



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1192

Date Filmed 1/29/83 Camera No. --- 2

Cameraman CB

FEDERAL ELECTION COMMISSION

- 1) Routing Slips
- 2) Objection Memoranda
- 3) Matters pertaining to conciliation

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

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

Signed Jonathan M. Levin
 Date 1/3/83

FEC 9-21-77

83040373038



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 21, 1982

John E. Nolan, Esq.
Steptoe & Johnson
1250 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1192
Kennedy for President

Dear Mr. Nolan:

This is in reference to the complaint by your client, Kennedy for President, filed with the Commission on March 19, 1980, concerning possible violations of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. § 431 et seq.), by the "Kennedy Truth Squad," a project of Conservatives Against Liberal Legislation (CALL). Based on your complaint, the Commission determined there was reason to believe and probable cause to believe that CALL violated 2 U.S.C. § 441b(a) by making prohibited corporate expenditures in connection with a Federal Election.

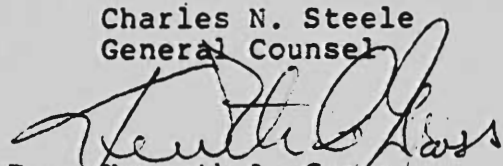
On December 14, 1982, however, the Commission decided not to file suit in this matter and voted to close the file.

This matter will become public within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

83040373039



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 21, 1982

Robert R. Sparks, Jr., Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1192
Conservatives Against Liberal
Legislation

Dear Mr. Sparks:

You were previously notified that on April 20, 1982, the Federal Election Commission found probable cause to believe that your client, Conservatives Against Liberal Legislation, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the above-captioned matter.

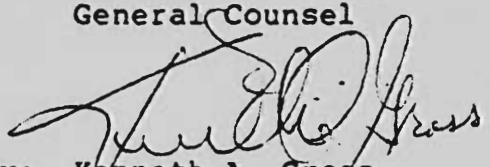
On December 14, 1982, the Commission decided not to file suit in this matter and voted to close the file.

This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. As you may know, 2 U.S.C. § 437g(a) (4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission.

Should you have any questions, please contact Jonathan Levin at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

83040373040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Conservatives Against Liberal) MUR 1192
Legislation)

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on December 14, 1982, do hereby certify that the Commission took the following actions in MUR 1192:

1. Failed by a vote of 2-3 to pass a motion to authorize the General Counsel to file a civil suit for relief in United States District Court and to send the letter attached to the General Counsel's report dated November 24, 1982.

Commissioners Harris and McDonald voted affirmatively for the motion; Commissioners Elliott, McGarry, and Reiche dissented. Commissioner Aikens was not present at the time of the vote.

2. Decided by a vote of 5-0 to close the file in MUR 1192.

Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

Attest:

12/15/82

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

83040373041

CORRECTED MEMO

November 24, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1192

Please have the attached General Counsel's Report distributed to the Commission for the agenda of December 14, 1982. Thank you.

Attachment

cc: Levin

83040373042

November 24, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1192

Please have the attached General Counsell's Report distributed to the Commission for the agenda of November 30, 1982. Thank you.

Attachment

cc: Levin

B 3 0 4 0 3 7 3 0 4 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Conservatives Against Liberal)
Legislation)

MUR 1192

GENERAL COUNSEL'S REPORT

RECEIVED SECTION
DEC 14 1982

I. Background

On September 13, 1982, the Commission received from this office a report recommending that the General Counsel be authorized to file suit against Conservatives Against Liberal Legislation (CALL) in the United States District Court. This recommendation was made after ninety days of conciliation had elapsed.

83040373044

II. Legal Analysis

While the opinion of the D.C. Circuit in Federal Election Commission v. Machinists Non-Partisan Political League, ("MNPL"), 655 F. 2d 380 (D.C. Cir. 1981), cert. denied, ___ U.S. ___, 102 S.Ct. 397 (1981) and the more recent opinion of the Eleventh Circuit in Federal Election Commission v. Florida for Kennedy Committee, 681 F. 2d 1281 (11th Cir. 1982), would be considered by a court in determining the merits of a suit brought in this matter, this matter involves expenditures by a corporation as opposed to expenditures by individuals or other non-corporate, non-union entities. The above courts of appeals did not address corporate expenditures.

In this matter, CALL, a corporation, has spent \$118,436.65 mailing statements which, in the General Counsel's view, appear to be "in connection with" the 1980 Presidential nomination. CALL's literature contained statements clearly aimed at attacking Senator Kennedy with direct reference to his Presidential plans at a point just prior to the primary season.

It should be further noted that this case would most likely be brought in the Eastern District of Virginia and subsequently in the Fourth Circuit, not the circuits where the other cases were brought. This may make a difference in the precedential value accorded to the previous cases.

83040373045

In light of the above analysis, the General Counsel recommends that the Commission grant authorization to file a civil suit for relief in United States District Court.

III. Recommendation

Authorize the General Counsel to file a civil suit for relief in United States District Court and to send the attached letter. (See Attachment 3).

24 November 1982
Date



Charles N. Steele
General Counsel

Attachments

1. Most recent conciliation proposal sent to respondent.
2. Reply from respondent, received October 25, 1982.
3. Proposed letter to respondent.

83040373046



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1982

Robert R. Sparks, Jr., Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1192

Dear Mr. Sparks:

On April 20, 1982, the Commission determined there is probable cause to believe that your client, Conservatives Against Liberal Legislation, committed a violation of 2 U.S.C. § 441b(a) because of corporate expenditures made in connection with the 1980 Democratic presidential nomination.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

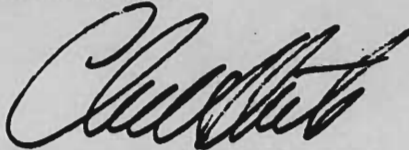
We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend that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

83040373047

Letter to Robert R. Sparks, Jr.,
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

83040373048



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1192 *JI*

Dear Mr. Sparks:

On April 20, 1982, the Commission determined there is probable cause to believe that your client, Conservatives Against Liberal Legislation, committed a violation of 2 U.S.C. § 441b(a) because of corporate expenditures made in connection with the 1980 Democratic presidential nomination.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

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 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. Please make your check for the civil penalty payable to the U.S. Treasurer.

83040373049

Letter to Robert R. Sparks, Jr.,
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

83040373050

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Conservatives Against)
Liberal Legislation)

MUR 1192

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on April 20, 1982, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1192:

1. Find probable cause to believe Conservatives Against Liberal Legislation violated 2 U.S.C. §441b in connection with its "Kennedy Truth Squad" activities.
2. Send the letter and conciliation agreement attached to the General Counsel's April 2, 1982 report.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

Date

4-21-82

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

83040373051

April 5, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1192

8 3 0 4 0 3 7 3 0 5 2
Please have the attached General Counsel's Report distributed to the Commission for the agenda of April 20, 1982. Thank you.

Attachment

cc: Levin

April 5, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1192

Please have the attached General Counsel's Report distributed to the Commission for the agenda of April 14, 1982. Thank you.

Attachment

cc: Levin

83040573053

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)

) MUR 1192

82 APR 5 A 9: 12

)
Conservatives Against)
Liberal Legislation)

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

APR 20 1982

I. Background

This matter was generated by a complaint filed by the Kennedy for President Committee. On September 3, 1980, the Commission found reason to believe that Conservatives Against Liberal Legislation (CALL) violated 2 U.S.C. § 441b(a) by making expenditures from its general treasury in connection with the 1980 presidential primary elections. The Commission investigated this matter and, on July 8, 1981, forwarded to respondent a brief stating the position of the General Counsel on the legal and factual issues involved in this matter. Counsel for respondent sent a reply brief dated July 31, 1981, contending that the Commission should not find probable cause to believe that CALL violated § 441b(a).

II. Legal Analysis of Respondent's Brief

Counsel for respondent bases his contention on four premises. They are: (1) CALL's expenditures did not involve the transfer of anything of value "to any candidate, campaign committee, or political party or organization" (see 2 U.S.C. § 441b(b)(2)); (2) CALL's expenditures were made at

83040373054

a time when Senator Edward Kennedy was not a candidate; (3) CALL's expenditures "did not address Senator Kennedy himself or his 'candidacy'"; and (4) the Commission lacks subject matter jurisdiction over the activities of CALL in this case.

The first argument of CALL's counsel ignores the language of 11 C.F.R. § 114.1(a)(1) which was promulgated by the Commission in 1977 and which interprets 2 U.S.C. § 441b(b)(2). This section states that the term "contribution or expenditure" shall include any

direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or anything of value... to any candidate, political party or committee, organization, or any other person (emphasis added).

11 C.F.R. § 114.1(a)(1). By adding the above-emphasized words, the Commission interpreted § 441b(b)(2) to prohibit corporate payments "in connection with" a federal election regardless of the recipient. This interpretation is consistent with the legislative history of the statutory section. See United States v. International Union (UAW), 352 U.S. 567 (1957), which upheld the indictment of a union for paying treasury funds to a media production firm for certain television broadcasts that stated the union's position on those seeking certain federal offices.

To deny that such activity, either on the part of a corporation or a labor organization, constituted an "expenditure in connection with any [federal] election" is to deny the long series of

83040373055

congressional efforts calculated to avoid the deleterious influences on federal elections resulting from the use of money by those who exercise control over large aggregations of capital. More particularly, this Court would have to ignore the history of the statute from the time it was first made applicable to labor organizations. As indicated by the reports of the Congressional Committees that investigated campaign expenditures, it was to embrace precisely the kind of indirect contribution alleged in the indictment that Congress [in 1947] amended § 313 to proscribe "expenditures." It is open to the Government to prove under this indictment activity by appellee that, except for an irrelevant difference in the medium of communication employed, is virtually indistinguishable from the Brotherhood of Railway Trainmen's purchase of radio time to sponsor candidates or the Ohio C. I. O.'s general distribution of pamphlets to oppose Senator Taft. Because such conduct was claimed to be merely "an expenditure [by the union] of its own funds to state its position to the world," the Senate and House Committees recommended and Congress enacted, as we have seen, the prohibition of "expenditures" as well "contributions" to "plug the existing loophole."

352 U.S. at 585.

The second argument of CALL's counsel appears to be based upon the decision of the United States Court of Appeals for the District of Columbia in Federal Election Commission v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert. denied, 50 U.S.L.W. 3278 (October 31, 1981) ("MNPL"), in which the court determined that contributions to committees organized to "draft" for President a person who was not yet a "candidate" were not subject to limitation under the Act. In making this determination, however, the Court of Appeals mistakenly

83040373036

reasoned that an organized attempt to influence the nomination of an individual for election to the office of President, by way of encouraging said individual to declare his or her candidacy and by way of opposing the nomination of other individuals is not an attempt to influence a federal election. In this matter, CALL clearly use language referring specifically to the impending candidacy of Senator Kennedy, and the language of the solicitation evidences a purpose to attack Senator Kennedy with the aim of reducing his popularity and the possibility that he would seek his party's nomination for President. (See General Counsel's Brief, dated July 8, 1981, at 3-6). CALL's effort was thus an attempt to influence a federal election.

There is a possibility that the MNPL ruling will, in effect, be reversed by the Supreme Court. The same issue decided in MNPL is currently pending before the United States Court of Appeals for the Eleventh Circuit. Federal Election Commission v. Florida for Kennedy Committee, 492 F. Supp. 587 (S.D. Fla. 1980), appeal docketed, No. 80-6013 (5th Cir. (now 11th Cir.) Dec. 18, 1980). Moreover, two district courts in other circuits have either expressly or impliedly rejected the broad proposition that the Commission does not have jurisdiction over pre-candidacy activities. In Federal Election Commission v. Wisconsin Democrats for Change in 1980, No. 80-C-124 (W.D. Wisc. Apr. 24, 1980),

83040373057

the court rejected that argument, stating: "[The Act] appears to cover 'draft' committees in the same manner as any other committees formed for the support of candidates for public office." Id., slip op. at 4. In Federal Election Commission v. Florida for Kennedy Committee, 492 F. Supp. 587 (S.D. Fla. 1980), the court declined to reach the jurisdictional issue directly, and stated that it could not hold "that the activities of the various draft committees were efforts solely to convince the Senator to run, rather than help elect him." 492 F. Supp. at 595. Because there is authority contrary to the analysis of the MNPL court, the Commission need not feel compelled to decline enforcement of the statute against CALL on the basis of that decision.

Aside from what this office perceives to be an erroneous conclusion, the opinion in MNPL is distinguishable from the present situation. In stating that contributions to draft groups were not under the Commission's jurisdiction, the court in MNPL was analyzing the "for the purpose of influencing" standard of 2 U.S.C. § 431(8)(A) which applies to the activities of individuals and other non-corporate, non-union persons. However, the court did not address activities by corporations which are governed by the standard set out in 2 U.S.C. § 441b. The elements

83040373058

comprising a § 441b violation are (1) expenditures from the corporate treasury (2) made in connection with a federal election. The prohibition of corporate contributions and expenditures has a long statutory history apart from that of the limitations on contributions and expenditures by individuals and committees found in the Federal Election Campaign Act. This history reflects a concern over the unique problem of the effect of corporate and labor union spending. This concern is reflected in the legislative history of 2 U.S.C. § 441b, formerly 18 U.S.C. § 610, and the perceived necessity to carve out certain narrow exceptions from this broad prohibition. Examples of such exceptions are those laid out in 2 U.S.C. § 441b(b)(2). The nature of these exceptions, e.g., for voter registration and get-out-the-vote activities, illustrates that the framers viewed the general ban of § 441b to reach more than just activities involving a specific candidate.

Further examples of this view may be found in the Commission regulations. Section 100.8(b)(3) excludes from the definition of "expenditure" costs incurred for encouraging people to register or to vote "except that corporations and labor organizations shall engage in such activity in accordance with 11 C.F.R. § 114.4(c) and (d). These latter sections provide in part that a corporation or

83040373059

labor organization may support nonpartisan registration and get-out-the-vote drives only if several specific requirements are met.

The references to the impending candidacy of Senator Kennedy throughout the text of the solicitations, the timing of the solicitations, and their highly foreseeable effect indicate that CALL produced these solicitations in connection with the 1980 Presidential election. As such, the funds expended by CALL in producing and mailing these solicitations were in violation of 2 U.S.C. § 441b. 1/

As to respondent's third argument, the leaflets at issue do not contain solely issue discussion akin to referendum or voter education expenditures protected under First National Bank of Boston v. Bellotti, 435 U.S. 765 (1978). Respondent does not address the excerpts quoted from CALL's leaflets cited at 3-6 of the General Counsel's Brief. As stated above, these excerpts demonstrate a discussion of Senator Kennedy's issue stands as they relate to his impending candidacy. In light of the language used by CALL in its leaflets, it appears somewhat disingenuous for CALL to claim that it was "merely discussing Kennedy's

1/ Respondent CALL specifically raised the argument that its activities were not "in connection with" a federal election in a subpoena enforcement action in this MUR. See Respondents Memorandum in Opposition to Petition to Show Cause Why Subpoena Should Not be Enforced, Misc. No. 81-68 (D.D.C., filed Apr. 6, 1981). The court rejected this argument by enforcing the Commission's subpoena. Federal Election Commission v. Conservatives Against Liberal Legislation, Mis. No. 81-68 (D.D.C., order dated Apr. 22, 1981).

