. Send the letter attached to the above-named report.

Attest:

11-28-78

Date

Margaret E. Chaney
for Marjorie W. Emmons
Secretary to the Commission

Signed by the General Counsel	11-15-78
Received in Office of Commission Secretary:	11-16-78, 11:06
Circulated on 48 hour vote basis:	11-17-78, 10:30

7 9 0 4 0 0 9 4 1 3 3

BEFORE THE FEDERAL ELECTION COMMISSION
November 7, 1978

RECEIVED
OFFICE OF THE
COMMISSIONER
'8 NOV 16 All: 06

In the Matter of)
)
)
Fund for a Conservative) MUR 503 (78)
Majority)
)

GENERAL COUNSEL'S REPORT

On September 28, 1978, the Commission voted to revise the proposed conciliation agreement first sent to the Fund for a Conservative Majority ("the Committee") on June 6, 1978, by adding the Committee's failure to file in a timely fashion its monthly reports covering April, May and June, 1978, and by reducing the proposed civil penalty to \$3,000, such reduction to be contingent upon the Committee's agreement to all terms in the revised proposed conciliation agreement.

The revised proposed agreement was sent to the Committee on October 3, 1978. On October 17, 1978, the Office of General Counsel received a letter from the Committee's counsel which stated that the Committee's Board of Directors was prepared to sign the agreement if two modifications were made. The first change involved deletion of paragraph E on page three of the revised agreement which stated that the Committee agreed to request information concerning occupations and principal places of business from contributors for whom such information was initially omitted in the Committee's reports. Counsel argued that the Committee has already made a second effort to secure this information from all relevant contributors in response to

the present compliance action and has forwarded to the Commission the results of this effort. The wording of the revised proposed conciliation agreement therefore would appear to require a third effort by the Committee which the Committee deemed unnecessary.

It has been Commission policy to require that committees make second efforts to secure missing contributor information. Given the Committee's undertaking of such a second effort, the fact that its failure rate has thereby been reduced from 53.5% to 37.5%, and the fact that paragraph F on page three of the revised agreement requires the submission of amended reports containing the previously omitted information or explanation of continuing omissions, we find that paragraph E may be omitted without substantive effect upon the overall agreement.

The Committee's second request for modification involves a change of language in paragraph G on page three of the revised agreement. The initial language reads:

"That Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion."

The Committee's proposed revision reads:

"That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978."

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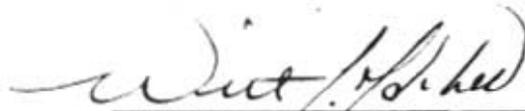
We find no substantive change in meaning as the result of the Committee's suggested revision and therefore believe it is acceptable.

7 9 0 4 0 0 9 4 1 3 6
Because the Committee's suggested revisions do not represent substantive changes of the revised proposed conciliation agreement approved by the Commission on September 28, 1978, on October 20, 1978, we sent to the Committee a proposed conciliation agreement incorporating the Committee's requested revisions. On November 7, 1978, we received the latest version of the agreement which has been signed by the Committee's treasurer, together with a check for \$3,000 to cover the civil penalty included in the agreement. We recommend Commission approval of this latest agreement. A recommendation to close the file in this matter is deferred pending receipt of the Committee's amendments of its reports pursuant to paragraph E, page 3, of the signed conciliation agreement.

RECOMMENDATIONS

1. Give final approval to the revised conciliation agreement signed by the Committee which is attached to this General Counsel's report.
2. Send the attached letter.

11/15/78
Date


William C. Oldaker
General Counsel

Attachments:
Letter to Mr. Heckman
Revised Conciliation Agreement



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building
Box 17416
Washington, D.C. 20041

Re: MUR 503

Dear Mr. Heckman:

On November , 1978, the Federal Election Commission agreed to accept the conciliation agreement with the Fund for a Conservative Majority which you signed on October 31, 1978. Enclosed are a copy of the signed agreement and a copy of the certification of the Commission's acceptance of this agreement.

We draw your attention to the language of paragraph E, page 3, of the agreement which provides that the Committee will file an amended report within thirty days of the date this agreement was approved by the Commission, such amendment to show the name, address, amount of contribution, and the occupation and principal place of business of contributors for which information with regard to occupation and principal place of business was omitted in the Committee's initial reports for the period covered by the Commission's audit of the Committee's records. The file in this matter cannot be closed until the requirements of this provision of the conciliation agreement have been met. We will expect to receive this amendment on or before December , 1978.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III, Esquire

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") has violated 2 U.S.C. §434(a), §434(b)(2), §434(b)(9) and (13):

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

79040094138

B. The Respondent failed to include in its initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted, and was reduced to 37.5% on August 22, 1978.

C. The Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. § 434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978, had not yet supplied this missing information with regard to 53.5% of such contributors. On August 22, 1978, the failure rate was reduced to 37.5%.

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. § 434(b)(2).

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E. That Respondent will file an amended report within thirty (30) days of the date this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business of each contributor. If any of the required information is not available, the amended report will indicate why it was not available.

F. That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20 and June 20, 1978, and the year-end report due January 31, 1978.

G. That failures on the part of the Respondent to file monthly reports and a year-end report in a timely fashion constitute violations of 2 U.S.C. § 434(a).

H. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

I. That Respondent will pay a civil penalty in the amount of Three Thousand Dollars, (\$3000), pursuant to 2 U.S.C. § 437g (a) (5) (B).

V. General Conditions

A. 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.

70040994140

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a) (5) (A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

10/31/78
Date

William C. Oldaker
General Counsel
Federal Election Commission



Robert Heckman
Treasurer
Fund for a Conservative
Majority

79040094141

158

THE FUND FOR A CONSERVATIVE MAJORITY

GATEWAY BUILDING, BOX 17416
WASHINGTON, D.C. 20041

68-153

560

OCT 31 19 78

DAY
TO THE
ORDER OF

FEDERAL ELECTION COMMISSION

\$ 3000.00

THREE THOUSAND DOLLARS

Central Bank

of Northern Virginia
MEMPHIS OFFICE • MEMPHIS, VIRGINIA 22942

Samuel F. C. ...
Ronald E. ...

FOR

e:0560015321

350416 611

Washington 600#
5491

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

(703) 821-1000

18 NOV 6 A10:01

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

November 3, 1978

807650

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

Re: MUR 503

Dear Mr. Oldaker:

Enclosed is a copy of a check for \$3,000.00 and a signed copy of the Conciliation Agreement between the Fund for a Conservative Majority and the Federal Election Commission.

Please forward to me a certified copy of the Agreement when you have executed it and after the Commission has given it final approval.

Sincerely,

Thomas M. Davis III

Thomas M. Davis, III

enclosure

cc: Mr. Ken Boehm
Mrs. Ann Weissenborn

70040094143

7 5 0 1 0 0 9 4 1 1 4

158

THE FUND FOR A CONSERVATIVE MAJORITY
GATEWAY BUILDING, BOX 17410
WASHINGTON, D.C. 20041

69-153
860

OCT 31 1978

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION \$ 3000.00

THREE THOUSAND DOLLARS

Central Bank
of Northern Virginia
MEMPHIS OFFICE - MEMPHIS, VIRGINIA 22042

Ronald E. Phillips, Esq.

FOR

⑆056001532⑆

⑆350416 6⑆

SEDAM & HERGE

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101



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

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LENN V. SEDAN, JR.
D. CURTIS HERSE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAB

November

WASHINGTON, D.C. 20004
202/691-1000

Handwritten: Sedan
Handwritten: O'Donoghue

Mr. William C. O'Donoghue
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20543

Handwritten: BY TELETYPE
NOV 22 1988

Dear Mr. O'Donoghue:

Enclosed is a copy of a check for \$5,000.00 and a signed copy of the Coalition Agreement between the Fund for a Conservative Majority and the Federal Election Commission.

Please forward to us a certified copy of the Agreement when you have executed it and after the Commission has given it final approval.

Sincerely,

Thomas M. Davis, III

enclosure

cc: Mr. Ken Boehm
Mrs. Ann Weissenborn

79040094146



FEDERAL ELECTION COMMISSION

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

October 20, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas M. Davis, III, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 503

Dear Mr. Davis,

Reference is made to your letter of October 16, 1978, in which you express the willingness of the Board of Directors of the Fund for a Conservative Majority to sign the conciliation agreement proposed by this Office if two modifications are made.

Enclosed is a revised version of the proposed conciliation agreement incorporating the changes which the Board has requested. We are prepared to submit this revised agreement to the Commission for approval upon receipt from the Committee of the signed original. Formal Commission approval is required in order for the agreement to become final and the file in this matter to be closed.

Please enclose with the signed agreement a check for \$3000 made payable to the United States Treasury in accordance with the provision of the agreement found in paragraph 1, page 3.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

79040094147

700107941
SEDAM & HERGE

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102



10 10 82
Mrs. Ann Weissenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION

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

October 20, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas M. Davis, III, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 503

Dear Mr. Davis,

Reference is made to your letter of October 16, 1978, in which you express the willingness of the Board of Directors of the Fund for a Conservative Majority to sign the conciliation agreement proposed by this Office if two modifications are made.

Enclosed is a revised version of the proposed conciliation agreement incorporating the changes which the Board has requested. We are prepared to submit this revised agreement to the Commission for approval upon receipt from the Committee of the signed original. Formal Commission approval is required in order for the agreement to become final and the file in this matter to be closed.

Please enclose with the signed agreement a check for \$3000 made payable to the United States Treasury in accordance with the provision of the agreement found in paragraph I, page 3.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

79040091110

DUPLICATE WEISSER

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

- 1. The following service is requested (check one):
 - Show to whom and date delivered _____ c
 - Show to whom, date, and address of delivery _____ c
 - RESTRICTED DELIVERY Show to whom and date delivered _____ c
 - RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
THOMAS M. DAVIS, III
SELMER VILLAGE
700 CLUBHOUSE HOUSE RD
MILBURN, NH 03011

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

943735

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
P. Jeffery

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

70040094151
This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") has violated 2 U.S.C. §434(a), §434(b)(2), §434(b)(9) and (13):

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

B. The Respondent failed to include in its initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted, and was reduced to 37.5% on August 22, 1978.

C. The Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. § 434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978, had not yet supplied this missing information with regard to 53.5% of such contributors. On August 22, 1978, the failure rate was reduced to 37.5%.

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. § 434(b)(2).

79040394152

E. That Respondent will file an amended report within thirty (30) days of the date this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business of each contributor. If any of the required information is not available, the amended report will indicate why it was not available.

F. That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20 and June 20, 1978, and the year-end report due January 31, 1978.

G. That failures on the part of the Respondent to file monthly reports and a year-end report in a timely fashion constitute violations of 2 U.S.C. § 434(a).

H. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

I. That Respondent will pay a civil penalty in the amount of Three Thousand Dollars, (\$3000), pursuant to 2 U.S.C. § 437g (a) (5) (B).

V. General Conditions

A. 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.

70040094153

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a) (5) (A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Robert Heckman
Treasurer
Fund for a Conservative
Majority

7 3 0 4 0 0 9 4 1 5 4

600#
5196

SEDAM & HERGE
ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

FEDERAL ELECTION COMMISSION

'78 OCT 17 PM 1:14
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

October 16, 1978

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

807003

Re: MUR 503

Dear Mr. Oldaker,

I am responding to your October 3, 1978, letter to Mr. Robert Heckman, the Treasurer of the Fund for a Conservative Majority (FCM), wherein you enclosed a draft of a proposed Conciliation Agreement between the parties.

I have reviewed the proposed Agreement with members of the Board of Directors of FCM, and am happy to report that they are prepared to sign the Agreement if two modifications are made.

We request the deletion of paragraph E on page three, where the Respondent agrees to request the information of those contributors whose occupations and principal places of business were omitted, but required to be reported. FCM has already requested that information initially and in a recent follow-up letter to each contributor. Those efforts meet the Commission's regulatory requirements. We therefore, see no further reason to mail a third request to those contributors at issue.

7001039153

Mr. William C. Oldaker
October 16, 1978
Page 2

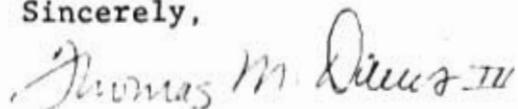
Also, we believe that paragraph G, on page three, should be rewritten to read as follows:

G. That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978.

If these two changes are agreeable to the Commission, then FCM is prepared to execute the Conciliation Agreement as proposed.

If you have any further questions, please feel free to call either myself or Curt Herge at this office.

Sincerely,



Thomas M. Davis, III

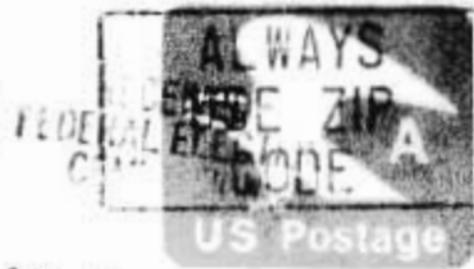
cc: Kenneth Boehm
Anne Weissenborn

70040094155

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

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



OCT 11 1978 1:14

7600 OLD SPRINGHOUSE ROAD

SEDAM & HERGE

ATTORNEYS AT LAW

1900 OLD BRIDGE ROAD

MELBANE, VIRGINIA 22661

(703) 221-1000

FEDERAL ELECTION COMMISSION

OCT 17 1978

WASHINGTON, D.C. 20543
202/451-1000

BLANK J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

October 19, 1978

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20445

Re: MS-102

Dear Mr. Oldaker,

I am responding to your October 8, 1978, letter to Mr. Robert Heckman, the Treasurer of the Fund for a Conservative Majority (FCM), wherein you enclosed a draft of a proposed Conciliation Agreement between the parties.

I have reviewed the proposed Agreement with members of the Board of Directors of FCM, and am happy to report that they are prepared to sign the Agreement if two modifications are made.

We request the deletion of paragraph E on page three, where the Respondent agrees to request the information of those contributors whose occupations and principal places of business were omitted, but required to be reported. FCM has already requested that information initially and in a recent follow-up letter to each contributor. Those efforts meet the Commission's regulatory requirements. We therefore, see no further reason to mail a third request to those contributors at issue.

79040094158

Mr. William C. Oldaker
October 16, 1978
Page 2

Also, we believe that paragraph G, on page three, should be rewritten to read as follows:

G. That Respondent was late in filing monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978.

If these two changes are agreeable to the Commission, then FCM is prepared to execute the Conciliation Agreement as proposed.

If you have any further questions, please feel free to call either myself or Curt Herge at this office.

Sincerely,

/s/

Thomas M. Davis, III

cc: Kenneth Boehm
Anne Weissenborn

TMD/wr

79040094159

SEDAM & HERGE

ATTORNEYS AT LAW

3600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

Ms. Anne A. Weissenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



70040091

Statement of Organization **800849**
 For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

RECEIVED
 FEDERAL ELECTION
 COMMISSION

503
 600 +
 5135

8 OCT 11 AM 11:56

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.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed THE FUND FOR A CONSERVATIVE MAJORITY	2 Identification Number C 00001966
(b) Address (number and street) GATEWAY BUILDING, BOX 17416	3 Date October 5, 1978
(c) City, State and ZIP code WASHINGTON, DC 20041	4 Is this an amended statement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ in the _____ Election (Federal office sought) (Year of election) to be held in the State of _____ (State in which election is held)

[THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FC EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.]

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc) held in _____ (Year of election in State) and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)

[ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.] (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ committee of the _____ Party. (National, State, county, city) (Democratic, Republican, etc.)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation Labor organization Membership organization Trade association Cooperative

Corporation without capital stock Other (please specify)

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

70040094161

Statement of Organization for a Committee

(Page 3)

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2

Name of Committee

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
 If "Yes" for how long? ▶

13 In the event of dissolution, what disposition will be made of residual funds? _____

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

Name of bank, repository, etc.	Mailing address and ZIP code
CENTRAL BANK OF NORTHERN VIRGINIA	MERRIFIELD OFFICE MERRIFIELD, VA 22042

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

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

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

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

Robert C. Hickman
 (Signature of Treasurer)

10/5/78
 (Date)

Note. Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further information contact: ▶

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



THE FUND FOR A CONSERVATIVE MAJORITY

Gateway Building
Box 17416
Washington, D.C. 20041

Attention: Anne A. Weissenborn

3 9 1 4 6 0 0 4 0 6 2

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



11 All: 56



FEDERAL ELECTION COMMISSION

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

October 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D.C. 20041

Re: MUR 503

Dear Mr. Heckman,

Enclosed please find a revised conciliation agreement which this Office is prepared to recommend to the Commission in settlement of MUR 503. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039 to discuss your objections to the agreement.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

70040094134

59156007002

503 Wisconsin

PS Form 3811, Apr. 1977 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. _____¢
 Show to whom, date, and address of delivery. _____¢
 RESTRICTED DELIVERY Show to whom and date delivered. _____¢
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Robt Heckman, Treas
 Fund for a Cono. Maj.

3. ARTICLE DESCRIPTION:

REGISTERED NO	CERTIFIED NO	INSURED NO.
	943494	

 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
 8/11 9
 CLEVELAND, OH

CERTIFIED MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17818
Washington, D.C. 20041

Re: MUR 503

Dear Mr. Heckman,

Enclosed please find a revised conciliation agreement which this Office is prepared to recommend to the Commission in settlement of MUR 503. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Anne A. Waissenborn, the attorney assigned to this matter, at (202) 523-4039 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

AW 10/2/78

79040094165

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") has violated 2 U.S.C. §434(a), §434(b)(2), §434(b)(9) and (13):

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

79040094167

B. The Respondent failed to include in his initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted, and was reduced to 37.5% on August 22, 1978.

C. The Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. § 434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978, had not yet supplied this missing information with regard to 53.5% of such contributors. On August 22, 1978, the failure rate was reduced to 37.5%.

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. § 434(b)(2).

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E. That Respondent will request the necessary information of those contributors whose occupations and principal places of business was omitted but required to be reported.

F. That Respondent will file an amended report within thirty (30) days of the date this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business of each contributor. If any of the required information is not available, the amended report will indicate why it was not obtained.

G. That Respondent failed to file with the Commission monthly reports due February 20, March 20, April 20, May 20, and June 20, 1978, and the year-end report due January 31, 1978, in a timely fashion.

H. That failures on the part of the Respondent to file monthly reports and a year-end report in a timely fashion constitute violations of 2 U.S.C. § 434(a).

I. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

K. That Respondent will pay a civil penalty in the amount of Three Thousand Dollars, (\$3000), pursuant to 2 U.S.C. § 437g(a)(5)(B).

V. General Conditions

A. 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

79040094169

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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a) (5) (A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Robert Heckman
Treasurer
Fund for a Conservative
Majority

70040094170

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fund for a Conservative)
Majority)

MJR 503 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 28, 1978, the Commission determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Include in a revised proposed conciliation agreement the respondent's failure to file in a timely fashion its monthly reports covering April, May and June, 1978.
2. Reduce the proposed civil penalty contained in the original conciliation agreement to \$3,000, such reduction to be contingent upon respondent's agreement to all terms in the revised proposed conciliation agreement.
3. Send the revised, proposed conciliation agreement and letter attached to the General Counsel's Report dated September 25, 1978.

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

Attest:

9/29/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

70040094171



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: SEPTEMBER 26, 1978
SUBJECT: OBJECTION - MUR 503 - Memorandum
from OGC dated 9-25-78
Received in OCS 9-25-78,
9:54

The above-named document was circulated on a 48 hour vote basis at 1:00, September 25, 1978.

