



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TAP # \_\_\_\_\_

Date Filmed 7/16/79 Camera No. --- 2

Cameraman BPC



FEDERAL ELECTION COMMISSION

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

May 10, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Blair Shaffer  
109 Frost Parkway  
Tiffin, Ohio 44883

Re: MUR 815

Dear Mr. Shaffer:

Enclosed please find a signed copy of the conciliation agreement reached between you and the Commission in resolution of the Commission's findings in MUR 815. Your check in the amount of \$200, the required civil penalty, has been received.

The Commission has now closed the file on this matter. Thank you for your cooperation.

Sincerely,

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

William C. Oldaker  
General Counsel

Enclosure



Case # 99.21

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )

9822 2

CONCILIATION AGREEMENT

This matter was initiated on the basis of a written complaint filed with the Federal Election Commission (FEC or Commission). An investigation was conducted and the Commission has found reasonable cause to believe that the respondent, Freedom First Foundation, violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii).

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Freedom First Foundation, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondent Freedom First Foundation and the subject matter of this proceeding;
- II. That respondent Freedom First Foundation has had a reasonable opportunity to demonstrate that no action should be taken in this matter;
- III. That the pertinent facts in this matter are as follows:
  - A. The Freedom First Foundation registered with the Commission on September 22, 1978 as a multicandidate committee.

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- B. The Foundation prepared and distributed an election packet prior to the general election expressly advocating the election of certain candidates and the defeat of others;
- C. Said election packet did not contain a notice that it was not authorized by any candidate and that it was financed by the Freedom First Foundation, violations of 2 U.S.C. § 441d(2); 11 C.F.R. §§ 109.4 (a) (1), 110.11(a) (1) (ii);
- D. The Foundation included an appropriate notice concerning availability of reports from the Commission on page 3 of a letter in the packet instead of on the "face or front" of the material as required by 2 U.S.C. § 435.
- E. The Freedom First Foundation's Ten Day Pre-General Election Report was due on October 28, 1978, and its 30 Day Post-General Election Report was due on December 7, 1978. The Foundation filed only one report, covering the entire term of its activity, on January 17, 1979. This report was also a termination report. The Foundation's failure to timely file its reports, filing a report purporting to meet the requirements of a Ten Day Pre-General Election Report and a 30 Day Post-General Election Report almost three months late, is a violation of 2 U.S.C. §§ 434(a) (1) (A) (i), (ii).

Wherefore, respondent Freedom First Foundation agrees:

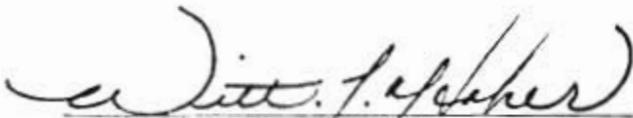
- I. That the above facts represent violations of 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii);
- II. That Respondent Freedom First Foundation will pay a civil penalty in the amount of \$200.00 pursuant to 2 U.S.C. § 437g(a)(6)(B);
- III. That Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq.

GENERAL CONDITIONS

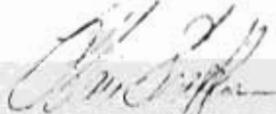
- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent, Freedom First Foundation, shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date: 13 April 1977

  
William C. Quidley  
General Counsel  
Federal Election Commission

Date: \_\_\_\_\_

  
Blair Shaffer, Chairman  
Freedom First Foundation

72040112607

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CLAIM CHECK NO.

389578

HOLD

DATE

5-18-79

1ST NOTICE

2ND NOTICE

RETURN

Detached from  
PS Form 3849-A  
Feb. 1978

Robert Blair Shaffer  
109 Frost Parkway  
Tiffin, Ohio 44883

REASON CHECKED  
Unclaimed \_\_\_\_\_  
Addressee unknown \_\_\_\_\_  
Insufficient Address \_\_\_\_\_  
No such street \_\_\_\_\_  
No such office in state \_\_\_\_\_  
Do not remain in this envelope \_\_\_\_\_



POSTAGE AND FEES PAID



CERTIFIED  
943650



FEDERAL ELECTION COMMISSION

125 K STREET NW  
WASHINGTON, DC 20461

May 21, 1979

Robert C. Grant  
114 East Ridgewood Parkway  
Denville, New Jersey 07834

Dear Mr. Grant:

On May 8, 1979, the Commission voted to terminate its investigation in MUR 815 and to accept a conciliation agreement and civil penalty from respondent, Freedom First Foundation, Robert Blair Shaffer, Chairman. A copy of the Commission's determination and the conciliation agreement is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation in this matter.

Sincerely,

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

William C. Oldaker  
General Counsel

Enclosures

1. Commission certification
2. Conciliation Agreement



FEDERAL ELECTION COMMISSION

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

May 10, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Blair Shaffer  
109 Frost Parkway  
Tiffin, Ohio 44883

Re: MUR 815

Dear Mr. Shaffer:

Enclosed please find a signed copy of the conciliation agreement reached between you and the Commission in resolution of the Commission's findings in MUR 815. Your check in the amount of \$200, the required civil penalty, has been received.

The Commission has now closed the file on this matter. Thank you for your cooperation.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure



150  
5/8/74

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Blain Shaffer  
102 Frost Parkway  
Tiffin, Ohio 44883

Re: MUR 815

Dear Mr. Shaffer:

Enclosed please find a signed copy of the conciliation agreement reached between you and the Commission in resolution of the Commission's findings in MUR 815. Your check in the amount of \$200, the required civil-penalty, has been received.

The Commission has now closed the file on this matter. Thank you for your cooperation.

Sincerely,

William C. Olander  
General Counsel

Enclosure

99.29

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )

9811 7

CONCILIATION AGREEMENT

This matter was initiated on the basis of a written complaint filed with the Federal Election Commission (FEC or Commission). An investigation was conducted and the Commission has found reasonable cause to believe that the respondent, Freedom First Foundation, violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii).

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Freedom First Foundation, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondent Freedom First Foundation and the subject matter of this proceeding;
- II. That respondent Freedom First Foundation has had a reasonable opportunity to demonstrate that no action should be taken in this matter;
- III. That the pertinent facts in this matter are as follows:
  - A. The Freedom First Foundation registered with the Commission on September 22, 1978 as a multicandidate committee.

- B. The Foundation prepared and distributed an election packet prior to the general election expressly advocating the election of certain candidates and the defeat of others;
- C. Said election packet did not contain a notice that it was not authorized by any candidate and that it was financed by the Freedom First Foundation, violations of 2 U.S.C. § 441d(2); 11 C.F.R. §§ 109.4 (a) (1), 110.11(a) (1) (ii);
- D. The Foundation included an appropriate notice concerning availability of reports from the Commission on page 3 of a letter in the packet instead of on the "face or front" of the material as required by 2 U.S.C. § 435.
- E. The Freedom First Foundation's Ten Day Pre-General Election Report was due on October 28, 1978, and its 30 Day Post-General Election Report was due on December 7, 1978. The Foundation filed only one report, covering the entire term of its activity, on January 17, 1979. This report was also a termination report. The Foundation's failure to timely file its reports, filing a report purporting to meet the requirements of a Ten Day Pre-General Election Report and a 30 Day Post-General Election Report almost three months late, is a violation of 2 U.S.C. §§ 434(a) (1) (A) (i), (ii).

Wherefore, respondent Freedom First Foundation agrees:

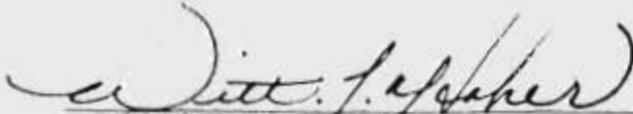
- I. That the above facts represent violations of 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii);
- II. That Respondent Freedom First Foundation will pay a civil penalty in the amount of \$200.00 pursuant to 2 U.S.C. § 437g(a)(6)(B);
- III. That Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq.

GENERAL CONDITIONS

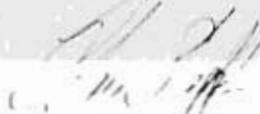
- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent, Freedom First Foundation, shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date: 12 April 1979

  
\_\_\_\_\_  
William C. Qadaver  
General Counsel  
Federal Election Commission

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Blair Shaffer, Chairman  
Freedom First Foundation

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter )  
 )  
Freedom First Foundation ) MUR 815

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 8, 1979 the Commission approved by a vote of 6-0 the following recommendations, as set forth in the General Counsel's Memorandum dated May 4, 1979, regarding the above-captioned matter:

1. Accept the Conciliation Agreement, attached to the above-named memorandum, and civil penalty as a resolution of matters considered in MUR 815.
2. Close the file.

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

Attest:

5-8-79

Date

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

Received in Office of Commission Secretary: Friday, 5-4-79, 2:49  
Circulated on 48 hour vote basis: Monday, 5-7-79, 12:00

May 4, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 815

Please have the attached Memo on MUR 815 distributed to the Commission on a 48 hour tally basis.

Thank you.



FEDERAL ELECTION COMMISSION

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

78 MAY 4 A 2: 49

May 4, 1979

MEMORANDUM

TO: The Commission  
FROM: William C. Oldaker *WCO*  
SUBJECT: Conciliation Agreement - MUR 815

The attached Conciliation Agreement was approved by the Commission on March 28, 1979. It has been returned by Respondent Freedom First Foundation, signed by Blair Shaffer, Chairman without addition or alteration. Respondent also submitted the required \$200 civil penalty.

Recommendations

Therefore, the Office of General Counsel makes the following recommendations:

1. Accept the attached Conciliation Agreement and civil penalty as a resolution of matters considered in MUR 815.
2. Close the file.



Purins (Lit #)  
9904

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )

98000

CONCILIATION AGREEMENT

This matter was initiated on the basis of a written complaint filed with the Federal Election Commission (FEC or Commission). An investigation was conducted and the Commission has found reasonable cause to believe that the respondent, Freedom First Foundation, violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii).

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Freedom First Foundation, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

- I. That the Federal Election Commission has jurisdiction over respondent Freedom First Foundation and the subject matter of this proceeding;
- II. That respondent Freedom First Foundation has had a reasonable opportunity to demonstrate that no action should be taken in this matter;
- III. That the pertinent facts in this matter are as follows:
  - A. The Freedom First Foundation registered with the Commission on September 22, 1978 as a multicandidate committee.

107-2507

- B. The Foundation prepared and distributed an election packet prior to the general election expressly advocating the election of certain candidates and the defeat of others;
- C. Said election packet did not contain a notice that it was not authorized by any candidate and that it was financed by the Freedom First Foundation, violations of 2 U.S.C. § 441d(2); 11 C.F.R. §§ 109.4 (a)(1), 110.11(a)(1)(ii);
- D. The Foundation included an appropriate notice concerning availability of reports from the Commission on page 3 of a letter in the packet instead of on the "face or front" of the material as required by 2 U.S.C. § 435.
- E. The Freedom First Foundation's Ten Day Pre-General Election Report was due on October 28, 1978, and its 30 Day Post-General Election Report was due on December 7, 1978. The Foundation filed only one report, covering the entire term of its activity, on January 17, 1979. This report was also a termination report. The Foundation's failure to timely file its reports, filing a report purporting to meet the requirements of a Ten Day Pre-General Election Report and a 30 Day Post-General Election Report almost three months late, is a violation of 2 U.S.C. §§ 434(a)(1)(A)(i), (ii).

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Wherefore, respondent Freedom First Foundation agrees:

- I. That the above facts represent violations of 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii);
- II. That Respondent Freedom First Foundation will pay a civil penalty in the amount of \$200.00 pursuant to 2 U.S.C. § 437g(a)(6)(B);
- III. That Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent, Freedom First Foundation, shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date: 19 April 1979

William C. Oldaker  
General Counsel  
Federal Election Commission

Date: \_\_\_\_\_

Blair Shaffer  
Blair Shaffer, Chairman  
Freedom First Foundation

CHEQUES AND MONEY ORDERS

Nº 32110

FOR

*January*

Tiffin, Ohio,

*1972*

56-203/412

PAY TO THE ORDER OF

*Federal Election Commission*

NOT VALID FOR MORE THAN \$200.00



**BancoOhio**  
First National Bank  
of Tiffin

151 HAMILTON ST. TIFIN, OHIO 44880  
OF TIFIN **200 AND 00/100**

*[Signature]*  
SIGNATURE  
*[Signature]*  
ADDRESS

⑆032110⑆ ⑆041202537⑆ 140⑆0⑆50025⑆



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MJE Ely JC*  
DATE: APRIL 25, 1979  
SUBJECT: MUR 815 - Interim Conciliation Report  
dated 4-23-79: Received in OCS  
4-23-79, 5:30

The above-named document was circulated on a 24-hour no-objection basis at 2:30, April 24, 1979.

The Commission Secretary's Office has received no objections of the Interim Conciliation Report as of 3:30 this date.

April 23, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 815

Please have the attached Interim Concil Report on  
MUR 815 distributed to the Commission.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

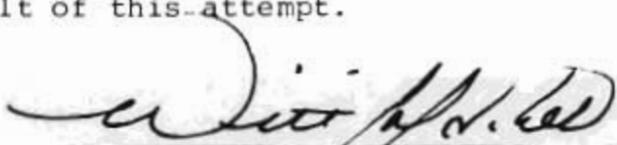
In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )  
Robert Blair Shaffer )

Interim Conciliation Report

On March 29, 1979, the Office of General Counsel sent a letter to Mr. Shaffer notifying him of the Commission's findings of reasonable cause to believe that the Foundation had violated the Federal Election Campaign Act. Since we have received neither a response from Mr. Shaffer nor notification of delivery via certified mail, we contacted the Post Office in South Schodack, New York, and were told that the letter had been forwarded to Mr. Shaffer.

Therefore, in an attempt to locate Mr. Shaffer and to reach a conciliation agreement in this matter, we have sent today, via Federal Express, another letter to Mr. Shaffer and one to Mr. Victor Cagliardi, Treasurer of the Foundation urging them to contact the Office of General Counsel. The Commission will be notified as to the result of this attempt.

4/23/79  
Date

  
William C. Oldaker  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 27, 1979, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated March 22, 1979, regarding the above-captioned matter:

1. Find reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. §441d(2), 11 C.F.R. §§109.4(a)(1), 110.11(a)(1)(ii) by not stating in the packet that it was authorized by any candidate and by not stating in the packet that it was financed by the Foundation.
2. Find reasonable cause to believe that the Foundation violated 2 U.S.C. §435(b) by not placing the required notice of availability of reports on the front of its material.
3. Take no further action with regard to the Foundation's possible violation of 2 U.S.C. §433(c), 11 C.F.R. §102.2(a)(6).
4. Find reasonable cause to believe that the Foundation violated 2 U.S.C. §§434(a)(1)(A)(i), ii, by failing to timely file reports as required by these sections.

Continued

MUR 815 (78)  
General Counsel's Report  
Dated March 22, 1979  
CERTIFICATION

Page 2

5. Proceed to conciliation in connection with the above findings.
6. Send the letter and Conciliation Agreement attached to the above-named report.

Attest:

3/28/79

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 3-23-79, 12:16  
Circulated on 48 hour vote basis: 3-23-79, 4:30

**BANK MONEY ORDER**

No 32110

56-753/412

FOR *County* Tiffin, Ohio, *April 1977*

PAY TO THE ORDER OF *Federal Election Commission*

NOT VALID FOR MORE THAN \$200.00

1ST NAT'L BK. OF TIFFIN **200 AND 00/100 CTS**

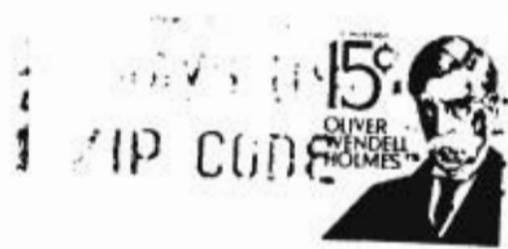


First National Bank of Tiffin

*[Signature]*  
SIGNATURE  
*[Address]*  
ADDRESS

⑆032110⑆ ⑆04⑆202537⑆ ⑆40⑆0⑆50026⑆

Call 11411



ZIP CODE

John Smith

1234

Washington DC 20545



FEDERAL ELECTION COMMISSION

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

April 24, 1979

FEDERAL EXPRESS

Victor Gagliardi  
710 James St.  
Utica, New York 13501

RE: MUR 815

Dear Mr. Gagliardi:

On March 29, 1979, I sent to:

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

a letter notifying him of the Commission's finding of reasonable cause to believe that the Foundation committed certain violations of the Federal Election Campaign Act. Included with the letter was a proposed conciliation agreement and copies are attached.

Since we have received no response from Mr. Shaffer as required by my March 29th letter, we have today sent another letter to him at his address in Tiffin, Ohio and this letter to you. Please immediately contact Mr. Shaffer and coordinate a response to the Commission's proposed Conciliation Agreement so that further action in this matter can be avoided.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4175.

Sincerely,

William C. Oldaker  
General Counsel



*Milk 815 - Des Moines*

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  
*Blair Shaffer, Chem.*

3 ARTICLE DESCRIPTION  
REGISTERED NO CERTIFIED NO INSURED NO  
*943124*

(Always obtain signature of addressee or agent)

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

4 DATE OF DELIVERY *APR 1 1977* CIV 6L  
POSTMARK  
*APR 1 1977* (Circular stamp)

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE  
CLERK'S INITIALS  
*ROF*



FEDERAL ELECTION COMMISSION

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

April 24, 1979

FEDERAL EXPRESS

Robert Blair Shaffer  
109 Frost Parkway  
Tiffin, Ohio 44883

RE: MUR 815

Dear Mr. Shaffer:

On March 29, 1979, I sent you a letter notifying you of the Commission's finding of reasonable cause to believe that the Freedom First Foundation committed certain violations of the Federal Election Campaign Act. This letter was sent to your address at the Foundation in South Schodack, New York and a copy is enclosed.

Since we have received no response from you as required by my March 29th letter, we are taking this additional step to attempt to locate you, reach a conciliation agreement in this matter and avoid further Commission action in this regard.

Please immediately contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4175 concerning your intentions in regard to the Conciliation Agreement.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

cc: Victor Gagliardi





FEDERAL ELECTION COMMISSION

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

March 29, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

On March 27, 1979, the Commission determined that there was reasonable cause to believe that the Freedom First Foundation committed certain violations of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii) by not stating in its election packet that it was not authorized by any candidate and by not stating in the packet that it was financed by the Foundation; violated 2 U.S.C. § 435(b) by not placing the required notice of availability of reports on the front of the materials; and violated 2 U.S.C. §§ 434(a)(1)(A)(i), (ii) by failing to timely file reports as required by these sections of the Act.

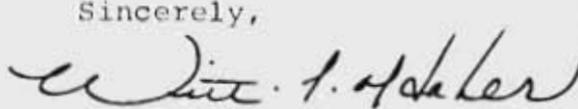
The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in the United States District Court and seek payment of a civil penalty not in excess of \$5000 or the amount of the violation.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.



If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202-523-4175.

Sincerely,



William C. Oldaker  
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

KFO  
3/28/79

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

On March , 1979, the Commission determined that there was reasonable cause to believe that the Freedom First Foundation committed certain violations of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii) by not stating in its election packet that it was not authorized by any candidate and by not stating in the packet that it was financed by the Foundation; violated 2 U.S.C. § 435(b) by not placing the required notice of availability of reports on the front of the materials; and violated 2 U.S.C. §§ 434(a)(1)(A)(i), (ii) by failing to timely file reports as required by these sections of the Act.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in the United States District Court and seek payment of a civil penalty not in excess of \$5000 or the amount of the violation.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.