8304037306C

philosophy and voting record" and that "[i]t did not anywhere address his potential candidacy." See Respondent's Brief at 5. 2/

8 3 0 4 0 3 7 3 0 6 1
The fourth argument of CALL's counsel appears to rely on assertions made by him in support of his second and third arguments. Counsel contends that there are several factors which the court in MNPL relied upon in making its decision and that "all relevant factors argue for a finding of lack of Commission jurisdiction over the activities here at issue." Brief of respondent, at 10. Counsel observes that the court in MNPL found the investigation to be a novel extension of the Commission's investigative authority; found that the Commission lacked "the broad investigatory authority" of agencies engaged in business regulation such as the FTC and the SEC (Brief of respondent, at 9); and asserted the need for "close scrutiny" of Commission action because such action involved "the danger of chilling the free exercise of political speech guaranteed by the first amendment" (Brief of respondent, at 10). However,

2/ See particularly a paragraph appearing in the CALL literature (see General Counsel's Brief Exhibits I - IV) which states as follows:

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

respondent's counsel misinterprets the reason the court in WHL identified the factors mentioned. Assuming arguendo that some of those factors may be present, they do nothing more than support the proposition that a court could review the issue of the agency's jurisdiction if a subpoena enforcement action were initiated. These factors do not themselves support a determination of whether jurisdiction in fact exists.

For the reasons stated supra in response to the second argument of CALL's counsel, 2 U.S.C. § 441b is applicable to the solicitations issued by CALL. Based on the foregoing analysis, the General Counsel recommends that the Commission find probable cause to believe that Conservatives Against Liberal Legislation violated 2 U.S.C. § 441b.

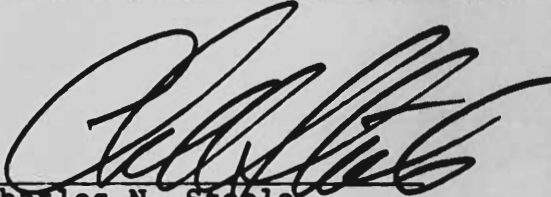
83040373062

IV. Recommendations

1. Find probable cause to believe Conservatives Against Liberal Legislation violated 2 U.S.C. § 441b in connection with its "Kennedy Truth Squad" activities.

2. Send the attached letter and proposed conciliation agreement.

2 April 1982
Date


Charles N. Steele
General Counsel

Attachments:

1. Proposed conciliation agreement
2. Letter to respondent

83040373062



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1192

Dear Mr. Sparks:

On , 1982, the Commission determined there is probable cause to believe that your client Conservatives Against Liberal Legislation committed a violation of 2 U.S.C. § 441b(a) because of corporate expenditures made in connection with the 1980 Democratic presidential nomination.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

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 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. Please make your check for the civil penalty payable to the U.S. Treasurer.

Attachment 2 - p. 1.

Letter to Robert R. Sparks, Jr.,
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

83040373065

2 - p. 2

600 #5185

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III

TWX/TELEX: 710-831-0696

CABLE: SEDAMHERGE

July 31, 1981

BY HAND

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

Re: MUR 1192

Dear Sir:

I enclose for filing, in accordance with 11 C.F.R. 111.16, the original of Respondent's Reply Brief in the referenced matter. By telephone conversation of July 20, 1981, Mr. Robert Bogin, Esq., of the office of General Counsel, granted counsel for Respondent to and including July 31, 1981 by which to file the enclosed Reply Brief.

Under separate cover, I am forwarding three (3) copies of the Brief to the General Counsel.

Sincerely,


Robert R. Sparks, Jr.

enclosure

cc: Mr. Robert Bogin

12:42 PM 10/10/81

10/10/81
10/10/81

83040573036

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Conservatives Against
Liberal Legislation

)
)
)
)

MUR 1192

61 JUL 31 P 4: 24

RESPONDENT'S REPLY BRIEF

STATEMENT OF PROCEEDINGS

8 3 0 4 0 3 7 3 0 6 7

This matter came before the Federal Election Commission ("Commission") on a complaint filed by the Kennedy for President Committee alleging that Conservatives Against Liberal Legislation ("CALL") had violated a number of provisions of the Federal Election Campaign Act by reason of various mailings distributed by The Kennedy Truth Squad ("KTS"), a project of CALL. These mailings, made prior to the date on which Senator Kennedy announced his candidacy for President, invited the attention of the general public to Kennedy's legislative record in the United States Senate and to his political philosophy.

The Commission voted either to take no action on the Kennedy Committee's allegations, or to find no reason to believe that a violation of the Campaign Act had occurred. However, because of the happenstance that CALL is a nonprofit corporation, the Commission did find reason to believe that CALL had violated 2 U.S.C. §441b(a), which forbids corporate expenditures "in connection with" a federal election.

8 3 0 4 0 3 7 3 0 6 8

Pursuant to that finding, the Commission, in two rounds of discovery requests, sought discovery from CALL of various documents and other information concerning the dates and extent of CALL's expenditures on its KTS mailings. CALL answered each of the Commission's first discovery requests, admitting that it was a corporation and that it made the challenged expenditures. The Commission then propounded a second series of requests and interrogatories to CALL, seeking information concerning the source of funds expended; CALL's membership and officers; the identity of the authors of its KTS mailings; and its connection, if any, with National Conservative Political Action Committee. CALL objected to most of those requests, and confirmed and restated its responses to the Commission's first round of discovery.

The Commission succeeded, in a subpoena enforcement action, in compelling CALL to supply all of the requested information. The court's order was issued without benefit of oral argument and was unaccompanied by a written opinion in support of that order. The court's order was issued before the decision of the United States Court of Appeals for the District of Columbia in Federal Election Commission v. Machinists Non-Partisan Political League (No. 80-1136) (May 19, 1981), which established the proposition that in Commission subpoena enforcement actions, it is essential that a court assure itself affirmatively that an investigation

is within the subject matter jurisdiction of the Commission before a Commission subpoena can be enforced.

ARGUMENT

- A. CALL has not violated 2 U.S.C. §441b(a) because it has not made a payment to any candidate.

Pursuant to 2 U.S.C. §441b(a), a corporation is prohibited from making a contribution or expenditure in connection with any election for federal office. The terms "contribution or expenditure" are defined to include any direct or indirect payment or gift of money or anything of value to any candidate, campaign committee, or political party or organization. 2 U.S.C. §441b(b)(2).

There is no suggestion in any of the evidence adduced in the course of the Commission's investigation of this matter, or even in the General Counsel's Brief, that any of the challenged expenditures were made to a candidate or his committee, or to any political party or organization. CALL has conceded that it made the challenged expenditures. But it has never been admitted that those expenditures involved the transfer of anything of value to a candidate. Such a transfer is a necessary prerequisite to a finding of a violation of 2 U.S.C. §441b(a). But such a transfer cannot be found in this case. For Senator Kennedy was not a candidate during the time period when CALL made the expenditures challenged here.

- B. CALL has not violated 2 U.S.C. §441b(a) because its expenditures were made at a time when Senator Kennedy was not a candidate.

CALL's challenged expenditures were made during the period July 24, 1979 through November 7, 1979, the date on which Senator Kennedy made a formal declaration of his candidacy for election as President. During the period when CALL made its KTS expenditures, Kennedy had publicly and repeatedly announced that he was not, and would not be, a candidate for President. Indeed, Senator Kennedy had filed with the Commission, pursuant to 11 CFR 100.3(a)(3), written disavowals of the activities of various independent groups working for, and urging, a Kennedy candidacy. Accordingly, on August 17, 1979, the Commission, in Advisory Opinion 1979-40, ruled that, since Senator Kennedy was not a candidate for federal office, the contribution limitations applicable to candidates and their authorized committees did not control amounts which could be contributed to the Florida for Kennedy Committee. It follows, therefore, that the Commission, having earlier held that Kennedy was not a candidate for federal office, cannot now seriously suggest that expenditures made by CALL which address Kennedy's legislative record were made "in connection with" an election to federal office.

The General Counsel, in his brief to the Commission, argues that all that is necessary for a violation of

33040373070

2 U.S.C. §441b(a) is that there be an "expenditure" by a corporation "in connection with" a federal election, and that it is immaterial whether or not there are any candidates for election. Without a candidate, there cannot be an election in any sense in which the word is ordinarily used. For that reason, CALL was careful to cease its activities and expenditures on the very day Kennedy publicly stood for election.

- C. CALL has not violated 2 U.S.C. §441b(a) because its activities did not address Senator Kennedy himself or his "candidacy"

CALL's KTS mailings addressed what CALL considered to be Kennedy's liberal legislative record. CALL's name - Conservatives Against Liberal Legislation - and its stated corporate purpose - to foster and develop greater public participation in governmental affairs - demonstrate what it was attempting to accomplish by its challenged activities. CALL was merely discussing Kennedy's philosophy and voting record. It did not anywhere address his potential candidacy. And once Kennedy became a candidate, CALL stopped all discussion of Senator Kennedy's record. In short, CALL's KTS mailings did not expressly advocate the election or defeat of a clearly identified candidate. They did not identify Kennedy as a candidate or a potential candidate for federal office. There was no reference to a campaign and no reference to the election or defeat of Senator Kennedy. In that respect, CALL's activities are akin to referendum or voter

education expenditures protected under First National Bank of Boston v. Bellotti, 435 U.S. 765 (1978).

Except for the happenstance that CALL is a nonprofit corporation, its activities would be unobjectionable. For communications by unincorporated groups informing the public about the voting record of a public official do not, in themselves, constitute the express advocacy of the election or defeat of that official and are therefore not subject to challenge. See Federal Election Commission v. Central Long Island Tax Reform Immediately Committee, et al., 616 F.2d 45 (2d. Cir. 1980).

The fortuity of CALL's incorporation should not make its otherwise unobjectionable mailings subject to challenge and restriction by the Commission. We do not here contend that 2 U.S.C. §441b is unconstitutionally overbroad. We recognize that there are decisions to the contrary. See, e.g., Federal Election Commission v. Weinstein (S.D.N.Y., 1978), 2 Fed. Elec. Camp. Fin. Guide (CCH) ¶9067. We do contend, however, that the danger sought to be ameliorated by 2 U.S.C. §441b - the aggregation of corporate wealth and its resulting effect on elections to public office - are not present where, as here, a small nonprofit issues group engages in little more than a voter education program which ceases the instant its subject becomes a candidate.

Discussion of issues and political philosophies, including those of incumbent officeholders and those who

83040373072

aspire to higher office, is not of itself electioneering. The distinction between the two may sometimes be elusive. But that is because "the distinction between discussion of issues and candidates and advocacy of election or defeat of candidates may often dissolve in practical application." Buckley v. Valeo, 424 U.S. 1, 42 (1976). Where such blending occurs, the Commission must tread carefully. That is the lesson of Buckley.

8 3 0 4 0 3 7 3 0 7 3
If the Commission finds probable cause to believe that CALL violated 2 U.S.C. §441b in this case, it will effectively chill all discussion by CALL and groups like it concerning the legislative records or political philosophies of all who might ever become candidates for federal office. Office holders should be held to their records and the Commission should be chary of taking action which might insulate incumbents from the consequences of their conduct on behalf of their constituents. A finding that CALL has violated 2 U.S.C. §441b(a) by KTS would have exactly that effect. See AO 1978-18 Fed. Elec. Camp. Fin. Guide (CCH) ¶5305 (dissenting opinion of Commissioner Joan D. Aikens).

CALL took Senator Kennedy at his word when he publicly and repeatedly denied his current or future candidacy. CALL believed Senator Kennedy when he disavowed, publicly and to the Commission pursuant to 11 C.F.R. 100.3(a)(3), the efforts and activities of various "draft-Kennedy" groups. Senator Kennedy was not as good as his public word, and now

CALL, if the Commission finds against it, is to pay the price.

8 3 0 4 0 3 7 3 0 7 4

If Senator Kennedy had not become a candidate, CALL's activities surely would not have been challenged, either by the Kennedy Committee (since there would not have been such a committee), or by the Commission (since such a challenge would mean that any discussion by CALL of the legislative record or philosophy of any person who might ever become a candidate would be subject to similar challenge). Moreover, a finding by the Commission against CALL would chill discussion not only of a wide range of persons who might later become candidates, but would chill discussion for an indefinite period before an election, as well. CALL was careful to stop its expenditures on the day Kennedy announced his candidacy, and yet it is now at risk for its pre-candidacy discussion. On the theory urged by General Counsel, there is apparently no safe period during which a corporation may discuss a person's legislative record or philosophy without fear of being called to task for inadvertently making a contribution or expenditure to or on behalf of one who, even despite his contrary promises, later changes his mind and becomes a candidate.

On the theory urged by the Commission, expenditures by any incorporated "draft-Kennedy" groups active on behalf of a Kennedy candidacy could be considered to have been made

"in connection with" a federal campaign and subject to challenge on that ground.

- D. The Commission lacks subject matter jurisdiction over the activities of CALL in this case.

In Federal Election Commission v. Machinists Non-Partisan Political League, supra, the Court found lack of subject matter jurisdiction in the Commission to investigate contributions made by a political committee to various "draft-Kennedy" groups. In doing so, it relied on four factors.

First, the court was concerned because the investigation at issue was a novel extension of the Commission's investigative authority. That is also true in this case. The Commission has never before decided whether an expenditure can be made "in connection with" an election if there is no candidate for that election. This case presents the issue squarely. If the Commission finds against CALL, it will have decided the issue.

Second, the court noted the difference between the scope of investigatory authority vested in agencies such as the Federal Trade Commission and the Securities and Exchange Commission, on the one hand, and the Commission, on the other. The court found that the Commission lacked the broad investigatory authority of those agencies.

Third, and the most important reason for close scrutiny of Commission action, was the danger of chilling

83040373076

the free exercise of political speech guaranteed by the first amendment. That is also true here, for the reasons discussed above.

The fourth factor - the fact that the Commission's assertion of jurisdiction turned solely upon a legal interpretation of a statute which did not depend on the discovery of facts through a subpoena - is not applicable to this case, since this is not a subpoena enforcement action. The Commission is not here attempting to learn what went on with CALL; it knows what happened and the General Counsel simply asserts that CALL's conduct was unlawful.

The court based its justification for testing for subject matter jurisdiction on the foregoing factors and found a lack of such jurisdiction. Accordingly, the court refused to enforce a Commission subpoena. See also Federal Election Commission v. Phillips Publishing, Inc. (D.C.D.C.) (No. 81-0079) (July 16, 1981) for the same analysis and result, although on a different ground.

In this case, all relevant factors argue for a finding of lack of Commission jurisdiction over the activities here at issue. If the Machinists Non-Partisan League court refused to enforce a subpoena, a fortiori, the Commission should refuse to find probable cause that CALL violated 2 U.S.C. §441b(a).