Commissioner Tiernan submitted an objection at 4:01, September 26, 1978, thereby placing MUR 503 on the Amended Agenda for September 28, 1978.

A copy of Commissioner Tiernan's vote sheet is attached.

ATTACHMENT:
Copy of Vote sheet

cc: Commissioner Tiernan

7904009417?

48 HOUR TALLY SET



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

78 SEP 26 P 4: 01

Date and Time Transmitted: SEPT. 25, 1978 - 1:0

Commissioner Teernan

RETURN TO OFFICE OF COMMISSION SECRETARY BY: SEPTEMBER 27, 1978 - 1:00

MUR No. 503 - Fund for a Conservative Majority - Committee
Responses to Proposed Conciliation Agreement
Memorandum from the General Counsel dated 9-25-78

() I approve the recommendation

() I object to the recommendation

COMMENTS: are solicitation costs "independent
Expenditures" ?

Date: 9/26/78 Signature: Robert O. Tiernan

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



70040094173

September 22, 1979

MEMORANDUM TO: Marge Brown
FROM: Elissa T. Jones
SUBJECT: WOB 503

Please have the attached memo to the Commission distributed on a 48 hour tally basis.

Thank you.

79040094174



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

78 SEP 25 A 9: 53

September 25, 1978

MEMORANDUM TO: The Commission

FROM: William C. Oldaker *W.C. Oldaker*
General Counsel

SUBJECT: Fund for a Conservative Majority (MUR 503) -
Committee Responses to Proposed Conciliation
Agreement

On May 17, 1978, the Commission found reasonable cause to believe that the Fund for a Conservative Majority ("the Committee") had violated 2 U.S.C. § 434(b)(9) and (13) by failing to identify, as independent, expenditures totaling \$39,655.26 made on behalf of the candidacy of Ronald Reagan, and also that the Committee had violated 2 U.S.C. § 434(b)(2) by failing to report occupations and principal places of business of 53.5% of its itemizable contributors during the 1976 campaign. The Commission also voted to merge non-filer violations of this Committee with MUR 503(78) and to incorporate these violations into the conciliation agreement to be sent to the Committee.

The proposed conciliation agreement contains provisions whereby the Committee would agree to provide the missing information concerning occupations and principal places of business of contributors and to file the monthly reports which covered January, February and March, 1978, plus the year-end report due January 31, 1978. The proposed conciliation agreement also provides for a civil penalty of \$20,000.

After a month's delay in responding to notification of the Commission's finding of reasonable cause to believe that the above violations had occurred and to the proposed conciliation agreement, the Committee has taken the following actions:

- 1) Submitted the monthly reports due for January, February and March, 1978, plus the year-end report due January 31, 1978.

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- 2) submitted information concerning the occupations and principal places of business for 39 of the 87 contributors for whom such information has been missing. The Committee's failure rate is thereby reduced from 53.5% to 37.5%. The Committee reports having sent out a second mailing to 117 contributors seeking the required information; therefore it appears that attempts have been made to reach all of the above 87 contributors.

We have also received two letters from the Committee's counsel which set forth the following defenses and counter-proposals:

A. Independent Expenditures

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The Committee's defense of its failure to properly identify the \$39,655.26 in independent expenditures made on behalf of Ronald Reagan is that it did not understand that expenditures for production and distribution of fund-raising solicitations were to be considered as independent expenditures. The Committee's \$25,156.26 in expenditures for radio advertisements on behalf of Reagan were reported as being for "Radio ads - independent expenditures in favor of Reagan for President". The expenditures made in soliciting the money used for the radio advertisements were also reported but not as independent expenditures on behalf of Reagan.

The Committee's counsel argues that during the time these improperly reported expenditures were being made, the spring of 1976, there existed no Commission advisory opinions or regulations concerning independent expenditures. The amendment to the Federal Election Campaign Act concerning independent expenditures did not become law until May 21, 1976. Counsel points out that a total of \$454,128 in independent expenditures was reported to the Commission by all reporting candidates and committees during 1976; \$287,686 of this total was for presidential candidates. He writes, "It is suggested that the reason why these figures were so small, as judged by historical standards, was difficulty in understanding the law which was then in a state of flux."

Counsel goes on to state that,

...(w)hile the subject expenditures were originally reported incorrectly, FCM promptly amended its reports when the deficiencies were called to its attention. There was no concealment and certainly no knowing and willful violation of the law. Given the status of the development of the concept of independent expenditures and

the understandable confusion between how to report expenditures made to raise money and how to report expenditures made for programmatic purposes, the asserted violations of the technical reporting requirements must be placed in perspective. In this case, FCM spent money to raise money and erred in following technical reporting procedures, not in the reporting the expenditures. The expenditures were reported and amended reports were promptly submitted upon the suggestion of the Commission.

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The Office of General Counsel finds some merit in this Committee argument concerning lack of clarity during the spring of 1976 as to what constituted a reportable "independent expenditure". On the other hand, throughout this period 2 U.S.C. § 434(b)(9) was in force which requires the identification of each candidate on whose behalf expenditures in excess of \$100 are made. In addition, the materials used by the Committee to solicit the contributions which were used in turn to make expenditures for radio ads on behalf of the Reagan candidacy specifically stated that the funds would be used for this particular purpose. This was not a general fund-raising effort, the proceeds of which were later channeled to the Reagan campaign. Therefore, even without the explicit language of 2 U.S.C. § 434(b)(13) and of Commission regulations, the Committee's argument that the fund-raising costs at issue did not constitute independent expenditures as then understood is not convincing. However, the Committee reported all of its solicitation expenditures, albeit incorrectly, and corrected its reports through amendment on September 7, 1977, after the Audit Division recommended that this be done.

B. Failure to disclose occupations and principal places of business of contributors

The Committee argues that it did not violate 2 U.S.C. § 434(b)(2) in that solicitation cards requested that contributors provide their occupations and principal places of business, and that a contributor's failure to provide that information was not the Committee's fault. Counsel writes, "At no time did the FCM try to circumvent the statute or attempt to conceal this information from the Commission." Counsel also points to the fact that, upon the recommendation of the Audit Division, the Committee did attempt to secure missing information and thereby reduced its failure rate from an initial 69.1% to 53.5% prior to the institution of this MUR. In reality, this attempt involved only two of the seven RFAI's sent to the Committee during the period covered by the audit, and counsel admits that the Committee was "dilatory" in its efforts to reach the contributors in question. Counsel states

that the delay was caused by a desire to save the excess costs involved in contacting the contributors and by the fact that the Committee did not realize "until recently" that a follow-up was required to prove best efforts. He argues that the Commission's regulations do not specifically require a second mailing and that the Committee's omission of such action "was neither purposeful, wilful, or a knowing violation of the law". Further, it is argued that the fact that the Committee has now sent follow-up letters to the contributors for whom information is needed should be deemed to place the Committee in compliance with Commission regulations and thus remove the need for a civil penalty in this regard.

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It should be noted that the Audit Division formally advised the Committee of its findings in early February, 1978, and that one of those findings included a recommendation that the Committee make a second effort to secure the missing information involved in five RFAI's concerning contributors' occupations and principal places of business. This recommendation was repeated in subsequent telephone conversations with the Committee's treasurer. Therefore, the Committee's knowledge that a second effort was needed is not recently acquired. On the other hand, the Committee has now sent out a second mailing apparently covering all contributors for whom information has been missing, and has received, and forwarded to the Commission, information for 37 of the 87 contributors involved. This has reduced the Committee's overall failure rate to 37.5%.

C. Late Filing of Reports

The letter from the Committee counsel states that the Committee is willing to stipulate to the provisions of the original proposed conciliation agreement which states that the Committee has been late in filing reports covering January, February and March, 1978, and the year-end report due January 31, 1978. After the proposed conciliation agreement was sent to the Committee, the Commission found reasonable cause to believe that the Committee had failed to file the required monthly reports covering April, May and June, 1978. On September 1, 1978, the Commission found reason to believe that the Committee had failed to file the monthly report covering July, 1978. The Committee has now submitted all of the above reports.

D. Civil Penalty

In his first letter, the Committee's counsel suggests that the \$20,000 civil penalty levied by the Commission should be reconsidered in light of the Committee's defenses to the several issues involved in this matter. In his second letter counsel states that "a fine of \$1,000.00 would be acceptable as a compromise pursuant to a conciliation agreement". He

requests that consideration be given to the total financial picture of the Committee. According to counsel, as of July 19, 1978, the Committee had cash on hand of approximately \$9,000 and debts and obligations of \$35,000. From July, 1977, to April, 1978, the Committee sent out approximately 484,000 direct-mail fund solicitations which netted revenues of \$12,848. This income was used in part to pay the salary of the executive director, his travel expenses, attorneys' fees, CPA fees, rent and other billings.

Counsel for the Committee states that a penalty as low as 10% of that assessed by the Commission "would still be a devastating and virtually confiscatory blow to the Committee." He points out that the Committee is willing to take steps to prevent any future recurrences of its past and present problems with the Commission, that it will retain counsel to assist in FEC matters, and that it will employ personnel to handle its books on a day to day basis. Counsel also writes:

There is no question but that the procrastination in responding to FEC directives and in filing FEC reports is a major factor behind FCM's problems with the Commission. These previous actions are not reflective, however, of FCM's attitudes, disposition or respect for the authority of the Commission and the job it is attempting to do. FCM is willing to stipulate that it will obey the law and regulations of the Commission and it is attempting now to take the action to correct past wrongs.

However, FCM hopes that its prior failures to respond in a timely and forthright manner to requests by the Commission will not subject it to an excessive and unwarranted civil penalty. It is requested that the Commission review all the facts relating to FCM and FCM's pledge of assurance to comply with all laws and regulations in the future prior to concluding this matter.

E. Comments by Office of General Counsel

The Office of General Counsel believes that the Committee's past reporting failures were the result, at worst, of gross negligence on the part of the Committee. Since receiving notification of the Commission's findings of reasonable cause to believe that the violations at issue have taken place, the Committee has replaced its executive director and retained legal counsel; has filed all monthly reports included in the proposed conciliation agreement plus all of those

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due more recently; has sent out letters to contributors requesting information on occupations and principal places of business, and has forwarded responses to the Commission; and has begun to collect other audit-related materials not included in the MUR.

At the beginning of 1978 the Committee had cash on hand of \$5,245.65. By July 31, 1978, it had taken in \$180,732.93, which included \$172,153.55 in contributions from individuals, a refund of \$129.27 and loans of \$8,450. Its year-to-date expenditures as of July 31 were \$166,034.08, these expenditures having included \$4,550 in reported transfers to authorized committees. Operating expenditures totaled \$153,034.08 and loan repayments \$8,450. Debts reported as of July 31 were \$61,688.48, while cash on hand was \$19,944.50.

The Office of General Counsel recommends that a revised conciliation agreement be sent to the Committee incorporating the Commission's findings of reasonable cause to believe that the Committee has violated 2 U.S.C. § 434(a) by failing to file in a timely fashion required reports covering April, May and June, 1978. We also recommend that this revised agreement include a civil penalty of \$3000, such a reduction in the civil penalty of \$20,000 originally proposed being contingent upon the respondent's agreement to all of the terms set out in the revised conciliation agreement. We propose this reduction in light of the Committee's present financial position and of its recent interest in and activity with regard to full compliance.

Recommendations

1. Include in a revised proposed conciliation agreement the respondent's failure to file in a timely fashion its monthly reports covering April, May and June, 1978.
2. Reduce the proposed civil penalty contained in the original conciliation agreement to \$3000, such reduction to be contingent upon respondent's agreement to all terms in the revised proposed conciliation agreement.
3. Send the attached revised, proposed conciliation agreement and letter.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Heckman, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D.C. 20041

Re: MUR 503

Dear Mr. Heckman,

Enclosed please find a revised conciliation agreement which this Office is prepared to recommend to the Commission in settlement of MUR 503. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Thomas M. Davis, III
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

79040091181

REPORT OF RECEIPTS AND EXPENDITURES
 FOR A CANDIDATE OR COMMITTEE
 SUPPORTING CANDIDATE(S) FOR
 NOMINATION OR ELECTION TO FEDERAL OFFICE

(Except for Candidates or Committees Receiving Federal Matching Funds)

RECEIVED 483
 FEDERAL ELECTION
 COMMISSION

78 SEP 11 11:20

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.

1 Fund for A Conservative Majority 2 I.D. No. C 00001966
 Name of Candidate or Committee (in full) Candidate/Committee
Gateway Building, P.O. Box 17416 3 N/A
 Address (number and street) Office Sought, State/District (if applicable)
Washington, D. C. 20041
 City, State and ZIP Code Check if address is different than previously reported. Year of Election _____

4 Type of Report (check appropriate boxes)

April 10 Quarterly Report Tenth day report preceding _____ election
 (primary, general or convention) Termination Report
 July 10 Quarterly Report on _____ in the State of _____ Amendment for: _____
 (date) (which report)
 October 10 Quarterly Report Thirtieth day report following _____ election
 (primary, general or convention)
 January 31 Annual Report Monthly Report July, 1978 on _____ in the State of _____
 (month) (date) (which report)
 This is a report for Primary Election General Election Primary and General Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES
 (Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>July 1, 1978</u> through <u>July 31, 1978</u>		
6 Cash on hand January 1, 19 78		\$ 5,245.65
7 Cash on hand at beginning of reporting period	\$ 3,820.78	
8 Total receipts (from line 19)	\$ 30,434.77	\$ 180,732.53
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 34,255.55	\$ 185,978.53
9 Total expenditures (from line 25)	\$ 14,311.05	\$ 166,034.03
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 19,944.50	\$ 19,944.50
11 Value of contributed items on hand to be liquidated (Attach itemized list) \$ _____		
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$ 0	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 61,688.48	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
Sept. 7, 1978 Robert C. Heckman Robert C. Heckman
 (Date) (Typed Name of Treasurer or Candidate) (Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441 (see reverse side of form).

For further information, contact:  Federal Election Commission
 1325 K Street, N.W. or call 800/424-9530
 Washington, D.C. 20463
 Approved by GAO
 B 147320 (R05-78)
 EX-113-01-01

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

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 OF RECEIPTS AND EXPENDITURES
(Page 2, FEC FORM 3)

NAME OF CANDIDATE OR COMMITTEE	REPORT COVERING THE PERIOD	
FUND FOR A CONSERVATIVE MAJORITY	FROM: 7/1/78	TO: 7/31/78

	Column A This Period	Column B Calendar Year-To-Date
RECEIPTS		
14. Contributions from Individuals (including contributions in-kind):		
(a) Itemized (use Schedule A)	\$. . . data to	
(b) Unitemized	\$. . . follow	
(c) Sales and collections included above: List by event on memo Schedule D (\$ _____)		
(d) Subtotal of contributions from individuals	\$ 30,434.77	\$ 172,153.66
15. Transfers from Political Committees:		
(a) Funds from affiliated/authorized committee (itemize on Schedule regardless of amount)	\$	
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$	
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$	
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ --	\$ 0
16. Other Income:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of other income	\$ --	\$ 0
17. Loans and Loan Repayments Received:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments received	\$ --	\$ 8,450.00
18. Refunds, Rebates, Returns of Deposits:		
(a) Itemized (use Schedule A)	\$	
(b) Unitemized	\$	
(c) Subtotal of refunds, rebates, returns of deposits	\$	\$ 129.27
19. Total Receipts	\$ 30,434.77	\$ 180,732.93
EXPENDITURES		
20. Operating Expenditures:		
(a) Itemized (use Schedule B)	\$ 14,311.05	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$ 14,311.05	\$ 153,034.08
21. Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ --	\$ 8,450.00
22. Transfers Out to Political Committees:		
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$	
(b) To other committees (itemize on Schedule B regardless of amount)	\$	
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$	
(d) Subtotal of transfers out	\$ --	\$ 4,550.00
23. Independent Expenditures (use Schedule E)	\$	\$ 0
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$	\$ 0
25. Total Expenditures	\$ 14,311.05	\$ 166,034.08
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES		
26. Total Receipts (from line 19)	\$	
27. Transfers In (from line 15(a))	\$	
28. Net Receipts (Subtract line 27 from line 26)	\$	
29. Total Expenditures (from line 25)	\$	
30. Transfers Out (from line 22(a))	\$	
31. Net Expenditures (Subtract line 30 from line 29)	\$	

7004039418

FUND FOR A CONSERVATIVE MAJORITY
Accounts payable as of August 1, 1978

Omega List Company
8320 Old Courthouse Road
Suite 440
Vienna, VA 22180

70040094181

<u>DATE</u>	<u>INVOICE</u>	<u>AMOUNT</u>
7/31/78	5881	240.00
7/27/78	5842	658.98
7/19/78	5806	1,345.95
7/13/78	5767	385.82
"	5766	60.00
8/5/77	4208	275.60
8/5/77	4209	340.25
8/29/77	4312	541.63
10/10/77	4527	220.27
10/10/77	4566	371.95
10/26/77	4598	215.80
"	4604	215.80
"	4660	60.00
11/4/77	4703	219.73
1/11/78	4923	120.00
2/8/78	5045	25.00
2/8/78	5046	25.00
"	5047	34.97
2/22/78	5111	623.86
"	5112	694.60
"	5113	297.80
"	5114	211.36
"	5115	218.85
"	5116	267.80
"	5117	189.80
3/1/78	5163	1,115.40
"	5164	1,708.52
3/22/78	5247	174.54
3/30/78	5278	288.00
4/18/78	5336	2,013.25
5/16/78	5491	485.44
5/16/78	5492	4,015.92
		<u>\$17,671.84</u>

Graphics 440
8320 Old Courthouse Road,
Suite 440
Vienna, VA 22180

1/12/78	1349	105.50
2/2/78	1366	50.00
2/22/78	1371	27.50

Graphics 440 contd.

3/8/78	1374	125.00
4/6/78	1404	50.00
5/9/78	1427	193.00
6/16/78	1445	81.00
6/26/78	1451	36.00
		<u>669.00</u>

7/26/78	2140	503.32	CREDIT
7/20/78	2130	869.45	
7/17/78	2109	1,658.33	
6/15/78	2049	249.95	
6/9/78	2032	161.48	
6/2/78	2012	1,029.55	
3/8/78	1802	2,647.60	
3/15/78	1813	617.40	
3/20/78	1818	19.13	
5/15/78	1956	353.58	
"	1959	958.20	
5/19/78	1976	837.83	
5/30/78	2007	79.80	
6/2/78	2012	1,029.55	
6/9/78	2032	161.48	
6/15/78	2049	249.95	
		<u>11,426.65</u>	

70010094135

PSA
1012 Russell Street
Baltimore, MD 21230

7/13/78	36506	48.46
7/13/78	36507	43.71
6/30/78	36199	300.67
6/30/78	36198	44.97
6/29/78	36121	40.13
6/29/78	36120	39.65
6/29/78	36053	41.03
6/28/78	35958	66.75
6/27/78	35892	56.11
6/14/78	35571	81.90
5/31/78	35443	39.37
"	35442	20.00
"	35441	20.00
"	35440	20.00
"	35439	39.20
5/30/78	35399	191.58
5/20/78	34823	60.98
4/26/78	34624	388.97
4/21/78	34456	15.12
4/17/78	34367	102.15
4/12/78	34275	37.79

-3-

PSA contd.