-2-

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202-523-4175.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure



- B. The Foundation prepared and distributed an election packet prior to the general election expressly advocating the election of certain candidates and the defeat of others;
- C. Said election packet did not contain a notice that it was not authorized by any candidate and that it was financed by the Freedom First Foundation, violations of 2 U.S.C. § 441d(2); 11 C.F.R. §§ 109.4 (a) (1), 110.11(a) (1) (ii);
- D. The Foundation included an appropriate notice concerning availability of reports from the Commission on page 3 of a letter in the packet instead of on the "face or front" of the material as required by 2 U.S.C. § 435.
- E. The Freedom First Foundation's Ten Day Pre-General Election Report was due on October 28, 1978, and its 30 Day Post-General Election Report was due on December 7, 1978. The Foundation filed only one report, covering the entire term of its activity, on January 17, 1979. This report was also a termination report. The Foundation's failure to timely file its reports, filing a report purporting to meet the requirements of a Ten Day Pre-General Election Report and a 30 Day Post-General Election Report almost three months late, is a violation of 2 U.S.C. §§ 434(a) (1) (A) (i), (ii).

Wherefore, respondent Freedom First Foundation agrees:

- I. That the above facts represent violations of 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii), 2 U.S.C. § 435(b) and 2 U.S.C. §§ 434(a)(1)(A)(i), (ii);
- II. That Respondent Freedom First Foundation will pay a civil penalty in the amount of \$200.00 pursuant to 2 U.S.C. § 437g(a)(6)(B);
- III. That Respondent will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq.

GENERAL CONDITIONS

- I. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter at issue herein, or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- II. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

III. It is agreed that respondent, Freedom First Foundation, shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date: \_\_\_\_\_

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

Date: \_\_\_\_\_

\_\_\_\_\_  
Blair Shaffer, Chairman  
Freedom First Foundation

March 23, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 815

Please have the attached General Counsel's Report on MUR 815 distributed to the Commission on a 48 hour tally basis.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Freedom First Foundation )

GENERAL COUNSEL'S REPORT

Introduction

In its first consideration of this matter, the Commission found reason to believe that the Freedom First Foundation had violated certain FECA provisions in connection with its preparation and distribution of a packet of information expressly advocating the election of certain federal candidates and the defeat of others. A letter detailing the Commission's findings was sent to respondent. This report will detail the Commission's initial findings and respondent's submission pertaining to each finding.

Legal Analysis

A. The § 441d Notice

The Freedom First Foundation prepared and distributed an election packet which expressly advocated the election of James Courter as U.S. Representative and Jeffrey K. Bell as U.S. Senator. As described in the First General Counsel's Report, the packet's "Election Update" contained the phrases "FOR CONGRESS - - JAMES A. COURTER;" "ABOUT HELEN MEYNER" -- "SEE WHAT YOU CAN DO TO HELP RETIRE THIS WOMAN;" "FOR U.S. SENATE - - JEFFREY K. BELL" -- "JEFF BELL DESERVES YOUR SUPPORT ON NOV. 7th;" "VOTE FOR YOUR FREEDOM ON NOVEMBER 7th." The use of these phrases renders the statement an "express advocacy" communication. See 11 C.F.R. § 109.1(b)(2) and

the Supreme Court's Analysis in Buckley v. Valeo, 424 U.S. 1, 44 n. 52.

However, the election packet did not state whether or not it was authorized by candidates Courter or Bell as required by 2 U.S.C. § 441d, 11 C.F.R. § 110.11. In addition, the packet did not state who financed it as required by 11 C.F.R. § 110.11(a)(1)(ii). The Foundation responds by admitting that the packet did not contain these required notices. Apparently, the Foundation was not aware of these requirements and didn't know whether the packet was "authorized" or not. Respondent states that Mr. Courter "did not authorize us to (expressly) campaign in his behalf" and "that no one from our group ever met Mr. Courter." There is no evidence that the packet was authorized by either candidate.

Therefore, the Office of General Counsel recommends that the Commission find reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii) by not stating in the packet that it was not authorized by any candidate and by not stating in the packet that it was financed by the Foundation.

B. The § 435 Notice

As discussed in the First General Counsel's Report, the Foundation did make some attempt to comply with 2 U.S.C. § 435(b) as is evidenced by the following statement which appears on page 3 of the letter in the packet: "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C. " However, 2 U.S.C. § 435(b) states:

(b) Each political committee shall 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." (Emphasis added).

See also 11 C.F.R. § 102.13.

It is clear from both the statute [2 U.S.C. § 435(b)] and the Commission's regulations [11 C.F.R. § 102.13] that the notice is required to appear "on the face or front page" of all literature soliciting contributions.

In its response, the Foundation stated that the packet was not assembled in any determined order and that there "was no way of insuring which page would be the 'face or front' of the communication."

Although the packet did contain the notice as substantively required by 2 U.S.C. § 435(b), the Office of General Counsel recommends that the Commission find reasonable cause to believe that the Foundation violated 2 U.S.C. § 435(b) by not placing said notice on the front of the packet as required.

C. Notification of Candidates Supported

The Foundation's Statement of Organization lists the following candidates supported: Jeffrey K. Bell, Gordon Humphrey, Gerald Solomon, and John Pucciano. The Foundation also noted on its Statement of Organization, however, that it was supporting the entire ticket of the Republican party. See Statement of Organization at 2, #9. The response from the Foundation indicates that it thought James Courter was included as a candidate supported, but

that in any event it was under the impression that indicating support for an entire party's ticket was sufficient. 2 U.S.C. § 433(b)(6)(B) states as an alternative to listing all candidates supported, listing "if the committee is supporting the entire ticket of a party, the name of the party." Therefore, the Office of General Counsel recommends that the Commission take no further action with regard to the Foundation's possible violation of 2 U.S.C. § 433(c) and 11 C.F.R. § 102.2(a)(6) since the Foundation complied with those provisions.

D. Failure to File Reports

The Foundation's response admits that it filed its reports late. The Ten Day Pre-General Election Reports was due on October 28, 1978, and the 30 Day Post-General Election Report was due on December 7, 1978. The Foundation has filed only one report which it designated the January 31 Annual Report. This Report was filed with the Commission on January 17, 1979, and covered activity for the period 9/20-11/7/79. The Report disclosed a total receipts of \$1807.00 and the same amount expended - all in connection with the preparation and distribution of the election packet. The Foundation also attached a note to this report which stated that it was "disbanding" and that this report should be considered a termination report. The Office of General Counsel recommends that the Commission find reasonable cause to believe that the Foundation violated 2 U.S.C. §§ 434(a)(1)(A)(i), (ii) by failing to timely file these required reports.

Recommendations

1. Find reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii) by not stating in the packet that it was authorized by any candidate and by not stating in the packet that it was financed by the Foundation.

2. Find reasonable cause to believe that the Foundation violated 2 U.S.C. § 435(b) by not placing the required notice of availability of reports on the front of its material.

3. Take no further action with regard to the Foundation's possible violation of 2 U.S.C. § 433(c), 11 C.F.R. § 102.2(a)(6).

4. Find reasonable cause to believe that the Foundation violated 2 U.S.C. §§434(a)(1)(A)(i), (ii) by failing to timely file reports as required by these sections.

5. Proceed to conciliation in connection with the above findings.

6. Send the attached letter and conciliation agreement.

3/22/79  
Date

William C. Oldaker  
General Counsel

Attachments

1. Respondent's Submission Dated February 10, 1979.
2. Respondent's Report
3. Proposed Conciliation Agreement and Letter to Respondent

Perkins  
10 February 1979

9522

FEB 12 11:34

Attn: Kathleen Perkins, Atty  
Federal Elections Commission  
1325 K. Street N.W.  
Washington, D.C. 20463

9522

Dear Ms. Perkins,

I am writing to answer the complaint of Robert C. Hunt against the Freedom Fund Foundation (MUR 815(79)). I will reply by paragraph number (your letter of 26 January 1979).

(1) Mr. Carter's campaign did not authorize as to (expressly) campaign in his behalf. However, his campaign knew of us and helped us find volunteers. Therefore, we may be in error in not having Mr. Carter's explicit remarks on

way or the other. The campaign was so busy that no one from our group ever met Mr. Conter.

(1) The packet was financed by the Foundation. There was no outside group, or sole individual, who was responsible. Contributions from the ads were used, as is stated in the packet.

(2) There was no way of measuring which page would be the "face or front" of the communication because of preparation. Also, there are no specific pages (1-2-3 etc), and the required notice was placed on the election update etc.

(3) We believe Mr. Conter is on our original form. Please check this. In any event, we also checked the "straight ticket" block, which is why we filed our final report by district, not candidate.

(4) We were late on both forms. I was hurried under commitments I had postponed because of business.

As you may note, we have dissolved the Foundation.  
We request that you take into account the  
complexity of the regulations, the small scope  
of our efforts, and our inexperience in making  
a judgement in this case.

Sincerely

Robert B. Hoff

Dear Sir,

We are sorry we've delayed our filing, but we did so because we didn't know if we were going to continue or not.

We have decided to disband our organization because of the difficulty of raising funds. Please terminate our file.

Thank you,

Robert C. Walker

7977174111

FEC FORM 3  
 REVISED  
 January 1978  
 Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20463

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)

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 Franklin Trust Foundation 2 I.D. No. \_\_\_\_\_ Candidate/Committee  
 Name of Candidate or Committee (in full)  
220 Box  
 Address (number and street)  
Shelburne VT 12162  
 City, State and ZIP Code  Check if address is different than previously reported Year of Election 78

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)  
 October 10 Quarterly Report  Thirtieth day report following \_\_\_\_\_ election (which report)  
 January 31 Annual Report (primary, general or convention)  
 Monthly Report \_\_\_\_\_ on \_\_\_\_\_ in the State of \_\_\_\_\_  
 (month) (date)  
 This is a report for  Primary Election  General Election  Primary and General  Other (specify 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
<u>2/1/78</u> Through <u>7/31/78</u>		
6 Cash on hand January 1, 1978		\$ 0
7 Cash on hand at beginning of reporting period	\$ 0	
8 Total receipts (from line 19)	\$ 1807.00	\$
(a) Subtotal: Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$	\$
9 Total expenditures (from line 25)	\$ 1807.00	\$
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a)	\$ 0	\$
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$ 0	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule CI)	\$ 0	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule CI)	\$ 0	

I certify that I have examined this Report and to the best of my knowledge and belief, it is true, correct and complete.  
Robert J. ... June 30, 1978 [Signature]  
 (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 43 or Section 447 (see reverse side of form).

For further information, contact:  Federal Election Commission  
 1225 K Street, N.W.  
 Washington, D.C. 20463 or call 300-424-9520

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

NAME OF CANDIDATE OR COMMITTEE

REPORT COVERING THE PERIOD FROM: TO:

RECEIPTS

Column A This Period

Column B Calendar Year-To-Date

14. Contributions from individuals (including contributions in-kind):

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Sales and collections included above.

List by event on memo Schedule D (S \_\_\_\_\_)

(d) Subtotal of contributions from individuals

\$ 1100.00  
\$ 737.00

15. Transfers from Political Committees:

(a) Funds from affiliated authorized committee (itemize on Schedule A 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

\$  
\$  
\$  
\$

16. Other income:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Subtotal of other income

\$  
\$  
\$

17. Loans and Loan Repayments Received:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Subtotal of loans and loan repayments received

\$  
\$  
\$

18. Refunds, Repayments, Returns of Deposits:

(a) Itemized (use Schedule A)

(b) Unitemized

(c) Subtotal of refunds, repayments, returns of deposits

\$  
\$  
\$

19. Total Receipts

\$ 1837.00

EXPENDITURES

20. Operating Expenditures:

(a) Itemized (use Schedule B)

(b) Unitemized

(c) Subtotal of operating expenditures

\$  
\$  
\$

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

\$  
\$  
\$

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

\$  
\$  
\$  
\$

23. Independent Expenditures (use Schedule B)

\$

24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule B)

\$

25. Total Expenditures

\$ 1807.00

RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES

26. Total Receipts (from line 19)

\$

27. Transfers in (from line 15(d))

\$

28. Net Receipts (subtract line 27 from line 26)

\$

29. Total Expenditures (from line 25)

\$

30. Transfers Out (from line 22(d))

\$

31. Net Expenditures (subtract line 30 from line 29)

\$

**SCHEDULE B  
REVISED**

January, 1978  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

**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

Page 1 of 1 for  
Line Number \_\_\_\_\_

(Use Separate Schedules for  
each numbered line)

Name of Candidate or Committee in Full			
<i>Fredrick Fri-Franklin</i>			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>Miss Laird 15 C.D. New Jersey</i>	<i>Support of campaign</i>	<i>Oct 17-78</i>	<i>750.00</i>
	Expenditure for: <input type="checkbox"/> Primary <input checked="" 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
<i>Georgeant Catskill NY</i>	<i>Support of campaign</i>	<i>Oct 17, 78</i>	<i>1225.00</i>
	Expenditure for: <input type="checkbox"/> Primary <input checked="" 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
<i>RNE Printing Franklin Catskill NY 12021</i>	<i>Printing and postage</i>	<i>Sept 78</i>	<i>352.00</i>
	Expenditure for: <input type="checkbox"/> Primary <input checked="" 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)			\$ <i>1827.00</i>
TOTAL this period (last page this line number only)			\$ _____

11-10-78

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In Kind,  
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a  
of FEC FORM 3

Name of Candidate or Committee in Full			
<i>Frederic First Foundation</i>			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
<i>Paul M. Collier 17 Kent Ave 44251</i>	<i>retired</i>	<i>10/2/78</i>	<i>100.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
<i>P. E. Suter Erie St Columbia NY 11703</i>		<i>12/4/78</i>	<i>500.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
<i>M. G. Suter Erie St Columbia NY 11703</i>		<i>10/4/78</i>	<i>200.00</i>
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each this Period
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed	Aggregate Year To Date \$	
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ <i>700.00</i>

FREEDOM OF INFORMATION ACT FOUNDATION

BOX 272  
SEAFORTH, N.C. 27159

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





FEDERAL ELECTION COMMISSION

1325 K STREET NW  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

On March , 1979, the Commission determined that there was reasonable cause to believe that the Freedom First Foundation committed certain violations of the Federal Election Campaign Act of 1971, as amended. Specifically, the Commission found reasonable cause to believe that the Freedom First Foundation violated 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1), 110.11(a)(1)(ii) by not stating in its election packet that it was not authorized by any candidate and by not stating in the packet that it was financed by the Foundation; violated 2 U.S.C. § 435(b) by not placing the required notice of availability of reports on the front of the materials; and violated 2 U.S.C. §§ 434(a)(1)(A)(i), (ii) by failing to timely file reports as required by these sections of the Act.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in the United States District Court and seek payment of a civil penalty not in excess of \$5000 or the amount of the violation.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.



-2-

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202-523-4175.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

10 February 1979

12 P1:34

Attn: Kathleen Perkins, Atty  
Federal Elections Commission  
1325 K. Street N.W.  
Washington, D.C. 20463

encl 17

Dear Mr. Perkins,

I am writing to address the complaint  
of [redacted] against [redacted] Freedom  
Fund Foundation (NOR 815 (78)). I will  
reply by paragraph number (see letter of  
26 January 1979).

① The Carter's campaign did not authorize  
as to (expressly) campaign in his behalf. However,  
his campaign knew of us and helped us find  
volunteers. Therefore, we may be in error in  
not having Mr. Carter's explicit remarks on

way or the other. The campaign was so busy that no one from our group ever met Mr. Counts.

(1) The packet was financed by the Foundation. There was no outside group, or sole individual, who was responsible. Contributions from the ads were used, as is stated in the packet.

(2) There was no way of insuring which page would be the "face or front" of the communication because of preparation. Also, there are no specific pages (1-2-3 etc), and the required notice was placed on the election update also.

(3) We believe Mr. Counts is on our original form. Please check this. In any event, we also checked the "straight ticket" block, which is why we filed our final report by district, not candidate.

(4) We were late on both forms. I was hurried under commitments I had postponed because of business.

As you may note, we have dissolved the Foundation.  
We request that you take into account the  
complexity of the regulations, the small scope  
of our efforts, and our inexperience in making  
a judgement in this case.

Sincerely

W. H. H. H.

*A. L. W. [unclear]*



*Ms. Kathleen Imig Perkins, Atty  
Federal Elections Commission  
1325 K Street NW  
Washington D.C.*

PE:10 11-80

*20463*

*file*



FEDERAL ELECTION COMMISSION

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

January 31, 1979

MEMORANDUM

TO: TOM HASELHORST

THROUGH: ORLANDO B. POTTER

FROM: WILLIAM C. OLDKOTT *W.C. Oldkott*

SUBJECT: Commission Recommendation - MUR 315

As per the attached Commission Certification in MUR 315, please remove the Freedom First Foundation from your list of referrals for non-filing of reports.



11271



FEDERAL ELECTION COMMISSION

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

January 26, 1979

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

The Federal Election Commission has received a complaint which alleges that the Freedom First Foundation (the "Foundation") committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 815(78).

The Commission has found reason to believe that the matters alleged in the complaint state possible violations of 2 U.S.C. §§441d, 435(b), 433(c), 434, and 11 C.F.R. §§109.4, 110.11, 102.13, 102.2(a)(6) and 104.4(b). Specifically, it appears that

- (1) The Freedom First Foundation may have violated 2 U.S.C. §441d and 11 C.F.R. §110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its "Election Update" communication (Placed by the Foundation in the Dover (N.J.) Daily Advance) and 11 C.F.R. §110.11(a)(1)(ii) by failing to include on the communication the name of the person(s) who financed the communication. These notifications are required on all communications which expressly advocate the election or defeat of clearly identified Federal candidates.
- (2) The Freedom First Foundation may have violated 2 U.S.C. §435(b) and 11 C.F.R. §102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.
- (3) The Freedom First Foundation may have violated 2 U.S.C. §433(c) and 11 C.F.R. §102.2(a)(6) by not properly amending its statement of organization to include James A. Courter as a candidate supported.



(4) The Freedom First Foundation may have violated 2 U.S.C. §434(a)(1)(A)(i) by failing to file the required Ten Day Pre-General Election Report. In addition, the Foundation has previously been notified of the Commission's finding of reasonable cause to believe that the Foundation had failed to file the required 30 Day Post-General Election Report.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

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

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

Sincerely,

*William C. Oldaker*

William C. Oldaker  
General Counsel

Attachment  
Complaint

PS Form 3811, Apr 1977

**MAIL ROOM**

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  
 Alan Shapiro, Chairman  
 Freedom First Foundation  
 2035 South Schick Road  
 N.S.

3 ARTICLE DESCRIPTION REGISTERED NO. CERTIFIED NO. INSURED NO.  
 98373

(Always obtain signature of addressee or agent)  
 I have received the article described above  
 SIGNATURE  Addressee  Authorized agent

4 DATE OF DELIVERY 2/5/79  
 POSTMARK  
 FEB 5 1979  
 CLEARS THROUGH S  
 R 7

5 ADDRESS: Complete only if requested  
 1345 West Miller

6 UNABLE TO DELIVER BECAUSE

5090 1977-0-249 595

KED  
1/25/74

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

The Federal Election Commission has received a complaint which alleges that the Freedom First Foundation (the "Foundation") committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 815(78).

The Commission has found reason to believe that the matters alleged in the complaint state possible violations of 2 U.S.C. §§441d, 435(b), 433(c), 434, and 11 C.F.R. §§109.4, 110.11, 102.13, 102.2(a)(6) and 104.4(b). Specifically, it appears that

- (1) The Freedom First Foundation may have violated 2 U.S.C. §441d and 11 C.F.R. §110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its "Election Update" communication (Placed by the Foundation in the Dover (N.J.) Daily Advance) and 11 C.F.R. §110.11(a)(1)(ii) by failing to include on the communication the name of the person(s) who financed the communication. These notifications are required on all communications which expressly advocate the election or defeat of clearly identified Federal candidate.
- (2) The Freedom First Foundation may have violated 2 U.S.C. §435(b) and 11 C.F.R. §102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.
- (3) The Freedom First Foundation may have violated 2 U.S.C. §433(c) and 11 C.F.R. §102.2(a)(6) by not properly vesting its statement of organization to local to James A. Courter and his wife supported.