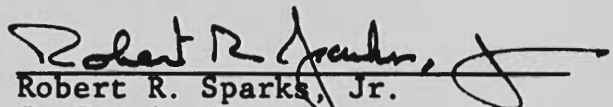
CONCLUSION

83040373077

The language of 2 U.S.C. §441b(a) simply does not address the facts of this case, which involve the discussion by nonprofit public education group of the voting record of one who had promised that he would not be a candidate, but who later changed his mind. The fact that "draft-Kennedy" groups were active at the same time as CALL was conducting its KTS mailings is not sufficient to justify a finding against CALL. It would be anomalous for the Commission to hold that the "draft-Kennedy" groups' activities, which were insufficient under Machinists Non-Partisan League to confer jurisdiction on the Commission to enforce a subpoena, are now a justification for jurisdiction over others or somehow justify a finding by the Commission that CALL has violated 2 U.S.C. §441b(a).

For the foregoing reasons, the Commission should decline to find probable cause that CALL has violated 2 U.S.C. §441b(a).

Date: July 31, 1981


Robert R. Sparks, Jr.
J. Curtis Herge
SEDAM & HERGE, P.C.
7600 Old Springhouse Road
McLean, Virginia 22102
(703) 821-1000

Counsel for Conservatives Against
Liberal Legislation

SEDAM & HERGE, P.C.

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

To:

General Counsel

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

FIRST CLASS MAIL

83040373079

SEDAM & HERGE, P.C.

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

To:

Commission Secretary

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

FIRST CLASS MAIL

July 8, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1192

Please have the attached Memo and Brief distributed
to the Commission on an informational basis. Thank you.

83040675090



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS by KKH*

SUBJECT: MUR #1192

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on July 8, 1981. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

81 JUL 8 AM 10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 1192
Conservatives Against Liberal)
Legislation)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

8 3 0 4 0 3 7 3 0 8 2
This matter was generated by a complaint filed by The Kennedy for President Committee alleging that National Conservative Political Action Committee (NCPAC) and Conservatives Against Liberal Legislation (CALL) are to be considered a single political committee and that these committees violated 2 U.S.C. §434 by failing to file the proper reports and 2 U.S.C. §§ 435(b) (former) and 441d by failing to include the required notice on solicitations and communications. Counsel for NCPAC and CALL responded to the Committee's complaint in a letter dated April 3, 1980. Enclosed in the response were papers evidencing that CALL is a non-profit Virginia corporation organized pursuant to 26 U.S.C. §501(c)(4) for the purpose of serving the public interest and promoting social welfare "by fostering and developing greater public participation in governmental affairs in order to achieve efficient operation and delivery of governmental services which benefit the community, business and citizens in all walks of life."

On September 3, 1980, the Commission found reason to believe that CALL violated 2 U.S.C. §441b(a) by making expenditures from its general treasury in connection with the 1980 Presidential

Primary elections. The Commission found no reason to believe that there was a violation of 2 U.S.C. §441d and voted to take no action at this time with respect to the alleged violations of 2 U.S.C. §434 and former 435(b). The Commission's investigation into this matter reveals that from July 24, 1979, until November 7, 1979, CALL sponsored mass mailing solicitations targeted to specific interest groups (Attachments 1-7). The cost of preparing and disseminating these solicitations totalled over \$118,436.65. All Kennedy Truth Squad expenditures were made from its general treasury. The gross receipts from The Kennedy Truth Squad project totalled over \$164,296.70 and these revenues were commingled with general revenues from other sources and projects of CALL.

II. Legal Analysis

2 U.S.C. §441b(a) makes it unlawful for any corporation whatever to make an expenditure in connection with any primary election. CALL admits that it made expenditures from its general treasury to pay for its Kennedy Truth Squad project. Nonetheless, CALL contends that its expenditures were not made in connection with an election. Therefore, the sole issue before the Commission is whether the expenditures for The Kennedy Truth Squad project were made in connection with the presidential primary election.

At the time of the CALL mailings, Senator Kennedy had

83040373083

Page 3

disavowed being a candidate for the Democratic nomination for President. However from July to November, 1979, the various Draft Kennedy Committees spent over \$100,000 in an effort to induce the Senator to seek his party's nomination. CALL's activities in opposition to Senator Kennedy took place during the same time period the draft Kennedy committees were spending funds to induce Senator Kennedy to run for office. The following excerpts from CALL's Kennedy Truth Squad project support a finding that CALL's expenditures were made in connection with the presidential primary election.

Exhibit 1 at 2

"Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

"Why is Kennedy so popular?

"I think the answer is simple: Most Americans don't know what Senator Kennedy is really up to. CBS, NBC, and ABC aren't telling us - they are on Teddy's side. They gloss over his dangerous disarmament record.

"So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help if we are to succeed in spreading the truth about Kennedy.

"Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away before it's too late." (emphasis in original)

Exhibit 2 at 1

"Will you help us buy television time and send some of America's leading conservatives across the country to warn our fellow Americans about Edward Kennedy's liberal policies?

Please -- nobody has taken on this obligation yet. But we must -- soon.

If the American people knew how radical Senator Edward Kennedy really is, he would not be their first choice in the Presidential polls. But the news media like Teddy. So voters have never heard the truth about Kennedy.

Kennedy's Senate staff is bigger than any other Senator's or Congressman's. In fact, Kennedy's staff is bigger than Vice-President Mondale's staff. Obviously, Kennedy has big plans."

Exhibit 3 at 1

"Yet Kennedy's future is bright.

Many polls (not all of them liberal polls) show the American people want Kennedy to be our next President.

Teddy gets good publicity from CBS, NBC, and ABC. Most of the major radio networks and newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better."

Exhibit 3 at 3

"Your contribution is an investment in the future of America: If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water. And then America dies."

Exhibit 4 at 2

"Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular? I think you already know the answer: Most Americans don't know what Kennedy is up to.

83040373035

I think it is up to us to warn the nation right away. The Kennedy Truth Squad will do just that. But we must have your help.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away -- before it's too late."

Exhibit 5 at 1

"What's more, our Kennedy Truth Squad is the ONLY project geared up and ready to go NOW to expose Kennedy's policies.

No one else has taken on this responsibility.

....

Kennedy's future is bright.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls."

Exhibit 5 at 3

"We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead." (sic)

Exhibit 6 at 4

"So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we know the union bosses can count on Kennedy to do their bidding.

....

.... And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies."

83040373036

Exhibit 7 at 4

"We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious plans come to a head.

....

So please support the Kennedy Truth Squad with your generous contribution today. If Kennedy gets any more popular and successful, you and I will have to live with his liberal programs for a long, long time."

8
3
0
4
0
3
7
3
0
8
7

A review of the preceding excerpts demonstrates that the purpose of The Kennedy Truth Squad project was to attack Senator Kennedy thereby reducing Senator Kennedy's popularity and the possibility of Senator Kennedy seeking his party's nomination for President. It is the opinion of the Office of General Counsel that the expenditures made on behalf of The Kennedy Truth Squad project were made in connection with the presidential primary election and that the Commission should find probable cause to believe that CALL violated 2 U.S.C. §441b(a).

Counsel for CALL argues that CALL's expenditures on behalf of The Kennedy Truth Squad project was not violative of 2 U.S.C. §441b because Senator Kennedy was not a candidate at the time of the expenditures and because the sole thrust of CALL's expenditures involved permitted issue discussion. The Commission should reject these arguments.

The language of 2 U.S.C. §441b(a) does not require as an element of a §441b violation that there be a "candidate" as that

83040373038

term is defined by the Act at 2 U.S.C. §431(2). The elements comprising a §441b violation are that there be "expenditures" from the corporate treasury and that these expenditures be "in connection with" a federal election. Counsel admits that CALL made corporate expenditures from the general treasury. The above-cited excerpts from The Kennedy Truth Squad projects support a finding that these expenditures were made "in connection with" the Democratic nomination for president. The recent case of FEC v. Machinists Non-Partisan Political League, No. 80-1136, (D.C.C. May 19, 1981), does not alter the conclusion that CALL violated 2 U.S.C. § 441b. In Machinists Non-Partisan Political League, the court held that the Commission does not have jurisdiction over the various draft Kennedy groups since these groups were not political committees as defined by the Act. The reasoning of this case, based on the fact that Senator Kennedy was not a candidate at the time the various Draft Kennedy group were active, is not applicable in the context of a 2 U.S.C. § 441b violation.

Furthermore, CALL cannot cloak its activities under the guise of being a non-partisan, issue-oriented group. Consideration of a corporation's right to speak on issues of general public interest implies no comparable right in the quite different context of participation in a political campaign for nomination to public office. First National Bank of Boston v. Bellotti, 435 U.S. 765, 788 n. 26 (1978).

III. General Counsel's Recommendation

Based on the above, the Commission should find probable cause to believe that CALL violated 2 U.S.C. §441b(a).

Date

July 7, 1981

Charles N. Steele
General Counsel

Attachments:
Exhibits I-VII

83040373089



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Patriot,

Will you help us buy television time and send some of America's leading patriots across the country to warn our fellow Americans about Edward Kennedy's disarmament record? Please -- nobody has taken on this obligation yet. But we must -- soon.

As the Russian menace grows, Senator Edward Kennedy lends his powerful voice to the Liberals' SALT II chorus.

"The military power of the United States remains unequalled in the world," Kennedy says in speeches to the American people.

But Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, strongly disagrees with Kennedy. General Rowny has resigned from the armed forces, after dozens of years of distinguished service, in order to warn America about SALT II.

And here at home, Jimmy Carter and Kennedy have joined forces on a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any felony. How much longer can our nation survive if the FBI's work becomes a crime?

And Kennedy has harmed our national security in many more ways with his leftist votes.

* He has helped give American technological aid to Russia, even though he knows that the Communists will use our technology to make bigger and better weapons.

* Kennedy pushes for relations with Castro's Cuba,

-more-

EXHIBIT I

pg 1 of 4

83040373090

even though FBI reports show that Cuba has trained American terrorists like the Weathermen.

And Kennedy ignores this chilling fact: Last year Cuba took delivery of 18 Russian MIG Bombers. Skilled Soviet pilots have also been sent to Cuba -- only 90 miles away from our southern shore. There are no American air defenses in the southern United States -- or anywhere else in the nation, thanks to liberal leaders like Kennedy.

* Kennedy helped kill the magnificent new B-1 Bomber and improved Minuteman Missile. He helped slow the new Trident Submarine in the production line. Military experts warn that we must have all three weapons right away.

* Moreover, it was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System this country had.

There will be many more crucial national security battles in the next year. SALT II could be ratified. Kennedy will play a major role in the Liberals' disarmament crusade. He could influence millions of voters -- unless we warn our fellow Americans.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular?

I think the answer is simple: Most Americans don't know what Senator Kennedy is really up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his dangerous disarmament record.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help if we are to succeed in spreading the truth about Kennedy.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Leading Congressmen and military men will sign on. Three media and advertising experts (who are also dedicated patriots) have joined the Kennedy Truth Squad. We are ready to warn the nation. All we need is the money to do the job.

Using your dollars, Congressmen and retired officers

can travel the nation to warn Americans who don't know about Edward Kennedy's disarmament record..

We will also run TV, radio, and newspaper ads exposing Kennedy's leading role in disarming the United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full page newspaper ads in towns and cities across the country.

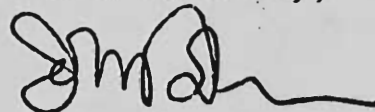
Unless we pay for trips by leading patriots to towns and cities across America.

So please support the Kennedy Truth Squad with a generous contribution today. Please invest in America's future -- before time runs out.

If you can afford to invest \$1000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for you help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order payable to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

And please sign the enclosed Message to Edward Kennedy and send it back to us with your contribution. We will deliver your Message and thousands of other Messages to Senator Kennedy himself.

P.P.S. If you have contributed to the Kennedy Truth Squad and would like to see the scripts of our radio and television ads -- or a list of the stations we have scheduled to run these ads, please write to: Chairman's Office, Conservatives against Liberal Legislation, Suite 515, 1500 Wilson Blvd., Arlington, Virginia 22209.

09 3 of 4

83040373092

Z1

Statement of Support

SENATOR KENNEDY: I OPPOSE YOUR DISARMAMENT
POLICIES. I SUPPORT THE Kennedy Truth Squad.

(Signed)

(Please do not rip off Kennedy Truth Squad office staff will detach)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's disarmament policies to the American people.

Here's my investment in your campaign:

____ \$500	____ \$400	____ \$300	____ \$200
____ \$100	____ \$50	____ \$40	____ \$30
____ \$20	____ \$	Other	

My check is made out to the National Conservative Public
Affairs Council, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to
Senator Kennedy. Please send information to: (Use other
side - do not write on back of Statement of Support.)

pg 4 of 4



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading conservatives across the country to warn our fellow Americans about Edward Kennedy's liberal policies? Please -- nobody has taken on this obligation yet. But we must -- soon.

If the American people knew how radical Senator Edward Kennedy really is, he would not be their first choice in the Presidential Polls. But the news media like Teddy. So voters have never heard the truth about Kennedy.

Kennedy's Senate staff is bigger than any other Senator's or Congressman's. In fact, Kennedy's staff is bigger than Vice President Mondale's staff. Obviously, Kennedy has big plans.

Consider what he has done already:

** As the Russian menace grows, Kennedy adds his powerful voice to the liberals' SALT II chorus -- and takes a leading role selling the disarmament pact to the American people.

It doesn't bother Kennedy that Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, has resigned from the armed forces, after dozens of years of service, in order to warn our fellow Americans about SALT II.

** With Jimmy Carter's help, Kennedy has drafted a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any

-more-

EXHIBIT II

ps 1 of 6

83040373094

felony.

How much longer can our nation survive if the FBI's work becomes a crime? .

** It was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System the United States had.

** It was Kennedy who helped stop the magnificent new B-1 Bomber in production and slow the indestructible Trident Submarine. And he opposed modernization of our Minuteman Missiles, which were put together during the era his brother was President.

But Edward Kennedy is not satisfied with the ruin he's helped make of our national security.

Consider:

** His socialized medicine scheme threatens to break the back of the taxpayer. Its pricetag: at least \$63 billion -- in the first year of the program alone.

** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending...while even liberal Time magazine calls for smaller federal budgets.

** Kennedy favors federal funding of abortion. He voted NO to Senator Orrin Hatch's bill to stop federal funding. And he uses his influence to hurt the Pro-Life Movement.

** Kennedy has been a leader in the feminists' fight to impose the Equal Rights Amendment on America. He voted to extend ERA ratification time. The ERA is still losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side. Will he be more powerful than ever?

Unless we join forces soon, I think he will be.

Why?

I think the answer is simple: Most Americans don't know what Senator Kennedy is up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his most outrageous schemes.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help

-more-

pg 2 of 6

83040373095

if we are to succeed in spreading the truth about Kennedy.

Leading Congressmen, military men, economists, doctors, lawyers, and students will sign on. Three conservative media and advertising experts are ready to go to work. The Kennedy Truth Squad is ready to warn the nation. All we need now is money to do the job.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Congressmen and other conservative leaders will travel the nation to explain to the American people what Edward Kennedy is up to.

We will also run television, radio, and newspaper ads exposing Kennedy's leading role in disarming America and pushing not only SALT II, but also federal funding of abortion, even higher taxes, socialized medicine, and the Equal Rights Amendment.