4/12/78	34274	14.83
		<u>\$1,732.37</u>

Kane Warehouse
8th & Franklin Streets, N.E.
Washington, D. C. 20017

4/1/76	40687	19.62
10/1/76	41114	19.26
12/1/76	41240	25.63
9/16/77	66759	15.00
1/1/78	41835	15.84
2/1/78	41881	21.78
3/1/78	41921	19.91
4/5/78	41980	19.91
5/1/78	42035	19.91
6/1/78	42083	19.91
7/5/78	42163	19.91
8/1/78	42213	19.91
		<u>\$236.64</u>

Tri State Envelope of PA
Ashland, PA 17921

7/10/78	30393	912.54
6/29/78	30223	678.80
5/11/78	28136	883.02
5/10/78	28138	1,088.40
		<u>\$3,562.76</u>

Tri-State of MD
6900 Faigle Road
Beltsville, MD 20705

6/29/78	3782	<u>\$1,023.40</u>
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Smith Lithograph
1029 East Gude Drive
Rockville, MD 20850

5/11/78	2481	371.64
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70010791195

Smith Lithograph contd.

4/13/78	2388	1,795.12
"	2389	3,124.37
"	2388	1,531.28
3/17/78	2325	1,027.85
"	2325	973.44
		<u>\$9,123.70</u>

Metro Printing & Mailing
8446 Lee Highway
Fairfax, Virginia 22030

7/12/78	M-78342	1,086.64
6/25/78	81383	837.20
6/26/78	81370	1,619.44
"	81385	1,175.36
4/17/78	780761B	4,133.73
3/30/78	780520	2,545.92
		<u>\$11,398.29</u>

Better Impressions
354 Maple Avenue
Vienna, VA 22180

6/30/78	015039	10.19
6/19/78	014860	12.58
6/6/78	014855	6.29
5/31/78	014585	13.05
		<u>\$42.11</u>

Washington Intelligence Bureau
8440 Lee Highway
Fairfax, VA 22030

7/24/78	680	<u>\$38.37</u>
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Plus Publications, Inc.
2626 Penn. Ave., N.W.
Washington, D. C. 20037

7/17/78	010490	<u>\$117.00</u>
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70040094187

Northwest Office Supply Co., Inc.
1337-14th Street, N.W.
Washington, D. C. 20005

6/7/78 9517 \$25.48

IBM
P.O. Box 57
Philadelphia, PA 19105

1/20/78 9X64603 \$74.36

Diversified Printing Services
2936 Prosperity Avenue
Fairfax, VA 22030

5/11/78 21143 807.72
1/31/78 25062 828.24
\$1,635.96

PS Enterprises, Inc.
3802-04 Old Silver Hill Road
Silver Hill, MD 20023

6/30/78 145637 \$2,374.80

Computer Communications
8320 Old Courthouse Road
Suite 440
Vienna, VA 22180

7/21/78 1671 2.00
4/11/78 1641 103.80
4/10/78 1643 17.44
3/21/78 1623 2.80
2/22/78 1614 177.00
\$200.42

Drawing Board
P.O. Box 250
Dallas, TX 75262

6/30/78 771361 \$ 5.00

70040094100

John Buckley
2662 Glengyle Drive
Vienna, VA 22180

8/2/78
6/1/78

4.50
13.00
\$17.50

Burgess, James E.
2045 North 15th Street
Arlington, VA 22201

4/1/78

1977 Audit

\$425.00

70010791137

TOTAL

AUGUST 1, 1978

OMEGA	\$17,671.84
GRAPHICS 440	669.00
BRUCE EBERLE ASSOC.	11,426.65
PSA	1,732.37
KANE WAREHOUSE	236.64
TRI STATE ENVELOPES OF PA	3,337.36
TRI STATE OF MD	1,028.40
SMITH LITHOGRAPH	9,123.70
METRO	11,398.29
BETTER IMPRESSIONS	42.11
WASHINGTON INTELLIGENCE BUREAU	38.37
PLUS PUBLICATIONS, INC.	117.00
NORTHWEST OFFICE SUPPLY	25.48
IBM	74.36
DIVERSIFIED	1,635.96
PS ENTERPRISES	2,374.80
COMPUTER COMMUNICATIONS	288.42
DRAWING BOARD	5.23
JOHN BUCKLEY	17.50
BURGESS	<u>425.00</u>
	<u>\$61,638.43</u>

79040094190

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Name of Candidate or Committee in Full
FUND FOR A CONSERVATIVE MAJORITY

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Postmaster, Dulles Washington, D. C. 20041	postage	7-5-78	60.00
		7-7-78	60.00
		7-14-78	5.00
		7-20-78	75.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Postmaster (Cont.)		7-26-78	500.00
		7-12-78	10.00
		Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	
Tyke Research Assoc., Inc. 1629 K Street N.W., #537 Washington, D. C. 20006	Subscription	7-5-78	25.00
		Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	
John S. Buckley 2662 Glengyle Drive Vienna, Virginia 22180	payroll	7-6-78	439.00
		7-21-78	219.50
		Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	
Metro Printing & Mailing 8446 Lee Highway Fairfax, Virginia 22031	postage and mailing	7-6-78	1,842.60
		7-11-78	2,000.00
		7-17-78	1,503.30
		7-18-78	1,304.00
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Specialty Printers of America 700 E. Parker Street Scranton, Pennsylvania 18509	printing	7-6-78	2,074.80
		Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	
Karol Lamos 701 Marshall Road Vienna, Virginia 22180	payroll	7-7-78	117.00
		7-14-78	118.00
		7-21-78	118.04
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
Karol Lamos 701 Marshall Road Vienna, Virginia 22180	copying	7-7-78	0.00
		7-17-78	0.10
		7-27-78	17.50
Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other			
SUBTOTAL of expenditures this page (optional):			0
TOTAL this period (last page this line number only):			0

7004009410

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Name of Candidate or Committee in Full FUND FOR A CONSERVATIVE MAJORITY			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Bank of Vienna 374 Maple Avenue East Vienna, rginia 22180	payroll tax deposit	7-11-78	493.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Sedam & Hedge 7600 Old Springhouse Road McLean, Virginia 22101	legal fees	7-12-78	500.00
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	7-19-78	500.00
IBM 1118 Market Street Philadelphia, Pennsylvania 19105	equipment rental	7-12-78	35.22
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Prudential P.O. Box 33280 Louisville, Kentucky 40232	hosp. ins.	7-14-78	22.43
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	7-26-78	22.43
Drawing Board P.O. Box 220250 Dallas, Texas 75222	supplies	7-17-78	7.24
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Mary Buckley 108 St. Andrews Drive Vienna, Virginia 22180	money counting	7-21-78	312.65
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Gateway Offices 400 W. Service Road, Suite 140 Dulles Airport Washington, D. C. 20041	rent	7-21-78	712.75
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
James E. Burgess, CPA 2045 N. 15th St., #308 Arlington, Virginia 22201	accounting fees	7-26-78	350.75
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (opt-outr)			\$
TOTAL this period (use page this line number only)			\$

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
FUND FOR A CONSERVATIVE MAJORITY			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Continental Telephone P.O. Box 402 Merrifield, Virginia 22120	telephone service	7-12-78	26.66
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	7-12-78	218.95
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$
TOTAL (Use this total on last page this line number only)			\$ 24,311.05

7004009410

7 9 0 4 0 0 9 1 1 9 1

FCM
THE FUND FOR A CONSERVATIVE MAJORITY

Washington, D.C. 20041
Box 17416
Gateway Building

Attn: Anne A. Weissenborn

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

RECEIVED
FEDERAL ELECTI
COMMISSION

8 SEP 11 P 1:20





FEDERAL ELECTION COMMISSION

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

September 7, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASELHORST *[initials]*

FROM: NON-FILER COORDINATOR *[initials]*

SUBJECT: MONTHLY NON-FILERS - REFERRAL - JUNE

70040094195

In accordance with the Task Force of Non-Filers, attached please find the referral of the committees that were published as Non-filers for the June Monthly reporting period covering May 1, 1978 through May 31, 1978.

The First notice (reason to believe) was sent by certified mail on July 5, 1978. The second notice (reasonable cause to believe) was sent by certified mail on July 20, 1978.

On August 21, 1978, the Press Office issued a release containing the names of the Committees which failed to file the June Monthly report.

Copies of the notices and certified green cards are included in this packet.

FUND FOR A CONSERVATIVE MAJORITY - Report filed August 22, 1978.

MUR 503



FEDERAL ELECTION COMMISSION

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

July 5, 1978

Fund for a Conservative Majority
AKA Young America Campaign
Mr. John S. Buckley, Treasurer
Gateway Building
P.O. Box 17416
Washington, DC 20041

Dear Mr. Buckley:

The Federal Election Commission has not received your June Monthly Report of Receipts and Expenditures for the period May 1, 1978 through May 31, 1978 as required by the Federal Election Campaign Act.

Your continued failure to file the required monthly report gives the Commission reason to believe that you are in possible violation of 2 U.S.C. §434.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within fifteen (15) days from the date of this notice with the Federal Election Commission at the above address and your Secretary of State or equivalent state officer.

If you have filed the required report, or if you require additional information, please contact Bernard Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Joan D. Aikens".

Joan D. Aikens
Chairman

Certified Mail
Return Receipt Requested





FEDERAL ELECTION COMMISSION

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

July 20, 1978

Mr. John S. Buckley, Treasurer
Fund For A Conservative Majority
AKA Young America Campaign
Gateway Building
P. O. Box 17416
Washington, DC 20041

Dear Mr. Buckley:

You have been notified by certified mail from the Federal Election Commission that your committee may have failed to file the June Monthly Report of Receipts and Expenditures as required by the Federal Election Campaign Act. This report was due on June 20, 1978. As of this date, no response has been received from you.

Your continued failure to file the above mentioned report gives the Commission reasonable cause to believe that you are in violation of 2 U.S.C. §434.

You have thirty (30) days from the date of your receipt of this notice to conciliate this matter with the Commission. Failure to file this report will result in the publication of your name on a list of non-filers and referral of your name to our Office of General Counsel which may result in civil penalties.

In the event that you have already filed your report, please contact our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Joan D. Aikens".

Joan D. Aikens
Chairman

Certified Mail
Return Receipt Requested

7004094197

FUND FOR A CONSERVATIVE MAJORITY

RCTP

11-1-

F.A.P.

PS Form 3811, Mar. 1976

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

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

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

- Show to whom and date delivered
- Show to whom, date, and address of delivery
- RESTRICTED DELIVERY Show to whom and date delivered
- RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943755	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: Addressee Authorized agent

4. DATE OF DELIVERY: 7/24/78

POSTMARK: 8/6

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS: AC

704094002

RCTB

Belmont D.

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:

Fund For A Conservative Majority
Mr. John S. Buckley, Treasurer
Gateway Building/ P.O. Box 1/416
Washington, D.C. 20041

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943490	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: Addressee Authorized agent

4. DATE OF DELIVERY: 7/24/78

POSTMARK: 8/6

5. ADDRESS (Complete only if requested):

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS: [Signature]

RTB

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contribu-
 tions or expenditures in excess of \$1,000 in any calendar year in support
 of such candidate(s).

(See Reverse Side For Instructions.)

038006
 600#4796

RECEIVED
 FEDERAL ELECTION
 COMMISSION

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.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed <p style="text-align: center;">THE FUND FOR A CONSERVATIVE MAJORITY</p>	2 Identification Number <p style="text-align: center;">C 00001966</p>
(b) Address (number and street) <p style="text-align: center;">GATEWAY BUILDING, Box 17416</p>	3 Date <p style="text-align: center;">SEPTEMBER 5, 1978</p>
(c) City, State and ZIP code <p style="text-align: center;">WASHINGTON, DC 20041</p>	4 Is this an amended statement <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one.

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)
 a candidate for _____ (Federal office sought) in the _____ (Year of election) Election
 to be held in the State of _____ (State in which election is held)
 (THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate)
 to receive contributions and make expenditures with respect to the _____ Elections
 held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee, _____ (Full name of principal campaign committee)
 (ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ (National, State, county, city) committee of the _____ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

Corporation
 Labor organization
 Membership organization
 Trade association
 Cooperative
 Corporation without capital stock
 Other (please specify)

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

Statement of Organization For Committee

(Page 2)

Name of Committee **THE FUND FOR A CONSERVATIVE MAJORITY**

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
 (b) Will it operate on a statewide basis in one State? Yes No
 (c) Will it primarily support candidates seeking State or local office? Yes No
 (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

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

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
AVI NELSON	Friends of Avi Nelson 89 State St., Suite 730 Boston, MA 02109	Senate	Republican

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
LOUIS E. JENKINS	Jenkins for Senate 1 American Place Baton Rouge, LA 70825	Senate	Democratic

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position

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

Name of Committee

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
 If "Yes" for how long? ▶

13 In the event of dissolution, what disposition will be made of residual funds? _____

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

Name of bank, repository, etc.	Mailing address and ZIP code

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

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

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

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

Robert P. Keenan

(Signature of Treasurer)

9/5/78

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further information contact:



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

7004009420

7 0 0 4 0 0 9 4 2 0 2



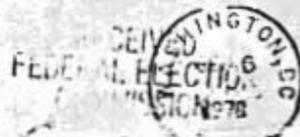
THE FUND FOR A CONSERVATIVE MAJORITY

Gateway Building

Box 17416

Washington, D.C. 20041

ALWAYS
USE ZIP
CODE



'78 SEP 7 AM 11:34

ALWAYS
USE ZIP
CODE



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

ATTENTION: ANNE A. WEISSENBOERN

Wessensorn
**Statement of Organization
 For a Political Committee**

805703

4675-

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

FEDERAL ELECTION COMMISSION

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. *78 AUG 29 10 19 58*

1(a) Name of Committee (in full) Check if name or address is changed
The Fund for a Conservative Majority

2 Identification Number
C 00001966

(b) Address (number and street)
Gateway Bldg. Box 17416

3 Date
August 24, 1978

(c) City, State and ZIP code
Washington, D.C. 20041

4 Is this an amended statement Yes No
 If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one:

(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ (Federal office sought) in the _____ (Year of election) Election to be held in the State of _____ (State in which election is held) (THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

(b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ (General, Primary, Runoff, etc) Election(s) held in _____ (Year of election in State), and will file all reports and statements with the candidate's principal campaign committee. _____ (Full name of principal campaign committee) (ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

(c) This committee supports only one candidate _____ (Name of Candidate) but is not an authorized committee.

(d) This committee supports more than one Federal candidate and is not a party committee.

(e) This committee is a _____ (National, State, county, city) committee of the _____ (Democratic, Republican, etc.) Party.

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
 Corporation Labor organization Membership organization Trade association Cooperative
 Corporation without capital stock Other (please specify)

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

790040094201

Statement of Organization For a Committee

(Page 2)

Name of Committee
The Fund for a Conservative Majority

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? Yes No
- (b) Will it operate on a statewide basis in one State? Yes No
- (c) Will it primarily support candidates seeking State or local office? Yes No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? Yes No

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

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
Lawrence P. McDonald	P.O. Box 745 Marietta, GA 30061	Congress	Democrat

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9 If this committee is supporting the entire ticket of a party, give name of party ▶

10 Identify by name, address and position, the person in possession of committee books and records

Full name	Mailing address and ZIP code	Title or position

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

7904009430

Name of Committee

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position

12 Does this committee plan to stay in existence beyond the current calendar year? Yes No
 If "Yes" for how long?

13 In the event of dissolution, what disposition will be made of residual funds? _____

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

Name of bank, repository, etc.	Mailing address and ZIP code

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

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

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

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

Robert C. Heckman
 (Signature of Treasurer)

8/24/78
 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g or §441; (see instructions)

For further information contact:  Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Rec# 4634

hand delivered
8-22-78

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D. C. 20006
(202) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

August 22, 1978

Miss Anne A. Weissenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 503

Dear Anne:

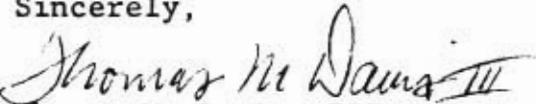
Enclosed are several late filings from the Fund for a Conservative Majority. Please note that at the August 6, 1978 Board of Directors meeting, FCM replaced their former Executive Director John S. Buckley with Kenneth F. Boehm, a practicing attorney. This change was a further effort by the FCM Board to establish continuing compliance with the FEC and its regulations.

I have attached forwarding letters from Mr. Boehm and the following reports:

1. Monthly Reports for March, April, May and June, 1978
2. An updated listing of contributor's information, including the new occupation-place of business cards.

I can also report that, after conferring with FCM personnel, a fine of \$1,000.00 would be acceptable as a compromise, pursuant to a conciliation agreement.

FCM is continuing to update all outstanding matters in an effort to bring themselves current with Commission regulations.

Sincerely,

Thomas M. Davis, III

cc: Kenneth F. Boehm
enclosures

79040091206



THE FUND FOR A CONSERVATIVE MAJORITY

August 21, 1978

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

Dear Ms. Weisenborn,

Since becoming employed by the Fund for a Conservative Majority just two weeks ago, I have made every effort to bring FCM's FEC reports up to date. Full and prompt compliance with all Federal Election Commission requirements is my top priority. To that end, many overtime hours were necessary, the services of an extra bookkeeper were obtained and numerous other steps were taken.

Through these efforts, FCM has been able to complete its monthly reports for March, April, May and June of this year. The July report is almost finished and will be presented shortly.

As an attorney, I recognize the importance of Federal Election Commission rules and deadlines. As FCM's Political Director, I intend to consult, as often as is necessary, our attorneys, accountant and the FEC to ensure that all legal requirements are met.

Please feel free to contact me at any time if I can be of assistance.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth F. Boehm".

Kenneth F. Boehm, Esq.
Political Director

Chairman
Ron Robinson

Executive Director
John S. Buckley

Directors
Frank J. Donatelli

Jeffrey D. Kane

Robert Heckman



THE FUND FOR A CONSERVATIVE MAJORITY

August 17, 1978

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

Dear Ms. Anne Weisenborn:

Enclosed please find a listing of contributors to The Fund for a Conservative Majority together with information on occupation and principal place of business, that was missing from previous reports to the Federal Election Commission.

This new information has been obtained by virtue of a second request to contributors, enclosing a prepaid, addressed return postcard. A sample of our letter to contributors is enclosed.

In all, we received 66 cards by return mail along with 5 envelopes returned by the post office. Xerox copies of all 71 itmes are enclosed.

The enclosed information amends our reports for the months of April, May, June, July, August, and September of 1976 as well as the report for the first quarter of 1977.

Please feel free to contact me if I can be of further assistance.

Sincerely,

Kenneth F. Boehm
Kenneth F. Boehm, Esq.
Political Director

79040094203

Chairman
Ron Robinson

Executive Director
John S. Buckley

Directors
Frank J. Donatelli

Jeffrey D. Kane

Robert Heckman

7 9 0 4 0 0 9 4 2 1 0

Mr. Charles L. Smith
503 Fall River Road
Houston, Texas 77024

Occ: EXECUTIVE

Prin. Pl. Bus. Apt. No. 1815
BOGOTA, COLOMBIA

2/77

ALSO
9/76

APRIL 10, 1977
QUARTERLY REPORT

7 0 0 4 0 0 9 4 2 1 1

Mr. H. M. Kinball
Box 56
Maringouin, L. 70757

Occ: Principal
Prin, Pl. Bus. 70757

9/76

Mr. John Cahill
425 California Street
San Francisco, C A 94104

Occ: Engineering Consultant
Prin. Pl. Bus. 425 California St.