(4) The Freedom First Foundation may have violated 2 U.S.C. §434(a)(1)(A)(i) by failing to file the required Ten DAY Pre-General Election Report. In addition, the Foundation has previously been notified of the Commission's finding of reasonable cause to believe that the Foundation had failed to file the required 30 DAY Post-General Election Report.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

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

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

Sincerely,

William C. Oldaker  
General Counsel

7904011371

January 22, 1979

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 815

Please have the attached First General Counsel's Report on MUR 815 distributed to the Commission on a 48 hour tally basis.

Thank you.

19040112710

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 815 (78)  
Robert Blair Shaffer, Chairman )  
Freedom First Foundation )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on January 25, 1979, the Commission determined by a vote of 4-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated January 22, 1979, regarding the above-named matter:

1. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §441d, 11 C.F.R. §110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its statement and 11 C.F.R. §110.11(a)(1)(ii) by failing to include the name of the person(s) who financed the communication.
2. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §435(b) and 11 C.F.R. §102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.
3. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §433(c) and 11 C.F.R. §102.2(a)(6) by not properly amending its statement of organization to include James A. Courter as a candidate supported.

(Continued)

4. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §434(a)(1)(A)(i) by failing to file the required Ten Day Pre-General Election Report.
5. Proceed to conciliation in connection with the Foundations failure to file its 30 Day Post-General Election Report.
6. Notify the Reports Analysis Division to remove the Freedom First Foundation from its list of referrals for non-filing.
7. Find no reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §434(e).
8. Send the letter, attached to the above-named report, to the respondent.

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

Attest:

*1/25/79*

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

Received in Office of Commission Secretary: 1-22-79, 11:57  
Circulated on 48 hour vote basis: 1-22-79, 5:00

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 JAN 22 1979

79 JAN 22 AM 11:52  
MUR NO. 815 (78)  
DATE COMPLAINT RECEIVED  
BY OGC \_\_\_\_\_  
STAFF  
MEMBER Perkins

SOURCE: Robert C. Grant, New Jersey

RESPONDENT'S NAME: Robert Blair Shaffer, Chairman,  
Freedom First Foundation

RELEVANT STATUTE: 2 U.S.C. §§ 441d, 433(c), 435(b), 434;  
11 C.F.R. §§ 110.11, 109.4(a)(1), 102.13, 102.2(a)(6),  
104.4(b)(4).

INTERNAL REPORTS CHECKED: Freedom First Foundation -- Statement of  
Organization

FEDERAL AGENCIES CHECKED: N/A

BACKGROUND

A. The Complaint

On November 6, 1978, the Commission received a notarized complaint from Mr. Robert C. Grant alleging that the Freedom First Foundation (the Foundation) violated sections 441d and 434(e) of the Federal Election Campaign Act. According to Mr. Grant a packet placed by the Foundation in the Dover (N.J.) Daily Advance does not contain "...disclaimers on the literature stating the treasurer of the organization and exactly who is funding this packet...they are advocating support of two candidates and the defeat of another without proper procedure." Mr. Grant also noted that a § 435(b) statement had appeared in the packet. (Attachment I)

B. Reporting and Registration

On September 22, 1978, the Foundation registered with the Commission in accordance with 2 U.S.C. § 433. On October 16, 1978, the Commission found reason to believe that the Foundation had violated 2 U.S.C. § 432(e)(3) and 434 for its failure to file an October 10 quarterly report. The Foundation responded to the notification on October 23, 1978 stating that "as of September 30, 1978, no fundraising or spending activities had been undertaken." (Attachment II) As of this writing the Foundation has not yet filed its ten day pre-general election report or its thirty day post-general election report.

The Commission has found RTPB and RCTB in connection with the Foundation's failure to file the 30 day post-general election report, but apparently no such findings have been made in connection with the Foundation's failure to file the 10 day pre-general election report.

C. The Packet

The packet complained of consists of ten pages. The first three pages are a cover letter with the letterhead "Freedom First Foundation" and dated October 1, 1978. The letter is signed by the Foundation's Chairman, Robert Blair Shaffer. The fourth page is entitled "ELECTION UPDATE" and a synopsis of Candidates James A. Courter, Helen Meyner and Jeffrey K. Bell is given. The fifth and sixth pages discuss taxes, inflation and the U.S. Military. The seventh page contains excerpts from the Wall Street Journal, dated December 15, 1977, and Newsweek dated January 16, 1978. The eighth page contains a quote from Edmund Burke, the ninth page an unsigned message from the Foundation, and the tenth page consists of an envelope addressed to the Foundation. (Attachment III).

PRELIMINARY LEGAL ANALYSIS

A. The § 441d Notice

According to the complaint, the Freedom First Foundation prepared the packet (See Attachment III) and placed it in the Dover (N.J.) Daily Advance. The packet's "ELECTION UPDATE" begins in bold type with "FOR CONGRESS -- JAMES A. COURTER." It then describes Mr. Courter in very favorable terms. Next follows a negative paragraph "ABOUT HELEN MEYNER." Ms. Meyner is described as "James Courter's opponent" and the reader is urged to "SEE WHAT YOU CAN DO TO HELP RETIRE THIS WOMAN." The "update" concludes with a paragraph describing Jeffrey K. Bell which includes: "FOR U.S. SENATE -- JEFFREY K. BELL"...JEFF BELL DESERVES YOUR SUPPORT ON NOV. 7th." And, finally, "AND VOTE FOR YOUR FREEDOM ON NOVEMBER 7th."

The Foundation's "Election Update" presents a clear case of "express advocacy." It expressly advocates the election of James A. Courter, the defeat of Helen Meyner and the election of Jeffrey K. Bell. The use of the phrases "For Congress," "Help Retire," "For U.S. Senate," "Deserves Your Support on Nov. 7th," and "Vote for Your Freedom on November 7th" renders the statement an "express advocacy" communication. See 11 C.F.R. § 109.1(b)(2) and the Supreme Court's analysis in Buckley v. Valeo, 424 U.S. 1, 44 n. 52.

FECA's Section 441d, 2 U.S.C. § 441d, requires that persons who finance the publication of a communication which "expressly advocat[es] the election or defeat of a clearly identified candidate"

(1) if authorized by a candidate, his authorized political committees or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the Commission, state that the communication has been authorized; or

(2) if not authorized by a candidate, his authorized political committees, or their agents, shall clearly and conspicuously, in accordance with regulations prescribed by the

Commission, 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 required to be disclosed under section 433(b)(2).

See also 11 C.F.R. § 110.11. However, the Foundation's "Election Update" does not contain an authorization statement -- an apparent violation of 2 U.S.C. § 441d(1), 11 C.F.R. § 110.11 -- or if the expenditure for the statement was made independent of the candidates supported, a non-authorization notice -- an apparent violation of 2 U.S.C. § 441d(2), 11 C.F.R. §§ 109.4(a)(1) 110.11(a)(1)(ii). In addition, the statement does not include "the name of the person who made or financed the expenditure for the communication" as required by 11 C.F.R. § 110.11(a)(1)(ii).

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 441d, 11 C.F.R. §§ 110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its statement and 11 C.F.R. § 110.11(a)(1)(ii) by failing to include the name of the person(s) who financed the communication.

B. The § 435(b) Notice

The Foundation did make some attempt to comply with 2 U.S.C. § 435(b) as is evidenced by the following statement which appears on page 3 of the letter in the packet: "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C." However, 2 U.S.C. § 435(b) states:

(b) Each political committee shall 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." (Emphasis added).

See also 11 C.F.R. § 102.13.

It is clear from both the statute [2 U.S.C. § 435(b)] and the Commission's regulations [11 C.F.R. § 102.13] that the notice is required to appear "on the face or front page" of all literature soliciting contributions. Although this violation might appear to be de minimis, since other apparent FECA violations exist in connection with the packet, it would seem appropriate to also point out the error in placement of the notice to the Foundation. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 435(b) and 11 C.F.R. § 102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.

C. The Change in Candidates Supported

Page two of the Foundation's Statement of Organization, filed September 22, 1978, lists four candidates who will be supported by the Committee. See 2 U.S.C. § 433(b)(6). James A. Courter is not included in this list although his election is expressly advocated in the Foundation's "Election Update." FECA requires, 2 U.S.C. § 433(c), that any "change in information previously submitted in a statement of organization shall be reported to the Commission within a 10-day period following the change." See also 11 C.F.R. § 102.2(a)(6). The Foundation has not reported a change in the candidates it supports to include James A. Courter. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 433(c) and 11 C.F.R. § 102.2(a)(6) by not properly amending its statement of organization to include James A. Courter as a candidate supported.

D. Failure to File Reports

The Freedom First Foundation has failed to file both its Ten Day Pre-General Election Report, due October 28, 1978 and its 30 Day Post-General Election Report, due December 7, 1978. For some reason, the Foundation's failure to file was not noted by the computer and therefore no RTB/RCTB findings were made in connection with the non-filing of the Ten Day Pre-General Election Report. However, the Commission did find RTB and RCTB in connection with the Foundation's failure to file the 30 Day Post-General Election Report. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 434(a)(1)(A)(i) by failing to file the required Ten Day Pre-General Election Report, proceed to conciliation in connection with the Foundation's failure to file its 30 Day Post-General Election report and notify the Reports Analysis Division to remove the Freedom First Foundation from its list of referrals for non-filing.

E. Section 434(e) Allegation

Complainant alleges that the absence of notifications on the Foundation's packet violates 2 U.S.C. § 434(e). Section 434(e) states certain reporting requirements for persons "other than political committee(s)." Since the Freedom First Foundation is a registered political committee, § 434(e) would not address its reporting obligations. Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 434(e).

RECOMMENDATION

1. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. § 441d, 11 C.F.R. § 110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its statement and 11 C.F.R. § 110.11(a)(1)(ii) by failing to include the name of the person(s) who financed the communication.

2. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §435(b) and 11 C.F.R. §102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.

3. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §433(c) and 11 C.F.R. §102.2(a)(6) by not properly amending its statement of organization to include James A. Courter as a candidate supported.

4. Find reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §434(a)(1)(A)(i) by failing to file the required Ten Day Pre-General Election Report.

5. Proceed to conciliation in connection with the Foundation's failure to file its 30 Day Post-General Election Report.

6. Notify the Reports Analysis Division to remove the Freedom First Foundation from its list of referrals for non-filing.

7. Find no reason to believe that the Freedom First Foundation may have violated 2 U.S.C. §434(e).

8. Send the attached letter to respondent.

Attachments

1. Complaint
2. Respondent's Statement of Organization
3. Commission's Mailgram to Respondent - RTB for failure to file Quarterly Report and respondent's response.
4. Respondent's Publication
5. Proposed letter to respondent.

114 E. Ridgewood Parkway  
Denville, N.J. 07834  
(201) 625-3983

MUR 815

Mr. Jay Myerson  
Federal Election Commission  
1100 G. St., N.W.  
Washington, D.C. 20463

807837

Attachment I

Dear Mr. Myerson:

I would like to file a complaint against the Freedom First Foundation, Box 222, South Schodack, N.Y. 12162, Robert Blair Shaffer, Chairman, in compliance with 2 U.S.C. 437, g (a) (1).

These people placed a packet in the Dover (N.J.) Daily Advance containing copies of a Wall St. Journal article, an unsigned cover letter, slander against Helen Meyner (D. NJ-13), and paragraphs supporting James Courter and Jeffrey Bell all titled "Election Update", a sheet on taxes, inflation, and U.S. Military Inferiority and of course a return envelope for a monetary contribution to the Foundation to "help alert other Americans to the perilous condition of the 2 party system."

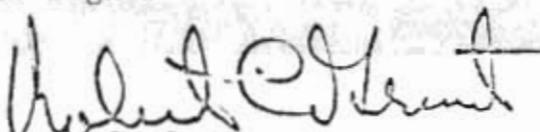
The "report" states "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C." If there is such a report available, I would like to see it.

There are no disclaimers on the literature stating the treasurer of the organization and exactly who is funding this packet. They are violating the Federal Election Campaign Act of 1971 2 U.S.C. 434 (e) and 441 (d) and are advocating support of two candidates and the defeat of another without proper procedure.

Documentation of my allegation is enclosed in their packet (per attached) as it appeared in the daily newspaper.

I am not a candidate nor am I filing this complaint on behalf of or at the request of a candidate.

It continues to amaze me that newspaper management is unaware of Federal Election Commission standards and will print or insert damn near anything if the price is right.

  
Robert C. Grant

Signed, sworn and notarized this 2<sup>nd</sup> day of Nov, 1973.



DOUGLAS COUNTY  
NOTARY PUBLIC  
M. J. [unclear]

Attachment II

# FREEDOM FIRST FOUNDATION

BOX 222  
SOUTH SCHODACK, N.Y. 12162

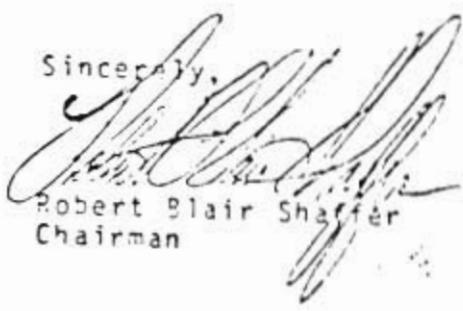
23 October 1978

Federal Elections Commission  
Washington, D.C.

Dear Sirs,

Our committee was only recently formed (22 September) and as of 30 September 1978 we had not undertaken any fundraising or spending activities.

Sincerely,



Robert Blair Shaffer  
Chairman

7 0 0 3 0 0 2 5 1 5 1

Attachment II

Records with respect to each election.

1. Name of Committee (in full)  Check if name of address is changed  
Freedom First Foundation

2. Identification Number

(b) Address (number and street)  
P.O. Box 222

3. Date  
September 22, 1978

(c) City, State and ZIP code  
South Schodack, New York 12162

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, Caucus, etc.) Election, 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
None		

If the registering political committee has identified a "connected organization" active, 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 sheet if number of sheets exceeds 6. Attach and attach to this Statement of Organization (Indicate on the separate sheet where each item is continued on separate page.)



Attachment II

Statement of Organization For a Committee

(Page 3)

FEC Form 1  
July 1976  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Name of Committee: **Freedom First Foundation**

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
Robert Blair Shaffer	109 Frost Parkway Tiffin, Ohio 44883	Chairman
M. David Shaffer	1735 East County Rd. 50 Tiffin, Ohio 44893	Vice-Chairman
Victor Gagliardi	710 James St. Utica, N.Y. 13501	Treasurer
Dorothy Zdunczyk	2034 South Old Post Rd. Castleton, N.Y. 12061	Secretary

12. Does this committee plan to stay in existence beyond the current calendar year?  Yes  No  
If "Yes" for how long? January 1, 1981

13. In the event of dissolution, what disposition will be made of residual funds? Outstanding debts, Candidates Contributions

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
Old Fort Banking Company	P.O. Box 99, Old Fort, Ohio 44861

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
None			

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.

*Victor Gagliardi*  
(Signature of Treasurer)

25 Sept 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

1-135006-289008 10/14/78 ICS WA  
10/14/78



Attachment II

132-2654

3 OCT 28 P 2:17

\*\*\*\*\*CERTIFIED R 125\*\*\*\*\*412915-12289-00106\*\*\*\*\*  
FREEDOM FIRST FOUNDATION  
VICTOR GAGLIARDI  
P.O. BOX 222  
SOUTH SCHORACK NY 12162

\*\*\*\*\*CERTIFIED\*\*\*\*\*

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE OCTOBER 10 QUARTERLY REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT.

UNLESS YOU WERE RECENTLY REGISTERED, PRIOR NOTIFICATION WAS SENT TO YOU APPROXIMATELY 30 DAYS AGO ADVISING YOU THAT YOUR THIRD QUARTER 1978 REPORT WAS DUE ON OCTOBER 10, 1978. THE REPORT MUST DISCLOSE YOUR CAMPAIGN RECEIPTS AND EXPENDITURES FROM JULY 1, 1978 (OR FROM THE CLOSING DATE OF YOUR LAST REPORT OR FROM THE DATE IN WHICH YOU BECAME A CANDIDATE OR ORGANIZED AS A COMMITTEE) THROUGH SEPTEMBER 30, 1978.

YOUR APPARENT FAILURE TO FILE THIS REPORT GIVES THE COMMISSION REASON TO BELIEVE THAT YOU ARE IN VIOLATION OF 2 U.S.C. 532(E)(3) AND 532.

YOU ARE HEREBY AFFORDED A REASONABLE OPPORTUNITY TO DEMONSTRATE WHY NO ACTION SHOULD BE TAKEN AGAINST YOU. YOUR REPORT SHOULD BE FILED IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 1325 K STREET, N.W., WASHINGTON, D.C. 20005. A COPY OF THIS REPORT SHOULD ALSO BE FILED WITH YOUR SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

IF YOU HAVE FILED THE REQUIRED REPORT OR REQUIRE ADDITIONAL INFORMATION, PLEASE CONTACT THE REPORTS ANALYSIS DIVISION ON THE TOLL FREE NUMBER (800)426-6931. OUR LOCAL NUMBERS ARE (202)523-1474 (PARTY) AND 523-1404 (NON-PARTY, PRESIDENTIAL, INDEPENDENT EXPENDITURES).

SINCERELY,

JOAN D. AIKENS  
CHAIRMAN

CERTIFIED MAIL  
RET BY RECEIPT REQUESTED  
10/14/78

REGISTERED MAIL



Attachment II

\*78 SEP 28 AM 11:46

# First Class Mail

7 0 7 3 7 7 6 1 7 3 0

OM FIRST FOUNDATION  
Box 222  
Schodack, N.Y. 12162

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

STLETON-ON-HUDSON, N.Y. 12033

# FREEDOM FIRST FOUNDATION

BOX 222  
SOUTH SCHODACK, N.Y. 12162

*Attachment III*

1 October, 1978

Dear Citizen,

I am writing you in an effort to forestall the greatest political crisis our nation has faced since the disintegration of the Whigs in 1848. The crisis I am referring to is, of course, the imminent collapse of the Republican Party.

Registered Republicans make up only less than 18% of the electorate. Republicans in Congress are outgunned 2 to 1, and of the 50 state governors, there are only 12 Republicans. Republicans control only 19 of the 99 state legislative bodies. Nor are these isolated or temporary instances of Republican weakness. Democrats have completely controlled Congress for 40 of the last 44 years. Even more disturbing is that Republican congressional candidates received 45% of the votes cast in the '76 national elections but won only 32% of the seats at stake because of district gerrymandering by Democrat governors, the same governors who will be in control when new districts are drawn in 1981. The party of Lincoln, Roosevelt and Taft is fast fading from the political landscape of America.

The Foundation views with great alarm the demise of one of the last bastions of free enterprise thought, concern for individual rights, and insistence on a strong national defense that have characterized the Republican Party over the last three decades. We feel it is essential to maintain some semblance of the two party system, and we fear that in "Koreagate" and the underhanded measures used to shove a record pay raise through against conservative opposition, that we have already seen a glimpse of one party arrogance and irresponsibility. The pundits who maintain that there isn't a dime's worth of difference between the two major parties don't really know, since many of us cannot remember a time when Democrat liberals didn't control both Congress and the Supreme Court.

The elections of 1978 will be remembered as a major turning point for our country in years to come. It will very likely be the last chance conservatives will have to win the kind of major victories they must have to break the liberal stranglehold on our nation.