Senator Kennedy gets free media time from his friends at the major television and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for television and radio ads. Unless we spend the money for full page newspaper ads in towns and cities across the country. Unless we send Kennedy Truth Squad speakers to towns and cities across the country.

So please support the Kennedy Truth Squad with a generous contribution today. Invest in America's future - before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20, you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to

Conservatives against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

Copies of the radio and television scripts and a
list of the stations we have scheduled to run ads, may
be obtained by sending a self-addressed envelope to
the Office of the Chairman at the above address.

P.P.S. Please sign the enclosed Message to Edward
Kennedy and return it to us with your contribution.
I will personally deliver your Message to Senator Kennedy
himself...along with thousands of other Messages. So
please help us reach our fellow Americans today. Be as
generous as you can.

83040373077

pg 4 of 6

Message to Edward Kennedy

Senator Kennedy: I oppose your radical policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's radical policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

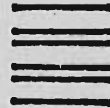
Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

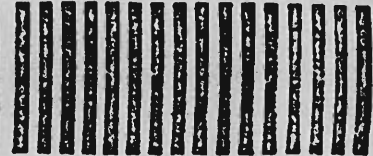
pg 5 of 6

8 3 0 4 0 3 7 3 0 9 9

pg 6 of 6



NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Taxpayer,

Let's not kid ourselves: Proposition 13 and talk of a tax limitation amendment haven't helped.

The government still takes a big bite out of your paycheck. And government-caused inflation takes another huge bite of your income.

Senator Edward Kennedy's spending schemes -- his campaign for over one hundred billion dollars more government spending each year -- threaten us more than any liberal force in the country. Right now -- Senator Kennedy is more dangerous than any liberal.

Yet Kennedy's future is bright.

Many polls (not all of them liberal polls) show the American people want Kennedy to be our next President.

Teddy gets good publicity from CBS, NBC, and ABC. -- Most of the major radio networks and newspapers are on his side. No wonder Americans today want Kennedy to be President.. They don't know any better. ..

Most taxpayers believe what they see and hear on TV, radio, and in the newspapers. They don't know...

-- that Kennedy's socialized medicine scheme would cost us at least \$63 billion in its first year alone

-- about Kennedy's role in the forced taxpayer loan to New York City that cost us at least \$2.3 billion

-- that Kennedy cost us \$25-30 billion when he helped beat the Kemp-Roth 33% tax cut plan

-- that Kennedy loudly campaigns against any kind

-more-

EXHIBIT III

pg 1 of 5

83040373100

of tax limitation or federal budget balancing

-- that Kennedy's staff -- larger than any other Senate staff, and larger even than Vice President Mondale's staff -- has a mountain of new bureaucracy proposals ready for Teddy to push. He likes to call them "antitrust" laws. They'll ruin many a good business, and they'll cost hundreds of millions to enforce.

Our fellow taxpayers don't know these facts about Kennedy. And of course, CBS, NBC, and ABC aren't telling them.

So it is up to us to warn our fellow taxpayers. And unless we warn them very soon, I think Kennedy will grow more powerful than ever.

But we can stop Teddy and his liberal policies cold.

The Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

We are ready to warn the nation. Leading Congressmen and economists can travel the country to warn taxpayers who don't know about Kennedy's big spending record. But we need your dollars to pay their travel expenses.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in bankrupting the taxpayer.

Three media and advertising experts have joined the Kennedy Truth Squad. The work they do could make the difference.

To turn the country against Kennedy's liberal policies, I think it will take a matter of a few months of warnings to taxpayers across the country that Kennedy is helping to bankrupt them.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

We must cover the nation with our message. Television ads can reach hundreds of thousands of voters at once. Radio ads are an excellent investment -- they reach tens of thousands.

Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page Kennedy

-more-

pg 2 of 5

83040373101

ad in the Washington Post will cost us at least \$8,000!

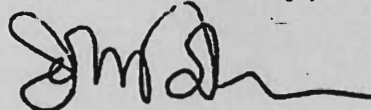
So please -- support the Kennedy Truth Squad today, and be as generous as you possibly can.

Your contribution is an investment in the future of America: If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water. And then America dies.

So please, if you can afford to invest \$1,000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. Even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself... along with thousands of other Messages. So please help us reach our fellow taxpayers today. Be as generous as you can.

Message to Edward Kennedy

Senator Kennedy: I oppose your big spending policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's big spending policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5



BUSINESS REPLY MAIL

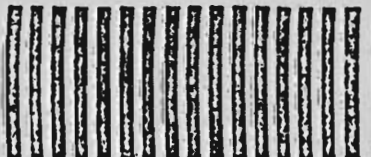
FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



pg 5 of 5

7013704038



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading pro-family leaders across the country to warn our fellow Americans about Edward Kennedy's anti-family record?

Please -- nobody has taken on this obligation yet. But we must -- soon.

It is hard to blame one liberal for destroying family life in America. For rampant homosexuality. For the six million abortions in the United States since 1973. For the Equal Rights Amendment threat.

We certainly cannot blame Senator Edward Kennedy for all this.

But Senator Kennedy is popular and very influential. For example, many polls (not all of them liberal polls) show the American people today choose Kennedy over any other candidate for President.

Yet consider how dangerous Kennedy's policies are:

--- He voted to extend ratification time for ERA. When the National Organization for Women plots strategy, they can count on Teddy. Yes, the ERA is losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side, more powerful than ever, if we don't act now.

--- Senator Orrin Hatch tried to stop federal funding of abortion with his bill. Senator Kennedy voted NO -- and has helped rally abortionists ever since.

--- Senator Kennedy helped beat Senator Jessie Helms' school prayer bill. He called Helms' bill a

-more-

EXHIBIT IV

p3 1 of 5

83040373105

threat to the Constitution.

--- If you call Senator Kennedy's office and ask for Kennedy's position on homosexuals, you will get this answer: Kennedy believes in "equal protection under the law for all citizens."

In other words, Kennedy wants homosexuals to enjoy all the same rights as normal Americans.

Any Senator who takes positions like these is dangerous, but what makes Kennedy especially dangerous is this: He has big plans.

His liberal staff is bigger than any other Senator's or Congressman's -- and bigger even than Vice President Mondale's staff.

But CBS, NBC, and ABC aren't saying a bad word about Teddy's obvious power grab. They (and most of the press) hide Teddy's far left policies, too.

Worse, few on our side protest Kennedy's policies -- even though he is probably the single biggest enemy of family life in the United States today.

But now we have the Kennedy Truth Squad. Good Congressmen and several defenders of family life will join forces. Three media and advertising experts have signed on to do TV, radio, and full-page newspaper ads that expose Kennedy's record.

The Kennedy Truth Squad is ready to warn the nation. Frankly, all we need now is money to do the job. Please help today.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular? I think you already know the answer: Most Americans don't know what Kennedy is up to.

I think it is up to us to warn the nation right away. The Kennedy Truth Squad will do just that. But we must have your help.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away -- before it's too late.

Using your dollars, some of the most distinguished

-more-

pg 2 of 5

83040373106

conservative members of Congress and other respected defenders of family life will travel the country, visiting towns and cities to warn Americans about Kennedy's record on abortion, the ERA, school prayer, and homosexuals.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in ruining family life and the moral health of our beloved United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full-page newspaper ads in towns and cities across the country.

Unless we pay for trips to towns and cities by leading conservatives and defenders of family life.

So please support the Kennedy Truth Squad with a generous contribution today. Please -- invest in America's future. Before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Sincerely,

Rhonda K. Stahlman
Rhonda K. Stahlman
Chairman

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself...along with thousands of other Messages. So please help us reach our fellow Americans today. Be as generous as you can.

pg 3 of 5

83040373107

Message to Edward Kennedy

Senator Kennedy: I oppose your anti-family policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's anti-family policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr. Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5

83040373108



BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES

PA 5 of 5

8 3 0 4 0 3 7 3 1 0 9



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
300 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

I want to deliver a personal MESSAGE to Edward Kennedy
from you.

Your MESSAGE is that you're putting him on notice: he
can no longer hide his liberal policies of big spending and
tax raises.

Please sign your MESSAGE to Kennedy and send it back
to me.

And please join our Kennedy Truth Squad to help spread
the truth about Kennedy's inflationary tax policy.

Our group, Conservatives Against Liberal Legislation,
is made up of experienced conservatives who can and will
educate Americans about the liberals' programs.

What's more, our Kennedy Truth Squad is the ONLY project
geared up and ready to go NOW to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join the Kennedy Truth
Squad because you've already shown your commitment to lower
taxes.

Let's not kid ourselves: Proposition 13 and talk of a
Tax Limitation Amendment have not yet stopped your taxes
going up. The government still takes a big bite out of
your income. And government-caused inflation takes another
huge bite.

Kennedy's future is bright.

If the American people knew how radical Kennedy's policies
really are he wouldn't be their first choice in the Presidential
polls.

As you know, Teddy gets free publicity from the major

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT V

pg 1 of 1

83040373110

TV and radio networks. Many newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV and radio and read in the papers. They don't know that:

- Kennedy's SOCIALIZED MEDICINE SCHEME would cost us at least \$63 billion in its first year alone.
- Kennedy's role in the forced TAXPAYER BAIL-OUT of NEW YORK CITY cost us at least \$2.3 billion.
- Kennedy cost us \$25-80 billion when he helped BEAT the Kemp-Roth tax cut plan.
- Kennedy loudly campaigns AGAINST any kind of tax limitation or federal budget balancing.
- Kennedy's staff is larger than any other Senate staff, and larger even than Vice President Mondale's staff.
- Kennedy is pushing for new "anti-trust" laws. But you know they'll ruin many a good business. And they'll cost us taxpayers hundreds of millions to enforce.

So it's up to you and me to educate our fellow-taxpayers. And unless we tell them right now, Kennedy will grow more powerful than ever.

But we can expose Teddy's anti-taxpayer policies.

Starting this fall, the Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

- * Leading Congressmen are scheduling news conferences about Kennedy's policies. They plan to travel the country to warn taxpayers about Kennedy's big spending record.
- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in bankrupting you, the taxpayer.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas to concerned taxpayers who've already shown they'll work and act to stop Kennedy.

To turn the country against Kennedy's liberal policies will take months of warnings. So we must start right now.

Can we do it? Yes, recently our group played a vital role

000-67

83040373111

Page three

in stopping taxpayer financing of elections. We successfully ran a voter-mailing campaign to influence U.S. Congressmen.

Now, with your help, we must cover the nation this fall with our Kennedy message:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$4,600 or more.

Kennedy gets free media time from his friends at the major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television and radio ads and voter mailings.

Only if we spend money for full-page newspaper ads in towns and cities across the country.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in a leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 320 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water.

If you can afford to invest \$100 or \$50, your check will go a long way toward spreading the Kennedy Truth Squad's message.

But even if you can send just \$25, \$15, even \$10 at this

pg 3 of 7

Page four

time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation. Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell America about Kennedy's big-spending liberalism.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director

Conservatives Against Liberal Legislation

TD/tp

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

8 3 0 1 4 0 3 7 3 1 1 3

pg 4 of 7

With your help we can place ads like
this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE —
and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

Cuts in federal budget authority and outlays in 1980
Cuts in foreign aid, countercyclical public service jobs,
health programs, federal travel spending, categorical
state grants.

AMOUNT
\$1 BILLION

\$10 BILLION

Cuts in transportation, economic
development, health, social pro-
grams, welfare, categorical state
grants totalling:

\$24.4 BILLION

Cuts to provide "no
real growth" in
federal spending

\$12 BILLION

1% attrition in the
federal work force and
cuts in bureaucrats'
overtime pay, film
making and travel
expenses.

\$1.1 BILLION

TOTAL

\$48.5 BILLION



**When it comes to cutting YOUR
taxes, Senator Kennedy says
NO!**

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal
policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7500, Washington, D.C. 20044

pg 5 of 7

AD/tp

8304037311

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your big-spending anti-taxpayer policies.

Your socialized medicine plans will cost the taxpayer \$63 billion the first year.

You've voted against

- * the Kemp-Roth tax cut plan
- * tax limitation
- * federal budget balancing

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy's policies.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH ABOUT KENNEDY'S LIBERAL PROGRAMS:

() \$500 () \$250 () \$100 () \$50

() \$25 () \$15 () \$10 () \$ ____ Other

My check is made out to Conservatives Against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____

State _____

Zip _____

pg 6 of 7

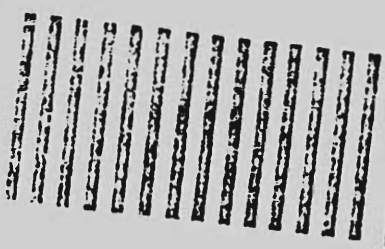
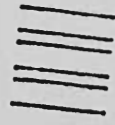
CF/Mtp

8304037311E

83040373116

Conservatives Against Liberal Legislation
P.O. Box 7589
Washington, D.C. 20044

BUSINESS REPLY MAIL
First Class Permit #11973
Washington, D.C.
POSTAGE WILL BE PAID BY ADDRESSEE



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

pg 7 of 7



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy
from you.

Your message is that you're putting him on notice:
Kennedy can no longer hide his record of voting the BIG
LABOR BOSSES' LINE.

Please sign your MESSAGE to Kennedy and send it back
to me.

And please join our Kennedy Truth Squad to spread the
truth about Kennedy's support for Big Labor.

Quite frankly, I want you to join the Kennedy Truth
Squad because I feel you are strongly opposed to big labor
control of our economy and politics.

If the American people knew how radical Kennedy's
policies are, he wouldn't be their first choice in the
Presidential polls.

- Yet, the AFL-CIO gives Kennedy a 100% rating: he's voted
- FOR: Common Situs picketing to let building workers
strike a whole construction site against one contractor
 - FOR: repeal of the Hatch Act, to let bureaucrats and postal
workers get involved in politics
 - FOR: "labor law reform", a thinly disguised license for
big unions to undermine the right to work.

Our group, Conservatives Against Liberal Legislation,
(C.A.L.L.), is made up of experienced conservatives who can
and will expose liberal programs for what they are.

What's more, our Kennedy Truth Squad is the only project
geared up and ready to go NOW to expose Kennedy's pro-union

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT VI

pg 1 of 6

83040373117

bosses policies.

No one else has taken on this responsibility.

Yet big labor has adopted Kennedy as its Crown Prince. Look at William Winpisinger, a self-confessed ideological socialist. He and his International Association of Machinists are promoting Kennedy almost as if they were his staff members.

Kennedy voted FOR big labor on:

- 1) increasing the minimum wage by 50% or pegging it to inflation
- 2) guaranteed full employment - jobs for everyone whether they're needed or not (the Humphrey-Hawkins bill)
- 3) collective bargaining and union recognition in the Civil Service
- 4) a separate Department of Education. If you thought H.E.W. was a hive of bureaucracy, imagine this new creation, beloved of the left-leaning National Education Association.

By contrast Kennedy voted AGAINST:

- 1) protecting the right to work of non-union teachers, and against
- 2) Senator Thurmond's bill to outlaw military unions.