San Francisco, CA 94104

9/76

Mr. Philip N. Fortin
P.O. Box 1555
Billings, Montana 59103

Occ: Contractor
Prin Pl. Bus. Billings, Mont.

9/76

Mr. Michael A. Cordner
1188 Tulip Lane
Rockford, Ill. 61107

Occ: ENGINEER
Prin. Pl. Bus. SUNDSTRAND CORP
ROCKFORD ILL.

9/76

2 9 0 1 0 0 9 4 2 1 2

Mr. J. Carl De La Cour, Jr.
100 Beach Road
Jupiter, FL 33458

Occ: Retired

Prin.Pl.Bus: None

9/76

Mr. K.C. Livermore
4389 Clover Street
Honeye Falls, NY 14472

Occ: Seed grower and dealer

Prin.Pl.Bus: Honeye Falls, N.Y.

9/76

Mr. C.F. Davidson, Jr.
639 Fairview Road
Clarks Summit, PA 18411

Occ: Farmer

Prin.Pl.Bus. 639 Fairview Road
Clarks Summit, Pa. 9/76
18411

Mr. W.K. McNeilly
270-27th Avenue 3
San Francisco, CA 94121

Occ: SENIOR FINANCIAL ANALYST

Prin.Pl.Bus. CHILTON USA INC.

9/76

7 0 0 4 0 0 9 4 2 1 3

Mr. James Hoffman
517 Third Avenue N E
Oelwein, Iowa 50662

Occ: factory worker

Prin.Pl.Bus. Johnston, Iowa 50131

9/76

Mr. P.E. Letchworth
37 Park Way
Piedmont CA 94611

Occ: RETIRED -

Prin.Pl.Bus. _____

9/76

Mr. E. Bardwell
726 N. Fuller Avenue
Hollywood, CA 90046

Occ: by [unclear]

Prin.Pl.Bus. [unclear]

9/76

7 0 0 4 0 0 9 4 2 1 4

Mrs. Grace Young
301 W. College
Farmington, MO

Occ: No record

Prin.Pl.Bus. at the bank

Grace Young

8/76

Mr. C.G. Remington
520 Everglades Isle
Palm Beach, FL 33486

Occ: Treas., self-employed, SICKLER MUSIC INC.

Prin.Pl.Bus. 4001 Broadway, West Palm Beach
Fl. 33407

8/76

SK-10

Mr. W.G. Reed
2210 ~~Seattle Bldg.~~ EXCHANGE BLDG
Seattle, WA ~~98014~~
98104

Occ: RETIRED

Prin. Pl. Bus. 2210 EXCHANGE BLDG
SEATTLE WA 98104

8/76

7 0 0 4 0 0 9 4 2 1 5

Mr. Cecil Haden
P.O. Box 3006
Houston, Texas 77001

Occ: President - Seawater, Texas
Prin.Pl.Bus. 2243 Milford Street
Houston, Texas 77041

6/76

Mr. Beverly V. Thompson, Jr.
P.O.Box 28938
Fort Worth Texas 76128

Occ: EXEC. + RANCHER
Prin.Pl.Bus. TEXAS STEEL
COMPANY

6/76

7 9 0 4 0 0 9 4 2 1 6

Mr. James M. Landrum
4622 Northwest Highway
Dallas, Texas 75220

Occ: Self

Prin.Pl.Bus. _____

JAMES N. LANDRUM
- 1101 MERCANTILE DALLAS BLDG.
DALLAS, TEXAS 75201

7/76

Mrs. Emma Bardwell
726 N. Fuller Avenue
Hollywood, CA 90046

Occ: Housewife

Prin.Pl.Bus. _____

7/76

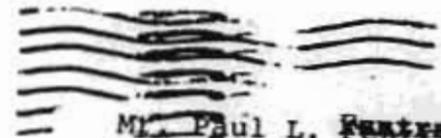
Mr. R.B. Masterson
Box 13
Guthrie, Texas 79236

Occ: Farmer

Prin.Pl.Bus. _____

Guthrie, Texas

7/76



~~Mr. Paul L. Fentress~~
Box 1173 Fentress
Palm Beach FL 33480

Occ: Self-employed

Prin.Pl.Bus. Home

7/76

7 0 0 4 0 0 9 1 2 1 7

Mr. C.F. Davidson
639 Fairview Road
Clarks Summit, PA 18411

Occ: Farmer

Prin.Pl.Bus. 639 Fairview Road
Clarks Summit, PA 18411

7/76

Mr. E.A. Louis
645 N. Wren
Palatine, ILL 50067

Occ: AIRLINE PILOT

Prin.Pl.Bus. UAL
O'HARE FIELD CHICAGO IL 60666

7/76

Mr. L.J. King
65 Tejon
Denver, CO 80217

Occ: FOOD CHAIN

Prin.Pl.Bus. DENVER
COLO. 80217

7/76

Miss Ethel Pew ROBERTS ROAD &
~~Old Bulch Road & Morris~~ MORRIS AVENUE
Bryn Mawr, PA 19010

Occ: RETIRED

Prin.Pl.Bus. HOWARD GUESS
SUITE 410
TWO RADNOR CORPORATE CENTER
100 MATSONFORD ROAD
RADNOR, PA. 19087
7/76

7 0 0 4 0 0 9 4 2 1 3

Mr. G. A. Buder, Jr.
7 North 7th Street
St. Louis, MO 63101

Occupation: Attorney

Principal Place of Business:
7 N. 7th St.
St. Louis, Mo. 63101

5/76

Mr. Shelby Davis
70 Pine Street
New York NY 10005

Occ: Investment Banker

Prin. PL. Bus. As above

5/76

Mr. William McBride Love
8 Portland Place
St. Louis, MO 63108

Occupation: INVESTMENTS

Principal Place of Business:
23 N BRENTWOOD BLVD
ST. LOUIS, MO 63105

5/76

Mr. H. M. Kimball
P.O. Box 56
Maringouin, LA 70757

Occupation: Flour Distributor

Principal Place of Business:
Box 56
MARINGOUIN LA 70757

5/76

7 2 0 4 0 0 9 4 2 1 9

Mr. Homer N. Chapin
7 Hilltop Drive
Wilbraham MA 01095

Occ: Financial Consultant

Prin.Pl.Bus. Springfield, Mass

5/76

Mr. Walter R. Beardsley
1127 Myrtle Street
Elkhart, IN 46514

Occupation: Chairman of the Board (Ret.)

Principal Place of Business:

Miles Laboratories, Inc.
1127 Myrtle St., P.O. Box 40
Elkhart, IN 46515

5/76

Mr. A.E. Findley
P.O. Box 27785
Raleigh NC 27611

Occ: _____

Prin.Pl.Bus. Retired

5/76

Mr. J.S. Hudnall
630 Citizens Bank Bldg.
Tyler, Texas ~~75701~~ 75702

Occ: Geologist (self-employed)

Prin.Pl.Bus. see above address

5/76

7 0 0 4 0 0 9 4 2 2 0

Raymond Wise Corporation

~~Mr. Raymond Wise Corp~~
P.O. Drawer 33628
Houston, TX 77033

Occupation: *Contractor*

Principal Place of Business:

Houston

Texas

5/76

Mr. Fred T. Hanson
316 Norris
McCook, NE 69001

Occupation: *Lawyer*

Principal Place of Business:

316 Norris Ave.

McCook, Ne. 69001

5/76

Mr. and Mrs. *William Kleinhoff*
10 Home Road
Hatboro, PA *18940*



Occupation: *...*

Principal Place of Business:

H P ...

...

5/76

Mr. Hugh E. Ledbetter
PO Box 352
Norman, OK 73070

Occ: *Geologist*

Prin.Pl.Bus. *Norman, OK*

5/76

7 0 0 1 0 0 9 1 2 2 2

SUBURBAN
COASTAL CORP.



MR. & MRS. BRYCE L. REYNOLDS
20700 Prospect Road
Saratoga, California 95070

Bryce L. Reynolds
Regional Vice President

2655 Carr-pus Drive • San Mateo, California 94403
Suite 100 (415) 573-7811

5/76

Mr. C.H. Johnson
390 Eighth Street
San Pedro, CA 90731

Occ: *Transcript - account*
Prin. Pl. Bus. *400 of 4th St*
San Pedro, Calif 90731
h 5/76

Mrs. E.B. Purcell
1818 Main Street
Newberry, SC 29108

82 yr old widow

Occ: *Taking care of myself*
Prin. Pl. Bus. *My home*

5/76

Mr. Theo N. Law
713 River Oaks Bank Tower
Houston, Texas 77019

Occ: Self-employed, Investments
Prin. Pl. Bus. 2001 Kirby Dr., Suite 713
Houston, Texas 77019

5/76

1 0 0 1 0 5 9 1 2 2 3

Miss Grace Yount
301 West College
Farmington, MO 63640

Occupation: Retired

Principal Place of Business:

5/76

Miss Marie E. Kennedy
Bryn Mawr Terrace
Bryn Mawr, PA 19010

Occ: none

Prin.Pl.Bus. _____

5/76

Mr. A.P. Cary
2519 Farrington Street
Dallas Texas 75207

Occ: Engineer

Prin.Pl.Bus. Cary Products Co.
P. O. Drawer A C, Hutchins, Texas 75141
(101 Lancaster Hutchins Drive Road)

5/76

Mr. Phil Gernhard
9229 Sunset Boulevard
Los Angeles, CA 90060

Occupation: Producer / Records

Principal Place of Business:

9229 Sunset Blvd
Suite 618
Los Angeles, CA 90069
5/76

7 0 0 4 0 0 9 4 2 2 1

Mr. H.N. Havis
1403 Doran Drive
Odessa, Texas 79761

Occ: Farmer

Prin.PlBus. Seminole, Texas

26

5/76

Mrs. Edmee R. Morsman
40 Bridle Trail
Darien CT 06820

Occ: Housewife

Prin.Pl.Bus: _____

5/76

Mrs. Mary O'Brien
Route 3
Wilmington, IL 60481

Occupation: Farm Property Manager

Principal Place of Business: Same

Mary O'Brien

5/76

Mr. Lloyd E. Fuller
Box 1028
Sierra Vista, AZ 85653

Occupation: REAL ESTATE INVESTMENT

Principal Place of Business:

SIERRA VISTA
(1000 W. LAMAR REAL)

5/76

7 9 0 4 0 0 9 1 2 2 5

Mr. Van Irvine
Casper Town House
Casper, NY 83601

Occupation: Rancher (cattle & sheep)

Principal Place of Business:
1113 W. 25th St.

CASPER, WYO.

82601
5/76

Mr. J. Clarence Karcher
1740 Fidelity Union Tower
1507 Pacific Avenue
Dallas, Texas 75201

Mr. J. Clarence Karcher
1740 Fidelity Union Tower
1507 Pacific Avenue
Dallas, Texas 75201

Occ: Retired geophysicist

Prin.Pl.Bus. 1740 Fidelity Union Tower
Dallas, Texas 75201

Dr. Karcher died July 13, 1978. Please remove
name from your mailing list. 5/76

Mr. R.L. Dunkelman
7810 Creswell
Shreveport, LA 71106

Occ: RETIRED

Prin.Pl.Bus. NONE

5/76

Mr. P. Widener
128 E. Vine Street
Lexington, KY 40507

Mr. P. Widener
128 E. Vine Street
Lexington, KY 40507
P.O. Box 979
Sheridan, Wyo. 82801

Occ: Ranching - Oil & Gas

Prin.Pl.Bus. Same as above

5/76

7 0 0 1 0 7 9 4 2 2 6

Mrs. W.R. Peavey
PO Box 395
Wello, NV 89835

Occ: Housewife
Prin.Pl.Bus. Wells, Nevada

5/76

Mr. Louis T. Kraemer
P.O.Box 10
Placentia CA 92670

Occ: Rancher
Prin.Pl.Bus. 230 No. Angelina

5/76

Mrs. Elizabeth B. Shand
Rancho Bahada Del Sol Bajada
6183 Balcom Canyon Road
Moorpark, CA 93201

Occ: Breeder of Thoroughbred Horses -
Prin.Pl.Bus. as above address -

5/76

New address:
P.O. Box 12368
Dallas, Texas 75222
Mr. G. Howell Hight
127 ~~Branden Drive West~~
San Antonio Texas ~~78209~~

Occ: Investment
Prin.Pl.Bus. Texas

5/76

7 0 0 4 0 0 9 4 2 2 7

Mr. Kenneth A. Ford
P.O. box B
Perryton, Texas 79070

Occ: oil field service

Prin.PL.Bus. Perryton, Texas

5/76

Mr. Sam Noble
PO Box 1486
Ardmore, OK 73401

Occ: Chairman of Board, Noble Affiliates

Prin.Pl.Bus. Lincoln Center

5/76

Mrs. St. John Garwood
1802 San Gabriel St.
Austin, Texas 78701

Occ: Housewife

Prin.Pl.Bus. None

4/76

Mr. and Mrs. Joel Gessins
306 West Broadway
Muskogee, OK

Occ: Stockbroker

Prin.Pl. Bus. 213 No 3RD Muskogee Ok

4 /76

Mr. Curtis Katz
45 East 55th Street
New York, NY 10022

Occ: Lawyer

Prin.Pl.Bus. Business Man

3/76

70740094228

7 0 0 4 0 , 0 9 4 2 2 9



THE FUND FOR A CONSERVATIVE MAJORITY
Gateway Building
Box 17416
Washington, D.C. 20041

Mr. Ralph Stewart
Wall Street #1717
Seattle, WA 98121





THE FUND FOR A CONSERVATIVE MAJORITY
 Gateway Building
 Box 17416
 Washington, D.C. 20041



THE FUND FOR A CONSERVATIVE MAJORITY
 Gateway Building
 Box 17416
 Washington, D.C. 20041

Mr. E. T. Turner
 9 Murray Street
 New York, NY 10007

NEW YORK NY 10007



7 9 0 1 0 7 7



NOT DELIVERABLE
 JULIUS WELCH STATION
 HOUSTON TX 77027

Mrs. Thomas Kathy
 4040 Felipe Road
 Houston, TX 77027



FCM

THE FUND FOR A CONSERVATIVE MAJORITY
Gateway Building
Box 17416
Washington, D.C. 20041

FCM

THE FUND FOR A CONSERVATIVE MAJORITY
Gateway Building
Box 17416
Washington, D.C. 20041

Handwritten: Mr. Blair

Postmark: WASHINGTON DC 13 JUL 1978

Stamp: ADDRESS UNKNOWN
Illustration: A hand pointing to a stamp that says "NO POSTAGE TO SENDER"

Mr. Gould P.K. Blair
3841 Sixth Avenue South
Birmingham, AL 35222

WASHINGTON, D.C.
-PM.
13 JUL
1978



Handwritten: Mr. Klep

Mr. John P. Klep
17116 S. Post Oak
Houston, Texas 77027

Postmark: HOUSTON TX 13 JUL 1978

..LEP711 RETURN
NOT DELIVERABLE AS ADDRESSE
UNABLE TO FORWARD

HOUSTON TX
7 PM
13 JUL
1978





FEDERAL ELECTION COMMISSION

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

REFERRAL

July 31, 1978

MEMORANDUM

TO: OFFICE OF GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER *AL. for*
TOM HASELHORST *H a.B.P.*

FROM: NON-FILER COORDINATOR *[Signature]*

SUBJECT: MONTHLY NON-FILERS - REFERRAL- MAY MONTHLY (1)

70010094232

In accordance with the Task Force of Non-filers, attached please find the referral of the committees that were published as Non-filers for the May Monthly reporting period covering April 1, 1978 through April 30, 1978.

The First notice (reason to believe) was sent by certified mail on June 1, 1978. The second notice (reasonable cause to believe) was sent by certified mail on June 19, 1978.

On July 20, 1978, the Press Office issued a release containing the names of the Committees which failed to file the May Monthly report.

Copies of the notices and certified green cards are included in this packet.

FUND FOR A CONSERVATIVE MAJORITY





FEDERAL ELECTION COMMISSION

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

Fund For A Conservative Majority
AKA Young America Campaign
John S. Buckley, Treasurer
Gateway Building
P. O. Box 17416
Washington, D.C. 20041

Dear Mr. Buckley:

The Federal Election Commission has not received your May Monthly Report of Receipts and Expenditures for the period April 1, 1978 through April 30, 1978 as required by the Federal Election Campaign Act.

Your continued failure to file the required monthly report gives the Commission reason to believe that you are in possible violation of 2 U.S.C. §434.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within fifteen (15) days from the date of this notice with the Federal Election Commission at the above address and your Secretary of State or equivalent state officer.

If you have filed the required report, or if you require additional information, please contact Bernard Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Chairman

Certified Mail
Return Receipt Requested

GCC# 4179
MAW

SEDAM & HERGE

ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22101

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 821-1000

THOMAS M. DAVIS, III
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
CHRISTOPHER M. WAS

July 19, 1978

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

Re: MUR 503

Dear Mr. Oldaker:

This letter is written on behalf of our client, The Fund for a Conservative Majority (hereinafter FCM), in response to your letter, dated June 6, 1978, in which it was reported that the Federal Election Commission had found reasonable cause to believe that:

(1) FCM had violated 2 U.S.C. 434(b)(2), by failing to identify \$39,655.26 in independent expenditures made on behalf of the candidacy of Ronald Reagan; and

(2) FCM had violated 2 U.S.C. 434(b)(9) and (13), by failing to report the occupations and principal places of business of 53.5% of its itemized contributors.

Your reference number for this matter is MUR 503.

On behalf of FCM, we appreciate the opportunity you have given us to respond to your letter of June 6, 1978 and of the opportunity to address ourselves to the terms of the proposed conciliation agreement which was enclosed therewith. In so doing, we believe that it will be shown that FCM never knowingly and willfully violated the subject provisions of the Federal Election Campaign Act. Furthermore, it will be shown that the subject deficiencies have either been corrected, or that every reasonable effort is being made to secure the information necessary to correct the record, as requested by the Commission. Finally, it will be shown that FCM, in recognition of its record before the Commission, is prepared to revitalize its staff and to secure the professional assistance it requires in order to

70040094235

William C. Oldaker, Esq.
Page Two
July 19, 1978

comply, in a timely manner, with the requirements of law. As a result, it is respectfully submitted that this is a matter which requires only the assistance of the staff of the Commission in making the requisite adjusting entries in the public reports of FCM and that the proposed civil penalty is excessive and unwarranted under the circumstances.

Background of FCM

FCM is a small, multi-candidate political committee, which was organized as the Young America's Campaign Committee (YACC) in 1970. The Board of Directors of FCM consists of five young men, Ron Robinson, John S. Buckley, Frank J. Donatelli, Jeffrey D. Kane and Robert Heckman, all of whom are presently under 28 years of age. The net revenues of FCM (gross contributions less costs of fund-raising) amounted to approximately \$9,000 in 1977 and \$11,000 to date in 1978.

FCM was a part-time operation for all of the Directors until June 1976, two months after the subject independent expenditures were made, when Mr. Buckley was made the full-time executive director of FCM. At that time, FCM had a debt of approximately \$75,000.