There are several important factors working in our favor:

1. Turn out in off-year elections is historically low, and this is a big help to Republican candidates because their supporters are better informed and more likely to vote.
2. The average gain in Congress for the "party out of power" is 33 seats. (Unfortunately, that would leave the Democrats in complete control.)
3. All national polls indicate a strong conservative trend in the wake of issues like welfare fraud, the Panama Canal giveaway, huge government deficits and the unprecedented Russian arms buildup.

4. The labor unions, long the most powerful force in politics in this country, have hinted that they are so certain of their control of Congress that they are going to "punish" those Democrat/liberals who failed to vote the straight union line.
5. Jimmy Carter is proving to be an inept President, with even Democrat Senators referring to him as "President Schlep". And I don't think the American people will have to be reminded of Andy Young's friendship with Castro or Carter's massive increases in government spending (and thus future inflation) to realize where his brand of liberalism is leading America.

All of these developments lead me to believe that 1978 will be the last real chance conservatives have, unless this country lasts a good deal longer than I have reason to believe it will under liberal Democrat leadership.

Unfortunately, and in spite of the points I have listed in our favor, we will probably not win the '78 elections. The problem is that *Labor Unions alone* will outspend all the Republican and Democratic candidates put together. That's not even counting the money that Democrats raise and spend themselves. Something is wrong with a system that allows this kind of power to accumulate in the hands of a few labor union leaders, and we must correct this imbalance or be destroyed.

It is the duty of each citizen to help his country, and America deserves your help. The United States of America has done more for the people of the world and its own citizens than any other country in the history of this planet. There are three things you can do to help in the crucial '78 elections.

1. Many people vote for liberal Democrat candidates year after year because "they've always voted that way", even though they are personally conservative. If you have friends like this, please show them this letter and urge them to at least consider voting for a Republican once, if only to save the two party system.
2. All of us have family and friends who, for one reason or another, have drifted away from voting or don't bother to vote in off-year election. Please do your best to see that these people vote in '78. If things don't go well for us this year, their vote won't be that important in the future anyway.
3. Polls show that more than 80% of all Republicans would contribute to help their party if they knew how. I want you to consider seriously what it has been worth to you to live in the greatest free nation on earth, and contribute something to the Coalition to Save the Republican Party. If you are retired or raising a family, you may only be able to contribute \$1 or \$2, but most of you could afford far more, and America deserves your help. **ALL OF YOU COULD AFFORD \$1 TO GET THIS MESSAGE TO OTHER AMERICANS.**

It is amazing to me how many Americans have "dropped out" of voting or even caring what government does. They feel completely powerless and helpless in the face of complex problems and the struggle to "get by". Believe me, if Americans don't wake up soon, they will be powerless, and all our sacrifices will have been in vain. For those of you who haven't kept up with recent events, I've enclosed some news items from some "obscure" publications. (Newsweek, Wall Street Journal, U.S. News and World Report,) to let you know how desperate our plight is.

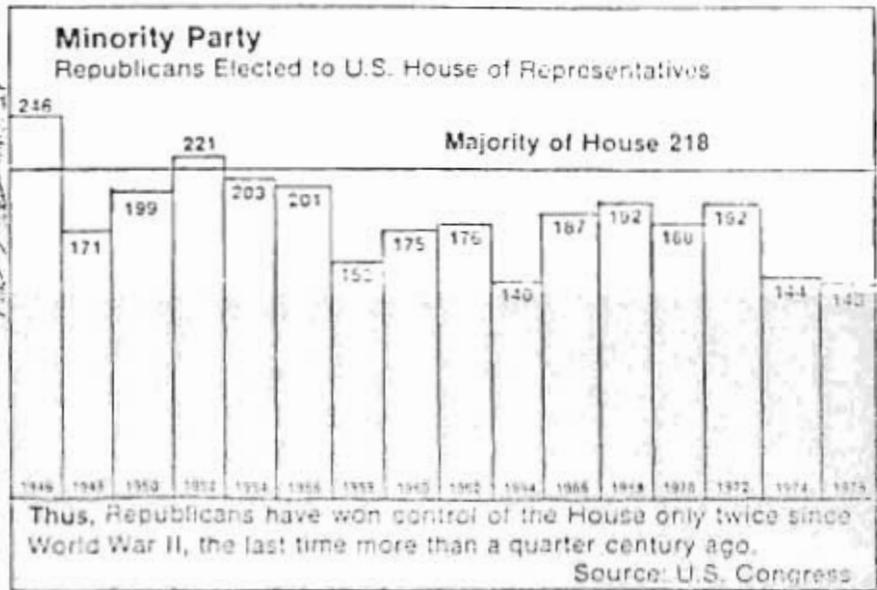
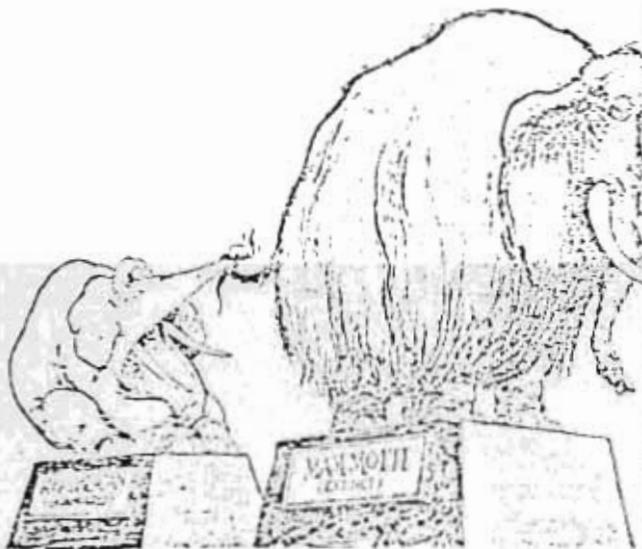
I hope you will be able to help us in our fight to preserve the two-party system and our freedoms. I fear greatly that the prayers of the enslaved peoples of the world are in vain, and that we in America will fail to maintain our own freedoms.

Please do what you can to hold back the darkness a little longer.

*Robert Blair Shaffer*  
Robert Blair Shaffer  
Chairman

### ABOUT THE FOUNDATION:

1. *Ninety per cent of all work for the Foundation is performed by volunteers. Our paid employees earn \$4. per hour or \$160 per week, and work without compensation for overtime.*
2. *Contributions are tax deductible. Please do not send us more than \$25, but please send at least \$1. If you have more to contribute, find a deserving candidate and support him.*
3. *All excess funds will be contributed to Republican candidates for Senate, Congress or Governor.*
4. *A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C.*



# ELECTION UPDATE

LAST DAY TO REGISTER

14 OCT., 1978

LAST DAY FOR ABSENTEE BALLOT

31 OCT. 1978

PLEASE POST PROMPTLY

**FOR CONGRESS — JAMES A. COURTER** IS A LIFELONG RESIDENT OF NORTHWEST NEW JERSEY AND A RESPECTED ATTORNEY. HE IS RUNNING FOR CONGRESS BECAUSE HE IS A THOUGHTFUL AND CONSCIENTIOUS MAN WHO IS CONCERNED ABOUT THE DECLINE OF AMERICA'S FORTUNES, BOTH HERE AND ABROAD. JAMES A. COURTER'S FORTHRIGHT STANDS FOR TAX REDUCTIONS FOR WORKING AMERICANS, FOR A STRONG NATIONAL DEFENSE, AND FOR ECONOMY AND MODERATION IN GOVERNMENT SPENDING HAVE EARNED HIM WIDESPREAD SUPPORT IN THE 13th CONGRESSIONAL DISTRICT.

## ABOUT HELEN MEYNER

James Courter's opponent for Congress is incumbent democrat Helen Meyner. Ms. Meyner is one of the most liberal members of Congress, and her campaigns in the past have always eked out narrow victories by running slick, very well financed media blitzes. What Ms. Meyner's expensive commercials don't talk about is:

- a. **BIG GOVERNMENT:** She has consistently voted to increase the size and cost of government, voting against the Kemp-Roth tax cuts, for more government bureaucracy for small businessmen (OSHA), for larger budgets for everything (except nation defense!) and for food stamps for strikers. Don't we have enough giveaway programs already?
- b. **BIG LABOR:** Ms. Meyner has one of the highest ratings possible by George Meany's AFL-CIO and other big union bosses, voting for labor backed proposals more than 90% of the time. This includes votes for labor law "reform" and to repeal the Hatch Act. Both of these measures would increase union's power (they are among Meyner's biggest financial supporters). Aren't unions powerful enough?
- c. **SMALL NATIONAL DEFENSE.** Ms. Meyner has consistently voted against a strong national defense. This includes votes against the B-1 bomber, against the neutron bomb, and against new ships for our outdated Navy. Apparently, she's not worried about the Soviet Union's huge and increasing military might.

WON'T YOU SEE WHAT YOU CAN DO  
TO HELP RETIRE THIS WOMAN?

**FOR U.S. SENATE — JEFFREY K. BELL** UNDERSTANDS WHY TAXES MUST BE REDUCED TO REVITALIZE BUSINESS AND JOBS IN NEW JERSEY, ONE OF THE HIGHEST TAXED STATES IN THE NATION. A BRILLIANT THEORETICIAN, A VIET NAM VETERAN, AND POSSESSOR OF ONE OF THE BRIGHTEST INTELLECTS TO RUN FOR HIGHER OFFICE IN RECENT MEMORY, JEFF BELL DESERVES YOUR SUPPORT ON NOV. 7th.

### ABOUT THIS PACKET:

As you can probably tell, a lot of time and effort went into the preparation of this message. We have taken personal financial risks to publish and distribute this packet, and we really appreciate any help you can send us. Even if no one helps us, it will be worth it if you try to get as many people as possible to read and consider our message. AND VOTE FOR YOUR FREEDOM ON NOVEMBER 7th.

THIS IS YOU  
TAXPAYER NAME AND ADDRESS

YOUR ATTENTION IS DIRECTED TO AMOUNTS DUE AS INDICATED BELOW

DEBT OR LIABILITY ITEM	GROSS COST	YOUR SHARE
Public Debt	\$ 721,000,000,000	\$ 9,012
Accounts Payable	\$ 80,000,000,000	\$ 1,000
Undelivered Orders	\$ 332,000,000,000	\$ 4,150
Long Term Contracts	\$ 15,000,000,000	\$ 187
Loan and Credit Guarantees	\$ 209,000,000,000	\$ 2,612
Insurance Commitments	\$1,733,000,000,000	\$ 21,662
Annuity Programs	\$5,900,000,000,000	\$ 73,750
Unadjudicated Claims		
International Commitments & other Financial Obligations	\$ 43,000,000,000	\$ 537
<b>TOTAL</b>	<b>\$9,033,000,000,000</b>	<b>\$112,912</b>

TERMS:  
You just keep paying

*This is your share of the national debt.*

## Finance

# How Republican Plan Would Cut Your Taxes

## Amount Your Income Tax Would Drop

Republicans' Kemp-Roth plan would have this impact when it became fully effective

### Married Couple, Two Children

Income	Tax Now	Proposed Tax	Reduction Dollars	Percent
\$ 8,000	\$ 122	\$ 12	\$ 110	90%
\$ 10,000	\$ 446	\$ 215	\$ 231	51%
\$ 12,500	\$ 917	\$ 502	\$ 415	41%
\$ 15,000	\$ 1,300	\$ 812	\$ 488	39%
\$ 20,000	\$ 2,150	\$ 1,233	\$ 917	36%
\$ 30,000	\$ 4,272	\$ 2,751	\$ 1,521	34%
\$ 40,000	\$ 6,948	\$ 4,312	\$ 2,636	34%
\$ 50,000	\$ 9,253	\$ 6,155	\$ 3,098	32%
\$ 75,000	\$ 15,255	\$ 10,150	\$ 5,105	32%
\$100,000	\$20,845	\$13,150	\$ 7,695	30%

### Married Couple, No Children

Income	Tax Now	Proposed Tax	Reduction Dollars	Percent
\$ 8,000	\$ 431	\$ 220	\$ 211	46%
\$ 10,000	\$ 791	\$ 443	\$ 348	42%
\$ 12,500	\$ 1,166	\$ 713	\$ 453	39%
\$ 15,000	\$ 1,651	\$ 1,023	\$ 628	36%
\$ 20,000	\$ 2,555	\$ 1,640	\$ 915	34%
\$ 30,000	\$ 4,712	\$ 3,059	\$ 1,653	34%
\$ 40,000	\$ 7,427	\$ 4,911	\$ 2,516	34%
\$ 50,000	\$10,810	\$ 7,110	\$ 3,700	32%
\$ 75,000	\$19,005	\$12,030	\$ 6,975	32%
\$100,000	\$29,600	\$19,705	\$ 9,895	30%

Three years—

### Single Person

Income	Tax Now	Proposed Tax	Reduction Dollars	Percent
\$ 8,000	\$ 810	\$ 461	\$ 349	42%
\$ 10,000	\$ 1,199	\$ 698	\$ 501	42%
\$ 12,500	\$ 1,631	\$ 976	\$ 655	40%
\$ 15,000	\$ 2,126	\$ 1,309	\$ 817	39%
\$ 20,000	\$ 3,202	\$ 2,052	\$ 1,150	36%
\$ 30,000	\$ 5,950	\$ 3,200	\$ 2,750	34%
\$ 40,000	\$ 9,230	\$ 4,741	\$ 4,489	33%
\$ 50,000	\$12,985	\$ 6,815	\$ 6,170	32%
\$ 75,000	\$22,810	\$14,715	\$ 8,095	32%
\$100,000	\$35,235	\$25,215	\$ 10,020	29%

Hold By  
Jan 19  
53  
40

Frederic L. who works a  
manuscript of 14  
demonstrate their  
own compensation  
earnings, say, \$10,000  
difference, but it might be

Hold Down State Wages. Having  
increases, the President then could  
hold raises for their employees to \$4 or 5

Cut Local Taxes. If their projected wage increase  
the states and cities could trim their sales, income  
taxes. Another reason for reduction: many states are  
enjoying budget surpluses.

The weak and perilous course would be to surrender to inflation on the presumption that interest groups are just too strong and the nation's will is too weak to fight it. In fact, President Carter has given in to many of the contingencies, firing up inflation by calling for large jumps in welfare and urban spending, in farm subsidies and tariffs on imports as varied as sugar, TV sets, and, just last week, CB radios. So long as the Administration appears to have round heels, self-seeking groups—from coal miners to steelmakers—will continue to press their inflationary desires.

The President has said that when he returns from his overseas trip this week, he will produce a comprehensive anti-inflation plan. His economic advisers urge him to take a tough stand by calling for a reduction of subsidies, regulations and the growth of spending. Clearly, the immediate risks would be outweighed by the ultimate rewards. If the U.S. reduces domestic inflation, the dollar will rise, import prices will decline, purchasing power will expand, interest rates will fall, housing will climb, profits will increase, the stock market will turn up, capital spending will swell, more jobs will be created and business will flourish. In sum, the small sacrifices made by special groups will lead to big benefits for all.

— Marshall Leeb

Hold Down State Wages. Having increases, the President then could hold raises for their employees to \$4 or 5

Cut Local Taxes. If their projected wage increase the states and cities could trim their sales, income taxes. Another reason for reduction: many states are enjoying budget surpluses.

Ten Ways to Cut Inflation

# THE UNITED STATES OF AMERICA

This is the  
42c  
out of every dollar  
we earn  
that goes to  
**TAXES!**

Detach at perforation  
and throw this portion away.

This is the  
26c  
out of what's left  
that's been  
eaten up by  
**INFLATION**  
in the past 10 years  
alone!

Detach at perforation  
and throw this portion away

This is the  
32c  
we have left to  
live on!

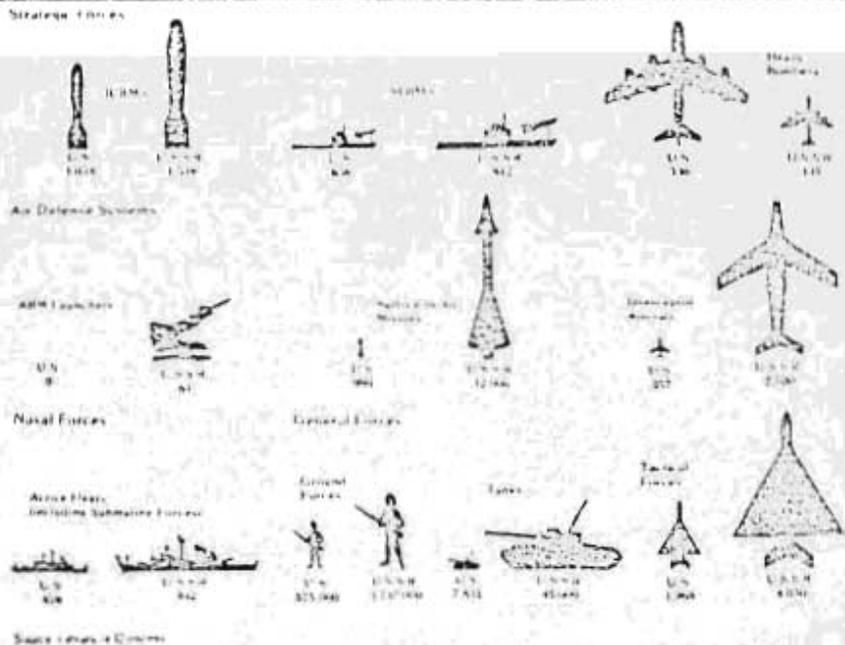
Keep this portion as a  
reminder of what reckless  
government spending  
costs us.

## ONE DOLLAR

### Russians Seeking U.S. Retreat

"The evidence is incontrovertible that the Soviet Union has repeatedly, flagrantly, and indeed contemptuously violated the treaties to which we have adhered...it is terribly clear that they remain determined to gain decisive military superiority over the United States, and that in pursuit of this end they have been willing to dishonor their most fundamental agreements with us....Since 1972, virtually every segment of the Soviet civilian economy has fallen upon hard times, and indicators suggest that even gloomier economic times are ahead. Yet, instead of diverting resources from the military to the civilian sectors of its economy, the Soviet Union has increased military spending each year since the signing of SALT I....In every vital phase of military preparedness, the Russians now are outspending us both in dollar terms and as a percentage of GNP....I submit that the Russians would not be willing to so cheat and sacrifice in quest of military dominance unless they intend to exploit that dominance, once it is attained....I think Soviet leaders contemplate threatening the use of their superiority to drive the United States into headlong retreat and isolation from its vital interests around the world."—Melvin R. Laird, Former Secretary of Defense, "Arms Control: The Russians Are Cheating", Reader's Digest, December 1977.

### A Comparison of U.S. & Soviet Military Power



### Coalition For Peace Through Strength

### NOT SALT II... WE WANT TO GET OUT OF SALT II

The SALT II treaty now being negotiated will legalize and perpetuate Soviet strategic military superiority.

The claim that SALT II provides for parity because both sides are limited to 2250 strategic weapons is an incredibly bold misrepresentation because:

- Soviet Backfire, Badger and Blinder strategic bombers — which CAN bomb the U.S. — are not counted in this ceiling while all U.S. strategic bombers are counted.
- Soviet ICBMs carry six times more explosive power than the U.S. ICBM. Yet SALT II would not permit the U.S. to build "heavy" missiles as the U.S.S.R. has done.

- Ground and sea launched cruise missiles of over 600 kilometers range are prohibited. Yet the Soviets could strike 69% of U.S. population with such sea launched missiles whereas the U.S. could reach less than 15% of the Soviet population with the same type missiles.

- The development of new strategic missile systems will be restricted or prohibited. This will prevent the U.S. from matching the eight new Soviet ICBMs which are in testing or production (compared to none for the U.S.).

- There is no on-site inspection. Thus the Soviets can cheat on SALT II as they have on SALT I.