Union bosses like George Meany, Jerry Wurf of the American Federation of State, County, and Municipal Employees, William Winpisinger, all rely on Kennedy to carry out their wishes.

If we don't join forces soon, Kennedy's programs will grow more widespread than ever.

Why is Kennedy so popular?

Simple. Most Americans don't know how really liberal Kennedy's policies are.

So it's up to you and me to warn our fellow Americans.

Together we can educate millions of Americans about Teddy's pro-Big Labor voting record.

Our Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's stance on unions. We aim to start this fall.

- * We're ready to warn the nation. Leading Congressmen like Ron Paul from Texas, and Bill Royer from California are scheduling news conferences and speaking tours.

Can we do it? Yes, recently our group played a vital role

- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in support of the repeal of the Hatch Act, common situs picketing and many more big labor schemes.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas where we know concerned Americans like you will fight the union bosses' power.

To turn the country against Kennedy's liberal policies will take months of warnings. Educating Americans that Kennedy will go along with just about any scheme the union bosses promote.

So it's vital we educate Americans about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our postcard mailing campaign to Congressmen played a crucial role in stopping taxpayer financing of elections.

What's more, right now our "STOP SALT II" mailing campaign to Senators has rallied many Senators who were wavering.

Now we must cover the nation with our message about Kennedy's liberal schemes this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a leading local paper like the paper you may read will cost us \$4,600 or more.

Senator Kennedy gets free media time from his friends at major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television, radio and newspaper ads and mailings to inform voters.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before

Page four

Kennedy's ambitious plans begin to come to a head.

Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in leading local paper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 310 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we know the union bosses can count on Kennedy to do their bidding.

If you can afford to invest \$100 or \$50, your check will go a long way to spreading the Kennedy Truth Squad's message. But even if you can send \$25, \$15, or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell the truth about Kennedy's anti-right to work, pro-union boss policies.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director
Conservatives Against Liberal Legislation

TD/ub

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

pg 4 of 6

Message to Senator Edward Kennedy
Senator Kennedy:

I oppose your pro-union boss policies on:

- 1) repeal of the Hatch Act
- 2) common situs picketing
- 3) "labor law reform"
- 4) inflationary minimum wage
and guaranteed full employment
- 5) a separate Department of Education

I support the Kennedy Truth Squad

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my
warning.
- * Take out full-page newspaper ads
- * Use TV and radio to tell the truth
about Kennedy.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH
ABOUT KENNEDY:

() \$500 () \$250 () \$100 () \$50
() \$ 25 () \$15 () \$ 10 () \$ ___ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044

Mr., Mrs., Miss

Address

City State Zip

CF/Mub

pg 5 of 6

83040373122

ER-2



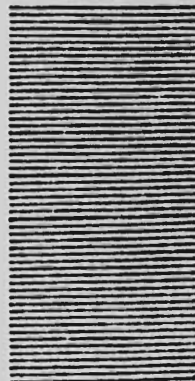
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



pg 6 of 6



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your MESSAGE to Kennedy is that you're putting him on notice: Kennedy can no longer hide his radical record of ultra-liberal policies.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to help spread the truth about Kennedy's liberalism.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls.

Our group, Conservatives Against Liberal Legislation, is made up of experienced and dedicated conservatives who can and will expose liberal programs in their true light.

What's more our Kennedy Truth Squad is the only project geared up and ready to go now to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join our Kennedy Truth Squad because I feel you strongly disagree with Kennedy's liberal policies.

So I invite you to join our project which gets right to the heart of the liberals' strategy.

Will you help us now to send some of America's

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT VII p 1 of 5

top Conservatives across the country to warn Americans about Edward Kennedy?

Won't you sit down right now and do two things for me:

- 1) Sign the MESSAGE TO KENNEDY.
- 2) Fill in the Reply Memo I've attached to the MESSAGE and send it with your gift to get the Truth Squad launched.

The American people don't know how radical Kennedy's policies are because the major TV and radio networks and newspapers are on his side.

Consider these facts:

- ** Kennedy's support for Big Labor bosses on Common Situs picketing and the repeal of the Hatch Act shows he'll tag along with anything the unions want. He needs big labor support at the polls. We and other conservative groups helped stop Common Situs picketing and repeal of the Hatch Act, but it's clear KENNEDY'S PROGRAMS HAVE BIG LABOR'S SEAL OF APPROVAL.
- ** Kennedy's socialized medicine scheme threatens to break the backs of you and me, the taxpayers. Its price tag: at least \$63 billion. In the first year of the program alone.
- ** Kennedy leads the liberal campaign against the American family. He supports federal funds for abortion. He supports "gay rights". He wants to extend the time to ratify the Equal Rights Amendment (E.R.A.)
- ** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending.
- ** Kennedy has a long record of undermining America's defenses. He's opposed the B-1 Bomber, the Minuteman Missile, the Trident Submarine, the Safeguard Missile System. He wants close relations with Castro's Cuba even though the Soviets have combat troops and MiGs there now, just 90 miles from our shores.

Unless we join forces right now, Kennedy will be more powerful than ever.

So it's up to you and me to warn our fellow-Americans.

2 of 5

83040373124

Starting this fall, the Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's ultra-liberal policies.

- 1) Leading Congressmen, military men and other top conservatives can hold news conferences and travel the country to warn and educate Americans about Kennedy's schemes.

But the Kennedy Truth Squad needs your dollars to pay our speakers' travel expenses.

- 2) We've scheduled TV, radio and full-page newspaper ads along the lines of the sample I've enclosed, to expose Kennedy's big spending.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- 3) We'll mail letters in key areas to concerned citizens who've already shown they'll work and act to stop liberal legislation.

Our Truth Squad about Kennedy's liberal policies will take months.

So it's vital we start to educate America about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our group played a vital role in stopping a bill for taxpayer financing of elections by postcard mailing to U.S. Congressmen. Now we're in the forefront of a "Stop SALT II" campaign through mailings to Senators.

With your help we can cover the nation with our message about Kennedy this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$ 4,600 or more.

But we can get the other side, the true side, of the Kennedy

story across only if we spend the money for television, radio and newspaper ads and voter mailings.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious plans come to a head. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on a major station	\$ 4,000 each
* Spot radio commercial	\$ 310 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, you and I will have to live with his liberal programs for a long, long time.

If you can afford to invest \$100 or \$50, your check will go a long way to spread the Kennedy Truth Squad's message. But if you can send \$25, \$15 or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

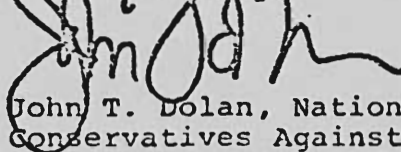
Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy Kennedy on the run today.

Thank you in advance for helping tell America the truth about Kennedy's big-spending, anti-family, anti-defense liberalism.

With warm appreciation for your help.

Most sincerely



John T. Dolan, National Director
Conservatives Against Liberal Legislation

TD/gvl

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

4 of 5

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your radical policies on:

- 1) disarmament
- 2) socialized medicine
- 3) abortion and ERA
- 4) pro-union boss legislation

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide.

HERE'S MY INVESTMENT IN YOUR TRUTH SQUAD:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$___ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

CF/Mgv

5 of 5

83040373127



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, VA 22102

RE: MUR 1192

Dear Mr. Herge:

Based on a complaint filed with the Commission on March 19, 1980, and information supplied by Conservatives Against Liberal Legislation (CALL), the Commission determined that there was reason to believe that CALL violated 2 U.S.C. §441b(a), a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Robert Bogin at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: *[Signature]*
Kenneth A. Gross
Associate General Counsel

Enclosure
Brief

With your help we can place ads like this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE — and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

Cuts in federal budget authority and outlays in 1980

AMOUNT
\$1 BILLION

Cuts in foreign aid, countercyclical public service jobs, health programs, federal travel spending, categorical state grants.

\$10 BILLION

Cuts in transportation, economic development, health, social programs, welfare, categorical state grants totalling:

\$24.4 BILLION



Cuts to provide "no real growth" in federal spending

\$12 BILLION

1% attrition in the federal work force and cuts in bureaucrats' overtime pay, film making and travel expenses.

\$1.1 BILLION

TOTAL \$48.5 BILLION

When it comes to cutting YOUR taxes, Senator Kennedy says NO!

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll send you FREE a copy of our TV and radio scripts about Teddy Kennedy's liberal programs.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7500, Washington, D.C. 20044

pg 5 of 7

100573 RECEIVED
GCL-4725
81 MAY 20 AM: 09

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-631-0886
CABLE: SEDAMHERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III

May 18, 1981

Mr. Robert I. Bogin
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1192(80)

Dear Mr. Bogin:

I submit herewith the responses of Conservatives Against Liberal Legislation (CALL) to the written questions propounded to CALL by the Commission on December 22, 1980. CALL's responses are numbered and lettered to correspond to the paragraphs of the Commission's questions:

1. CALL mailed, distributed, or otherwise disseminated the papers marked by the Commission as Exhibits I-VI on the dates indicated below:

(a) Exhibit I

7-26-79
7-30-79
9-27-79
10-03-79
10-05-79
10-09-79

(b) Exhibit II

7-24-79	10-11-79
8-23-79	10-17-79
9-25-79	10-19-79
9-26-79	10-23-79
9-28-79	10-24-79
10-01-79	11-02-79
10-03-79	11-07-79
10-05-79	

51 MAY 20 PM: 52

RECEIVED
GENERAL COUNCIL

83040373130

81 MAY 20 AM : 09

Mr. Robert I. Bogin
 Page Two
 May 18, 1981

(c) Exhibit III

7-25-79	10-12-79
7-26-79	10-15-79
9-27-79	10-17-79
9-28-79	10-19-79
10-05-79	10-22-79
10-09-79	11-02-79
10-10-79	11-07-79

(d) Exhibit IV

7-25-79	10-15-79
8-23-79	10-17-79
9-27-79	10-22-79
10-05-79	10-24-79
10-09-79	

(e) Exhibit V

9-27-79
 10-17-79
 11-06-79

(f) Exhibit VI

9-27-79
 10-17-79
 11-06-79

2. The total cost of preparing and disseminating each of the Exhibits was as follows:

(a)	Exhibit I	- \$	7,497.65
(b)	Exhibit II	-	23,868.59
(c)	Exhibit III	-	13,102.29
(d)	Exhibit IV	-	4,184.20
(e)	Exhibit V	-	43,595.75
(f)	Exhibit VI	-	26,188.17

3. CALL maintains a checking account at First American Bank of Virginia, account number 06143636. On or about May 7, 1981, CALL opened a checking account at Virginia National Bank, account number 322 72 332.

83040373131

RECEIVED

81 MAY 20 AM: 09

Mr. Robert I. Bogin
Page Three
May 18, 1981

4. CALL does not maintain a savings account.
5. CALL's cash on hand on July 24, 1979 was \$3,368.09.

6. CALL's gross receipts from its Truth Squad mailings were as follows:

(a)	Exhibit I	-	\$ 10,848.10
(b)	Exhibit II	-	36,676.14
(c)	Exhibit II	-	14,445.50
(d)	Exhibit IV	-	3,002.15
(e)	Exhibit V	-	72,076.50
(f)	Exhibit VI	-	27,248.31

7. All Kennedy Truth Squad expenditures were made from its general treasury. Truth Squad revenues were comingled with general revenues from other sources and projects of CALL.

8. Until March, 1981, CALL sublet office space from NCPAC at a fair market rental rate and, for a short period shared a receptionist with NCPAC, on an allocated cost basis, i.e., a portion of the receptionist's salary was paid by CALL. Subject to the foregoing, CALL and NCPAC have not, and do not now, share common office space, employees, and/or offices.

Mr. Dolan is CALL's National Director, an honorary title. In that capacity, Mr. Dolan has signed some, but not all, of CALL's fund raising solicitations.

9. (a) Except as described above, CALL has never received money or anything of value from NCPAC.

(b) Except as described above, NCPAC has never lent CALL money or anything of value.

10. Other than money received through the solicitation efforts of the Kennedy Truth Squad, CALL's sources of revenues are from other educational and grassroots lobbying efforts.

33040373132

81 MAY 20 AM: 09

Mr. Robert I. Bogin
 Page Four
 May 18, 1981

11. CALL has no members.

12. CALL's officers since January 1, 1979 were as follows:

<u>Office</u>	<u>Name</u>	<u>Dates</u>
Chairman	John T. Dolan	Jan.1, 1979-Apr.17, 1979
	Rhonda K. Stahlman	Apr.17, 1979-Present
Secretary	Frank Donatelli	Jan.1, 1979-Apr.17, 1979
	Maiselle Shortley	Apr.17, 1979-Mar.4, 1981
	Kris Kolesnik	Mar.4, 1981-Present
Treasurer	Roger Stone	Jan.1, 1979-Apr.17, 1979
	Maiselle Shortley	Apr.17, 1979-Mar.4, 1981
	Kris Kolesnik	Mar.4, 1981-Present

13. The principal authors of Exhibits I-VI were Roger McCaffrey and Kathleen McDonald.

14. The addresses of Kennedy Truth Squad mailings identified by the Commission as Exhibits I-VI were selected from a list or lists of past contributors to conservative causes.

Sincerely,


 Robert R. Sparks, Jr.

83040373133

8 3 0 4 0 5 7 3 1 3 4

RECEIVED

81 MAY 20 AM: 00

BEFORE THE FEDERAL ELECTION COMMISSION

IN RE: CONSERVATIVES AGAINST)
LIBERAL LEGISLATION,) MUR 1192(80)
Respondent.)

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX) s.s.

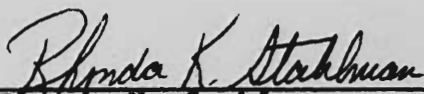
Affidavit, made this 18th day of May, 1981, by Rhonda K. Stahlman, who, being first duly sworn, deposes and says as follows:

1. That she is the Chairman of Conservatives Against Liberal Legislation, a corporation organized and existing under and by virtue of the Virginia Nonstock Corporation Act.

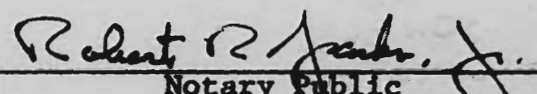
2. That she is familiar with the program of Conservatives Against Liberal Legislation, which was designated and known as "Kennedy Truth Squad," a project of Conservatives Against Liberal Legislation.

3. That she has read the letter, dated May 18, 1981, from Robert R. Sparks, Jr., Esq. to Robert E. Bogin, Esq., Office of General Counsel, Federal Election Commission, and that the facts contained therein are true to the best of her knowledge, information, and belief.

IN WITNESS WHEREOF, this Affidavit has been signed on the day and date first above written.


Rhonda K. Stahlman

Sworn to before me this 18th day of May, 1981.


Notary Public

My Commission Expires: May 10, 1982

0304037013

SEDAN & HERGE

ATTORNEYS AT LAW

1500 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22101



Mr. Robert I. Bogin
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS / JODY CUSTER *jc*
DATE: MAY 13, 1981
SUBJECT: MUR 1192 - Interim Investigative Report #4,
dated 5-1-81; Signed 5-11-81; Received
in OCS 5-11-81, 2:26

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 11:00,
May 12, 1980.