In August, 1976, with its debt at approximately \$45,000, YACC changed its name to The Fund for a Conservative Majority (FCM) and, in conjunction with their direct-mail fundraiser, embarked on an ambitious fundraising program to reduce the FCM debt. By November, 1976, the debt of FCM had been reduced to approximately \$25,000.

In December, 1976, FCM rented an office at the Gateway Building at Dulles Airport. This office, the one still utilized by FCM, was rented because the rental contract gave FCM a modicum of administrative support, an answering service and ten hours of secretarial service per month. FCM did engage a certified public accountant to help with the books and the preparation of FEC reports on an "as requested" basis. Furthermore, on occasion, FCM did consult with legal counsel on isolated problems with Federal or state election laws. However, it was FCM's decision, given its debt and the small cash flow, that the retention of legal counsel or the expansion of its staff on even a minimal basis, was a financial impossibility.

79010094237

As of the date of this letter, FCM has cash on hand of approximately \$9,000 and its debts and obligations amount to approximately \$35,000. During the period from July, 1977 through April, 1978, FCM mailed approximately 484,000 direct-mail fund raising solicitation letters at a cost of approximately \$140,664. The net revenue realized by FCM in response to those solicitations, gross receipts less the costs of solicitation, amounted to approximately \$12,848. Out of that income, Mr. Buckley's salary, travel expenses, attorneys fees, CPA fees, rent and other billings had to be paid.

This background is presented not as an excuse for the activities under review, but as a factor for consideration in judging those activities against the requirements imposed by law and the suitability of the proposed civil penalty.

The Proposed Conciliation Agreement

A. Independent expenditures.

The proposed conciliation agreement, in paragraphs A and B, states that:

- A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy, but did not identify these expenditures as independent until September 9, 1977.
- B. That failure to identify independent expenditures constitutes violations of 2 U.S.C. §434(b)(9) and (13).

Sections 434(b)(9) and (13) of Title 2 of the United States Code provide, as follows:

"(b) Each report under this section shall disclose

(9) the identification of each person to whom expenditures have been made by such committee or on behalf of such committee or candidate within the calendar year in an aggregate amount or value in excess of \$100.00, the amount, date, and purpose of each such expenditure and the name and address of, and office sought by, each candidate on whose behalf such expenditure was made;

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* * * *

(13) in the case of an independent expenditure in excess of \$100 by a political committee, other than an authorized committee of a candidate, expressly advocating the election or defeat of a clearly identified candidate, through a separate schedule (A) any information required by paragraph (9), stated in a manner which indicates whether the independent expenditure involved is in support of, or in opposition to, a candidate; (B) Under penalty of perjury, 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;"

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It should be noted that the concept of "independent expenditures" was first identified, or articulated, by the Supreme Court of the United States in Buckley v. Valeo, 424 U.S.1, on January 30, 1976. As a result, Congress modified the Federal Election Campaign Act with amendments that became law on May 21, 1976. It was not until August 19, 1976 that the regulations implementing the Act were promulgated in proposed form by the Federal Election Commission. No advisory opinions or regulations were issued in the interim, particularly during the time during which all of FCM's independent expenditures were made. The regulations were promulgated in final form and made effective on April 13, 1977.

During the 1976 primary and general elections, a total of \$454,128 in independent expenditures were reported to the Federal Election Commission, Index of Independent Expenditures by Individuals and Receipts and Expenditures by Unauthorized Delegates, FEC Disclosure Series No. 3 (1977). Of that total, \$287,686 was for presidential candidates. It is suggested that the reason why these figures were so small, as judged by historical standards, was difficulty in understanding the law which was then in a state of flux. For example, it is reported that the Honorable W. St. John Garwood, a former Associate Justice of the Supreme Court of Texas, made independent expenditures as an "unauthorized delegate" candidate in the Texas primary, but he complained to the Commission of not being able to understand the material sent to him about independent expenditures. (FEC microfilm 76 FEC/025/3797.)

William C. Oldaker, Esq.
Page Five
July 19, 1978

Nevertheless, in the interim between the January 30, 1976 decision of the Supreme Court and the effective date of the Federal Election Campaign Act Amendments of 1976, FCM embarked upon the independent expenditure program here under review. That program, from the perspective of FCM, consisted of two parts: (1) the production and distribution of direct-mail solicitations designed to raise the funds for the project, and (2) the expenditure of those funds for radio advertisements in support of FCM's candidate. The program was concluded by the end of May, 1976.

In its report to the Commission (FEC Form 3) for the period covering May 1, 1976 through May 31, 1976, (signed June 16, 1976), FCM reported its expenditures for the radio advertisements and identified the purpose of those expenditures as being for "Radio ads - independent expenditures in favor of Reagan for President." These expenditures amounted to \$25,156.26. FCM also reported to the Commission in that and other reports all of the expenditures it made in the production and distribution of the fund-raising solicitations in support of this project. Those expenditures, which amounted to \$39,655.26 and which are here at issue, were not understood by FCM to be independent expenditures and were not identified as such. They were not concealed, however, but were reported.

With reference to this matter, the Audit Division of the Federal Election Commission included the following findings and recommendations in its formal audit report on FCM:

"Our review of the Committee's records disclosed expenditures totaling \$39,655.26 made on behalf of Ronald Reagan which the Committee failed to identify as independent expenditures on its disclosure reports. In addition, the Committee failed to file the required Treasurer's Certification of Independence in connection with these expenditures and for an additional \$25,156.26 of independent expenditures properly identified on its reports (also on behalf of Ronald Reagan).

"We recommend that the Committee file the required Schedules E for the independent expenditures which they failed to report properly, and a separate Certification of Independence for those which were previously identified as such.

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Recommendation

"Since we received the requested documents on September 7, 1977, no further action is recommended. However, the Committee is reminded of the seriousness of this omission for future compliance." (Emphasis added.)

Thus, as noted by the Commission's Audit Division, while the subject expenditures were originally reported incorrectly, FCM promptly amended its reports when the deficiencies were called to its attention. There was no concealment and certainly no knowing and willful violation of the law. Given the status of the development of the concept of independent expenditures and the understandable confusion between how to report expenditures made to raise money and how to report expenditures made for programmatic purposes, the asserted violations of the technical reporting requirements must be placed in perspective. In this case, FCM spent money to raise money and erred in following technical reporting procedures, not in reporting the expenditures. The expenditures were reported and amended reports were promptly submitted upon the suggestion of the Commission. Nevertheless, FCM now finds itself faced with a very substantial civil penalty for having properly engaged in an activity which others engaged in improperly at far less cost to themselves. (See, Campaign Practices Reports, Vol. 5, No. 9., May 1, 1978, pp. 7-8, in which it was reported that Mr. Peter Secchia was fined \$500 for making \$22,714 of expenditures on behalf of President Ford which were found by the Commission not to be independent.)

It is submitted, therefore, that FCM should not be subjected to a more severe penalty for failing to have "identified" expenditures as independent (at a time before the Commission's regulations were even proposed), than an individual was penalized for having made unlawful independent expenditures.

B. Itemization of Contributions

The proposed conciliation agreement, in paragraphs C., D., E. and F., states, as follows:

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978 had not yet supplied this missing information with regard to 53.5% of such contributors.

William C. Oldaker, Esq.
Page Seven
July 19, 1978

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. 434(b)(2).

E. That Respondent will request the necessary information of those contributors whose occupation and principal place of business was omitted but required to be reported.

F. That Respondent will file an amended report within thirty (30) days of the date of this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business for each contributor. If any of the required information is not available, the amended report will indicate why it was not obtained.

79040091242

Although 2 U.S.C. 434(b)(2) requires the full name and mailing address, and occupation and principal place of business of each person who has made one or more contributions to or for a committee, FCM's inability to identify 53.5% of such contributors as of May 17, 1978, must also be placed in perspective. The original solicitations asked each contributor to include their occupations and business addresses on the return envelope that was sent to FCM with the contribution. The notation on the return envelope provided that: "A Federal statute requires us to request the following information from you." The fact that such a small return of occupations and business addresses came back to the Committee was not the fault of FCM. At no time did FCM try to circumvent the statute or attempt to conceal this information from the Commission. FCM did make an effort, at the suggestion of the Audit Division, to secure the missing information and reduced, by the Commission's admission, the contributors failing to file occupations and places of business from 69.1% to 53.5%, a reduction of 22.6%.

As of the date of this letter every single contributor who has not yet supplied the requested information has been mailed an additional request to supply the necessary information. FCM is willing to admit that they were dilatory in sending out follow-up letters to everyone who failed to file all the required information. The fact that they wanted to spare the excess cost, and did not realize until recently that a follow-up was required to prove best efforts to obtain this information, may be no excuse. However, this omission by FCM was neither purposeful, wilfull, or a knowing violation of the law, and the Committee is now cooperating in every way it can at this date to obtain all of the information not previously filed.

William C. Oldaker, Esq.
Page Eight
July 19, 1978

Paragraph E of the proposed conciliation agreement states that FCM will request the necessary information of those contributors whose occupations and principal place of business was omitted or required to be reported. That has been done and, when the information arrives, amended reports will be filed as set forth in paragraph F.

In any event, Part 102.9(e) of the Commission's regulations provide that the treasurer of a political committee should use his or her "best efforts" to obtain the required information. It had been the belief of the Treasurer of FCM that the "best efforts" standard had been met by asking contributors, in the first instance, to supply the required information. The regulations do not suggest that "best efforts" must be demonstrated by telephoning the contributor, by sending the contributor a second request, or by taking any other specific action. As a consequence, the original failure of FCM to go to the expense of sending follow-up letters to every contributor as suggested by the Commission, or to reduce the percentage of failures to respond from 53.5% to 50% or to some other percentage acceptable to the Commission, cannot be made the subject of a severe civil penalty in the absence of a specific regulation to the contrary. In fact, as provided in Part 102.9(e), because there is now a showing by FCM that best efforts have been made (in accordance with the informal standards set by the Commission), the Committee must be deemed to be in compliance with the regulatory requirements. As a consequence, because FCM has now sent one follow-up request to every contributor who failed to file the requisite information, it must be "deemed" to be in compliance with the regulatory requirement and not to be subject to civil penalty.

C. Late filing of Reports.

Paragraph G notes that the respondent failed to file with the Commission reports due on February 10, 1978, March 10, 1978, April 10, 1978 and the year-end report due January 31, 1978. In fact, because FCM has elected monthly reporting status, the reports are due on the 20th, not the 10th, of each month. Nevertheless, as of this writing, the reports due on January 31, 1978 and February 20, 1978 have been filed. The report which should have been filed on March 20, 1978, is submitted herewith. The reports with April, May and June reporting dates are in preparation and will be completed shortly. FCM will stipulate, as specified in paragraph H of the conciliation agreement, that these reports have been late and that they have been negligent in failing to file these reports in a timely manner.

79040094247

William C. Oldaker, Esq.
Page Nine
July 19, 1978

Paragraph J, stating that the respondent will now and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended, is acceptable.

D. Civil Penalty.

Finally, it is suggested that the civil penalty proposed in paragraph K of the proposed conciliation agreement be weighed in light of the factors discussed. Considering the total financial picture for FCM, a fine of \$20,000 is grossly excessive. If the Commission believes, after reviewing all of the pertinent facts in this case, that some fine should be allotted to FCM on the basis of their tardiness in filing reports, technical violations in identifying independent expenditures and for failing to comply with an informal standard of showing "best efforts" in obtaining contributor information, a fine of even ten percent of that suggested by the conciliation agreement would still be a devastating and virtually confiscatory blow to FCM.

FCM is willing to stipulate that it will take actions that will prevent any future recurrences of the present problems. FCM will retain counsel on a continuing basis to assist with its FEC matters. FCM will also employ personnel to handle its books and day to day activities in the future. There is no question but that the procrastination in responding to FEC directives and in filing FEC reports is a major factor behind FCM's problems with the Commission. These previous actions are not reflective, however, of FCM's attitude, disposition or respect for the authority of the Commission and the job it is attempting to do. FCM is willing to stipulate that it will obey the law and regulations of the Commission and it is attempting now to take the action to correct past wrongs.

However, FCM hopes that its prior failures to respond in a timely and forthright manner to requests by the Commission will not subject it to an excessive and unwarranted civil penalty. It is requested that the Commission review all the facts relating to FCM and FCM's pledge of assurance to comply with all laws and regulations in the future prior to concluding this matter.

79040094244

William C. Oldaker, Esq.
Page Ten
July 19, 1978

We look forward to meeting with you and your associates to discuss this matter further if you so desire.

Sincerely,

Thomas M. Davis III
Thomas M. Davis, III

70040094245

enclosure

cc: Anne A. Weissenborn
Federal Election Commission

The Fund for a Conservative Majority

7 9 0 0 0 9 4 2 4 6

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22101

To:

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

FIRST CLASS MAIL

GC # 4199
NRN



FEDERAL ELECTION COMMISSION

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

July 18, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 503 - Interim Status Report dated 7-12-78
Signed: 7-14-78
Received in Office of Commission
Secretary: 7-17-78, 12:30

The above-mentioned document was circulated on a 24 hour no-objection basis at 3:30 p.m., July 17, 1978.

As of 4:00 p.m. this date, no objections have been received in the Office of Commission Secretary to the Interim Status Report.

Please note question raised by Commissioner Staebler. A copy of his vote sheet is attached.

Commissioners Aikens, Springer, Staebler and Thomson returned their papers by the deadline.

70040094247

July 17, 1977

MEMORANDUM TO: George [unclear]
FROM: Elissa T. Carr
SUBJECT: MUR 503

Please have the attached Interim Status Report distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040094248

BEFORE THE FEDERAL ELECTION COMMISSION

JULY 12, 1978

In the Matter of)
Fund for a Conservative Majority) MUR 503(78)

INTERIM STATUS REPORT

On February 23, 1978, the Commission found reason to believe and on May 17, 1978, reasonable cause to believe that the Fund for a Conservative Majority ("the Committee") had violated 2 U.S.C. § 434(b)(2) and 2 U.S.C. § 434(b)(9) and (13). The Commission also voted to merge the non-filer violations of this Committee with MUR 503(78) and to incorporate this in the conciliation agreement to be sent to the Committee.

A letter advising the Committee of the Commission's findings, together with a proposed conciliation agreement containing a civil penalty of \$20,000, was sent to the Committee on June 6, 1978, and received by the Committee on June 8, 1978.

On July 10, 1978, we received a telephone call from the Committee treasurer requesting a meeting with the attorney handling this matter. On July 11, 1978, members of the staffs of the Office of General Counsel and the Audit Division met with the treasurer to review the matters covered by the conciliation agreement plus an additional violation recently forwarded to the Office of General Counsel by the Audit Division involving failure by the Committee to respond to two recommendations contained in the audit notification sent to the Committee on February 8, 1978.

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The Committee treasurer stated that he would deliver two missing monthly reports plus some Section 434(b)(2) and other documentation on July 12. On July 11 the Office of General Counsel received a telephone call from the newly appointed counsel for the Committee who asked to meet with OGC staff on July 12. At that meeting the counsel will be informed of the necessity for a Committee response to the conciliation agreement within the next week.

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7/14/78

Date



William C. Oldaker
General Counsel



THE FUND FOR A CONSERVATIVE MAJORITY

July 12, 1978

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

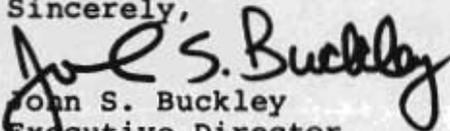
Attention: Anne A. Weissenborn
Re: MUR 503

Dear Sirs:

With reference to your letter, dated June 6, 1978, please be advised that the Fund for a Conservative Majority has engaged the law firm, Sedam & Herge, 7600 Old Springhouse Road, McLean, Virginia 22101, to represent it on all matters it has pending before the Federal Election Commission.

You are specifically authorized to discuss with representatives of that firm any and all matters relating to MUR 503 and to provide them with copies of any and all written communications relevant thereto.

Sincerely,


John S. Buckley
Executive Director

cc: J. Curtis Herge

Chairman
Ron Robinson

Executive Director
John S. Buckley

Directors
Frank J. Donatelli

Jeffrey D. Kane

Robert Heckman



FEDERAL ELECTION COMMISSION

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

MOR 500

June 29, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER ^{BL for}
TOM HASELHORST ^{O.B.P.}

FROM: NON-FILER COORDINATOR ^{CB for BW}

SUBJECT: MONTHLY NON-FILERS - REFERRAL - APRIL MONTHLY - (1)

In accordance with the Task Force of Non-Filers, attached please find the referral of the committees that were published as Non-filers for the April Monthly reporting period covering March 1, 1978 through March 30, 1978.

The First notice (reason to believe) was sent by certified mail on May 3, 1978. The second notice (reasonable cause to believe) was sent by certified mail on May 19, 1978.

On June 19, 1978, the Press Office issued a release containing the names of the Committees which failed to file the April Monthly report.

Copies of the notices and certified green cards are included in this packet.

70040094252

APRIL MONTHLY NON-FILER

FUND FOR A CONSERVATIVE MAJORITY
John S. Buckley
Gateway Building
P.O. Box 17416
Washington, D.C. 20041

79040094253



FEDERAL ELECTION COMMISSION

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

May 3, 1978

Fund for a Conservative Majority Aka
Young America Campaign
Mr. John S. Buckley, Treasurer
Gateway Building
P.O. Box 17146
Washington, DC 20041

Dear Mr. Buckley:

The Federal Election Commission has not received your April Monthly Report of Receipts and Expenditures for the period March 1 through March 31 as required by the Federal Election Campaign Act, as amended.

Your continued failure to file the required monthly report gives the Commission reason to believe that you are in possible violation of 2 U.S.C. §434.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within fifteen (15) days from the date of this notice with the Federal Election Commission at the above address and your Secretary of State or equivalent state officer.

If you have filed the required report, or if you require additional information, please contact Bernard Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Commissioner

Certified Mail
Return Receipt Requested

79040091251



FEDERAL ELECTION COMMISSION

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

May 19, 1978

Fund for A Conservative Majority
AKA Young American Campaign
Mr. John S. Buckley, Treasurer
Gateway Building
P.O. Box 17146
Washington, D.C. 20041

Dear Mr. Buckley:

You have been notified by certified mail from the Federal Election Commission that your committee may have failed to file the April Monthly Report of Receipts and Expenditures as required by the Federal Election Campaign Act. This report was due on April 20, 1978. As of this date, no response has been received from you.

Your continued failure to file the above mentioned report gives the Commission reasonable cause to believe that you are in violation of 2 U.S.C. §434.

You have thirty (30) days from the date of your receipt of this notice to conciliate this matter with the Commission. Failure to file this report will result in the publication of your name on a list of non-filers and referral of your name to our Office of General Counsel which may result in civil penalties.

In the event that you have already filed on your report, please contact our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

Certified Mail
Return Receipt Requested

7 9 0 4 0 0 9 4 2 5 5

ATTACHMENT

FUND FOR A CONSERVATIVE MAJORITY

1ST NOTICE
REASON TO BELIEVE

#943966

UNACCOUNTED FOR

2ND NOTICE
REASONABLE CAUSE TO BELIEVE

#438193

70040094256

DETG /M/P JEB

Form 3811, Mar. 1978

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:

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438-193	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

M. G. Crews

4. DATE OF DELIVERY POSTMARK

5/23/78 [Circular Postmark]

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
KC

☆ GPO : 1978 - O-283-486



FEDERAL ELECTION COMMISSION

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

June 20, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

SUBJECT: MUR 503 (78) - Interim Conciliation Report dated 6-16-78
Received in Office of Commission Secretary:
6-16-78, 3:13

The above-mentioned document was circulated on a 24 hour
no-objection basis at 2:00 p.m., June 19, 1978.