# A New GOP Game Plan

For the party out of power, an off-year election is traditionally a chance to pick up seats in Congress and give Presidential hopefuls a few practice turns. But this year the beleaguered Republican Party is taking a different tack, concentrating less on Congressional races and channeling its effort into gubernatorial and state-legislature campaigns. "It's essential to start coming back at the state level," says GOP National Chairman William Brock, "because that's the foundation for 1980 and beyond." In at least one respect, the Republicans are fighting for survival: after the 1980 census, state legislatures will redraw Congressional district lines to reflect population shifts, and as of now the Democrats will control most of the redistricting. "We could be gerrymandered out of existence," worries one Wisconsin Republican.

The GOP has never been in worse shape. As recently as 1970, it controlled half the state legislatures and had 32 governors. Now there are only five Republican legislatures and a dozen governors. Republicans are outnumbered 259 to 146 in the House and 62 to 38 in the Senate. They stand to gain from ten to twenty House seats this year—the normal swing to the party out of power—and they might defeat two or three Democrats in the Senate, possibly Floyd Haskell of Colorado and William Hathaway of Maine. But retirements have opened Senate seats long held by Republicans in Michigan, Kansas and Nebraska, and in the end the GOP will be doing well to break even in the Senate.

**Sure winners:** Only in the statehouses do the Republicans have much hope. Nine incumbent Democratic governors cannot succeed themselves, and the Republicans think they have a good shot in many of these states, especially in the Midwest and in the West. In Connecticut, Democrat Ella Grasso is considered vulnerable if a good opponent can be found, while in Oregon, former Republican governor Tom McCall should be a favorite if he decides to run. Eight of nine Republican governors, on the other hand, are eligible to run again and most of them look like sure winners—including James Thompson of Illinois, a 1980 Presidential hopeful. In all, the GOP thinks it can pick up as

## Politics and People

By ALAN L. OTTEN

### Drawing Lines

WASHINGTON—Republicans don't usually think well of Common Cause. They suspect it of being a secret agent of the Democratic Party, or worse.

Yet Common Cause is embarking on a grassroots campaign that could help preserve a strong Republican Party. It seeks to amend state constitutions to provide a more independent, less partisan method of drawing boundaries for congressional and state legislative districts.

The issue is of general interest for Republicans because unless they make stunning gains in gubernatorial and state legislative elections in 1978 and 1980, the Democratic majorities that would exist in most states could almost gerrymander the GOP out of existence after the 1980 census figures are in and new legislative lines must be drawn almost everywhere.

The root problem is, of course, the gerrymander: the construction of political-shaped legislative districts that may favor one side or the other. These boundaries, arbitrary lines are usually drawn by members of the legislative strength of the party in power, but they're also used in "back-seat deals" protecting key incumbents of both parties, to help party leaders seek unworkable legislation in line, or to minimize the representation of a racial minority.

"The present process works extremely well for incumbent legislators and other political insiders," a Common Cause analysis asserts. "It does not serve the public well... by minimizing electoral competition, unfair districting undermines the political process and weakens the political parties.... Competition forces the political process to be responsive to needs of old and new people.... Without competition, the parties lack the incentive to bring forward proposals for improvement."

The reason why politicians are so concerned about post-1980 reapportionment is because they may have so little leverage on it. There are Republican majorities in only 10 states. Republican majorities in both houses of the legislature in only five small states. Republican control of one house in only eight other states. Unless the GOP begins redrawing ground next fall, when most governors and many state legislators will be elected for four-year terms, the Democrats will dominate the crucial 1981 legislative session when most new boundary-drawing will be done.

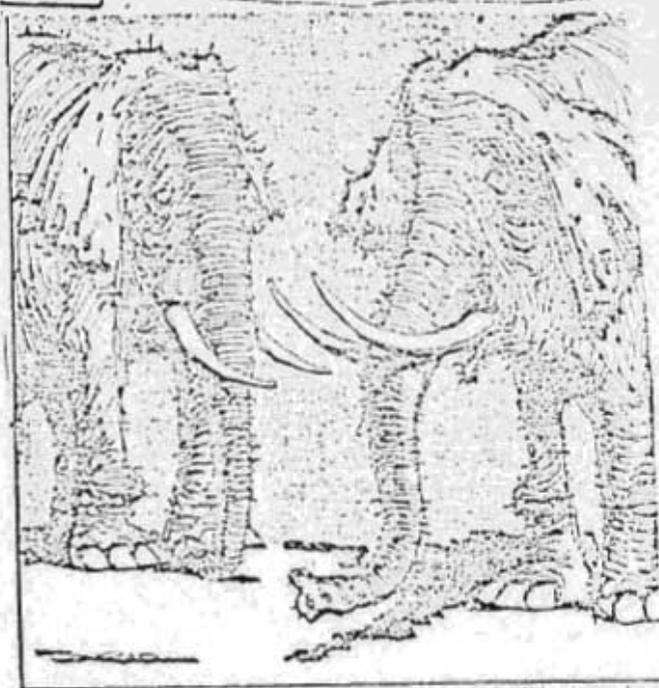
In the past six congressional elections, says Steven Stockmeyer, executive director of the House GOP Campaign Committee, the GOP has averaged better than 40% of the popular vote for House candidates, but has won less than 30% of the 435 House seats. In 1974 and 1976, it got over 40% of the popular vote and only one-third of the seats. All the perquisites of incumbency helped Democrats keep winning, of course, but so did post-1970 gerrymanders.

"Under present boundaries, it's virtually impossible to get a Republican House," says GOP pollster Robert Teeter. "To get half the seats, Republicans would probably have to get over 50% of the popular vote. You can make a very good case that there are no more than 60 truly competitive seats in the House right now."

A similar disparity holds in many state legislatures, Mr. Teeter adds. In the 110-seat Michigan house, "you'd have to stretch it to find 15 really competitive seats," he figures. The Democrats control that body 56 to 42.

Fairer representation took a giant step forward in the 1960s with the Supreme Court's one-man-one-vote decisions. Those ended wide population variations among districts, usually underrepresenting cities and suburbs. The courts have been chary, however, about getting deeply involved in political or racial gerrymandering.

The computer, which many thought would help establish neat, nonpartisan boundaries, has actually made for more skillful gerrymandering. "The computer," says Mr. Teeter, "has raised the level of the art. You can gerrymander more precisely."



"Have you noticed how old and wrinkled Carter looks lately?"

of '76 with two choices," says Brock, who lost his own Senate seat then. "Throw in the towel or start rebuilding. We've got to lay the ground work for the next decade." Unless Brock's strategy works this year, the GOP will edge even closer to extinction.

*“All that is necessary for  
the forces of evil to win  
the world is for enough  
good men to do nothing.”*

Edmund Burke 1729-1797

9  
This envelope contains Important Information about  
your Country's future.

It has been brought to you by a Volunteer.

Please set it aside and read it when you  
can consider it carefully.

PLACE  
FIRST CLASS  
POSTAGE  
HERE

FREEDOM FIRST FOUNDATION  
Box 222  
South Schodack, N.Y. 12162



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

RE: MUR 815(78)

Dear Mr. Shaffer:

The Federal Election Commission has received a complaint which alleges that the Freedom First Foundation (the "Foundation") committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 815(78).

The Commission has found reason to believe that the matters alleged in the complaint state possible violations of 2 U.S.C. §§441d, 435(b), 433(c), 434, and 11 C.F.R. §§109.4, 110.11, 102.13, 102.2(a)(6) and 104.4(b). Specifically, it appears that

- (1) The Freedom First Foundation may have violated 2 U.S.C. §441d and 11 C.F.R. §110.11 or 109.4(a)(1) by failing to include the proper authorization/non-authorization notice on its "Election Update" communication (Placed by the Foundation in the Dover (N.J.) Daily Advance) and 11 C.F.R. §110.11(a)(1)(ii) by failing to include on the communication the name of the person(s) who financed the communication. These notifications are required on all communications which expressly advocate the election or defeat of clearly identified Federal candidates.
- (2) The Freedom First Foundation may have violated 2 U.S.C. §435(b) and 11 C.F.R. §102.13 by improperly placing the required notice on page three of its solicitation letter rather than on the "face or front" of the communication.
- (3) The Freedom First Foundation may have violated 2 U.S.C. §433(c) and 11 C.F.R. §102.2(a)(6) by not properly amending its statement of organization to include James A. Courter as a candidate supported.



(4) The Freedom First Foundation may have violated 2 U.S.C. §434(a)(1)(A)(i) by failing to file the required Ten Day Pre-General Election Report. In addition, the Foundation has previously been notified of the Commission's finding of reasonable cause to believe that the Foundation had failed to file the required 30 Day Post-General Election Report.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Kathleen Imig Perkins, the attorney assigned to this matter, at 202/523-4060.

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

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

Sincerely,

William C. Oldaker  
General Counsel

Attachment  
Complaint



FEDERAL ELECTION COMMISSION

125 K STREET NW  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *more by fe*

DATE: DECEMBER 12, 1978

SUBJECT: MUR 815 (78) - First General Counsel's  
Report dated 12-11-78;  
Received in OCS: 12-11-78,  
1:25

The above-named document was circulated on a 48 hour vote basis at 9:00, December 12, 1978.

Commissioner Aikens submitted an objection at 11:38, this date, thereby placing MUR 815 on the Amended Agenda for the Executive Session on December 13, 1978.

*1st GC Report  
was withdrawn*

December 11, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 815

Please have the attached First General Counsel's Report on MUR 815 distributed to the Commission on a 48 hour tally basis.

Thank you.

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

FIRST GENERAL COUNSEL'S REPORT

70 DEC 11 P 1: 25

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION DEC 1 1978

MUR # 815 (78)  
DATE COMPLAINT RECEIVED  
BY OGC \_\_\_\_\_

STAFF MEMBER Cummings

COMPLAINANT'S NAME: Robert C. Grant, New Jersey

RESPONDENT'S NAME: Robert Blair Shaffer, Chairman, Freedom  
First Foundation

RELEVANT STATUTE: 2 U.S.C. §§441d, 433

INTERNAL REPORTS CHECKED: Freedom First Foundation

FEDERAL AGENCIES CHECKED: None

BACKGROUND

A. The Complaint

On November 6, 1978, the Commission received a notarized complaint from Mr. Robert C. Grant alleging that the Freedom First Foundation (the "Foundation") violated sections 441d and 434(e) of the Federal Election Campaign Act. According to Mr. Grant a packet placed by the Foundation in the Dover (N.J.) Daily Advance does not contain "... disclaimers on the literature stating the treasurer of the organization and exactly who is funding this packet ... they are advocating support of two candidates and the defeat of another without proper procedure." Mr. Grant also noted that a §435(b) statement had appeared in the packet. (Attachment I)1/

1/ It should be noted that the Foundation has made some attempt to comply with §435(b) as is evidenced by the following statement which appears on page 3 of the letter in the packet: "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C." However, a §435(b) notice is required to be placed on the first page of "all literature and advertisements soliciting contributions." The cover letter which was in the packet solicited contributions. Based on the Commission's policy concerning the §435(b) notice, we recommend that, since the Foundation did make an effort to comply in this matter, no action be taken against the respondent for its omission, on page 1, of the §435(b) notice.

## B. Reporting and Registration

On September 22, 1978, the Foundation registered with the Commission in accordance with 2 U.S.C. 433. On October 16, 1978, the Commission found reason to believe that the Foundation had violated 2 U.S.C. §§432(e)(3) and 434 for its failure to file an October 10 quarterly report. The Foundation responded to the notification on October 23, 1978 stating that "as of September 30, 1978 no fundraising or spending activities had been undertaken." (Attachment II) As of this writing the Foundation has not yet filed its ten day pre-general report.<sup>2/</sup>

## C. The Packet

The packet complained of consists of ten pages. The first three pages consist of a cover letter with the letterhead "Freedom First Foundation" and dated October 1, 1978. The letter is signed by the Foundation's Chairman, Robert Blair Shaffer. The fourth page is entitled "ELECTION UPDATE" and a synopsis of Candidates James A. Courter, Helen Meyner and Jeffrey K. Bell is given. The fifth and sixth pages discuss taxes, inflation and the U.S. Military. The seventh page contains excerpts from the Wall Street Journal, dated December 15, 1977, and Newsweek dated January 16, 1978. The eighth page contains a quote from Edmund Burke, the ninth page an unsigned message from the Foundation, and the tenth page consists of an envelope addressed to the Foundation. (Attachment II)

## II. PRELIMINARY LEGAL ANALYSIS

### A. 1: The §441d Notice

The page entitled "ELECTION UPDATE" expressly advocates the election of James A. Courter, the defeat of Helen Meyner and the election of Jeffrey K. Bell. In the top quarter of the communication is the statement in bold, darker black, capitalized letters "FOR CONGRESS-JAMES A. COURTER" followed by a favorable endorsement of candidate Courter which concludes with: "James A. Courter's forthright stands for tax reductions for Working Americans, for a strong national defense, and for economy and moderation in government spending have earned him widespread support in the 13th Congressional District."

The review of Helen Meyner is entitled: "ABOUT HELEN MEYNER" which is in direct contrast to "FOR CONGRESS-JAMES A. COURTER." The discussion of Candidate Meyner is colored, as exemplified by this phrase in the opening paragraph: "...eked out narrow victories by running slick, very well financed media blitzes." The discussion concerning Candidate Meyner's voting record is also colored by the categorization of reported votes as "BIG GOVERNMENT," "BIG LABOR" and "SMALL NATIONAL DEFENSE" and the partisan comments inserted in the discussions concerning Meyner's voting patterns with regard to the

<sup>2/</sup> In accordance with the May 23, 1978 Report of Task Force pg. 7, D, 2. we recommend that the Commission take no action against the Foundation for its failure to file a ten day pre-general report. Only those non-party committees with receipts or expenditures in excess of \$100,000 during the calendar year will be referred to the Office of the General Counsel for late filing if the Committee fails to file until after the Commission finds reason to believe.

paragraph headings quoted above. The discussions end with this quote in bold, darker black and capitalized print: "WON'T YOU SEE WHAT YOU CAN DO TO HELP RETIRE THIS WOMAN?"

In the bottom quarter of the communication is the statement in bold, capitalized darker black, letters "FOR U.S. SENATE-JEFFREY K. BELL" followed by a favorable endorsement of Candidate Bell which concludes with: ... "Jeff Bell deserves your support on November 7th."

Clearly this presentation constitutes a communication expressly advocating the election of some and defeat of another clearly identified Federal candidates. The statement of authorization/non-authorization required by 2 U.S.C. §441d of all communications which expressly advocate the election or defeat of clearly identified Federal candidates does not appear.

B. Failure to Name All Candidates Supported

In accordance with §433(b)(6), page two of the Foundation's statement of organization lists four candidates who will be supported by the Committee. James A. Courter is not included in this list although he is endorsed by the Foundation in its packet. Therefore, we recommend that the Commission find reason to believe that the Foundation has violated 2 U.S.C. §433(c) for its failure to notify the Commission, within a 10 day period, of a change in its statement of organization.

C. Section 434(e) Allegation

Section 434(e) of the Act applies to certain reporting requirements connected with express advocacy to persons other than political committees. Since respondent is a registered committee, complainant's allegation regarding a violation of this section does not have merit.

III.

RECOMMENDATION

1. Find reason to believe that the Freedom First Foundation violated 2 U.S.C. §§433(c), and 441d of the Federal Election Campaign Act.
2. Find no reason to believe the Freedom First Foundation violated 2 U.S.C. §434(e).
3. Authorize that the attached letter be sent.

ATTACHMENTS

- I. Complaint, Respondent's Publication
- II. Report Filed by Respondent, Prior Commission Finding
- III. Proposed letter to Respondent

114 E. Ridgewood Parkway  
Denville, N.J. 07834  
(201) 625-3983

*Call 5-4802*  
MUR 815

Mr. Jay Myerson  
Federal Election Commission  
1325 K St., N.W.  
Washington, D.C. 20463

NOV 13 1978  
807637

*Attachment I*

Dear Mr. Myerson:

I would like to file a complaint against the Freedom First Foundation, Box 222, South Schodack, N.Y. 12162, Robert Blair Shaffer, Chairman, in compliance with 2 U.S.C. 437, g (a) (1).

These people placed a packet in the Dover (N.J.) Daily Advance containing copies of a Wall St. Journal article, an unsigned cover letter, slander against Helen Meyner (D. NJ-13), and paragraphs supporting James Courter and Jeffrey Bell all titled "Election Update", a sheet on taxes, inflation, and U.S. Military Inferiority and of course a return envelope for a monetary contribution to the Foundation to "help alert other Americans to the perilous condition of the 2 party system."

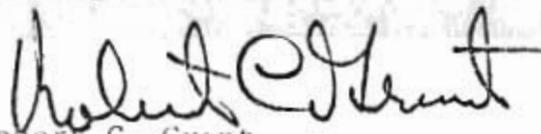
The "report" states "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C." If there is such a report available, I would like to see it.

There are no disclaimers on the literature stating the treasurer of the organization and exactly who is funding this packet. They are violating the Federal Election Campaign Act of 1971 2 U.S.C. 434 (e) and 441 (d) and are advocating support of two candidates and the defeat of another without proper procedure.

Documentation of my allegation is enclosed in their packet (per attached) as it appeared in the daily newspaper.

I am not a candidate nor am I filing this complaint on behalf of or at the request of a candidate.

It continues to amaze me that newspaper management is unaware of Federal Election Commission standards and will print or insert damn near anything if the price is right.

  
Robert C. Grant

Signed, sworn and notarized this 2nd day of Nov. 1978.



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

# FREEDOM FIRST FOUNDATION

BOX 222  
SOUTH SCHODACK, N.Y. 12162

*Attachment I*

1 October, 1978

Dear Citizen,

I am writing you in an effort to forestall the greatest political crisis our nation has faced since the disintegration of the Whigs in 1848. The crisis I am referring to is, of course, the imminent collapse of the Republican Party.

Registered Republicans make up only less than 18% of the electorate. Republicans in Congress are outgunned 2 to 1, and of the 50 state governors, there are only 12 Republicans. Republicans control only 19 of the 99 state legislative bodies. Nor are these isolated or temporary instances of Republican weakness. Democrats have completely controlled Congress for 40 of the last 44 years. Even more disturbing is that Republican congressional candidates received 45% of the votes cast in the '76 national elections but won only 32% of the seats at stake because of district gerrymandering by Democrat governors, the same governors who will be in control when new districts are drawn in 1981. The party of Lincoln, Roosevelt and Taft is fast fading from the political landscape of America.

The Foundation views with great alarm the demise of one of the last bastions of free enterprise thought, concern for individual rights, and insistence on a strong national defense that have characterized the Republican Party over the last three decades. We feel it is essential to maintain some semblance of the two party system, and we fear that in "Koreagate" and the underhanded measures used to shove a record pay raise through against conservative opposition, that we have already seen a glimpse of one party arrogance and irresponsibility. The pundits who maintain that there isn't a dime's worth of difference between the two major parties don't really know, since many of us cannot remember a time when Democrat liberals didn't control both Congress and the Supreme Court.

The elections of 1978 will be remembered as a major turning point for our country in years to come. It will very likely be the last chance conservatives will have to win the kind of major victories they must have to break the liberal stranglehold on our nation.

There are several important factors working in our favor:

1. Turn out in off-year elections is historically low, and this is a big help to Republican candidates because their supporters are better informed and more likely to vote.
2. The average gain in Congress for the "party out of power" is 33 seats. (Unfortunately, that would leave the Democrats in complete control.)
3. All national polls indicate a strong conservative trend in the wake of issues like welfare fraud, the Panama Canal giveaway, huge government deficits and the unprecedented Russian arms buildup.