There were no objections to the Interim Investigative
Report at the time of the deadline.

83040373136

May 11, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1192

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

83040573137

BEFORE THE FEDERAL ELECTION COMMISSION
MAY 1, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 MAY 11 P 2: 26

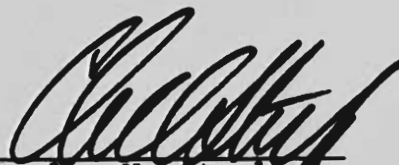
In the Matter of)
)
Conservative Against) MUR 1192
Liberal Legislation)
(CALL))

SENSITIVE

INTERIM INVESTIGATIVE REPORT #4

On February 18, 1981, the Commission issued an order requesting CALL to submit written answers to questions. CALL refused to comply with the Commission order. This Office filed a petition to show cause why CALL should not be ordered to comply with the Commission's order. The court granted the Commission's petition and further ordered CALL to submit its answers to the questions requested by the Commission on or before May 15, 1981. Upon receipt of the answers, (assuming this case is not appealed), this Office will review the file and be prepared to make the appropriate recommendation in our next report to the Commission.

11 May 1981
Date


Charles N. Steele
General Counsel

83040373138



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS /JODY CUSTER *jc*
DATE: MARCH 31, 1981
SUBJECT: MUR 1192 - Interim Investigative Report #3,
dated March 26, 1981; Received in OCS,
March 27, 1981, 4:54

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 11:00,
March 30, 1981.

There were no objections to the Interim Investigative
Report at the time of the deadline.

B 3 0 4 0 3 7 3 1 3 9

March 27, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1192

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

83040373140

BEFORE THE FEDERAL ELECTION COMMISSION
March 26, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

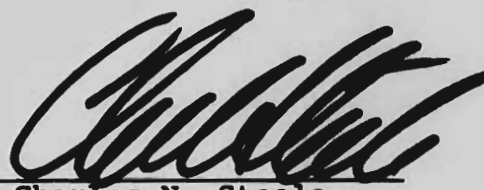
81 MAR 27 P 4: 54

In the Matter of)
)
Conservatives Against) MUR 1192
Liberal Legislation)

INTERIM INVESTIGATIVE REPORT #3

On February 18, 1981, the Commission authorized the issuance of an order to answer questions. Respondent did not avail itself of the opportunity to seek to quash the Commission's order pursuant to 11 C.F.R. § 111.15. Instead, respondent refused to voluntarily comply with the order. Consequently, an order for a motion to show cause why respondent should not answer the Commission's order was filed in the United States District Court for the District of Columbia on March 20, 1981. Respondent was given a week to file papers in opposition to the Commission's motion. We expect the court to rule on this matter by mid-April.

27 March 1981
Date


Charles N. Steele
General Counsel

83040373141

912469
CCO-4145
811111 12:36

SEDAM & HERGE

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

March 9, 1981

TWX/TELEX: 710-831-0886

CABLE: SEDAMHERGE

RECEIVED
GENERAL COUNSEL
MAR 11 12:25

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

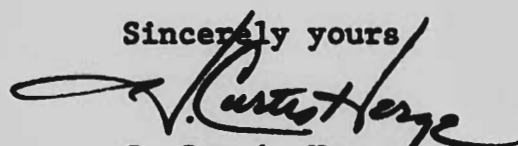
Attention: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

Dear Mr. Steele:

The purpose of this letter is to advise you that, for the reasons set forth in my letter to you, dated January 9, 1981, Conservatives Against Liberal Legislation shall not voluntarily comply with the Order to Submit Written Answers, which you enclosed with your letter to me, dated February 24, 1981.

Sincerely yours



J. Curtis Herge
Counsel to Conservatives
Against Liberal Legislation

83040373142

8 3 0 4 0 3 7 3 1 0 4 3

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102



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

Attention: Robert Bogin, Esq.
Office of General Counsel

366 YCC 4871
81 MAR 3 AM 1:49

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

McLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

TWX/TELEX: 710-831-0896

CABLE: SEDAMHERGE

March 2, 1981

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

Re: MUR 1192(80)

Dear Mr. Bogin:

Included among the materials with the letter from Mr. Steele to me, dated February 24, 1981, was the enclosed Authorization to Issue Order. The Authorization was not signed. Please send to me a copy of the Authorization which bears the signatures of at least four members of the Federal Election Commission.

Sincerely,



J. Curtis Herge

enclosure

25:25 3 MAR 3

RECEIVED
GENERAL COUNSEL
OFFICE OF THE
ATTORNEY GENERAL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance
of an order to the following person in connection
with MUR 1192 (80):

Rhonda K. Stahlman
1500 Wilson Blvd.
Arlington, Virginia 22209

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Frank P. Reiche
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

Attachment III

83040373145

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102



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

03040373146



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 24, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 1192 (80)

Dear Mr. Herge:

The Commission is in receipt of your letter dated January 9, 1981 wherein you advised the Office of General Counsel that your client respectfully declines to answer the questions enclosed in a letter dated December 22, 1980. As you are aware, the Commission on September 3, 1980 found reason to believe that CALL violated 2 U.S.C. § 441b(a) by making corporate expenditures in connection with the 1980 Democratic presidential primary elections. The questions which CALL declines to answer are relevant to the Commission's investigation into this matter.

Consequently, the Federal Election Commission has issued the attached order which requires CALL to answer questions and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971. It is required that CALL submit the requested information under oath and that CALL do so within ten days of receipt of this order.

In reference to your contention that the Commission failed to comply with 11 C.F.R. § 111.8(b) by not providing a copy of the staff report with notification of the Commission's reason to believe finding, it is the position of the Commission that neither the Act nor Commission Regulations require that a staff report be provided in matters that are generated by external complaints filed with the Commission. CALL received a copy of the complaint and pursuant to 2 U.S.C. § 437g(a)(1) was presented with

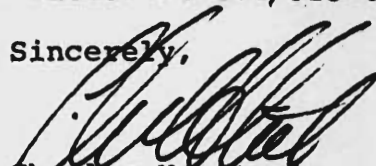
83040373147

Letter to J. Curtis Herge, Esquire
Page Two
MUR 1192 (80)

the opportunity to demonstrate that no action should be taken against CALL on the basis of the complaint. CALL availed itself of this opportunity. The Commission then proceeded to its reason to believe finding solely on the basis of information contained in the complaint and CALL's response. In such circumstances, the requirement of 11 C.F.R. § 111.8(b) is not applicable eventhough the violation cited in the complaint was other than found by the Commission.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter at 202/523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosures

93040373148

J. Curtis Herge, Esq.	
746738	
3-2-81	
USPS	

J. Curtis Herge, Esq.	
438977	
7-8-81	
USPS	



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 1192 (80)

Dear Mr. Herge:

The Commission is in receipt of your letter dated January 9, 1981 wherein you advised the Office of General Counsel that your client respectfully declines to answer the questions enclosed in a letter dated December 22, 1980. As you are aware, the Commission on September 3, 1980 found reason to believe that CALL violated 2 U.S.C. § 441b(a) by making corporate expenditures in connection with the 1980 Democratic presidential primary elections. The questions which CALL declines to answer are relevant to the Commission's investigation into this matter.

Consequently, the Federal Election Commission has issued the attached order which requires CALL to answer questions and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971. It is required that CALL submit the requested information under oath and that CALL do so within ten days of receipt of this order.

In reference to your contention that the Commission failed to comply with 11 C.F.R. § 111.8(b) by not providing a copy of the staff report with notification of the Commission's reason to believe finding, it is the position of the Commission that neither the Act nor Commission Regulations require that a staff report be provided in matters that are generated by external complaints filed with the Commission. CALL received a copy of the complaint and pursuant to 2 U.S.C. § 437g(a)(1) was presented with

83040373149

Letter to J. Curtis Herge, Esquire
Page Two
MUR 1192 (80)

the opportunity to demonstrate that no action should be taken against CALL on the basis of the complaint. CALL availed itself of this opportunity. The Commission then proceeded to its reason to believe finding solely on the basis of information contained in the complaint and CALL's response. In such circumstances, the requirement of 11 C.F.R. § 111.8(b) is not applicable eventhough the violation cited in the complaint was other than found by the Commission.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter at 202/523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

Order
Questions

RB
2/20/81

83040373130

FEDERAL ELECTION COMMISSION

QUESTIONS

RHONDA K. STAHLMAN

MUR 1192 (80)

Attached to these questions are Exhibits I-VI which were submitted by CALL in response to a request that all documents paid for by CALL in connection with its Kennedy Truth Squad project be submitted to the Federal Election Commission. Please refer to these Exhibits when responding to the questions below.

1. a. For each of the following exhibits state on or about what date did CALL mail, distribute or otherwise disseminate the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
2. a. For each of the following exhibits state what was the total cost (costs, include, but are not limited to, materials, labor, overhead, stamps, salaries, etc.) of preparing and disseminating the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?

83040373151

3. Does CALL have a checking account(s)? If so, please state the name of the bank and the account number of each account maintained by CALL .
4. Does CALL have a savings account(s)? If so, please state the name of the bank and account number of each savings account maintained by CALL.
5. On July 24, 1980, which is the date that the first Kennedy Truth Squad communications were issued, how much "cash on hand" as that term is defined at 11 C.F.R. § 104.3(a)(1), did CALL have?
6.
 - a. How much money did CALL gross as a result of its Kennedy Truth Squad solicitation marked as Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
7.
 - a. Did CALL make any expenditures out of its general treasury funds in connection with any of the Kennedy Truth Squad projects?
 - b. If the answer to 7a. is yes, what was the total amount of these expenditures?
8. What is the relationship, if any, between CALL and the National Conservative Political Action Committee (NCPAC)? In your answer please explain the role that John T. Dolan plays with respect to CALL and whether CALL and NCPAC share common office space, employees, and/or offices.
9.
 - a. Has CALL ever received money or anything of value from the National Conservative Political Action Committee (NCPAC)? If so, please state the date, circumstances, and amount of money or value received.
 - b. Has NCPAC ever loaned CALL money or anything of value? If so, please state the date, circumstances and amount of the loan.

83040373152

Rhonda K. Stahlman
Page Three
Questions - MUR 1192 (80)

10. Other than money received through the solicitation efforts of the Kennedy Truth Squad projects, what other source of monies does CALL have?
11. Does CALL have any members? If so, do these members pay dues? How many members does CALL have? What are the standards for membership in CALL? What is the dues structure?
12. List all officeholders of CALL and office held since January 1, 1979.
13. Who were the principal authors of Exhibits I-VI?
14. How was it decided which people were to be sent Exhibits I-VI?

83040373153

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Conservatives Against)
Liberal Legislation)

MUR 1192 (80)

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Conservatives Against Liberal Legislation
1500 Wilson Boulevard
Arlington, Virginia 22209

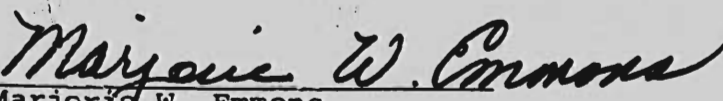
Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order.

Wherefore, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. in this Nineteenth day of February, 1981.


John Warren McGarry
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Questions - 3 pages

83040373154



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Patriot,

Will you help us buy television time and send some of America's leading patriots across the country to warn our fellow Americans about Edward Kennedy's disarmament record? Please -- nobody has taken on this obligation yet. But we must -- soon.

As the Russian menace grows, Senator Edward Kennedy lends his powerful voice to the Liberals' SALT II chorus.

"The military power of the United States remains unequalled in the world," Kennedy says in speeches to the American people.

But Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, strongly disagrees with Kennedy. General Rowny has resigned from the armed forces, after dozens of years of distinguished service, in order to warn America about SALT II.

And here at home, Jimmy Carter and Kennedy have joined forces on a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any felony. How much longer can our nation survive if the FBI's work becomes a crime?

And Kennedy has harmed our national security in many more ways with his leftist votes.

* He has helped give American technological aid to Russia, even though he knows that the Communists will use our technology to make bigger and better weapons.

* Kennedy pushes for relations with Castro's Cuba,

-more-

EXHIBIT I

pg 1 of 4

83040373155

even though FBI reports show that Cuba has trained American terrorists like the Weathermen.

And Kennedy ignores this chilling fact: Last year Cuba took delivery of 18 Russian MIG Bombers. Skilled Soviet pilots have also been sent to Cuba -- only 90 miles away from our southern shore. There are no American air defenses in the southern United States -- or anywhere else in the nation, thanks to liberal leaders like Kennedy.

* Kennedy helped kill the magnificent new B-1 Bomber and improved Minuteman Missile. He helped slow the new Trident Submarine in the production line. Military experts warn that we must have all three weapons right away.

* Moreover, it was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System this country had.

There will be many more crucial national security battles in the next year. SALT II could be ratified. Kennedy will play a major role in the Liberals' disarmament crusade. He could influence millions of voters -- unless we warn our fellow Americans.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular?

I think the answer is simple: Most Americans don't know what Senator Kennedy is really up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his dangerous disarmament record.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help if we are to succeed in spreading the truth about Kennedy.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Leading Congressmen and military men will sign on. Three media and advertising experts (who are also dedicated patriots) have joined the Kennedy Truth Squad. We are ready to warn the nation. All we need is the money to do the job.

Using your dollars, Congressmen and retired officers

can travel the nation to warn Americans who don't know about Edward Kennedy's disarmament record..

We will also run TV, radio, and newspaper ads exposing Kennedy's leading role in disarming the United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full page newspaper ads in towns and cities across the country.

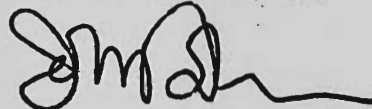
Unless we pay for trips by leading patriots to towns and cities across America.

So please support the Kennedy Truth Squad with a generous contribution today. Please invest in America's future -- before time runs out.

If you can afford to invest \$1000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for you help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order payable to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

And please sign the enclosed Message to Edward Kennedy and send it back to us with your contribution. We will deliver your Message and thousands of other Messages to Senator Kennedy himself.

P.P.S. If you have contributed to the Kennedy Truth Squad and would like to see the scripts of our radio and television ads -- or a list of the stations we have scheduled to run these ads, please write to: Chairman's Office, Conservatives against Liberal Legislation, Suite 515, 1500 Wilson Blvd., Arlington, Virginia 22209.

Z1

Statement of Support

SENATOR KENNEDY: I OPPOSE YOUR DISARMAMENT
POLICIES. I SUPPORT THE Kennedy Truth Squad.

(Signed)

(Please do not rip off Kennedy Truth Squad office staff will detach)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's disarmament policies to the American people.

Here's my investment in your campaign:

_____ \$500	_____ \$400	_____ \$300	_____ \$200
_____ \$100	_____ \$50	_____ \$40	_____ \$30
_____ \$20	_____ \$	Other	

My check is made out to the National Conservative Public
Affairs Council, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to
Senator Kennedy. Please send information to: (Use other
side - do not write on back of Statement of Support.)

on 4 of 4

834040373158



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading conservatives across the country to warn our fellow Americans about Edward Kennedy's liberal policies? Please -- nobody has taken on this obligation yet. But we must -- soon.