As of 3:30 p.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim Conciliation
Report.

70010094257



June 15, 1978

MEMORANDUM TO: Marge Hanson
FROM: Elissa T. Carr
SUBJECT: MUR 503

Please have the attached Interim Conciliation Report distributed to the Commission.

Thank you.

79040094258

BEFORE THE FEDERAL ELECTION COMMISSION

June 14, 1978

In the Matter of)
)
Fund for a Conservative Majority) MUR 503(78)

INTERIM CONCILIATION REPORT

On February 23, 1978, the Commission found reason to believe and on May 17, 1978, reasonable cause to believe that the Fund for a Conservative Majority ("the Committee") had violated 2 U.S.C. §432(b)(2) and 2 U.S.C. §434(b)(9) and (13). The Commission also voted to merge the non-filer violations of this Committee with this MUR 503(78) and to incorporate this in the conciliation agreement to be sent to the Committee.

A letter advising the Committee of the Commission's findings, together with a proposed conciliation agreement, was sent to the Committee on June 6, 1978 and received by the Committee on June 8. The ten-day period given the Committee to make its response will thus expire on June 18, 1978.

16 June 1978
Date


William C. Oldaker

79040094259

A-571

MUR 503



FEDERAL ELECTION COMMISSION

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

June 14, 1978

MEMORANDUM

TO : William C. Oldaker

THRU : Orlando B. Potter *O.B.P.*
Staff Director

FROM : *RJ* Robert J. Costa/Craig Russell *CR*

SUBJECT : Fund for a Conservative Majority - Failure to Respond to Certain Audit Recommendations

70040094260

On February 8, 1978, we sent our audit notification letter to the subject Committee recommending certain actions necessary for rectifying the various audit findings, to be undertaken within 30 days of receipt of the letter.

To date, the Committee has failed to respond in any form to two (2) of those recommendations embodied in our letter as follows: 1) obtain and forward for review supporting documentation for 147 unsupported expenditures (36.0% of the total number of Committee expenditures requiring such documentation, per 2 U.S.C. 432(d)), 2) that the Committee advise the Commission in writing of the steps they have taken to correct all the problem areas noted in our report to prevent their recurrence.

Telephone conversations with the Treasurer on February 21, and May 1, 1978, indicated that no efforts had been made, up to that time, towards complying with these recommendations. The Treasurer has expressed his willingness to comply, but as yet no response has been forthcoming.

Other matters concerning the subject Committee are currently being handled in your office under MUR 503(78). Please contact Craig Russell on extension 3-4155 if there are any questions.



II. Findings and Conclusions

A. Title II - Reporting and Recordkeeping

(1) Advance Reporting

Sections 434(b)(9) and (10) of Title 2, United States Code, provide that each report under these sections shall disclose the identification of each person to whom expenditures have been made by such committee or candidate in an amount in excess of \$100 and in a lesser amount if the total expenditures to the same payee exceed \$100 during the calendar year, together with the date, amount and purpose of such expenditure.

Prior to September 29, 1976, the Committee used the term "expense advance made" as the purpose for advance payments made to its field workers. However, on that date the Commission issued a policy statement indicating that "advance-travel" was not adequate purpose for an expenditure and that reporting committees and candidates should disclose the "particulars" of an expenditure (see Exhibit A). Subsequently, the Committee used the term "salary advance" as the purpose of such payments. Committee reports contain 507 entries totaling \$82,381.00 for which that purpose was reported. The initial advances are shown as loans made. When documentation supporting each advance was received, the Committee reported a "salary advance repaid" from the person to whom the advance was paid, (Line 16a-Loan Repayments-FEC Form 3) and added a corresponding amount to their unitemized expenditures (Line 20b-FEC Form 3). In addition to the \$82,381.00 stated above, other expense advances of \$1,807.34 were reported on line 20 of Committee reports with some other purpose listed for the expenditures. Thus, this procedure provided no more detailed disclosure than the method used prior to the Commission's September 29, 1976 policy statement.

In a number of cases, the recipients of advances did not return all the documentation required to support the full amount advanced. In those cases, the documented portion was handled as noted above. The undocumented portion was deducted from salary owed to the recipient. The Committee deducted a total of \$27,876.34 from the salaries of its employees to offset all or portions of advances made which were not documented or accounted for to their satisfaction.

When the Audit staff brought this matter to the attention of Committee officials, their explanation was that like any other business entity, the Committee assumed that if an employee could not provide adequate reporting for the advance, then the money was presumed to have been spent for personal items, and was therefore deducted from his salary at the close of the campaign.

70040094261



FEDERAL ELECTION COMMISSION

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

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Buckley, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, DC 20041

Re: MUR 503

Dear Mr. Buckley:

The Federal Election Commission has found reasonable cause to believe that the Fund for a Conservative Majority has violated 2 U.S.C. § 434(b)(2) by failing to identify \$39,655.26 in independent expenditures made on behalf of the candidacy of Ronald Reagan and 2 U.S.C. § 434(b)(9) and (13) by failing to report the occupations and principal places of business of 53.5% of its itemized contributors.

Please be advised that the Commission is under a duty to make every endeavor for a period of not less than 30 days to correct such a violation 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).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Anne A. Weissenborn at (202) 523-4039 to discuss your objections to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7026601002

HW 503

PS Form 3811, Apr. 1977

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

1. The following service is requested (check one).
- Show to whom and date delivered. _____
 - Show to whom, date, and address of delivery. _____
 - RESTRICTED DELIVERY
Show to whom and date delivered. _____
 - RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$ _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr John Buckley

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>43554</i>	

(Always obtain signature of addressee or agent)

I have received this article described above.

SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY *6/18/78* POSTMARK *FEM R.M. [Stamp]*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS *KC*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

7 0 0 4 0 0 9 1 2 6 4

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") has violated 2 U.S.C. §434(a), §434(b)(2) §434(b)(9) and (13):

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

B. The Respondent failed to include in its initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted.

C. That Respondent failed to file with the Commission monthly reports due February 10, 1978, March 10, 1978, and April 10, 1978, and the year-end report due January 31, 1978.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. § 434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May 17, 1978, had not yet supplied this missing information with regard to 53.5% of such contributors.

D. That failure to report occupations and principal places of business of itemizable contributors constitutes violation of 2 U.S.C. § 434(b)(2).

79040094265

E. That Respondent will request the necessary information of those contributors whose occupation and principal place of business was omitted but required to be reported.

F. That Respondent will file an amended report within thirty (30) days of the date this agreement is approved by the Commission, showing name, address, amount of contribution(s), and the occupation and principal place of business for each contributor. If any of the required information is not available, the amended report will indicate why it was not obtained.

G. That Respondent failed to file with the Commission monthly reports due February 10, 1978, March 10, 1978, and April 10, 1978, and the year-end report due January 31, 1978.

H. That failure on the part of the Respondent to file monthly reports and a year-end report constitute violations of 2 U.S.C. §434.

I. That Respondent will file the monthly reports due February 10, 1978, March 10, 1978, and April 10, 1978, and the year-end report due January 31, 1978, within thirty (30) days of the date this agreement is approved by the Commission.

J. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

K. That Respondent will pay a civil penalty in the amount of Twenty Thousand Dollars, (\$20,000), pursuant to 2 U.S.C. §437g(a)(5)(B).

70040094265

V. General Conditions

A. 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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

John Buckley
for the Fund for a Conservative
Majority

79040094267



FEDERAL ELECTION COMMISSION

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

May 24, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MW E*
SUBJECT: MUR 503 - Revised Conciliation Agreement &
Memorandum undated
Received in Office of Commission
Secretary: 5-19-78

The above-mentioned document was circulated on a 24
hour no-objection basis at 12:30 p.m., May 23, 1978.

There were no objections to the Revised Conciliation
Agreement.

79040091268

re: D-88

re: MUR503



FEDERAL ELECTION COMMISSION

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

May 15, 1978

MEMORANDUM

70040091269

TO: GENERAL COUNSEL

THROUGH: ORLANDO B. POTTER *OBP*

FROM: TOM HASELHORST *TH*

SUBJECT: MARCH MONTHLY NON-FILER
(TOTAL OF ONE)

REFERENCE: FOR THE PERIOD FEBRUARY 1 THROUGH FEBRUARY 28, 1978
D-88

The Reports Analysis Division has completed (through publication), its tracking of committees which are non-filers for the February reporting period, and are referring one committee to your office in accordance with Directive No. 1. The notices and green certification cards for each stage are also attached.

The first notice (reason to believe), was sent by certified mail on March 31, 1978. The second notice (reasonable cause to believe), was sent by certified mail on April 19, 1978.

On May 4, 1978, the Press Office issued a release containing the name of the committee which failed to file the March Monthly Report. Only that committee to which the Commission sent reason to believe and reasonable cause to believe notices was published in the press release.

Should this committee file the required report subsequent to this referral, your office will be contacted promptly of the filing. In order to do so, please let me know who will be handling this referral. Should you have any questions, please direct them to Steve Mims, Chief of the Non-Party Branch.

Attachments





FEDERAL ELECTION COMMISSION

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

March 31, 1978

Fund For A Conservative Majority
John S. Buckley, Treasurer
Gateway Building, P.O. Box 17416
Washington, DC 20041

Dear Mr. Buckley:

It has come to the attention of the Federal Election Commission that you may have failed to file the March Monthly report of Receipts and Expenditures as required by the Federal Election Campaign Act. This report should disclose all financial activity from February 1 through February 28, 1978.

Your apparent failure to file the March Monthly Report gives the Commission reason to believe you are in possible violation of 2 U.S.C. §434.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required report, you should do so within ten (10) days of receipt of this notice with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, and your Secretary of State or equivalent state officer.

However, if you have filed the above-mentioned report, or if you require additional information, please contact Steve Mims in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



79740094270



FEDERAL ELECTION COMMISSION

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

Mr. John S. Buckley, Treasurer
Fund For A Conservative Majority
Gateway Building
P.O. Box 17416
Washington, D.C. 20041

Dear Mr. Buckley:

You have been notified by certified mail that you have failed to file the March Monthly Report of Receipts and Expenditures, for the period covering February 1 through February 28, 1978, as required by the Federal Election Campaign Act.

As of this date, we have received no response from you. Your continued failure to file the required report gives the Commission reasonable cause to believe that you are in violation of 2 U.S.C. §434. You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you.

You have thirty (30) days from the date of your receipt of this letter to conciliate this matter with the Commission. Unless an immediate response is received from you, the Reports Analysis Division must refer your name to our Office of General Counsel which may result in civil penalties and may result in the publication of your name on a list of non-filers.

You should file the required document with the Commission at the above address. A copy of these statements should also be filed with your Secretary of State or the equivalent state officer. In the event you have already filed the required statements, please so advise.

If you have any further questions, please contact Bernard Brown in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

Certified Mail
Return Receipt Requested



7904094271

FUND FOR A CONSERVATIVE MAJORITY

1ST NOTICE
REASON TO BELIEVE

#943447

UNACCOUNTED FOR

2ND NOTICE
REASONABLE CAUSE TO BELIEVE

#943669

2781001002

2 Non-Filer JBB

PS Form 3811, Mar. 1978

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

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

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

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

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

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

2. ARTICLE ADDRESSED TO:

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
| 943669 |

(Always obtain signature of addressee or agent)

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

M. J. B. JBB

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
P. M.

APR 19 1971

☆ GPO : 1969 O-303-486

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Fund for a Conservative Majority) MUR 503 (78)

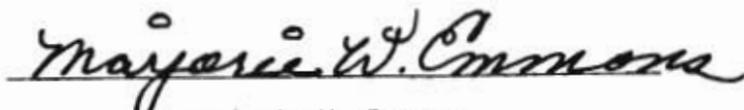
CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 17, 1978, the Commission determined by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe that the Committee has violated 2 U.S.C. Section 432(b)(2) and 2 U.S.C. Section 434(b)(9) and (13).
2. Send the letter and conciliation agreement attached to the General Counsel's Report signed May 12, 1978, subject to a change in the civil penalty to \$20,000.
3. Merge the non-filer violations of this Committee with this MUR 503 (78), and incorporate this in the proposed conciliation agreement.

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

Date: 5/19/78


Marjorie W. Emmons
Secretary to the Commission

Sent to Emmons
for correction 7-18-78
ETJ

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BEFORE THE FEDERAL ELECTION COMMISSION

May 12 , 1978

In the Matter of)
)
Fund for a Conservative) MUR 503(78)
Majority)

GENERAL COUNSEL'S REPORT

I. Summary of allegations and Commission Action

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During the audit of the Fund for a Conservative Majority ("the Committee"), the Audit Division discovered that the Committee had failed to identify in its reports independent expenditures totaling \$39,655.26 made on behalf of the candidacy of Ronald Reagan. 2 U.S.C. §434(b)(9) requires that committees' reports contain the name and address of each candidate on whose behalf an expenditure is made, while 2 U.S.C. §434(b)(13) and 11 C.F.R. §109.2 require that committees making independent expenditures must report on a separate schedule any such expenditure in excess of \$100 which expressly advocates the election or defeat of a clearly identified candidate. Here approximately 75% of the unidentified expenditures were made after May 11, 1976, the date Section 434(b)(13) became effective. As to the remaining 25%, the Committee was on notice via Section 434(b)(9) that it was to identify each candidate on whose behalf an expenditure in excess of \$100 had been made. Pursuant to a recommendation by the Audit Division, the Committee filed the required Schedule E's on September 9, 1977.

The auditors also discovered that the Committee had initially failed to report the occupations and principal places of business of 69.1% of itemizable contributors in violation of 2 U.S.C. §434(b)(2). Seven requests for additional information were sent to the Committee in this regard, and the Committee attempted to secure the information requested in two of these seven requests by writing a follow-up letter which produced results in 50% of the instances involved. As a result, the Committee had lowered its overall failure rate to 53.5% prior to the institution of this MUR.

The Committee claimed exertion of its "best efforts" with regard to two of the remaining RFAI's, efforts which consisted only of its having requested the missing information on the donor reply card sent out with the original solicitation letters. In addition, in 44 instances involving three reports to the Commission, a "best efforts" stamp was used on itemized contributions which lacked the required information, the stamp again referring only to the request made on the original donor reply card.

Until January, 1977, the present Fund for a Conservative Majority reported as Young America's Campaign Committee ("YACC"). A YACC donor reply card in the possession of the Audit Division states, "A Federal statute requires us to request the following information from you," and then provides spaces for "occupation" and "business address". This particular card was used for a specific fund; however, it is the understanding of the Office of the General Counsel that its format was used for all such cards. If so, OGC believes that the wording on the Committee's donor reply cards emphasized the necessity of the Committee's requesting

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the information, and not that it be provided by the contributor. Therefore, the original card did not represent a best effort to obtain the required information.

On February 23, 1978, the Commission found reason to believe that the Committee had violated 2 U.S.C. §434(b)(2) and 2 U.S.C. §434(b)(9) and (13).

Evidence

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A letter was sent to the Committee's treasurer informing him of the Commission's reason to believe finding. On March 9, 1978, during a telephone conversation with a Commission attorney, the treasurer stated that the Committee planned no more steps with regard to the question of independent expenditure reporting, but that the Committee was in the process of collecting the missing information about occupations and principal places of business of contributors. On April 20, 1978, the treasurer stated during a second telephone conversation that the information which had been collected in response to the MUR would be delivered to the Commission on April 24, 1978. It was never received. On May 1, 1978, the treasurer told a member of the Audit staff that the information would be mailed to the Commission and should arrive on May 4th or 5th. It has not yet appeared.

Recommendation

1. That the Commission find reasonable cause to believe that the Committee has violated 2 U.S.C. §434(b) (2) and 2 U.S.C. §434 (b) (9) and (13).
2. Send the attached letter and conciliation agreement.

12 May 1978
Date


William C. Oldaker
General Counsel

79040094277

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Fund for a Conservative) MUR 503(78)
Majority)

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that the Fund for a Conservative Majority (hereinafter "Respondent") violated 2 U.S.C. §441a(a)(1)(A);

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

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters into this agreement voluntarily with the Commission.

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

A. The Committee made a total of \$39,655.26 in independent expenditures on behalf of the candidacy of Ronald Reagan but initially failed to identify these expenditures as independent in its reports. Upon the recommendation of the Audit Division of the Commission the Committee filed the required Schedule E's on September 9, 1977.

70740994273

B. The Respondent failed to include in its initial reports to the Commission the occupations and principal places of business of 69.1% of itemizable contributors. This failure rate had been reduced to 53.5% by the time MUR 503(78) was instituted.

WHEREFORE, Respondent agrees:

A. The Respondent made \$39,655.26 in independent expenditures during the 1976 campaign on behalf of Ronald Reagan's candidacy but did not identify these expenditures as independent until September 9, 1977.

B. That failure to identify independent expenditures constitutes violation of 2 U.S.C. §434(b)(9) and (13).

C. That Respondent failed initially to report the occupations and principal places of business of 69.1% of its itemized contributors and as of May , 1978, had not yet supplied this missing information with regard to 53.8% of such contributors.

D. That Respondent will provide the Commission with the missing information concerning occupations and principal places of business of 53.8% of itemized contributors.

E. That Respondent will pay a civil penalty in the amount of Five Hundred Dollars (\$500), pursuant to 2 U.S.C. §437g(a)(5)(B).

V. General Conditions

A. 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

79040794270

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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. §437g (a) (5) (A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

John Buckley
for the Fund for a Conservative
Majority

7 0 0 4 0 0 9 4 2 8 0

D-78

re MUR 503



FEDERAL ELECTION COMMISSION

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

May 11, 1978

MEMORANDUM FOR: THE OFFICE OF GENERAL COUNSEL

THROUGH : ORLANDO B. POTTER *OB.P.*

FROM : TOM HASELHORST *TH*

SUBJECT : FEBRUARY MONTHLY NON-FILERS
(FOR THE PERIOD JANUARY 1 THROUGH JANUARY 31, 1978)

79040094201

The Reports Analysis Division has completed (through publication) its tracking of those committees which are monthly non-filers for the January reporting period. One committee has failed to file and is being referred to your office in accordance with Directive No. 1. The notices and green certification cards for each step are also attached.

The first notice (reason to believe) was sent on March 3, 1978. The second notice (reasonable cause to believe) was sent on March 27, 1978 by regular mail. On April 6, 1978 the Press Office issued a release containing the names of those committees which have failed to file the February Monthly Report. Only those committees which the Commission had sent reason to believe and reasonable cause to believe notices were published in the press release. Because evidence of the mailing of the reasonable cause to believe notice could not be established, that notice was re-mailed on April 17, 1978.

Should this committee file the required report subsequent to this referral, your office will be notified promptly of the filing. In order to do so, please let me know who will be handling this referral. Should you have any questions, please direct them to the appropriate team chief for assistance.