4. The labor unions, long the most powerful force in politics in this country, have hinted that they are so certain of their control of Congress that they are going to "punish" those Democrat/liberals who failed to vote the straight union line.
5. Jimmy Carter is proving to be an inept President, with even Democrat Senators referring to him as "President Schlep". And I don't think the American people will have to be reminded of Andy Young's friendship with Castro or Carter's massive increases in government spending (and thus future inflation) to realize where his brand of liberalism is leading America.

All of these developments lead me to believe that 1978 will be the last real chance conservatives have, unless this country lasts a good deal longer than I have reason to believe it will under liberal Democrat leadership.

Unfortunately, and in spite of the points I have listed in our favor, we will probably not win the '78 elections. The problem is that *Labor Unions alone* will outspend all the Republican and Democratic candidates put together. That's not even counting the money that Democrats raise and spend themselves. Something is wrong with a system that allows this kind of power to accumulate in the hands of a few labor union leaders, and we **must** correct this imbalance or be destroyed.

It is the duty of each citizen to help his country, and America deserves your help. The United States of America has done more for the people of the world and its own citizens than any other country in the history of this planet. There are three things you can do to help in the crucial '78 elections.

1. Many people vote for liberal Democrat candidates year after year because "they've always voted that way", even though they are personally conservative. If you have friends like this, please show them this letter and urge them to at least consider voting for a Republican once, if only to save the two party system.
2. All of us have family and friends who, for one reason or another, have drifted away from voting or don't bother to vote in off-year election. Please do your best to see that these people vote in '78. If things don't go well for us this year, their vote won't be that important in the future anyway.
3. Polls show that more than 80% of all Republicans would contribute to help their party if they knew how. I want you to consider seriously what it has been worth to you to live in the greatest free nation on earth, and contribute something to the Coalition to Save the Republican Party. If you are retired or raising a family, you may only be able to contribute \$1 or \$2, but most of you could afford far more, and America deserves your help. **ALL OF YOU COULD AFFORD \$1 TO GET THIS MESSAGE TO OTHER AMERICANS.**

It is amazing to me how many Americans have "dropped out" of voting or even caring what government does. They feel completely powerless and helpless in the face of complex problems and the struggle to "get by". Believe me, if Americans don't wake up soon, they **will** be powerless, and all our sacrifices will have been in vain. For those of you who haven't kept up with recent events, I've enclosed some news items from some "obscure" publications. (Newsweek, Wall Street Journal, U.S. News and World Report,) to let you know how desperate our plight is.

I hope you will be able to help us in our fight to preserve the two-party system and our freedoms. I fear greatly that the prayers of the enslaved peoples of the world are in vain, and that we in America will fail to maintain our own freedoms.

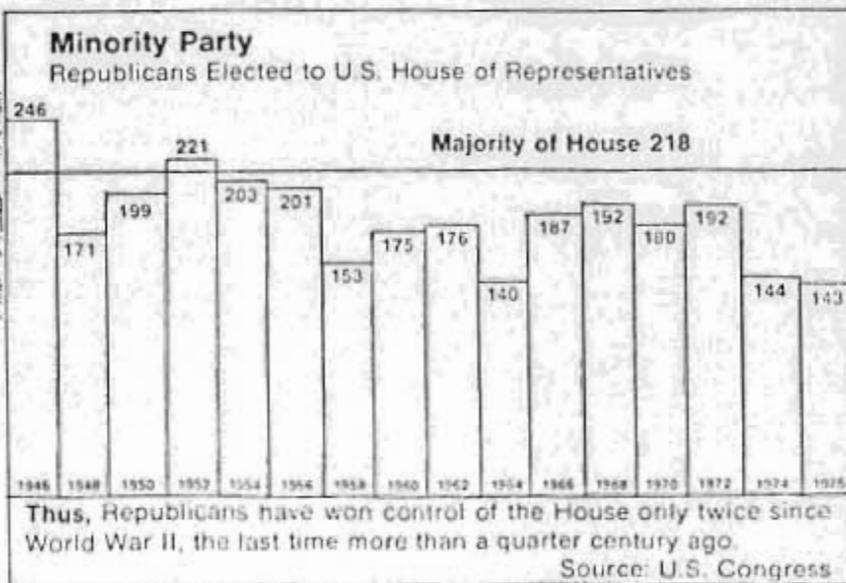
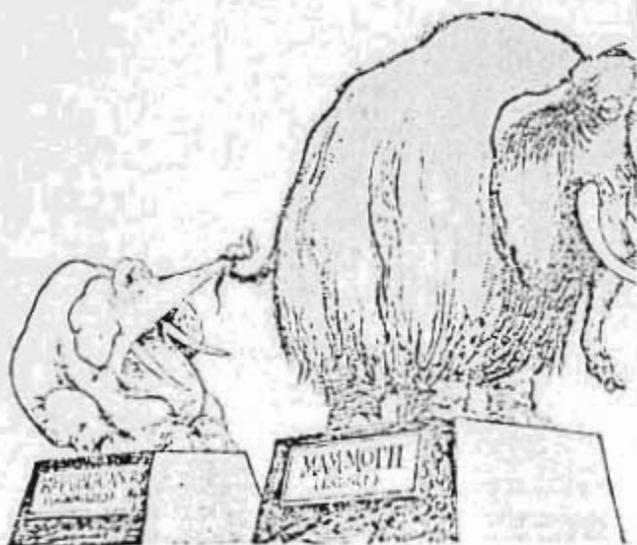
Please do what you can to hold back the darkness a little longer.



Robert Blair Shaffer  
Chairman

## ABOUT THE FOUNDATION:

1. *Ninety per cent of all work for the Foundation is performed by volunteers. Our paid employees earn \$4. per hour or \$160 per week, and work without compensation for overtime.*
2. *Contributions are tax deductible. Please do not send us more than \$25, but please send at least \$1. If you have more to contribute, find a deserving candidate and support him.*
3. *All excess funds will be contributed to Republican candidates for Senate, Congress or Governor.*
4. *A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C.*



# ELECTION UPDATE

LAST DAY TO REGISTER

14 OCT., 1978

PLEASE POST PROMPTLY

LAST DAY FOR ABSENTEE BALLOT

31 OCT. 1978

**FOR CONGRESS — JAMES A. COURTER** IS A LIFELONG RESIDENT OF NORTHWEST NEW JERSEY AND A RESPECTED ATTORNEY. HE IS RUNNING FOR CONGRESS BECAUSE HE IS A THOUGHTFUL AND CONSCIENTIOUS MAN WHO IS CONCERNED ABOUT THE DECLINE OF AMERICA'S FORTUNES, BOTH HERE AND ABROAD. JAMES A. COURTER'S FORTHRIGHT STANDS FOR TAX REDUCTIONS FOR WORKING AMERICANS, FOR A STRONG NATIONAL DEFENSE, AND FOR ECONOMY AND MODERATION IN GOVERNMENT SPENDING HAVE EARNED HIM WIDESPREAD SUPPORT IN THE 13th CONGRESSIONAL DISTRICT.

## ABOUT HELEN MEYNER

James Courter's opponent for Congress is incumbent democrat Helen Meyner. Ms. Meyner is one of the most liberal members of Congress, and her campaigns in the past have always eked out narrow victories by running slick, very well-financed media blitzes. What Ms. Meyner's expensive commercials don't talk about is:

- a. **BIG GOVERNMENT:** She has consistently voted to increase the size and cost of government, voting **against** the Kemp-Roth tax cuts, **for** more government bureaucracy for small businessmen (OSHA), **for** larger budgets for **everything** (except nation defense!) and **for** food stamps for strikers. Don't we have enough giveaway programs already?
- b. **BIG LABOR:** Ms. Meyner has one of the highest ratings possible by George Meany's AFL-CIO and other big union bosses, voting **for** labor backed proposals more than 90% of the time. This includes votes **for** labor law "reform" and to repeal the Hatch Act. Both of these measures would increase union's power (they are among Meyner's biggest financial supporters). Aren't unions powerful enough?
- c. **SMALL NATIONAL DEFENSE:** Ms. Meyner has consistently voted against a strong national defense. This includes votes **against** the B-1 bomber, **against** the neutron bomb, and **against** new ships for our outdated Navy. Apparently, she's not worried about the Soviet Union's huge and increasing military might.

**WON'T YOU SEE WHAT YOU CAN DO  
TO HELP RETIRE THIS WOMAN?**

**FOR U.S. SENATE — JEFFREY K. BELL** UNDERSTANDS WHY TAXES MUST BE REDUCED TO REVITALIZE BUSINESS AND JOBS IN NEW JERSEY, ONE OF THE HIGHEST TAXED STATES IN THE NATION. A BRILLIANT THEORETICIAN, A VIET NAM VETERAN, AND POSSESSOR OF ONE OF THE BRIGHTEST INTELLECTS TO RUN FOR HIGHER OFFICE IN RECENT MEMORY, JEFF BELL DESERVES YOUR SUPPORT ON NOV. 7th.

---

### ABOUT THIS PACKET:

As you can probably tell, a lot of time and effort went into the preparation of this message. We have taken personal financial risks to publish and distribute this packet, and we really appreciate any help you can send us. Even if **no one** helps us, it will be worth it if you try to get as many people as possible to read and consider our message, **AND VOTE FOR YOUR FREEDOM ON NOVEMBER 7th.**

## STATEMENT OF ACCOUNT

THIS IS YOU!!

TAXPAYER NAME AND ADDRESS

YOUR ATTENTION IS DIRECTED TO AMOUNTS DUE AS INDICATED BELOW

DEBT OR LIABILITY ITEM	GROSS COST	YOUR SHARE
Public Debt	\$ 721,000,000,000	\$ 9,012
Accounts Payable	\$ 80,000,000,000	\$ 1,000
Undelivered Orders	\$ 332,000,000,000	\$ 4,150
Long Term Contracts	\$ 15,000,000,000	\$ 187
Loan and Credit Guarantees	\$ 209,000,000,000	\$ 2,612
Insurance Commitments	\$1,733,000,000,000	\$ 21,662
Annuity Programs	\$5,900,000,000,000	\$ 73,750
Unadjudicated Claims		
International Commitments & other Financial Obligations	\$ 43,000,000,000	\$ 537
<b>TOTAL</b>	<b>\$9,033,000,000,000</b>	<b>\$112,912</b>

## TERMS:

You just keep paying

*This is your share of the national debt!*

## Finance

# How Republican Plan Would Cut Your Taxes

## Amount Your Income Tax Would Drop

Republican Kimp-Roth plan would have this impact when it became fully effective

### Married Couple, Two Children

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 120	\$ 12	\$ 108	90%
\$ 10,000	\$ 446	\$ 218	\$ 228	51%
\$ 12,500	\$ 917	\$ 539	\$ 378	41%
\$ 15,000	\$ 1,390	\$ 812	\$ 578	39%
\$ 20,000	\$ 2,190	\$ 1,363	\$ 792	36%
\$ 30,000	\$ 4,207	\$ 2,781	\$ 1,451	34%
\$ 40,000	\$ 6,539	\$ 4,512	\$ 2,326	34%
\$ 50,000	\$ 9,980	\$ 6,555	\$ 3,225	32%
\$ 75,000	\$ 19,265	\$ 12,703	\$ 6,105	32%
\$100,000	\$28,890	\$20,193	\$8,700	30%

### Married Couple, No Children

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 431	\$ 233	\$ 198	46%
\$ 10,000	\$ 761	\$ 443	\$ 318	42%
\$ 12,500	\$ 1,186	\$ 718	\$ 468	39%
\$ 15,000	\$ 1,651	\$ 1,028	\$ 623	38%
\$ 20,000	\$ 2,565	\$ 1,643	\$ 912	36%
\$ 30,000	\$ 4,712	\$ 3,036	\$ 1,616	34%
\$ 40,000	\$ 7,427	\$ 4,611	\$ 2,516	34%
\$ 50,000	\$ 10,610	\$ 7,110	\$ 3,500	33%
\$ 75,000	\$20,605	\$13,690	\$6,315	31%
\$100,000	\$29,530	\$20,795	\$8,805	30%

1 three years—

### Single Person

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 810	\$ 461	\$ 349	43%
\$ 10,000	\$ 1,199	\$ 698	\$ 501	42%
\$ 12,500	\$ 1,631	\$ 976	\$ 655	40%
\$ 15,000	\$ 2,129	\$ 1,309	\$ 817	38%
\$ 20,000	\$ 3,232	\$ 2,062	\$ 1,170	36%
\$ 30,000	\$ 5,950	\$ 3,950	\$ 2,000	34%
\$ 40,000	\$ 9,233	\$ 6,141	\$ 3,092	33%
\$ 50,000	\$ 12,985	\$ 8,815	\$ 4,170	32%
\$ 75,000	\$22,810	\$16,715	\$5,895	26%
\$100,000	\$32,305	\$25,218	\$7,017	22%

Hold On  
Janur  
\$3.7  
90%

Freeze L.  
who took a  
manship of T.  
demonstrate their  
own compensation  
earning, say, \$100,000  
difference, but it might be

**Hold Down State Wages.** Having in-  
creases, the President then could  
hold raises for their employees to 5% or so.

**Cut Local Taxes.** If their projected wage increa-  
the states and cities could trim their sales, income  
taxes. Another reason for reduction: many states are  
are enjoying budget surpluses.

The weak and perilous course would be to surrender to in-  
flation on the presumption that interest groups are just too strong,  
and the nation's will is too weak to fight it. In fact, President Car-  
ter has given in to many of the competitors—firing up inflation  
by calling for large jumps in welfare and urban spending, in farm  
subsidies and tariffs on imports as varied as sugar, TV sets and  
just last week, CB radios. So long as the Administration appears  
to have round heels, self-seeking groups—from coal miners to  
steelmakers—will continue to press their inflationary desires.

The President has said that when he returns from his over-  
seas trip this week, he will produce a comprehensive anti-  
inflation plan. His economic advisers urge him to take a tough  
stand by calling for a reduction of subsidies, regulations and the  
growth of spending. Clearly, the immediate risks would be out-  
weighed by the ultimate rewards. If the U.S. reduces domestic in-  
flation, the dollar will rise, import prices will decline, purchasing  
power will expand, interest rates will fall, housing will climb,  
profits will increase, the stock market will turn up, capital spend-  
ing will swell, more jobs will be created and business will flour-  
ish. In sum, the small sacrifices made by special groups will lead  
to big benefits for all.

— Marshall Loeb

*Search for:*  
**Ten Ways to Cut Inflation**  
Time Essay

# THE UNITED STATES OF AMERICA

This is the  
**42¢**  
out of every dollar  
we earn  
that goes to  
**TAXES!**

Detach at perforation  
and throw this portion away.

This is the  
**26¢**  
out of what's left  
that's been  
eaten up by  
**INFLATION**  
in the past 10 years  
alone!

Detach at perforation  
and throw this portion away.

This is the  
**32¢**  
we have left to  
live on!

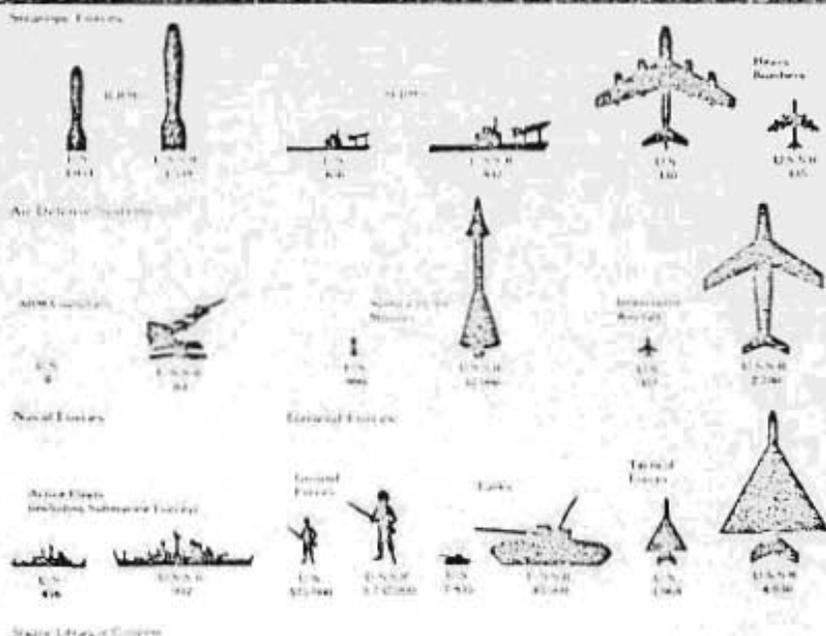
Keep this portion as a  
reminder of what reckless  
government spending  
costs us.

ONE DOLLAR

## Russians Seeking U.S. Retreat

"The evidence is incontrovertible that the Soviet Union has repeatedly, flagrantly, and indeed contemptuously violated the treaties to which we have adhered...it is terribly clear that they remain determined to gain decisive military superiority over the United States, and that in pursuit of this end they have been willing to dishonor their most fundamental agreements with us....Since 1972, virtually every segment of the Soviet civilian economy has fallen upon hard times, and indicators suggest that even gloomier economic times are ahead. Yet, instead of diverting resources from the military to the civilian sectors of its economy, the Soviet Union has increased military spending each year since the signing of SALT I....In every vital phase of military preparedness, the Russians now are outspending us both in dollar terms and as a percentage of GNP....I submit that the Russians would not be willing to so cheat and sacrifice in quest of military dominance unless they intend to exploit that dominance, once it is attained....I think Soviet leaders contemplate threatening the use of their superiority to drive the United States into headlong retreat and isolation from its vital interests around the world."—Melvin R. Laird, Former Secretary of Defense, "Arms Control: The Russians Are Cheating", Reader's Digest, December 1977.

## A Comparison of U.S. and Soviet Military Power



Coalition For Peace Through Strength

## How SALT II Treaty Would Leave United States Militarily Inferior

The SALT II treaty now being negotiated will legalize and perpetuate Soviet strategic military superiority.

The claim that SALT II provides for parity because both sides are limited to 2250 strategic weapons is an incredibly bold misrepresentation because:

- Soviet Backfire, Badger and Blinder strategic bombers — which CAN bomb the U.S. — are not counted in this ceiling while all U.S. strategic bombers are counted.
- Soviet ICBMs carry six times more explosive power than the U.S. ICBMs. Yet SALT II would not permit the U.S. to build "heavies" missiles as the U.S.S.R. has done.

- Ground and sea launched cruise missiles of over 600 kilometers range are prohibited. Yet the Soviets could strike 60% of U.S. population with such sea launched missiles whereas the U.S. could reach less than 15% of the Soviet population with the same type missiles.

- The development of new strategic missile systems will be restricted or prohibited. This will prevent the U.S. from matching the eight new Soviet ICBMs which are in testing or production (compared to none for the U.S.).

- There is no on-site inspection. Thus the Soviets can cheat on SALT II as they have on SALT I.

# A New GOP Game Plan

For the party out of power, an off-year election is traditionally a chance to pick up seats in Congress and give Presidential hopefuls a few practice turns. But this year the battered Republican Party is taking a different tack, concentrating less on Congressional races and channeling its effort into gubernatorial and state-legislature campaigns. "It's essential to start coming back at the state level," says GOP National Chairman William Brock, "because that's the foundation for 1980 and beyond." In at least one respect, the Republicans are fighting for survival: after the 1980 census, state legislatures will redraw Congressional district lines to reflect population shifts, and as of now the Democrats will control most of the redistricting. "We could be gerrymandered out of existence," worries one Wisconsin Republican.

The GOP has never been in worse shape. As recently as 1970, it controlled half the state legislatures and had 32 governors. Now there are only five Republican legislatures and a dozen governors. Republicans are outnumbered 289 to 146 in the House and 62 to 38 in the Senate. They stand to gain from ten to twenty House seats this year—the normal swing to the party out of power—and they might defeat two or three Democrats in the Senate, possibly Floyd Haskell of Colorado and William Hathaway of Maine. But retirements have opened Senate seats long held by Republicans in Michigan, Kansas and Nebraska, and in the end the GOP will be doing well to break even in the Senate.