If the American people knew how radical Senator Edward Kennedy really is, he would not be their first choice in the Presidential Polls. But the news media like Teddy. So voters have never heard the truth about Kennedy.

Kennedy's Senate staff is bigger than any other Senator's or Congressman's. In fact, Kennedy's staff is bigger than Vice President Mondale's staff. Obviously, Kennedy has big plans.

Consider what he has done already:

** As the Russian menace grows, Kennedy adds his powerful voice to the liberals' SALT II chorus -- and takes a leading role selling the disarmament pact to the American people.

It doesn't bother Kennedy that Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, has resigned from the armed forces, after dozens of years of service, in order to warn our fellow Americans about SALT II.

** With Jimmy Carter's help, Kennedy has drafted a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any

-more-

EXHIBIT II

pg 1 of 6

83040373159

felony.

How much longer can our nation survive if the FBI's work becomes a crime? .

** It was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System the United States had.

** It was Kennedy who helped stop the magnificent new B-1 Bomber in production and slow the indestructible Trident Submarine. And he opposed modernization of our Minuteman Missiles, which were put together during the era his brother was President.

But Edward Kennedy is not satisfied with the ruin he's helped make of our national security.

Consider:

** His socialized medicine scheme threatens to break the back of the taxpayer. Its pricetag: at least \$63 billion -- in the first year of the program alone.

** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending...while even liberal Time magazine calls for smaller federal budgets.

** Kennedy favors federal funding of abortion. He voted NO to Senator Orrin Hatch's bill to stop federal funding. And he uses his influence to hurt the Pro-Life Movement.

** Kennedy has been a leader in the feminists' fight to impose the Equal Rights Amendment on America. He voted to extend ERA ratification time. The ERA is still losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side. Will he be more powerful than ever?

Unless we join forces soon, I think he will be.

Why?

I think the answer is simple: Most Americans don't know what Senator Kennedy is up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his most outrageous schemes.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help

-more-

pg 2 of 6

03040373160

if we are to succeed in spreading the truth about Kennedy.

Leading Congressmen, military men, economists, doctors, lawyers, and students will sign on. Three conservative media and advertising experts are ready to go to work. The Kennedy Truth Squad is ready to warn the nation. All we need now is money to do the job.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Congressmen and other conservative leaders will travel the nation to explain to the American people what Edward Kennedy is up to.

We will also run television, radio, and newspaper ads exposing Kennedy's leading role in disarming America and pushing not only SALT II, but also federal funding of abortion, even higher taxes, socialized medicine, and the Equal Rights Amendment.

Senator Kennedy gets free media time from his friends at the major television and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for television and radio ads. Unless we spend the money for full page newspaper ads in towns and cities across the country. Unless we send Kennedy Truth Squad speakers to towns and cities across the country.

So please support the Kennedy Truth Squad with a generous contribution today. Invest in America's future - before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20, you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to

Conservatives against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

. Copies of the radio and television scripts and a
list of the stations we have scheduled to run ads, may
be obtained by sending a self-addressed envelope to
the Office of the Chairman at the above address.

P.P.S. Please sign the enclosed Message to Edward
Kennedy and return it to us with your contribution.
I will personally deliver your Message to Senator Kennedy
himself...along with thousands of other Messages. So
please help us reach our fellow Americans today. Be as
generous as you can.

83040373162

Message to Edward Kennedy

Senator Kennedy: I oppose your radical policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's radical policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

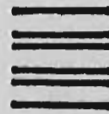
Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

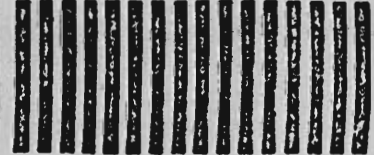
pg 5 of 6

33040373164

PS 6 of 6



NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad
Post Office Box 7580
Washington, D.C. 20044



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Taxpayer,

Let's not kid ourselves: Proposition 13 and talk of a tax limitation amendment haven't helped.

The government still takes a big bite out of your paycheck. And government-caused inflation takes another huge bite of your income.

Senator Edward Kennedy's spending schemes -- his campaign for over one hundred billion dollars more government spending each year -- threaten us more than any liberal force in the country. Right now -- Senator Kennedy is more dangerous than any liberal.

Yet Kennedy's future is bright.

Many polls (not all of them liberal polls) show the American people want Kennedy to be our next President.

Teddy gets good publicity from CBS, NBC, and ABC. Most of the major radio networks and newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better. ..

Most taxpayers believe what they see and hear on TV, radio, and in the newspapers. They don't know...

-- that Kennedy's socialized medicine scheme would cost us at least \$63 billion in its first year alone

-- about Kennedy's role in the forced taxpayer loan to New York City that cost us at least \$2.3 billion

-- that Kennedy cost us \$25-30 billion when he helped beat the Kemp-Roth 33% tax cut plan

-- that Kennedy loudly campaigns against any kind

-more-

EXHIBIT III

pg 1 of 5

83040373165

of tax limitation or federal budget balancing

-- that Kennedy's staff -- larger than any other Senate staff, and larger even than Vice President Mondale's staff -- has a mountain of new bureaucracy proposals ready for Teddy to push. He likes to call them "antitrust" laws. They'll ruin many a good business, and they'll cost hundreds of millions to enforce.

Our fellow taxpayers don't know these facts about Kennedy. And of course, CBS, NBC, and ABC aren't telling them.

So it is up to us to warn our fellow taxpayers. And unless we warn them very soon, I think Kennedy will grow more powerful than ever.

But we can stop Teddy and his liberal policies cold.

The Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

We are ready to warn the nation. Leading Congressmen and economists can travel the country to warn taxpayers who don't know about Kennedy's big spending record. But we need your dollars to pay their travel expenses.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in bankrupting the taxpayer.

Three media and advertising experts have joined the Kennedy Truth Squad. The work they do could make the difference.

To turn the country against Kennedy's liberal policies, I think it will take a matter of a few months of warnings to taxpayers across the country that Kennedy is helping to bankrupt them.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

We must cover the nation with our message. Television ads can reach hundreds of thousands of voters at once. Radio ads are an excellent investment -- they reach tens of thousands.

Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page Kennedy

-more-

pg 2 of 5

83040373166

ad in the Washington Post will cost us at least \$8,000!

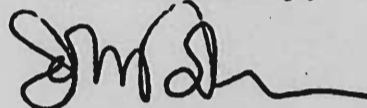
So please -- support the Kennedy Truth Squad today, and be as generous as you possibly can.

Your contribution is an investment in the future of America: If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water. And then America dies.

So please, if you can afford to invest \$1,000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. Even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself... along with thousands of other Messages. So please help us reach our fellow taxpayers today. Be as generous as you can.

Message to Edward Kennedy

Senator Kennedy: I oppose your big spending policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's big spending policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5



BUSINESS REPLY MAIL

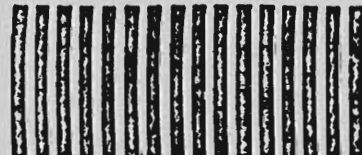
FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



Pg. 5 of 5

83040373169



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading pro-family leaders across the country to warn our fellow Americans about Edward Kennedy's anti-family record?

Please -- nobody has taken on this obligation yet. But we must -- soon.

It is hard to blame one liberal for destroying family life in America. For rampant homosexuality. For the six million abortions in the United States since 1973. For the Equal Rights Amendment threat.

We certainly cannot blame Senator Edward Kennedy for all this.

But Senator Kennedy is popular and very influential. For example, many polls (not all of them liberal polls) show the American people today choose Kennedy over any other candidate for President.

Yet consider how dangerous Kennedy's policies are:

--- He voted to extend ratification time for ERA. When the National Organization for Women plots strategy, they can count on Teddy. Yes, the ERA is losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side, more powerful than ever, if we don't act now.

--- Senator Orrin Hatch tried to stop federal funding of abortion with his bill. Senator Kennedy voted NO -- and has helped rally abortionists ever since.

--- Senator Kennedy helped beat Senator Jessie Helms' school prayer bill. He called Helms' bill a

-more-

EXHIBIT IV

pg 1 of 5

83040373170

threat to the Constitution.

--- If you call Senator Kennedy's office and ask for Kennedy's position on homosexuals, you will get this answer: Kennedy believes in "equal protection under the law for all citizens."

In other words, Kennedy wants homosexuals to enjoy all the same rights as normal Americans.

Any Senator who takes positions like these is dangerous, but what makes Kennedy especially dangerous is this: He has big plans.

His liberal staff is bigger than any other Senator's or Congressman's -- and bigger even than Vice President Mondale's staff.

But CBS, NBC, and ABC aren't saying a bad word about Teddy's obvious power grab. They (and most of the press) hide Teddy's far left policies, too.

Worse, few on our side protest Kennedy's policies -- even though he is probably the single biggest enemy of family life in the United States today.

But now we have the Kennedy Truth Squad. Good Congressmen and several defenders of family life will join forces. Three media and advertising experts have signed on to do TV, radio, and full-page newspaper ads that expose Kennedy's record.

The Kennedy Truth Squad is ready to warn the nation. Frankly, all we need now is money to do the job. Please help today.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular? I think you already know the answer: Most Americans don't know what Kennedy is up to.

I think it is up to us to warn the nation right away. The Kennedy Truth Squad will do just that. But we must have your help.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away -- before it's too late.

Using your dollars, some of the most distinguished

-more-

pg 2 of 5

83040373171

conservative members of Congress and other respected defenders of family life will travel the country, visiting towns and cities to warn Americans about Kennedy's record on abortion, the ERA, school prayer, and homosexuals.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in ruining family life and the moral health of our beloved United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full-page newspaper ads in towns and cities across the country.

Unless we pay for trips to towns and cities by leading conservatives and defenders of family life.

So please support the Kennedy Truth Squad with a generous contribution today. Please -- invest in America's future. Before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Sincerely,

Rhonda K. Stahlman
Rhonda K. Stahlman
Chairman

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself...along with thousands of other Messages. So please help us reach our fellow Americans today. Be as generous as you can.

pg 3 of 5

83040373172

Message to Edward Kennedy

Senator Kennedy: I oppose your anti-family policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's anti-family policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

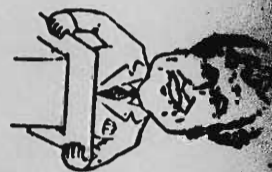
Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5



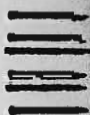
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

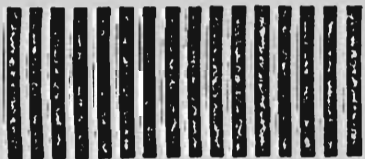
Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION



NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



PA 5 of 5

83040373174



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
1700 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your MESSAGE is that you're putting him on notice: he can no longer hide his liberal policies of big spending and tax raises.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to help spread the truth about Kennedy's inflationary tax policy.

Our group, Conservatives Against Liberal Legislation, is made up of experienced conservatives who can and will educate Americans about the liberals' programs.

What's more, our Kennedy Truth Squad is the ONLY project geared up and ready to go NOW to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join the Kennedy Truth Squad because you've already shown your commitment to lower taxes.

Let's not kid ourselves: Proposition 13 and talk of a Tax Limitation Amendment have not yet stopped your taxes going up. The government still takes a big bite out of your income. And government-caused inflation takes another huge bite.

Kennedy's future is bright.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls.

As you know, Teddy gets free publicity from the major

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

ENCLOSURE

pg 1 of 1

83040373175

TV and radio networks. Many newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV and radio and read in the papers. They don't know that:

- Kennedy's SOCIALIZED MEDICINE SCHEME would cost us at least \$63 billion in its first year alone.
- Kennedy's role in the forced TAXPAYER BAIL-OUT of NEW YORK CITY cost us at least \$2.3 billion.
- Kennedy cost us \$25-80 billion when he helped BEAT the Kemp-Roth tax cut plan.
- Kennedy loudly campaigns AGAINST any kind of tax limitation or federal budget balancing.
- Kennedy's staff is larger than any other Senate staff, and larger even than Vice President Mondale's staff.
- Kennedy is pushing for new "anti-trust" laws. But you know they'll ruin many a good business. And they'll cost us taxpayers hundreds of millions to enforce.

So it's up to you and me to educate our fellow-taxpayers. And unless we tell them right now, Kennedy will grow more powerful than ever.

But we can expose Teddy's anti-taxpayer policies.

Starting this fall, the Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

- * Leading Congressmen are scheduling news conferences about Kennedy's policies. They plan to travel the country to warn taxpayers about Kennedy's big spending record.
- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in bankrupting you, the taxpayer.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas to concerned taxpayers who've already shown they'll work and act to stop Kennedy.

To turn the country against Kennedy's liberal policies will take months of warnings. So we must start right now.

Can we do it? Yes, recently our group played a vital role

09-2-67

83040373176

Page three

in stopping taxpayer financing of elections. We successfully ran a voter-mailing campaign to influence U.S. Congressmen.

Now, with your help, we must cover the nation this fall with our Kennedy message:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$4,600 or more.

Kennedy gets free media time from his friends at the major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television and radio ads and voter mailings.

Only if we spend money for full-page newspaper ads in towns and cities across the country.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in a leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 320 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water.

If you can afford to invest \$100 or \$50, your check will go a long way toward spreading the Kennedy Truth Squad's message.

But even if you can send just \$25, \$15, even \$10 at this

pg 3 of 7

Page four

time, you'll help greatly to get the Truth Squad launched right now.

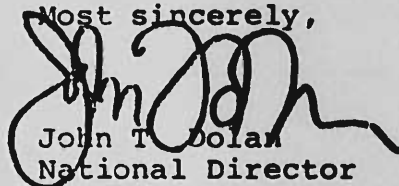
And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation. Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell America about Kennedy's big-spending liberalism.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director

Conservatives Against Liberal Legislation

TD/tpr

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

83040373178

With your help we can place ads like this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE — and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

	AMOUNT
Cuts in federal budget authority and outlays in 1980	\$1 BILLION
Cuts in foreign aid, countercyclical public service jobs, health programs, federal travel spending, categorical state grants.	\$10 BILLION
Cuts in transportation, economic development, health, social programs, welfare, categorical state grants totalling:	\$24.4 BILLION
Cuts to provide "no real growth" in federal spending	\$12 BILLION
1% attrition in the federal work force and cuts in bureaucrats' overtime pay, film making and travel expenses.	\$1.1 BILLION
TOTAL	\$48.5 BILLION



**When it comes to cutting YOUR
taxes, Senator Kennedy says
NO!**

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll send you FREE a copy of our TV and radio scripts about Teddy Kennedy's liberal programs.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7500, Washington, D.C. 20044

pg 5 of 7

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your big-spending anti-taxpayer policies.

Your socialized medicine plans will cost the taxpayer \$63 billion the first year.

You've voted against

- * the Kemp-Roth tax cut plan
- * tax limitation
- * federal budget balancing

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy's policies.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH ABOUT KENNEDY'S LIBERAL PROGRAMS:

() \$500 () \$250 () \$100 () \$50

() \$25 () \$15 () \$10 () \$____ Other

My check is made out to Conservatives Against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

pg 6 of 7

CF/mtp

8304037181

pg 7 of 7



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit #11973
Washington, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044





Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy
from you.