Attachments



FUND FOR A CONSERVATIVE MAJORITY
AKA YOUNG AMERICA CAMPAIGN

John S. Buckley, Treasurer

Gateway Building

P. O. Box 17416

Washington, D.C. 20041

C00001966

7904009428:



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20463

March 3, 1978

John S. Buckley, Treasurer
Fund for a Conservative Majority
AKA Young America Campaign
Gateway Building
Post Office Box 17416
Washington, D.C. 20041

Dear Mr. Buckley:

It has come to the attention of the Federal Election Commission that you may have failed to file the February Monthly Report of Receipts and Expenditures as required by the Federal Election Campaign Act. This Report should disclose all financial activity from January 1, through January 31, 1978.

Your apparent failure to file the February Monthly Report gives the Commission reason to believe you are in possible violation of 2 U.S.C. §434.

You are hereby afforded a reasonable opportunity to demonstrate why no action should be taken against you. If you have not filed the required Report, you should do so within ten (10) days of receipt of this notice with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, and your Secretary of State or equivalent state officer.

However, if you have filed the above-mentioned Report, or if you require additional information, please contact our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

Certified Mail
Return Receipt Requested

79040091283



FEDERAL ELECTION COMMISSION

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

April 17, 1978

John S. Buckley, Treasurer
Fund For A Conservative Majority
AKA Young America Campaign
Gateway Building
P.O. Box 17416
Washington, DC 20041

Dear Mr. Buckley:

You have been notified by the Federal Election Commission that you have failed to file the February Monthly Report of Receipts and Expenditures, as required by the Federal Election Campaign Act. This report should disclose all financial activity from January 1, through January 31, 1978.

Your continued failure to file the February Monthly Report gives the Commission reasonable cause to believe that you are in violation of 2 U.S.C. 434. You have thirty (30) days to conciliate this matter. Failure to respond may subject you to civil penalties and may result in the publication of your name on a list of non-filers. If you have any further questions, please contact our Reports Analysis Division on the toll free number (800) 424-9530. Our local number is (202) 523-4508.

Sincerely,

Thomas E. Harris

Thomas E. Harris
Chairman

Certified Mail
Return Receipt Requested



79040094284

FUND FOR A CONSERVATIVE MAJORITY

1ST NOTICE

438356

CB/RAD

PS Form 3811, Nov. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one).
 Show to whom and date delivered.....¢
 Show to whom, date, and address of delivery.....¢
 RESTRICTED DELIVERY
 Show to whom and date delivered.....¢
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery \$.....
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 Fund for a Conservative Majority

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 438356 | |
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 88

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS
 Y M

☆ GPO : 1977

2ND NOTICE

943664

RCTB Fund for a Conservative Majority

PS Form 3811, Nov. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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: *AS*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | 943664 | |
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

APR 19 1978

☆ GPO : 1978-O-203-428



FEDERAL ELECTION COMMISSION

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

May 9, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 503 - Interim Status Report - dated 5-3-78
Signed by General Counsel: 5-5-78
Received in Office of Commission
Secretary: 5-5-78, 3:20

The above-mentioned document was circulated on a 24 hour no-objection basis at 3:00 p.m., May 8, 1978.

As of 4:00, this date, no objections have been received in the Office of Commission Secretary to the Interim Status Report.

79040094286

May 5, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 503

Please have the attached Interim Status Report on MUR 503 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040094287

BEFORE THE FEDERAL ELECTION COMMISSION

MAY 3, 1978

In the Matter of)
)
Fund for a Conservative) MUR 503
Majority)

INTERIM STATUS REPORT

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During the audit of the Fund for a Conservative Majority ("the Committee"), the Audit Division discovered that the Committee had failed to disclose independent expenditures made on behalf of the candidacy of Ronald Reagan. Pursuant to a recommendation by the Audit Division the required Schedule E's were filed on September 9, 1977.

The auditors also discovered that the Committee had initially failed to report the occupations and principal places of business of 69.1% of its itemized contributors, a figure later reduced to 53.8%.

On February 23, 1978, the Commission found reason to believe that the Committee had violated 2 U.S.C. §434(b)(9) and (13) and 2 U.S.C. §434(b)(2). A letter was sent to the treasurer of the Committee informing him of the Commission's decision. On March 9, 1978, during a telephone conversation with a Commission attorney the Committee treasurer stated that

the Committee planned no more steps with regard to the question of independent expenditure reporting, but that the Committee was in the process of collecting the missing information as to the occupations and principal places of business of contributors. On May 1, 1978, a member of the audit staff was informed by the Committee treasurer that this latter information would be delivered to the Commission by May 5.

5/5/78
Date

William C. Oldaker
William C. Oldaker
General Counsel

79040094289



FEDERAL ELECTION COMMISSION

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

March 22, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: MUR 503 (78) - Interim Status Report dated 3-15-78
Signed by General Counsel 3-17-78
Received in Commission Secretary's
Office: 3-17-78, 4:07

The above-mentioned document was circulated to the
Commissioners on a 24 hour no-objection basis at 4:30, March 20,
1978.

As of 9:00 a.m., this date, no objections have been received
in the Office of Commission Secretary to the Interim Status Report.

79040094290

March 17, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 503

Please have the attached Interim Status Report on MUR 503 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040094291

BEFORE THE FEDERAL ELECTION COMMISSION

March 15, 1978

In the Matter of)
)
) MUR 503(78)
)
Fund for a Conservative Majority)

INTERIM STATUS REPORT

7904009429 ?
During the audit of the Fund for a Conservative Majority ("the Committee"), the Audit Division discovered that the Committee had failed to disclose independent expenditures on behalf of the candidacy of Ronald Reagan. Such failure to report independent expenditures constitutes a violation of 2 U.S.C. §434(b)(a) and (13). Pursuant to a recommendation by the Audit Division the required Schedule E's were filed on September 7, 1977.

The Committee was found to be in apparent violation of 2 U.S.C. §434 (b)(2) by having initially failed to report the occupations and principal places of business of 69.1% of its itemized contributors, a figure later reduced to 53.8%. A "best efforts" claim was made as to most of the remaining omissions, a claim based upon the request for this information contained on the Committee's original donor reply card.

On February 23, 1978, the Commission found reason to believe that the Committee had violated 2 U.S.C. §434 (b)(9) and (13) and 2 U.S.C. §434(b)(2). A letter was sent to

the treasurer of the Committee informing him of the Commission's decision. The treasurer has acknowledged this letter via a telephone call during which he stated that the Committee is in the process of collecting the missing information on occupations and principal places of business but that the Committee plans no additional action regarding the independent expenditures on behalf of Ronald Reagan.

7904009120;

3/17/78
Date

William C. Oldaker
William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

February 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Buckley, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D. C. 20041

Re: MUR 503

Dear Mr. Buckley,

The Federal Election Commission has found reason to believe that the Fund for a Conservative Majority ("FCM") has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that FCM failed to report independent expenditures in the sum of \$39,655.26 made on behalf of the campaign of Ronald Reagan in violation of 2 U.S.C. § 434(b) (9) and (13) and that FCM has failed to exert its best efforts to secure missing information concerning the occupations and principal places of business of 53.5% of its itemized contributors as required by 2 U.S.C. § 434(b) (2).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. 2 U.S.C. § 437g (a) (4). Please submit any factual or legal materials you believe are relevant to the Commission's investigation of this matter. Where appropriate, statements or explanations should be made under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.



79040094201

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at 202-523-4039.

Sincerely,

William C. Oldaker
General Counsel

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MUR 503 AW

PS Form 3811, Nov. 1977

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

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$ ____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
John Buckley, Treas

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *438279* | |
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
PK

MAR 9 1978
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 926

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Buckley, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D. C. 20041

Reg. NO. 503

Dear Mr. Buckley,

The Federal Election Commission has found reason to believe that the Fund for a Conservative Majority ("FCM") has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that FCM failed to report independent expenditures in the sum of \$39,655.26 made on behalf of the campaign of Ronald Reagan in violation of 2 U.S.C. § 434(b) (9) and (13) and that FCM has failed to exert its best efforts to secure missing information concerning the occupations and principal places of business of 53.5% of its itemized contributors as required by 2 U.S.C. § 434(b) (2).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. 2 U.S.C. § 437g (a) (4). Please submit any factual or legal materials you believe are relevant to the Commission's investigation of this matter. Where appropriate, statements or explanations should be made under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

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2/27/15

This matter will remain confidential in accordance with
5 U.S.C. § 552(a)(7)(B) unless you notify the Commission
in writing that you wish the investigation to be made public.
If you have any questions, please contact Anne A. Weissenborn,
the attorney assigned to this matter, at 202-328-4039.

Sincerely,

William C. Oldaker
General Counsel

79040094297

BEFORE THE FEDERAL ELECTION COMMISSION

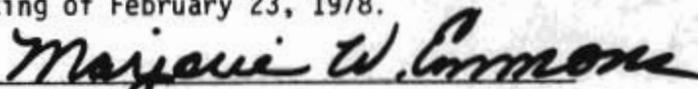
In the Matter of)
Fund for Conservative Majority)

MUR 503 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 23, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission approved the recommendations in the First General Counsel's Report to take the following actions in the above-captioned matter:

1. Find that the Fund for a Conservative Majority has violated 2 U.S.C. Section 434(b)(9) and(13) by failing to report independent expenditures on behalf of Ronald Reagan and 2 U.S.C. Section 434(b)(2) by failing to provide information concerning occupations and principal places of business as to 53.5% of its itemized contributors.
2. Send the draft letters attached to the General Counsel's report of February 10, 1978, first circulated on a no-objection basis, and objected to by Commissioners Thomson and Tiernan, thereby placing it on the agenda for the Executive Session of February 23, 1978. Commissioners Thomson and Tiernan withdrew their objections at the meeting of February 23, 1978.



Marjorie W. Emmons
Secretary to the Commission

DATED: February 24, 1978

79040094298



FEDERAL ELECTION COMMISSION

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

February 13, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 503 (78) - First General Counsel's Report

The above-mentioned document was circulated to the Commissioners on February 10 at 4:00.

Commissioner Thomson has submitted an objection thereby placing MUR 503 (78) on the Executive Session Agenda for Thursday, February 23, 1978.

79040094200



February 10, 1970

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. GARR
SUBJECT: MUR 503

Please have the attached 7 day report on MUR 503 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040091300

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION FEB 10 1979

MUR # 503
DATE COMPLAINT RECEIVED
BY OGC _____

STAFF MEMBER Weissenborn

COMPLAINANT'S NAME:

RESPONDENT'S NAME: Fund for Conservative Majority

RELEVANT STATUTE: 2 U.S.C. § 434(b) (9) and (13);
2 U.S.C. § 434(b) (2)

INTERNAL REPORTS CHECKED: Audit Report
Audit Records

FEDERAL AGENCIES CHECKED:

SUMMARY OF ALLEGATIONS

During its audit of the Fund for a Conservative Majority ("the Committee"), the Audit Division discovered that the Committee had failed to disclose independent expenditures on behalf of the candidacy of Ronald Reagan. Failure to report such expenditures constitutes a violation of 2 U.S.C. § 434(b) (9) and (13).

The Audit Division also discovered that the Committee failed to make reasonable "best efforts" to obtain information on occupations and principal places of business as to 53.5% of its itemized contributions. Omission of this information concerning contributors constitutes a violation of § 434(b) (2).

PRELIMINARY LEGAL ANALYSIS

1. 2 U.S.C. § 434(b) (9) requires that committees' reports contain the identity of each person to whom an expenditure in excess of \$100 is

made and also the name and address of each candidate on whose behalf an expenditure is made. 2 U.S.C. § 434(b)(13) and 11 C.F.R. § 109.2 require that committees making independent expenditures in excess of \$100 which expressly advocate the election or defeat of a clearly identified candidate shall report such expenditures to the Commission.

Here the Committee made expenditures totaling \$39,655.25 on behalf of the candidacy of Ronald Reagan which it initially failed to identify as independent expenditures on its disclosure reports. (Pursuant to a recommendation from the Audit Division the committee has since filed the required Schedule E's to reflect these independent expenditures.) Approximately 75% of the unidentified expenditures were made after May 11, 1976, the date Section 434(b)(13) became effective. As to the remaining 25%, the Committee was on notice via Section 434(b)(9) that it was to identify each candidate on whose behalf an expenditure in excess of \$100 had been made. Therefore, we believe that the Commission should find reason to believe that the Committee violated 2 U.S.C. § 434(b)(9) and (13).

2. 2 U.S.C. § 434(b)(2) requires that committees' reports of contributions contain information as to the occupations and principal places of business, if any, of each person whose contribution is itemized. Here the Committee initially failed to report occupations and principal places of business as to 69.1% of itemized contributors. Seven requests for additional information were sent to the Committee in this regard, and the Committee attempted to secure the information requested in two of these seven requests by writing a follow-up letter which produced results in 50% of the instances involved. As a result, the Committee's overall failure rate was reduced to 53.3%. With regard to

two of the remaining RFAI'a, the Committee has claimed exertion of its "best efforts", efforts which have consisted only of its having requested the missing information on the donor reply card sent out with the original solicitation letters. In addition, in 44 instances involving three reports to the Commission, a "best efforts" stamp was used on itemized contributions which lacked the required information, the stamp again referring only to the request made on the original donor reply card.

Until January, 1977, the present Fund for a Conservative Majority reported as Young American's Campaign Committee ("YACC"). A YACC donor reply card in the possession of the Audit Division states, "A Federal Statute requires us to request the following information from you," and then provides spaces for "occupation" and "business address". This particular card was used for a specific fund; however, we understand that its format was used for all such cards. If so, we believe that the wording on the Committee's donor reply cards emphasized the necessity of the Committee's requesting the information, and not its being provided by the contributor. Therefore, the original card does not represent a best effort to obtain the required information. We thus believe that the Commission should find reason to believe that the Committee has violated 2 U.S.C. § 434(b)(2) by its failure to secure and report the missing information regarding the occupations and principal places of business of 53.5% of its itemized contributors.

RECOMMENDATIONS

1. Find^{RTB} that the Fund for a Conservative Majority has violated 2 U.S.C. § 434(b)(9) and (13) by failing to report independent expenditures on behalf of Ronald Reagan and 2 U.S.C. § 434(b)(2) by failing to provide information concerning occupations and principal places of business as to 53.5% of its itemized contributors.
2. Send attached letter.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Buckley, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D. C. 20041

Re: MUR 503

Dear Mr. Buckley,

The Federal Election Commission has found reason to believe that the Fund for a Conservative Majority ("FCM") has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that FCM failed to report independent expenditures in the sum of \$39,655.26 made on behalf of the campaign of Ronald Reagan in violation of 2 U.S.C. § 434(b) (9) and (13) and that FCM has failed to exert its best efforts to secure missing information concerning the occupations and principal places of business of 53.5% of its itemized contributors as required by 2 U.S.C. § 434(b) (2).

Under the Act you have an opportunity to demonstrate that no action should be taken against you. 2 U.S.C. § 437g (a) (4). Please submit any factual or legal materials you believe are relevant to the Commission's investigation of this matter. Where appropriate, statements or explanations should be made under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.



79040094304

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at 202-523-4039.

Sincerely,

William C. Oldaker
General Counsel

79040094305



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: BILL OLDAKER
BOB COSTA

FROM: BILL LOUGHREY ^{AL}

RE: FUND FOR A CONSERVATIVE MAJORITY AUDIT

DATE: DECEMBER 15, 1977

I have reservations about sending the attached letter to the Fund For A Conservative Majority for the following reasons.

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11/19/77
EB
1. FCM disclosed as operating expenditures approximately \$40,000 in expenditures on behalf of Ronald Reagan. These expenditures were not labeled as being independent nor as being made on behalf of Reagan. I feel this matter warrants being treated as a MUR.
 2. The failure of the committee to make best efforts to obtain contributor information could also be treated as a Matter Under Review. (The figure in the Reagan audit was 40%; here it is 70%). - reduced to 53.5%.
 3. Based on my understanding of this audit and this committee, Young Americans For Freedom is the connected organization of Young America Campaign Committee or FCM. The Committee shares common office space and has common personnel with YAF. Mr. John Buckley is, I believe, National Director of YAF and is also treasurer of FCM. FCM has failed to disclose this relationship on its reports. In the audit report sent to the Committee, FCM should be asked to list Young Americans For Freedom as its connected organization.

For the above reasons I think the proposed letter should be withheld.



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: ORLANDO B. POTTER
FROM: BOB COSTA *RC*
DATE: December 14, 1977
SUBJECT: COMMITTEE LETTER REQUESTING AMENDMENTS

Attached are two (2) copies of a letter to be sent to the Fund for a Conservative Majority with regard to the audit of the committee.

This report was previously submitted to the Office of General Counsel for review. That office concurred with our recommendations and their comments have been incorporated into the report (copy attached).

This letter is being circulated to your office on a 48 hour no-objection basis. Should no objection be received by 12:00 p.m., Friday, December 16, the letter will be sent.

Attachments as stated





FEDERAL ELECTION COMMISSION

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

December 12, 1977

Mr. John Buckley, Treasurer
Fund for a Conservative Majority
Gateway Building, Box 17416
Washington, D.C. 20041

Dear Mr. Buckley:

The attached is to formally advise you of the findings and recommendations of the Audit staff resulting from the audit of the Fund For a Conservative Majority. These matters were discussed at the conclusion of the field work at Dulles Airport, Washington, D.C. on July 14, 1977.

You are requested to comply with the stated recommendations within 30 days of the receipt of this letter. After expiration of the 30 day period, the Audit staff will present a final audit report to the Commission for approval and subsequent public release. Efforts to comply with the recommendations will be noted in the report when presented. Failure to comply with the recommendations will also be noted.

If you have any questions, please do not hesitate to contact Mr. Thomas Haselhorst or Mr. Craig Russell at (202) 523-4155.

Sincerely,

Robert J. Costa
Assistant Staff Director
for the Audit Division

Attachment as stated

cc: Mr. Ron Robinson, Chairman
Young Americans for Freedom, Inc.

CERTIFIED MAIL:
RETURN RECEIPT REQUESTED



Findings and Recommendations

A. Reporting of Receipts

(1) Section 434(b)(3) of Title 2, United States Code, requires that a political committee disclose in its reports the total sum of individual contributions made to such committee during the reporting period.

Our review of the Committee's records and disclosure reports revealed that the Committee had deleted receipts totaling \$11,796.85 from their 1975 year-end report by a subsequent amendment filed in April, 1976. Available evidence and partial confirmation by a present officer lead the Audit staff to conclude that these receipts were raised in 1975 for a special project involving independent expenditures against a clearly defined candidate for the 1976 Presidential Election.

To date we have received conflicting explanations from the Committee as to why these receipts were deleted. It is the opinion of the Audit staff that Committee officials at that time mistakenly believed that these 1975 receipts were ultimately not reportable to the Commission, and hence, deleted them from 1975 year-end totals by amendment. These receipts were subsequently included in 1976 FEC report totals.

We recommended that the Committee, through comprehensive amendments, re-insert these 1975 receipts into the total receipts for that year, adjusting the 1976 totals accordingly. On September 7, 1977, the Committee filed the requested amendments. The 1975 amendment correctly reflected the receipts in question, however, the totals on the 1976 comprehensive amendment were not adjusted properly.

Recommendation

We recommend that the Committee file, within 30 days from receipt of this letter, a corrected 1976 comprehensive amended report reflecting the accurate adjustment to the '76 receipt totals.

(2) Reporting of Earmarked Contributions

Section 441a(a)(8) of Title 2, United States Code, states in part with respect to earmarked contributions, that the intermediary or conduit shall report the original source and the intended recipient of such contributions to the Commission.