**Sure Winners:** Only in the staterhouses do the Republicans have much hope. Nine incumbent Democratic governors cannot succeed themselves, and the Republicans think they have a good shot in many of these states, especially in the Midwest and in the West. In Connecticut, Democrat Ella Grasso is considered vulnerable if a good opponent can be found, while in Oregon, former Republican governor Tom McCall should be a favorite if he decides to run. Eight of nine Republican governors, on the other hand, are eligible to run again and most of them look like sure winners—including James Thompson of Illinois, a 1980 Presidential hopeful. In all, the GOP thinks it can pick up as

## Politics and People

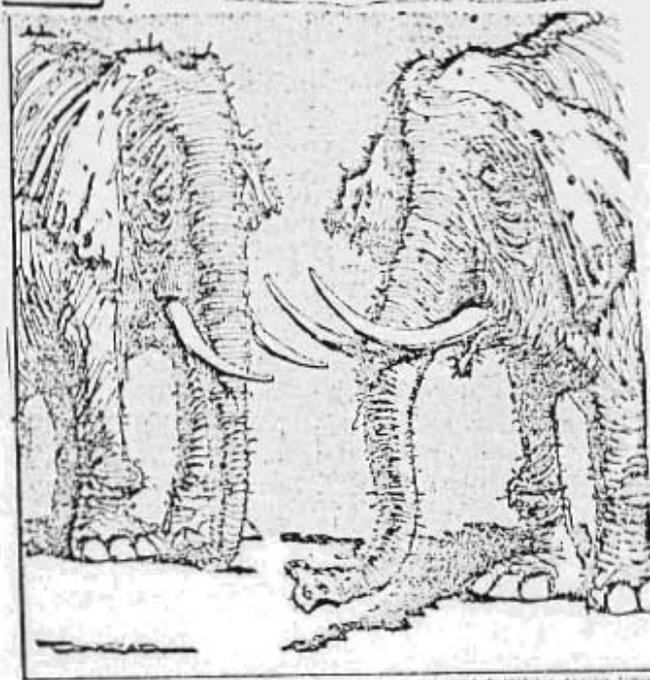
By ALAN L. OTTEN

### Drawing Lines

WASHINGTON—Republicans don't usually think well of Common Cause. They suspect it of being a secret agent of the Democratic Party, or worse.

Yet Common Cause is embarking on a grassroots campaign that could help preserve a strong Republican Party. It seeks to amend state constitutions to provide a more independent, less partisan method of drawing boundaries for congressional and state legislative districts.

The issue is of special import for Republicans because unless they make stunning gains in gubernatorial and state legislative elections in 1978 and 1980, the Democratic majorities that would exist in most states could almost gerrymander the GOP out of existence after the 1980 census figures are in and new legislative lines must be drawn almost everywhere.



"Have you noticed how old and wrinkled Carter looks lately?"

of '76 with two choices," says Brock, who lost his own Senate seat then. "Throw in the towel or start rebuilding. We've got to lay the ground work for the next decade." Unless Brock's strategy works this year, the GOP will edge even closer to extinction.

The root problem is, of course, the gerrymander: the construction of peculiarly shaped legislative districts that may meander all over the map. These bizarre boundary lines are usually drawn to maximize the legislative strength of the majority party, but they're also used in "sweetheart deals" protecting key incumbents of both parties, to help party leaders keep maverick legislators in line, or to minimize the representation of a racial minority.

"The present process works extremely well for incumbent legislators and other political insiders," a Common Cause analysis asserts. "It does not serve the public well . . . by minimizing electoral competition, unfair districting undermines the political process and weakens the political parties. . . . Competition forces the political process to be responsive to new ideas and new people. . . . Without competition, the parties lack the incentive to recruit or put forward their best candidates."

The reason Republicans are so worried about post-1980 reapportionment is because they may have so little leverage on it. There are Republican governors in only 12 states, Republican majorities in both houses of the legislature in only five small states, Republican control of one house in only eight other states. Unless the GOP begins regaining ground next fall, when most governors and many state legislators will be elected for four-year terms, the Democrats will dominate the crucial 1981-82 legislative sessions when most new boundary drawing will be done.

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"Under present boundaries, it's virtually impossible to get a Republican House," says GOP pollster Robert Teeter. "To get half the seats, Republicans would probably have to get over 60% of the popular vote. You can make a very good case that there are no more than 60 truly competitive seats in the House right now."

A similar disparity holds in many state legislatures, Mr. Teeter adds. In the 110-seat Michigan house, "you'd have to stretch it to find 15 really competitive seats," he figures. The Democrats control that body 58 to 42.

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*“All that is necessary for  
the forces of evil to win  
the world is for enough  
good men to do nothing.”*

Edmund Burke 1729-1797

This envelope contains Important Information about  
Your Country's future.

It has been brought to you by a Volunteer.

Please set it aside and read it when you  
can consider it carefully.

PLACE  
FIRST CLASS  
POSTAGE  
HERE

**FREEDOM FIRST FOUNDATION**

Box 222

South Schodack, N.Y. 12162

Attachment II

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with primary, general, or runoff elections must maintain adequate records with respect to each election.

1(a) Name of Committee (in full)  Check if name or address is changed  
**Freedom First Foundation**

2 Identification Number

(b) Address (number and street)  
**P.O. Box 222**

3 Date  
**September 22, 1978**

(c) City, State and ZIP code  
**South Schodack, New York 12162**

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 \_\_\_\_\_ 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 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 \_\_\_\_\_ Election (General, Primary, Runoff, etc.) held in \_\_\_\_\_ 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) (REG FORM 28)

(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 \_\_\_\_\_ Name, address and ZIP code \_\_\_\_\_ Relationship  
**None**

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 each line of information on separate continuation sheets as appropriate. Attach and attach to this Statement of Organization all continuation sheets in the appropriate order and place when information is continued on separate pages.

Statement of Organization For a Committee

Name of Committee  
**Freedom First Foundation**

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
Jeffrey K. Bell	Trenton, New Jersey 08601	U.S. Senate	Republican
Gordon Humphrey	Concord, New Hampshire 03301	U.S. Senate	Republican
Gerald Solomon	Glens Falls, New York 12801	U.S. Congress	Republican
John Pucciano	New Haven, Conn. 06501	U.S. Congress	Republican

17353

(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: **Republican**

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

Full name	Mailing address and ZIP code	Title or position
Robert Blair Shaffer	170 Frost Parkway Tiffin, Ohio 44883	Chairman

If additional information on separate continuation sheets is filed, refer to all letters from this Statement of Organization, indicate in the appropriate space on the later information on separate sheets.

# Statement of Organization For a Committee

(Page 3)

FEC Form 1  
 July 1976  
 Federal Election Commission  
 1325 K Street, N.W.  
 Washington, D.C. 20463

Name of Committee **Freedom First Foundation**

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
Robert Blair Shaffer	109 Frost Parkway Tiffin, Ohio 44893	Chairman
M. David Shaffer	1735 East County Rd. 50 Tiffin, Ohio 44893	Vice-Chairman
Victor Gagliardi	710 James St. Utica, N.Y. 13501	Treasurer
Dorothy Zdunczyk	2034 South Old Post Rd. Castleton, N.Y. 12061	Secretary

12 Does this committee plan to stay in existence beyond the current calendar year?  Yes  No  
 If "Yes" for how long? January 1, 1981

13 In the event of dissolution, what disposition will be made of residual funds? Outstanding Debts, Candidates Contributions

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
Old Fort Banking Company	P.O. Box 99, Old Fort, Ohio 44861

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
None			

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.

*Victor Gagliardi*  
(Signature of Treasurer)

25 Sept 76  
(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

7 0 0 3 0 3 6 1 7 3 0

DM FIRST FOUNDATION  
Box 222  
Schodack, N.Y. 12162



First Class Mail

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

78 SEP 28 AM 11:46

ASTLETON-ON-HUDSON, N.Y. 12033

1-135008-289008 10/16/78 ICS WA  
0011 1111 10/16/78



132-2654

3 OCT 28 P2:17  
...CERTIFIED...

\*\*\*\*\*CERTIFIED R 125\*\*\*\*\*412915-W2289-00108\*\*\*\*\*  
FREEDOM FIRST FOUNDATION  
VICTOR GAGLIARDI  
P.O. BOX 222  
SOUTH SCHODACK NY 12162

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE OCTOBER 10 QUARTERLY REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT.

UNLESS YOU WERE RECENTLY REGISTERED, PRIOR NOTIFICATION WAS SENT TO YOU APPROXIMATELY 30 DAYS AGO ADVISING YOU THAT YOUR THIRD QUARTER 1978 REPORT WAS DUE ON OCTOBER 10, 1978. THE REPORT MUST DISCLOSE YOUR CAMPAIGN RECEIPTS AND EXPENDITURES FROM JULY 1, 1978 (OR FROM THE CLOSING DATE OF YOUR LAST REPORT OR FROM THE DATE IN WHICH YOU BECAME A CANDIDATE OR ORGANIZED AS A COMMITTEE) THROUGH SEPTEMBER 30, 1978.

YOUR APPARENT FAILURE TO FILE THIS REPORT GIVES THE COMMISSION REASON TO BELIEVE THAT YOU ARE IN VIOLATION OF P.U.S.C. 432(F)(3) AND 432(F)(4).

YOU ARE HEREBY AFFORDED A REASONABLE OPPORTUNITY TO DEMONSTRATE WHY NO ACTION SHOULD BE TAKEN AGAINST YOU. YOUR REPORT SHOULD BE FILED IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 1325 K STREET, N.W., WASHINGTON, D.C. 20043. A COPY OF THIS REPORT SHOULD ALSO BE FILED WITH YOUR SECRETARY OF STATE OR EQUIVALENT STATE OFFICER.

IF YOU HAVE FILED THE REQUIRED REPORT OR REQUIRE ADDITIONAL INFORMATION, PLEASE CONTACT THE REPORTS ANALYSIS DIVISION ON THE TOLL FREE NUMBER (800)424-4537. OUR LOCAL NUMBERS ARE (202)523-1474 (PARTY) AND 523-1474 (NON-PARTY, PRESIDENTIAL, INDEPENDENT EXPENDITURES).

SINCERELY,

JOAN D. AYKENS  
CHAIRMAN

CERTIFIED MAIL  
FIRST CLASS PERMIT NO. 1000  
NEW YORK, NY

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

# FREEDOM FIRST FOUNDATION

BOX 222  
SOUTH SCHODACK, N.Y. 12162

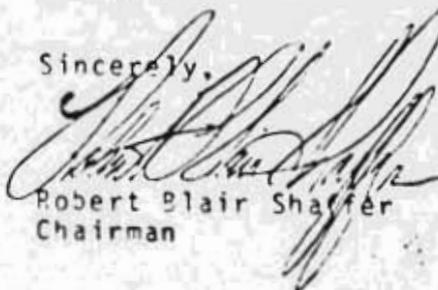
23 October 1978

Federal Elections Commission  
Washington, D.C.

Dear Sirs,

Our committee was only recently formed (22 September) and as of 30 September 1978 we had not undertaken any fundraising or spending activities.

Sincerely,



Robert Blair Shaffer  
Chairman

7 9 0 3 0 0 3 1 3 1

FREEDOM FOUNDATION

PO BOX 222  
SAATHI SCHODACK NY 12142

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

SOUTH JONJON, NY  
23  
OCT  
1978  
P.M.  
12162

11:17



FEDERAL ELECTION COMMISSION

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

*Attachment III*

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Blair Shaffer, Chairman  
Freedom First Foundation  
Box 222  
South Schodack, New York 12162

*Not sent*

Re: MUR 815(78)

Dear Mr. Shaffer:

The Federal Election Commission has received a complaint which alleges that the Freedom First Foundation (the "Foundation") committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 815(78).

The Commission has found reason to believe that the matters alleged therein state violations of 2 U.S.C. §441d and §433(c). Specifically it appears that page four, which is entitled "Election Update" of the packet placed by the Foundation in the Dover (N.J.) Daily Advance does not contain the statement of authorization/non-authorization required by 2 U.S.C. §441d of all communications which expressly advocate the election or defeat of clearly identified Federal candidates.

Also, Candidate James A. Courter is not included in the list on page two of the Committee's statement of organization as one of the candidates who will be supported by the Foundation. Therefore the Foundation has violated §433(c) of the Act for its failure to notify the Commission, within a 10 day period, of a change in its statement of organization.

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

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marcie Cummings, the staff member assigned to this matter, at 202-523-4175.

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

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

Sincerely,

William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

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

December 6, 1978

Mr. Robert C. Grant  
114 E. Ridgewood Parkway  
Denville, New Jersey 07834

Dear Mr. Grant:

Please find, pursuant to your request a copy of  
the reports filed by the Freedom First Foundation.

Sincerely,

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

William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

1155 L STREET, N.W.  
WASHINGTON, D.C. 20563

November 6, 1978

Robert C. Grant  
114 East Ridgewood Parkway  
Denville, New Jersey 07834

Dear Mr. Grant:

This is to acknowledge receipt of your complaint of November 2, 1978, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. A recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for handling complaints.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lester N. Scall".

Lester N. Scall  
Assistant General Counsel

Enclosure

114 E. Ridgewood Parkway  
Denville, N.J. 07834  
(201) 625-3983

Mr. Jay Myerson  
Federal Election Commission  
1325 K. St., N.W.  
Washington, D.C. 20463

807637

Dear Mr. Myerson:

I would like to file a complaint against the Freedom First Foundation, Box 222, South Schodack, N.Y. 12162, Robert Blair Shaffer, Chairman, in compliance with 2 U.S.C. 437, g (a) (1).

These people placed a packet in the Dover (N.J.) Daily Advance containing copies of a Wall St. Journal article, an unsigned cover letter, slander against Helen Meyner (D. NJ-13), and paragraphs supporting James Courter and Jeffrey Bell all titled "Election Update", a sheet on taxes, inflation, and U.S. Military Inferiority and of course a return envelope for a monetary contribution to the Foundation to "help alert other Americans to the perilous condition of the 2 party system."

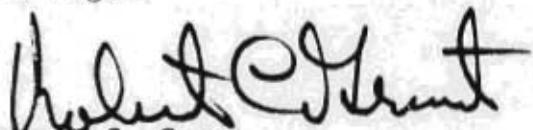
The "report" states "A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C." If there is such a report available, I would like to see it.

There are no disclaimers on the literature stating the treasurer of the organization and exactly who is funding this packet. They are violating the Federal Election Campaign Act of 1971 2 U.S.C. 434 (e) and 441 (d) and are advocating support of two candidates and the defeat of another without proper procedure.

Documentation of my allegation is enclosed in their packet (per attached) as it appeared in the daily newspaper.

I am not a candidate nor am I filing this complaint on behalf of or at the request of a candidate.

It continues to amaze me that newspaper management is unaware of Federal Election Commission standards and will print or insert damn near anything if the price is right.

  
Robert C. Grant

Signed, sworn and notarized this 2<sup>nd</sup> day of Nov. 1978.

  
DOUGLAS S. NOTARIS  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires 12/31/80

# FREEDOM FIRST FOUNDATION

BOX 222  
SOUTH SCHODACK, N.Y. 12162

1 October, 1978

Dear Citizen,

I am writing you in an effort to forestall the greatest political crisis our nation has faced since the disintegration of the Whigs in 1848. The crisis I am referring to is, of course, the imminent collapse of the Republican Party.

Registered Republicans make up only less than 18% of the electorate. Republicans in Congress are outgunned 2 to 1, and of the 50 state governors, there are only 12 Republicans. Republicans control only 19 of the 99 state legislative bodies. Nor are these isolated or temporary instances of Republican weakness. Democrats have completely controlled Congress for 40 of the last 44 years. Even more disturbing is that Republican congressional candidates received 45% of the votes cast in the '76 national elections but won only 32% of the seats at stake because of district gerrymandering by Democrat governors, the same governors who will be in control when new districts are drawn in 1981. The party of Lincoln, Roosevelt and Taft is fast fading from the political landscape of America.

The Foundation views with great alarm the demise of one of the last bastions of free enterprise thought, concern for individual rights, and insistence on a strong national defense that have characterized the Republican Party over the last three decades. We feel it is essential to maintain some semblance of the two party system, and we fear that in "Koreagate" and the underhanded measures used to shove a record pay raise through against conservative opposition, that we have already seen a glimpse of one party arrogance and irresponsibility. The pundits who maintain that there isn't a dime's worth of difference between the two major parties don't really know, since many of us cannot remember a time when Democrat liberals didn't control both Congress and the Supreme Court.

The elections of 1978 will be remembered as a major turning point for our country in years to come. It will very likely be the last chance conservatives will have to win the kind of major victories they must have to break the liberal stranglehold on our nation.

There are several important factors working in our favor:

1. Turn out in off-year elections is historically low, and this is a big help to Republican candidates because their supporters are better informed and more likely to vote.
2. The average gain in Congress for the "party out of power" is 33 seats. (Unfortunately, that would leave the Democrats in complete control.)
3. All national polls indicate a strong conservative trend in the wake of issues like welfare fraud, the Panama Canal giveaway, huge government deficits and the unprecedented Russian arms buildup.

# A New GOP Game Plan

For the party out of power, an off-year election is traditionally a chance to pick up seats in Congress and give Presidential hopefuls a few practice turns. But this year the battered Republican Party is taking a different tack, concentrating less on Congressional races and channeling its effort into gubernatorial and state-legislature campaigns. "It's essential to start coming back at the state level," says GOP National Chairman William Brock, "because that's the foundation for 1980 and beyond." In at least one respect, the Republicans are fighting for survival: after the 1980 census, state legislatures will redraw Congressional district lines to reflect population shifts, and as of now the Democrats will control most of the redistricting. "We could be gerrymandered out of existence," worries one Wisconsin Republican.

The GOP has never been in worse shape. As recently as 1970, it controlled half the state legislatures and had 32 governors. Now there are only five Republican legislatures and a dozen governors. Republicans are outnumbered 289 to 146 in the House and 62 to 38 in the Senate. They stand to gain from ten to twenty House seats this year—the normal swing to the party out of power—and they might defeat two or three Democrats in the Senate, possibly Floyd Haskell of Colorado and William Hathaway of Maine. But retirements have opened Senate seats long held by Republicans in Michigan, Kansas and Nebraska, and in the end the GOP will be doing well to break even in the Senate.

**Sure Winners:** Only in the statehouses do the Republicans have much hope. Nine incumbent Democratic governors cannot succeed themselves, and the Republicans think they have a good shot in many of these states, especially in the Midwest and in the West. In Connecticut, Democrat Ella Grasso is considered vulnerable if a good opponent can be found, while in Oregon, former Republican governor Tom McCall should be a favorite if he decides to run. Eight of nine Republican governors, on the other hand, are eligible to run again and most of them look like sure winners—including James Thompson of Illinois, a 1980 Presidential hopeful. In all, the GOP thinks it can pick up as

## Politics and People

By ALAN L. OTTEN

### Drawing Lines

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Yet Common Cause is embarking on a grassroots campaign that could help preserve a strong Republican Party. It seeks to amend state constitutions to provide a more independent, less partisan method of drawing boundaries for congressional and state legislative districts.

The issue is of special import for Republicans because unless they make stunning gains in gubernatorial and state legislative elections in 1978 and 1980, the Democratic majorities that would exist in most states could almost gerrymander the GOP out of existence after the 1980 census figures are in and new legislative lines must be drawn almost everywhere.



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of '76 with two choices," says Brock, who lost his own Senate seat then. "Throw in the towel or start rebuilding. We've got to lay the groundwork for the next decade." Unless Brock's strategy works this year, the GOP will edge even closer to extinction.

Illustration by Larry Green, BRUNO in Washington

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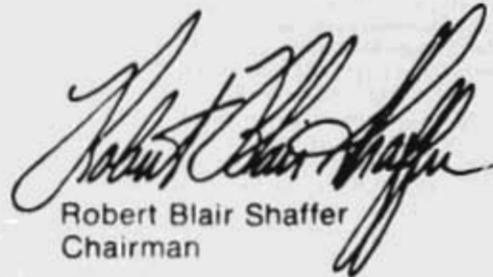
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The computer, which many thought would help establish neat, nonpartisan boundaries, has actually made for more skillful gerrymandering. "The computer," says Mr. Teeter, "has raised the level of the art. You can gerrymander more precisely."

I hope you will be able to help us in our fight to preserve the two-party system and our freedoms. I fear greatly that the prayers of the enslaved peoples of the world are in vain, and that we in America will fail to maintain our own freedoms.

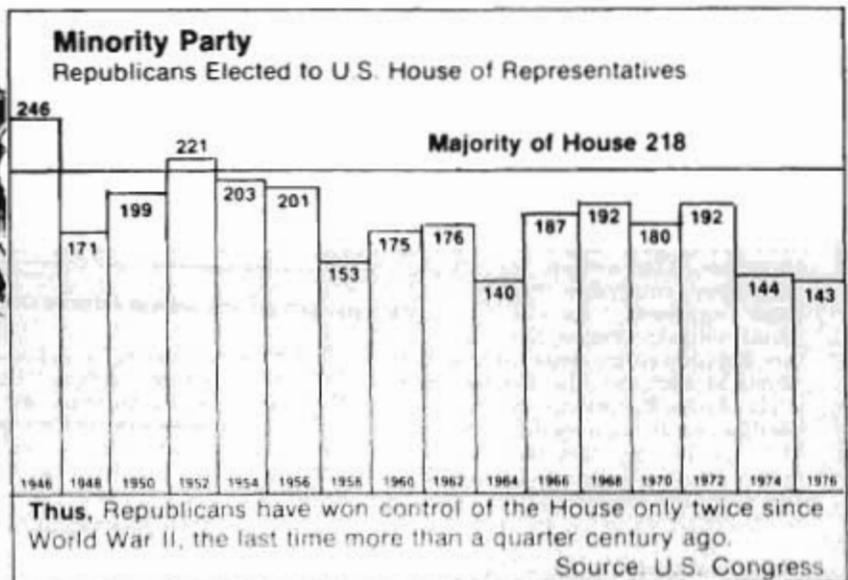
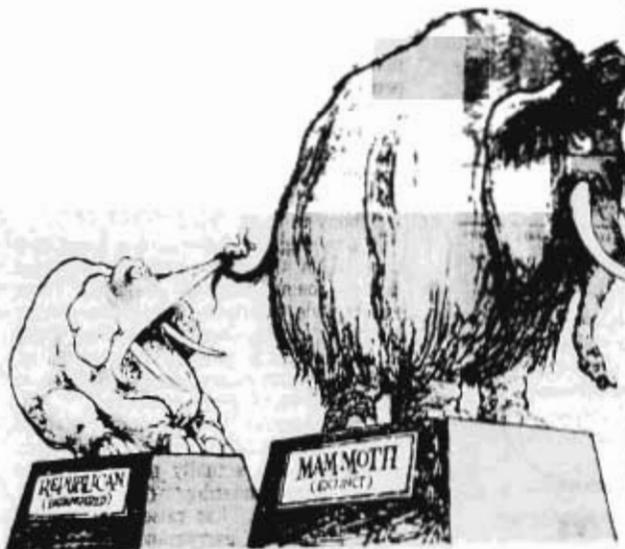
Please do what you can to hold back the darkness a little longer.

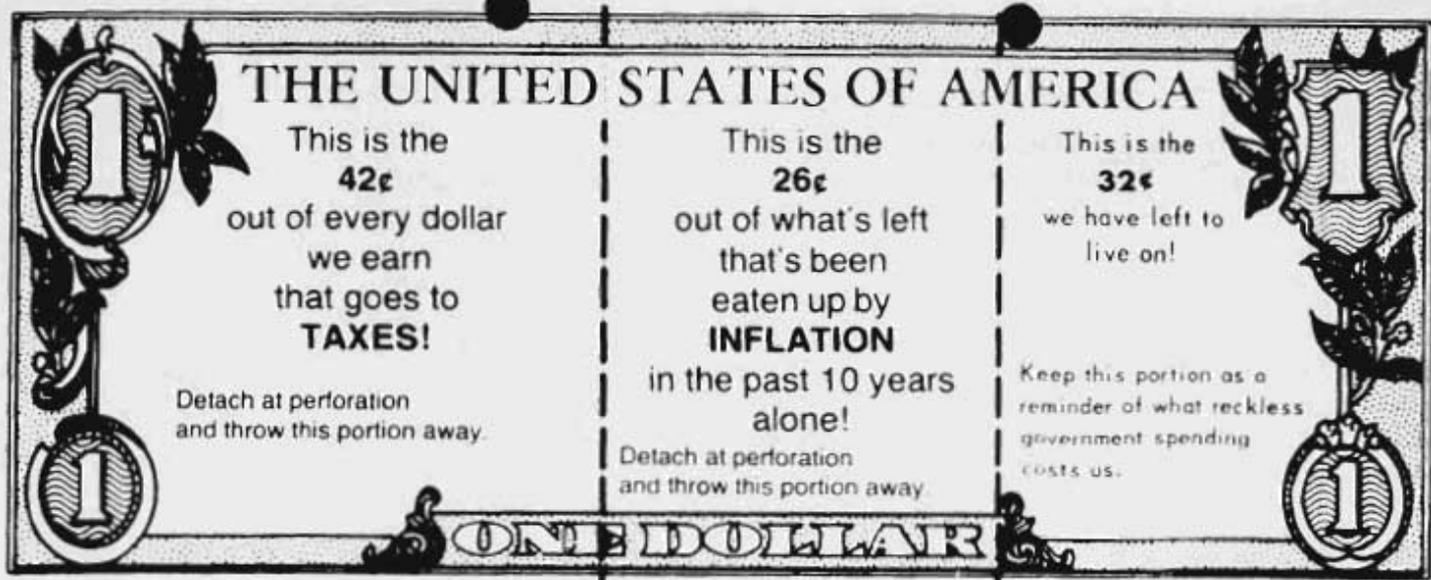


Robert Blair Shaffer  
Chairman

## ABOUT THE FOUNDATION:

1. *Ninety per cent of all work for the Foundation is performed by volunteers. Our paid employees earn \$4. per hour or \$160 per week, and work without compensation for overtime.*
2. *Contributions are tax deductible. Please do not send us more than \$25, but please send at least \$1. If you have more to contribute, find a deserving candidate and support him.*
3. *All excess funds will be contributed to Republican candidates for Senate, Congress or Governor.*
4. *A copy of our report (expenditures, etc.) can be obtained by writing the Federal Election Commission, Washington, D.C.*

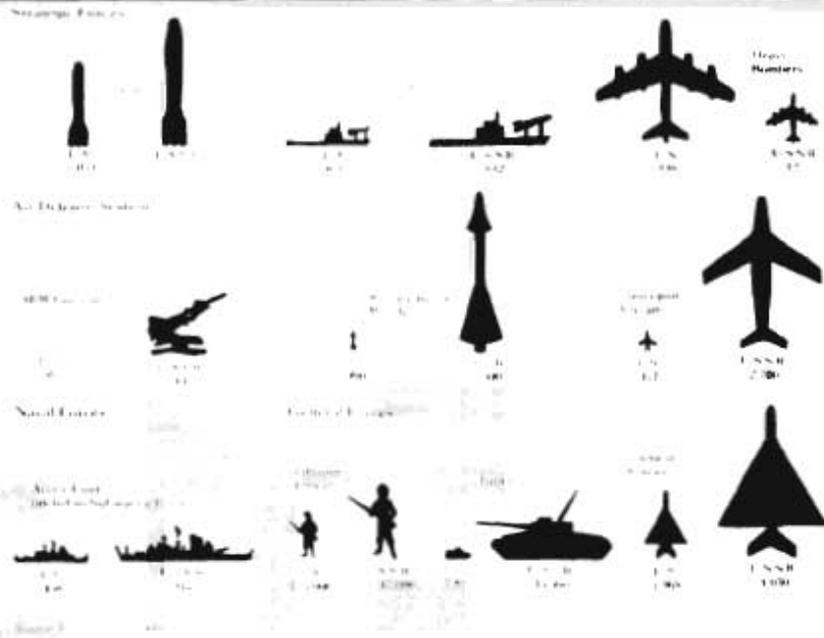




## Russians Seeking U.S. Retreat

"The evidence is incontrovertible that the Soviet Union has repeatedly, flagrantly, and indeed contemptuously violated the treaties to which we have adhered...it is terribly clear that they remain determined to gain decisive military superiority over the United States, and that in pursuit of this end they have been willing to dishonor their most fundamental agreements with us... Since 1972, virtually every segment of the Soviet civilian economy has fallen upon hard times, and indicators suggest that even gloomier economic times are ahead. Yet, instead of diverting resources from the military to the civilian sectors of its economy, the Soviet Union has increased military spending each year since the signing of SALT I...In every vital phase of military preparedness, the Russians now are outspending us both in dollar terms and as a percentage of GNP...I submit that the Russians would not be willing to so cheat and sacrifice in quest of military dominance, once it is attained...I think Soviet leaders contemplate threatening the use of their superiority to drive the United States into headlong retreat and isolation from its vital interests around the world."—Melvin R. Laird, Former Secretary of Defense, "Arms Control: The Russians Are Cheating", Reader's Digest, December 1977.

## A Comparison of U.S.-Soviet Military Power



Coalition For Peace Through Strength

## How SALT II Treaty Would Lock United States Into

### MILITARY INFERIORITY

The SALT II treaty now being negotiated will **legalize and perpetuate** Soviet strategic military superiority.

The claim that SALT II provides for parity because both sides are limited to 2250 strategic weapons is an incredibly bold misrepresentation because:

- Soviet Backfire, Badger and Blinder strategic bombers which CAN bomb the U.S. are **not** counted in this ceiling while all U.S. strategic bombers **are** counted.
- Soviet ICBMs carry six times more explosive power than the U.S. ICBMs. Yet SALT II would not permit the U.S. to build "heavy" missiles as the U.S.S.R. has done.

- Ground and sea launched cruise missiles of over 600 kilometers range are prohibited. Yet the Soviets could strike 89% of U.S. population with such sea launched missiles whereas the U.S. could reach less than 15% of the Soviet population with the same type missiles.

- The development of new strategic missile systems will be restricted or prohibited. This will prevent the U.S. from matching the eight new Soviet ICBMs which are in testing or production (compared to none for the U.S.).

- There is no on-site inspection. Thus the Soviets can cheat on SALT II as they have on SALT I.

STATEMENT OF ACCOUNT

*THIS IS YOU!!*  
**TAXPAYER NAME AND ADDRESS**

YOUR ATTENTION IS DIRECTED TO AMOUNTS DUE AS INDICATED BELOW

DEBT OR LIABILITY ITEM	GROSS COST	YOUR SHARE
Public Debt	\$ 721,000,000,000	\$ 9,012
Accounts Payable	\$ 80,000,000,000	\$ 1,000
Undelivered Orders	\$ 332,000,000,000	\$ 4,150
Long Term Contracts	\$ 15,000,000,000	\$ 187
Loan and Credit Guarantees	\$ 209,000,000,000	\$ 2,612
Insurance Commitments	\$1,733,000,000,000	\$ 21,662
Annuity Programs	\$5,900,000,000,000	\$ 73,750
Unadjudicated Claims		
International Commitments & other Financial Obligations	\$ 43,000,000,000	\$ 537
<b>TOTAL</b>	<b>\$9,033,000,000,000</b>	<b>\$112,912</b>

**TERMS:**  
 You just keep paying

*This is your share of the national debt.*

Finance

# How Republican Plan Would Cut Your Taxes

## Amount Your Income Tax Would Drop

Republicans' Kemp-Roth plan would have this impact when it became fully effective

### Married Couple, Two Children

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 120	\$ 12	\$ 108	90%
\$ 10,000	\$ 446	\$ 218	\$ 228	51%
\$ 12,500	\$ 917	\$ 539	\$ 378	41%
\$ 15,000	\$ 1,330	\$ 812	\$ 518	39%
\$ 20,000	\$ 2,180	\$ 1,388	\$ 792	36%
\$ 30,000	\$ 4,232	\$ 2,781	\$ 1,451	34%
\$ 40,000	\$ 6,848	\$ 4,512	\$ 2,336	34%
\$ 50,000	\$ 9,950	\$ 6,655	\$ 3,295	33%
\$ 75,000	\$ 19,255	\$ 13,150	\$ 6,105	32%
\$100,000	\$28,880	\$20,180	\$8,700	30%

### Married Couple, No Children

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 431	\$ 233	\$ 198	46%
\$ 10,000	\$ 761	\$ 443	\$ 318	42%
\$ 12,500	\$ 1,186	\$ 718	\$ 468	39%
\$ 15,000	\$ 1,651	\$ 1,026	\$ 623	38%
\$ 20,000	\$ 2,555	\$ 1,643	\$ 912	36%
\$ 30,000	\$ 4,712	\$ 3,096	\$ 1,616	34%
\$ 40,000	\$ 7,427	\$ 4,911	\$ 2,516	34%
\$ 50,000	\$ 10,610	\$ 7,110	\$ 3,500	33%
\$ 75,000	\$ 20,005	\$ 13,690	\$ 6,315	32%
\$100,000	\$29,630	\$20,735	\$8,895	30%

three years—

### Single Person

Income	Tax Now	Proposed Tax	Reduction	
			Dollars	Percent
\$ 8,000	\$ 810	\$ 461	\$ 349	43%
\$ 10,000	\$ 1,199	\$ 698	\$ 501	42%
\$ 12,500	\$ 1,631	\$ 976	\$ 655	40%
\$ 15,000	\$ 2,126	\$ 1,309	\$ 817	38%
\$ 20,000	\$ 3,252	\$ 2,067	\$ 1,170	36%
\$ 30,000	\$ 5,950	\$ 3,900	\$ 2,050	34%
\$ 40,000	\$ 9,233	\$ 6,141	\$ 3,092	33%
\$ 50,000	\$ 12,985	\$ 8,815	\$ 4,170	32%
\$ 75,000	\$ 22,610	\$ 16,715	\$ 5,895	26%
\$100,000	\$32,235	\$25,218	\$7,017	22%

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# Ten Ways to Cut Inflation

**Freeze E.** who took a  
 manship of T.  
 demonstrate thei  
 own compensation  
 earning, say, \$100,000.  
 difference, but it might be

**Hold Down State Wages.** Having up  
 increases, the President then could  
 hold raises for their employees to 5% or s.

**Cut Local Taxes.** If their projected wage increa.  
 the states and cities could trim their sales, incom  
 taxes. Another reason for reduction: many states ar  
 are enjoying budget surpluses

The weak and perilous course would be to surrender to inflation on the presumption that interest groups are just too strong and the nation's will is too weak to fight it. In fact, President Carter has given in to many of the constituencies, firing up inflation by calling for large jumps in welfare and urban spending, in farm subsidies and tariffs on imports as varied as sugar, TV sets and, just last week, CB radios. So long as the Administration appears to have round heels, self-seeking groups—from coal miners to steelmakers—will continue to press their inflationary desires.

The President has said that when he returns from his overseas trip this week, he will produce a comprehensive anti-inflation plan. His economic advisers urge him to take a tough stand by calling for a reduction of subsidies, regulations and the growth of spending. Clearly, the immediate risks would be outweighed by the ultimate rewards. If the U.S. reduces domestic inflation, the dollar will rise, import prices will decline, purchasing power will expand, interest rates will fall, housing will climb, profits will increase, the stock market will turn up, capital spending will swell, more jobs will be created and business will flourish. In sum, the small sacrifices made by special groups will lead to big benefits for all.

—Marshall Loeb

# ELECTION UPDATE

LAST DAY TO REGISTER

14 OCT., 1978

LAST DAY FOR ABSENTEE BALLOT

31 OCT. 1978

PLEASE POST PROMPTLY

**FOR CONGRESS — JAMES A. COURTER** IS A LIFELONG RESIDENT OF NORTHWEST NEW JERSEY AND A RESPECTED ATTORNEY. HE IS RUNNING FOR CONGRESS BECAUSE HE IS A THOUGHTFUL AND CONSCIENTIOUS MAN WHO IS CONCERNED ABOUT THE DECLINE OF AMERICA'S FORTUNES, BOTH HERE AND ABROAD. JAMES A. COURTER'S FORTHRIGHT STANDS FOR TAX REDUCTIONS FOR WORKING AMERICANS, FOR A STRONG NATIONAL DEFENSE, AND FOR ECONOMY AND MODERATION IN GOVERNMENT SPENDING HAVE EARNED HIM WIDESPREAD SUPPORT IN THE 13th CONGRESSIONAL DISTRICT.

## ABOUT HELEN MEYNER

James Courter's opponent for Congress is incumbent democrat Helen Meyner. Ms. Meyner is one of the most liberal members of Congress, and her campaigns in the past have always eked out narrow victories by running slick, very well financed media blitzes. What Ms. Meyner's expensive commercials don't talk about is:

- a. **BIG GOVERNMENT:** She has consistently voted to increase the size and cost of government, voting **against** the Kemp-Roth tax cuts, **for** more government bureaucracy for small businessmen (OSHA), **for** larger budgets for **everything** (except nation defense!) and **for** food stamps for strikers. Don't we have enough giveaway programs already?
- b. **BIG LABOR:** Ms. Meyner has one of the highest ratings possible by George Meany's AFL-CIO and other big union bosses, voting **for** labor backed proposals more than 90% of the time. This includes votes **for** labor law "reform" and to repeal the Hatch Act. Both of these measures would increase union's power (they are among Meyner's biggest financial supporters). Aren't unions powerful enough?
- c. **SMALL NATIONAL DEFENSE:** Ms. Meyner has consistently voted against a strong national defense. This includes votes **against** the B-1 bomber, **against** the neutron bomb, and **against** new ships for our outdated Navy. Apparently, she's not worried about the Soviet Union's huge and increasing military might.

**WON'T YOU SEE WHAT YOU CAN DO  
TO HELP RETIRE THIS WOMAN?**

**FOR U.S. SENATE — JEFFREY K. BELL** UNDERSTANDS WHY TAXES MUST BE REDUCED TO REVITALIZE BUSINESS AND JOBS IN NEW JERSEY, ONE OF THE HIGHEST TAXED STATES IN THE NATION. A BRILLIANT THEORETICIAN, A VIET NAM VETERAN, AND POSSESSOR OF ONE OF THE BRIGHTEST INTELLECTS TO RUN FOR HIGHER OFFICE IN RECENT MEMORY, JEFF BELL DESERVES YOUR SUPPORT ON NOV. 7th.

### ABOUT THIS PACKET:

As you can probably tell, a lot of time and effort went into the preparation of this message. We have taken personal financial risks to publish and distribute this packet, and we really appreciate any help you can send us. Even if **no one** helps us, it will be worth it if you try to get as many people as possible to read and consider our message. **AND VOTE FOR YOUR FREEDOM ON NOVEMBER 7th.**

This envelope contains Important Information about  
your Country's future.

It has been brought to you by a Volunteer.

Please set it aside and read it when you  
can consider it carefully.

7701014873

Edgewood Pkwy  
e NJ 07834



Mr. Jay Myerson  
Federal Election Commission  
1325 K. Street, N.W.  
Washington  
DC

FIRST CLASS

FIRST CLASS

20463

NOV 27 6 AM '71



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

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