Our review of the Committee records showed the receipt of five (5) \$1,000 earmarked contributions solicited by the Committee in connection with independent expenditures made on behalf of Ronald Reagan. These contributions were solicited specifically for this purpose and the contributors in question were fully aware that their gifts would be going entirely for the benefit of the candidate involved. We recommended to the Committee that they amend the report in question to reflect the earmarked nature of the contributions by identifying the candidate on whose behalf they were received, together with the fact that they were to be used for the purpose of making independent expenditures on behalf of Ronald Reagan.

Recommendation

Since we received the Committee's amended schedules on September 7, 1977, showing the requested information, no further action is recommended on this matter.

(3) Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code, requires political committees to include in their reports the full name, mailing address, occupation and principal place of business of each person who has made one or more contributions to the committee within the calendar year in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

Our examination of the Committee records indicated eight (8) contributions aggregating in excess of \$100 for a calendar year which were not itemized as required on the reports to the Commission. In addition, five (5) contributions were reported with incorrect amounts. This represented 5.2% of the total number of itemized contributors for the period under audit.

790400313

Recommendation

On September 7, 1977, we received the amendments including the previously omitted contributions; however, this amendment failed to reflect the correcting adjustments for the five (5) contributions originally reported with incorrect amounts. Since we are requesting the Committee to furnish additional and/or corrected information in other areas, we recommend that the Committee provide the corrected contribution information within 30 days of receipt of this letter.

(4) Best Efforts to Obtain Contributor Information

Section 434(b)(2) of Title 2, United States Code requires political committees to include in their reports to the Commission the full name, mailing address, occupation and principal place of business of each person who has made one or more contributions to the committee within the calendar year aggregating in excess of \$100, together with the amount and date of such contributions. Part 102.9(e) of the Commission Regulations further specifies that it is the duty of the treasurer of a political committee to use his best efforts to obtain the required information and to keep a complete record of the efforts to do so.

Our review of the Committee records, FEC reports, as well as discussions with the Treasurer revealed that:

(1) for 168 contributors itemized (69.1% of total) during the audit period, the Committee failed to provide the contributor's occupation and principal place of business;

(2) the Committee received routine Commission Requests for Additional Information (RAFI) requesting this information in connection with seven (7) reports;

(3) the Committee made a second attempt to obtain this information for only two of the seven RAFI's (reducing the above percentage to 53.5%), failing to maintain a complete record of their efforts;

(4) in letter responses to two other RAFI's (concerning the 10 day pre- and 30 day post-election reports), the Committee stated they had used their best efforts to obtain the missing information, but, as was subsequently disclosed, these best efforts referred only to the original request on the donor reply card sent out with the solicitation letter; and,

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(5) in 44 instances on three (3) FEC reports (7/10, 8/10 and 10/10/76) a "best efforts" stamp had been used on those itemized contributors lacking the required information, but that this also referred only to the original request in the solicitation packet.

Recommendation

It is the opinion of the Audit staff that the Committee failed to make a reasonable best effort to obtain the contributor's occupation and principal place of business in the majority of cases. Accordingly, we recommend that the Committee make a second attempt to obtain the required information from the contributor, document these efforts and file a comprehensive amended report with the additional information within 30 days of receipt of this letter.

B. Recordkeeping and Reporting of Expenditures

(1) Reporting of Independent Expenditures

Section 434(b)(9) and (13) of Title 2 of the United States Code require a political committee to report on a separate schedule the identity of the person to whom independent expenditures are made, the amount, date, and purpose of each independent expenditure in excess of \$100, and the name, address and office sought by each candidate on whose behalf such expenditure was made; and, to certify 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.

Our review of the Committee's records disclosed expenditures totaling \$39,655.26 made on behalf of Ronald Reagan which the Committee failed to identify as independent expenditures on its disclosure reports. In addition, the Committee failed to file the required Treasurer's Certification of Independence in connection with these expenditures and for an additional \$25,156.26 of independent expenditures properly identified on its reports (also on behalf of Ronald Reagan).

We recommended that the Committee file the required Schedules E for the independent expenditures which they failed to report properly, and a separate Certification of Independence for those which were previously identified as such.

79010174312

Recommendation

Since we received the requested documents on September 7, 1977, no further action is recommended. However, the Committee is reminded of the seriousness of this omission for future compliance.

(2) Itemization of Expenditures

Section 434(b)(9) of Title 2, United States Code, requires a political committee to identify each person to whom expenditures have been made within the calendar year in an aggregate amount exceeding \$100, and the amount, date, and purpose of each such expenditure.

a) During the course of our review of Committee records, it was observed that the Committee failed to itemize seven (7) expenditures in excess of \$100 each, totaling \$5,571.80. In addition, the Committee failed to itemize expenditures aggregating over \$100 for the calendar years as follows:

1. 1975 - 28 expenditures totaling \$774.91 (36.4% of total number of expenditures requiring itemization).
2. 1976 - 22 expenditures totaling \$839.03 (9.1% of total number of expenditures requiring itemization).

The Audit staff recommended to the Committee that they file comprehensive amendments for the years involved, reflecting the expenditures involved on Line 20a, Schedule B, as required, and adjusting the appropriate totals on the summary sheets.

Recommendation

Since we received the comprehensive amendment including the information requested above on September 7, 1977, no further action is recommended on this matter.

b) Our review of Committee records disclosed two (2) expenditures on behalf of the Hemenway for Congress Campaign which were not reported properly. In both cases, the Hemenway Campaign was reported as the recipient; however, the actual payee on the check was not identified as required. We recommended to the Committee that a comprehensive amendment be filed for the period of 1/1-3/3/77 reflecting the accurate reporting of these transactions.

Recommendation

We received the Committee's 1977 amendment on September 7, 1977, which failed to reflect the information requested above. Therefore, we recommend that the Committee correct their amendment within 30 days from receipt of this letter to accurately reflect these transactions.

(3) Documentation for Expenditures

Section 432(d) of Title 2, United States Code, states in part that the treasurer shall keep a receipted bill, stating the particulars, for every expenditure made by a political committee in excess of \$100 in amount, and for any such expenditures to the same person if the aggregate amount of such expenditures to that person during a calendar year exceeds \$100.

During our review of Committee records, it was discovered that in 147 cases (36.0% of the total number of expenditures requiring such documentation), the Committee had failed to retain a receipted bill or the cancelled check(s) and either the original bill, invoice or a contemporaneous memorandum for expenditures in excess of \$100 or which aggregated in excess of \$100.

This matter was brought to the attention of the Committee and they were advised to improve their record retention procedures in the future. Committee representatives responded affirmatively to our suggestion.

Recommendation

We recommend that the Committee make a reasonable effort to obtain the required documentation and to furnish the Audit staff with the documentation obtained or evidence of their efforts to obtain it within 30 days of receipt of this letter.

C. Disclosure of Depository

Sections 433(b)(9) and (c) of Title 2, United States Code, require political committees to include in their Statement of Organization a listing of all banks, safety deposit boxes, or other repositories used, and to report any changes in information previously submitted in a Statement of Organization.

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During the examination of the Committee's records, the Committee was found to have maintained a bank account, now closed, during the audit period which it failed to disclose in its original Statement of Organization or any amendment thereto.

Recommendation

We recommend that the Committee file an amended Statement of Organization disclosing the repository within 30 days of receipt of this letter.

D. Notices on Committee Solicitation

(1) Section 435(b) of Title 2, United States Code, requires political committees to include on the face or front page of all literature and advertisements soliciting contributions the following notice:

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

Our review of the Committee's solicitation efforts revealed that of the 15 multiple-piece solicitations used, 11 contained an altered form of the above notice on only one (1) piece in the solicitation packet, two (2) solicitation packets had no notice at all, and two (2) were satisfactory.

The Committee was advised of the requirements of the Act regarding this matter. They responded affirmatively, noting that closer adherence would be achieved in the future.

Recommendation

Since most of the solicitations contained the notice in at least the altered form, and because the Committee's response has been positive in this matter, no further action is recommended.

(2) Section 441d(2) of Title 2, United States Code, requires any person making an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through some type of general public political advertising not authorized by a candidate,

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his authorized political committees, or their agents, to clearly and conspicuously state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization.

Our review of the Committee's solicitations in connection with their independent expenditures on behalf of Ronald Reagan disclosed that of the two (2) solicitation packets sent out, neither letter contained the required information and only one (1) of the two (2) enclosed donor cards contained that information.

The Committee was advised of their failure to adhere to the Act regarding this matter and their response indicated adherence in the future.

Recommendation

Because the Committee has responded positively in this matter, no further action is recommended.

E. Overall Recommendation

It is the opinion of the Audit staff that, in the aggregate, the above findings represent a serious disregard for the disclosure and recordkeeping requirements of Title 2 of the United States Code. Therefore, it is the recommendation of the Audit staff that the Committee advise the Commission in writing within 30 days of receipt of this letter of the steps they have taken to correct the above problem areas in order to prevent their recurrence in the future.

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FEDERAL ELECTION COMMISSION

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

To [unclear] Audit
Learn thru Egan
APC

October 14, 1977

MEMORANDUM

TO: BILL OLDAKER
THROUGH: ORLANDO B. POTTER
FROM: *to H* TOM HASELHORST/BOB COSTA
SUBJECT: AUDIT REPORT

Attached is the audit report for the Fund for A Conservative Majority for your review and comment. The findings recommend a MUR be initiated as well as an amended report be filed within 30 days of receipt of the audit report. We would propose that the attached be considered an interim report and that it be sent with a cover letter to the Committee as notification of the required amendment and the MUR. We would then hold the final report pending receipt of the amended statement and disposition of the MUR.

If you have any questions, please call Tom Haselhorst on Extension 3-4155.

Attachment as stated

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This audit report is based on documents and working papers supporting each of its factual statements. They form part of the record upon which the Commission based its decision on the matters in this report and were available to the Commission and appropriate staff for review.

II. Findings and Conclusions

A. Reporting of Receipts

(1) Reporting of Total Receipts

Section 434(b)(3) of Title 2, United States Code requires that a political committee disclose in its reports the total sum of individual contributions made to such committee during the reporting period.

Our review of the Committee's records and disclosure reports revealed that the Committee had deleted receipts totaling \$11,796.85 from their 1975 year-end report by a subsequent amendment filed in April, 1976. Although Committee officials at that time are no longer serving on the Committee, available evidence and partial confirmation by a present officer lead the Audit staff to conclude that these receipts were raised in 1975 for a special project involving independent expenditures against a clearly defined candidate for the 1976 Presidential Election.

To date we have received conflicting explanations from the Committee as to why these receipts were deleted. In response to a previous Committee inquiry, the Commission issued OC 1975-121 on February 23, 1976, dealing with contributions raised and independent expenditures made by the Committee in connection with this project. The Opinion of Counsel did not specifically state that contributions raised under the auspices of the project had to be reported. It is the opinion of the Audit staff that Committee officials at that time mistakenly believed that these 1975 receipts were ultimately not reportable to the Commission and hence, deleted them from 1975 year-end totals by amendment. These receipts were subsequently included in 1976 FEC report totals.

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We recommended that the Committee, through comprehensive amendments, re-insert these 1975 receipts into the total receipts for that year, adjusting the 1976 totals accordingly. On September 7, 1977, the Committee filed the requested amendments. The 1975 amendment correctly reflected the receipts in question, however, the totals on the 1976 comprehensive amendment were not adjusted properly.

Recommendation

We recommend the Commission require the Committee to file within 30 days from receipt of this report a corrected 1976 comprehensive amendment reflecting the accurate adjustment to the '76 receipt totals.

(2) Reporting of Earmarked Contributions

Section 441a(a)(8) of Title 2, United States Code states in part with respect to earmarked contributions, that the intermediary or conduit shall report the original source and the intended recipient of such contributions to the Commission.

Our review of the Committee records showed the receipt of five (5) \$1,000 earmarked contributions solicited by the Committee in connection with independent expenditures made on behalf of Ronald Reagan. These contributions were solicited specifically for this purpose and the contributors in question were fully aware that their gifts would be going entirely for the benefit of the candidate involved. We recommended to the Committee that they amend the report in question to reflect the earmarked nature of the contributions by identifying the candidate on whose behalf the resulting independent expenditures were made.

Recommendation

Since we received the Committee's amended schedules on September 7, 1977, showing the requested information, no further action is recommended on this matter.

(3) Itemization of Contributions

Section 434(b)(2) of Title 2, United States Code requires political committees to include in their reports the full name, mailing address, occupation and principal place of business of each person who has made one or more contributions to the committee within the calendar year in an aggregate amount or value in excess of \$100, together with the amount and date of such contributions.

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used their best efforts to obtain the missing information, but, as was subsequently disclosed, these best efforts referred only to the original request on the donor reply card sent out with the solicitation letter; and (5) in 44 instances on three FEC reports (7/10, 8/10 and 10/10/76) a "best efforts" stamp had been used on those itemized contributors lacking the required information, but that this also referred only to the original request in the solicitation packet.

The Committee was advised that a "best effort" consisted of at least a second attempt to obtain the required information from the contributor, and documentation of these efforts. We recommended that they make a second such request in the future, when necessary. No recommendation was made to the Committee regarding the past itemized contributors lacking the required information.

Recommendation

It is the opinion of the Audit staff that the Committee failed to make a reasonable best effort to obtain the contributor's occupation and principal place of business in the majority of cases. Accordingly, we recommend that this finding be instituted as a Matter Under Review.

B. Recordkeeping and Reporting of Expenditures

(1) Reporting of Independent Expenditures

Sections 434(b)(9) and (13) of Title 2, of the United States Code require a political committee to report on a separate schedule the identity of the recipient, the amount, date and purpose of each independent expenditure in excess of \$100, and the name, address and office sought by each candidate on whose behalf such expenditure was made; and, to certify 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.

Our review of the Committee's records disclosed expenditures totaling \$39,655.26 made on behalf of Ronald Reagan which the Committee failed to identify as independent expenditures on its disclosure reports. In addition, the Committee failed to file the required Treasurer's Certification of Independence in connection with these expenditures and an additional \$25,156.26 of independent expenditures properly identified on its reports (also on behalf of Ronald Reagan).

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We recommended that the Committee file the required Schedules E for the independent expenditures which they failed to report properly, and a separate Certification of Independence for those which were previously identified as such.

Recommendation

Since we received the requested documents from the Committee on September 7, 1977, no further action is recommended.

(2) Itemization of Expenditures

Section 434(b)(9) of Title 2, United States Code requires a political committee to identify each person to whom expenditures have been made within the calendar year in an aggregate amount exceeding \$100, and the amount, date, and purpose of each such expenditure.

a) During the course of our review of Committee records, it was observed that the Committee failed to itemize seven (7) expenditures in excess of \$100 each, totaling \$5,571.80. In addition, the Committee failed to itemize expenditures aggregating over \$100 for the calendar years as follows:

1. 1975 - 28 expenditures totaling \$774.91 (36.4% of total number of expenditures requiring itemization).

2. 1976 - 22 expenditures totaling \$839.03 (9.1% of total number of expenditures requiring itemization).

The Audit staff recommended to the Committee that they file comprehensive amendments for the years involved, reflecting the expenditures involved on Line 20a, Schedule B, as required, and adjusting the appropriate totals on the summary sheets.

Recommendation

Since we received the comprehensive amendment including the information requested above on September 7, 1977, no further action is recommended on this matter.

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b) Our review of Committee records disclosed two expenditures on behalf of the Hemenway for Congress Campaign which were not reported properly. In both cases, the Hemenway Campaign was reported as the recipient; however, the actual payee on the check was not identified as required. We recommended to the Committee that a comprehensive amendment be filed for the period of 1/1-3/3/77 reflecting the accurate reporting of these transactions.

Recommendation

We received the Committee's 1977 amendment on September 7, 1977, which failed to reflect the information requested above. We recommended that the Committee be required to correct their amendment within 30 days from receipt of this report to accurately reflect these transactions.

(3) Documentation for Expenditures

Section 432(d) of Title 2, United States Code states in part, that the treasurer shall keep a receipted bill, stating the particulars, for every expenditure made by a political committee in excess of \$100 in amount, and for any such expenditures to the same person if the aggregate amount of such expenditures to that person during a calendar year exceeds \$100.

During our review of Committee records, it was discovered that in 147 cases (36.0% of the total number of expenditures requiring such documentation), the Committee had failed to retain a receipted bill or the cancelled check(s) and either the original bill, invoice or a contemporaneous memorandum for expenditures in excess of \$100 or which aggregated in excess of \$100.

This matter was brought to the attention of the Committee and they were advised to improve their record retention procedures in the future. Committee representatives responded affirmatively to our suggestion.

Recommendation

We recommend that the Committee be required to make a reasonable effort to obtain the required documentation, and furnish the Commission with the documentation obtained or evidence of their efforts to obtain it.

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C. Disclosure of Depository

Sections 433(b)(9) and (c) of Title 2, United States Code require political committees to include in their Statement of Organization a listing of all banks, safety deposit boxes, or other repositories used, and to report any changes in information previously submitted in a Statement of Organization.

During the examination of the Committee's records, the Committee was found to have maintained a bank account during the audit period which it failed to disclose in its original Statement of Organization, or any amendment thereto.

We recommended to the Committee that they file an amended Statement of Organization, covering the period the account was open, disclosing the repository in question.

Recommendation

To date we have not received the requested amendment from the Committee. Accordingly, we recommend the Commission require the Committee to file the amendment to their Statement of Organization disclosing the previously omitted repository.

D. Notices on Committee Solicitation

(1) Section 435(b) of Title 2, United States Code requires political committees to include on the face or front page of all literature and advertisements soliciting contributions the following notice:

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

Our review of the Committee's solicitation efforts revealed that of the fifteen (15) multiple-piece solicitations used, eleven (11) contained an altered form of the above notice on only one piece in the solicitation packet, two solicitation packets had no notice at all, and two were satisfactory.

The Committee was advised of the requirements of the Act regarding this matter. They responded affirmatively, noting that closer adherence would be achieved in the future.

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Recommendation

Since most of the solicitations contained the notice in at least the altered form, and because the Committee's response has been positive in this matter, no further action is recommended.

(2) Section 441d(2) of Title 2, United States Code requires any person making an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate through some type of general public political advertising not authorized by a candidate, his authorized political committees, or their agents, to clearly and conspicuously state that the communication is not authorized by any candidate, and state the name of the person who made or financed the expenditure for the communication, including, in the case of a political committee, the name of any affiliated or connected organization.

Our review of the Committee's solicitations in connection with their independent expenditures on behalf of Ronald Reagan disclosed that of the two solicitation packets sent out, neither letter contained the required information and only one of the two enclosed donor cards contained that information.

The Committee was advised of their failure to adhere to the Act regarding this matter and their response indicated adherence in the future.

Recommendation

Because the Committee has responded positively in this matter, no further action is recommended.

E. Overall Recommendation

It is the opinion of the Audit staff that, in the aggregate, the above findings represent a serious disregard for the disclosure and recordkeeping requirements of Title 2 of the United States Code. Therefore, it is the recommendation of the Audit staff that the Committee be required to advise the Commission in writing of the steps they have taken to correct the above problem areas in order to prevent their recurrence in the future.

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III. Auditor's Statement

Except for the matters specifically noted in this report, the audit disclosed that the Fund for a Conservative Majority conducted their activities in conformity with the Federal Election Campaign Act of 1971, as amended, in all material aspects.

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FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

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