Your message is that you're putting him on notice:
Kennedy can no longer hide his record of voting the BIG
LABOR BOSSES' LINE.

Please sign your MESSAGE to Kennedy and send it back
to me.

And please join our Kennedy Truth Squad to spread the
truth about Kennedy's support for Big Labor.

Quite frankly, I want you to join the Kennedy Truth
Squad because I feel you are strongly opposed to big labor
control of our economy and politics.

If the American people knew how radical Kennedy's
policies are, he wouldn't be their first choice in the
Presidential polls.

Yet, the AFL-CIO gives Kennedy a 100% rating: he's voted

FOR: Common Situs picketing to let building workers
strike a whole construction site against one contractor

FOR: repeal of the Hatch Act, to let bureaucrats and postal
workers get involved in politics

FOR: "labor law reform", a thinly disguised license for
big unions to undermine the right to work.

Our group, Conservatives Against Liberal Legislation,
(C.A.L.L.), is made up of experienced conservatives who can
and will expose liberal programs for what they are.

What's more, our Kennedy Truth Squad is the only project
geared up and ready to go NOW to expose Kennedy's pro-union

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT VI

pg 1 of 6

83040373182

Page two

bosses policies.

No one else has taken on this responsibility.

Yet big labor has adopted Kennedy as its Crown Prince. Look at William Winpisinger, a self-confessed ideological socialist. He and his International Association of Machinists are promoting Kennedy almost as if they were his staff members.

Kennedy voted FOR big labor on:

- 1) increasing the minimum wage by 50% or pegging it to inflation
- 2) guaranteed full employment - jobs for everyone whether they're needed or not (the Humphrey-Hawkins bill)
- 3) collective bargaining and union recognition in the Civil Service
- 4) a separate Department of Education. If you thought H.E.W. was a hive of bureaucracy, imagine this new creation, beloved of the left-leaning National Education Association.

By contrast Kennedy voted AGAINST:

- 1) protecting the right to work of non-union teachers, and against
- 2) Senator Thurmond's bill to outlaw military unions.

Union bosses like George Meany, Jerry Wurf of the American Federation of State, County, and Municipal Employees, William Winpisinger, all rely on Kennedy to carry out their wishes.

If we don't join forces soon, Kennedy's programs will grow more widespread than ever.

Why is Kennedy so popular?

Simple. Most Americans don't know how really liberal Kennedy's policies are.

So it's up to you and me to warn our fellow Americans.

Together we can educate millions of Americans about Teddy's pro-Big Labor voting record.

Our Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's stance on unions. We aim to start this fall.

- * We're ready to warn the nation. Leading Congressmen like Ron Paul from Texas, and Bill Royer from California are scheduling news conferences and speaking tours.

Can we do it? Yes, recently our group played a vital role

Page three

- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in support of the repeal of the Hatch Act, common situs picketing and many more big labor schemes.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas where we know concerned Americans like you will fight the union bosses' power.

To turn the country against Kennedy's liberal policies will take months of warnings. Educating Americans that Kennedy will go along with just about any scheme the union bosses promote.

So it's vital we educate Americans about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our postcard mailing campaign to Congressmen played a crucial role in stopping taxpayer financing of elections.

What's more, right now our "STOP SALT II" mailing campaign to Senators has rallied many Senators who were wavering.

Now we must cover the nation with our message about Kennedy's liberal schemes this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a leading local paper like the paper you may read will cost us \$4,600 or more.

Senator Kennedy gets free media time from his friends at major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television, radio and newspaper ads and mailings to inform voters.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before

pg 3 of 6

Page four

Kennedy's ambitious plans begin to come to a head.

Here's what it costs to get the Kennedy Truth Squad launched:

- * Speaking tour of major cities \$ 5,000
- * Full-page ad in leading local paper \$ 4,600 each
- * 1-Minute TV ad on major station \$ 4,000 each
- * Spot radio commercial \$ 310 each
- * 50,000 voter mailings \$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we know the union bosses can count on Kennedy to do their bidding.

If you can afford to invest \$100 or \$50, your check will go a long way to spreading the Kennedy Truth Squad's message. But even if you can send \$25, \$15, or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell the truth about Kennedy's anti-right to work, pro-union boss policies.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director

Conservatives Against Liberal Legislation

TD/ub

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

pg 4 of 6

Message to Senator Edward Kennedy
Senator Kennedy:

I oppose your pro-union boss policies on:

- 1) repeal of the Hatch Act
- 2) common situs picketing
- 3) "labor law reform"
- 4) inflationary minimum wage
and guaranteed full employment
- 5) a separate Department of Education

I support the Kennedy Truth Squad

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my
warning.
- * Take out full-page newspaper ads
- * Use TV and radio to tell the truth
about Kennedy.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH
ABOUT KENNEDY:

() \$500 () \$250 () \$100 () \$50
() \$ 25 () \$15 () \$ 10 () \$ ___ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044

Mr., Mrs., Miss

Address

City State Zip

CF/Mub

pg 5 of 6

83040373186

83040373137

83-2



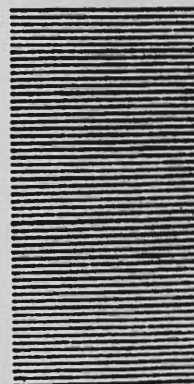
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 21973 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



pg 6 of 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance
of an order to the following person in connection
with MUR 1192 (80):

Rhonda K. Stahlman
1500 Wilson Blvd.
Arlington, Virginia 22209

Max L. Friedersdorf
Chairman

Thomas E. Harris
Commissioner

John W. McGarry
Vice Chairman

Frank P. Reiche
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

Attachment III

83040373138

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Conservatives Against)
Liberal Legislation)

MUR 1192 (80)

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission's Executive Session on February 18, 1980, at which a quorum was present, do hereby certify that the Commission authorized by a vote of 5-0 the sending of the order and cover letter to CALL, as submitted with the General Counsel's memorandum dated February 9, 1981.

Commissioners Aikens, McGarry, Reiche, Thomson, and Tiernan voted for the authorization.

Attest:

2-20-81

Date

Lena L. Stafford

Recording Secretary

33040675139



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mwe*

DATE: FEBRUARY 19, 1981

SUBJECT: ORDER IN RELATION TO MUR 1192

The attached order, approved by a vote of 5-0 in Executive Session on February 18, 1981, has been signed and sealed this date.

ATTACHMENT:
Order - CALL

83040373190

February 9, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1192

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

83040573121



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER SECRETARY

81 FEB 9 P 1: 39

February 9, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: Authorization to Issue Order in Connection
with MUR 1192 (80)

On September 3, 1980, the Commission found reason to believe that Conservatives Against Liberal Legislation (CALL) violated 2 U.S.C. § 441b by making expenditures from general treasury funds in connection with the Democratic Presidential primaries. The Commission in addition to a letter of notification sent respondent interrogatories. CALL answered these questions, nonetheless CALL's response raised further questions concerning its activities. Consequently, further questions were drafted and sent to CALL. (Attachment I). In a letter dated January 9, 1981, counsel for CALL advised this Office that it "declines to respond further to the additional questions." since "The Commission has been voluntarily provided with all the information and documentation necessary to enable it to make a considered judgment whether there is probable cause to believe that CALL may have violated 2 U.S.C. § 441b(a)." (Attachment II).

The questions which CALL declines to answer are relevant to the Commission's inquiry into CALL's activities in connection with the 1980 presidential primary elections or will lead to information relevant to the Commission's investigation. Thus, it is the recommendation that the Commission issue an order requiring a response to the Commission's interrogatories.

Recommendation

Authorize the attached order and cover letter to CALL.

Attachments: Letter to CALL - December 22, 1980
Letter from counsel - January 9, 1981
Copy of Order
Copy of cover letter
Authorization

83040373192



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

RE: MUR 1192 (80)

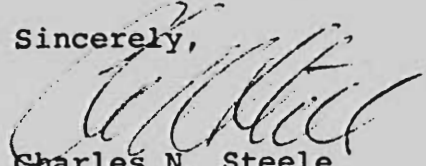
Dear Mr. Herge:

On September 10, 1980, Conservatives Against Liberal Legislation (CALL) received notification that the Commission had found reason to believe that CALL had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. At that time, CALL was requested to answer certain questions and to supply information in connection with the alleged violation. The Commission is in receipt of your letter dated September 29, 1980, wherein you answer the questions posed. The answers to these questions were not entirely responsive. Specifically, you did not state whether the expenditures for CALL's undertakings were from its general treasury.

In order to proceed in its investigation, the Commission needs information concerning CALL's finances. Consequently, additional questions are enclosed which require CALL to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code.

The Commission requires that CALL submit the information under oath and that CALL do so within ten days of receipt of this letter. If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at 202/523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

Attachment I pg 1 of 4

83040373193

FEDERAL ELECTION COMMISSION

QUESTIONS

RHONDA K. STAHLMAN

MUR 1192 (80)

Attached to these questions are Exhibits I-VI which were submitted by CALL in response to a request that all documents paid for by CALL in connection with its Kennedy Truth Squad project be submitted to the Federal Election Commission. Please refer to these Exhibits when responding to the questions below.

1. a. For each of the following exhibits state on or about what date did CALL mail, distribute or otherwise disseminate the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
 - g. Exhibit VII?
2. a. For each of the following exhibits state what was the total cost (costs include, but are not limited to, materials, labor, overhead, stamps, salaries, etc.) of preparing and disseminating the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?

3. Does CALL have a checking account(s)? If so, please state the name of the bank and the account number of each account maintained by CALL.
4. Does CALL have a savings account(s)? If so, please state the name of the bank and account number of each savings account maintained by CALL.
5. On July 24, 1980, which is the date that the first Kennedy Truth Squad communications were issued, how much "cash on hand", as that term is defined at 11 C.F.R. § 104.3(a)(1), did CALL have?
6.
 - a. How much money did CALL gross as a result of its Kennedy Truth Squad solicitation marked as Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
7.
 - a. Did CALL make any expenditures out of its general treasury funds in connection with any of the Kennedy Truth Squad projects?
 - b. If the answer to 7a. is yes, what was the total amount of these expenditures?
8. What is the relationship, if any, between CALL and the National Conservative Political Action Committee (NCPAC)? In your answer please explain the role that John T. Dolan plays with respect to CALL and whether CALL and NCPAC share common office space, employees, and/or offices.
9.
 - a. Has CALL ever received money or anything of value from the National Conservative Political Action Committee (NCPAC)? If so, please state the date, circumstances, and amount of money or value received.
 - b. Has NCPAC ever loaned CALL money or anything of value? If so, please state the date, circumstances and amount of the loan.

Rhonda K. Stahlman
Page Three
Questions - MUR 1192 (80)

10. Other than money received through the solicitation efforts of the Kennedy Truth Squad projects, what other source of monies does CALL have?
11. Does CALL have any members? If so, do these members pay dues? How many members does CALL have? What are the standards for membership in CALL? What is the dues structure?
12. List all officeholders of CALL and office held since January 1, 1979.
13. Who were the principal authors of Exhibits I-VI?
14. How was it decided which people were to be sent Exhibits I-VI?

83040373196

pg 4 of 4

SEDAM & HERGE

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-831-0896
CABLE: SEDAMHERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

January 9, 1981

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

Attention: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

Dear Mr. Steele:

By letter, dated December 22, 1980, you requested that our client, Conservatives Against Liberal Legislation (CALL), respond to a number of additional questions on the stated rationale that the answers will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 of the United States Code. These additional questions were submitted in the context of a finding by the Commission of reason to believe that CALL may have violated 2 U.S.C. 441b(a).

By letters, dated September 12, 1980 and September 29, 1980, we noted that the finding of reason to believe that CALL may have violated 2 U.S.C. 441b(a) was an internally generated matter, 11 CFR 111.8, by reason of the fact that the original complaint filed in this matter made no reference to a possible violation of 2 U.S.C. 441b(a). As a consequence, we objected to the fact that the Commission failed to provide us with a copy of the staff report as required by 11 CFR 111.8(b). Nevertheless, while we preserved our objection to the foregoing failure, we provided a substantive reply to the allegation that CALL may have violated 2 U.S.C. 441b(a). Included in that reply were specific answers to the questions posed by the Commission in its letter to the undersigned dated September 10, 1980.

Attachment II pg 1 of 3

83040373197

31 JAN 14 P 3: 07

RECEIVED
FEB 11 1981
FEDERAL ELECTION COMMISSION

GOC# 3725
31 JAN 14 P 2: 29

The Honorable Charles N. Steele
Page Two
January 9, 1981

It is the position of CALL that the Commission has been voluntarily provided with all the information and documentation necessary to enable it to make a considered judgment whether there is probable cause to believe that CALL may have violated 2 U.S.C. 441b(a). The additional questions submitted with your letter of December 22, 1980, venture beyond the parameters of that inquiry for the following reasons:

- (a) Questions 1, 2, 5, 6 and 10 would appear to be relevant only if CALL had indicated a desire to enter into negotiations directed towards reaching a conciliation agreement pursuant to 11 CFR 111.18(d). CALL has denied it violated 2 U.S.C. 441b(a) and has not elected to proceed under the provisions of 11 CFR 111.18(d).
- (b) Questions 3, 4, 11, 12, 13 and 14 do not appear relevant either to conciliation negotiations or to a determination whether there is probable cause to believe that CALL violated 2 U.S.C. 441(a).
- (c) Questions 8 and 9 do not appear relevant either to conciliation negotiations or to a determination whether there is probable cause to believe that CALL violated 2 U.S.C. 441b(a). Furthermore, the issue of a possible relationship between CALL and National Conservative Political Action Committee was laid to rest by the Commission at its meeting on September 3, 1980. (See, letter from Chairman Friedersdorf to the undersigned dated September 10, 1980.)
- (d) Question 7 was answered in our letter of September 29, 1980. To avoid any ambiguity, however, we confirm that the subject expenditures were made from CALL's general treasury.

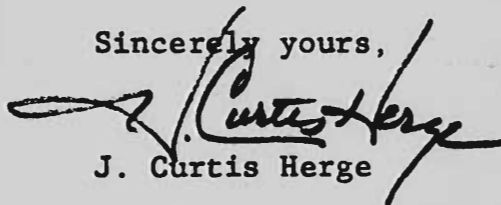
pg 2 of 3

83040373128

The Honorable Charles N. Steele
Page Three
January 9, 1981

For the foregoing reasons, CALL respectfully declines to respond further to the additional questions. This position finds support in the decision of the Court in Felice M. Gelman, et al. v. Federal Election Commission, United States District Court for the District of Columbia, No. 80-2471, October 24, 1980.

Sincerely yours,


J. Curtis Herge

83040373179

pg 3 of 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Conservatives Against
Liberal Legislation

)
)
) MUR 1192(80)
)
)

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Conservatives Against Liberal Legislation
1500 Wilson Boulevard
Arlington, Virginia 22209

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of
its investigation in the above-styled matter, the Federal
Election Commission hereby orders you to submit written
answers to the questions attached to this Order.

Such answers must be submitted under oath and must be
forwarded to the Commission within 10 days of your receipt
of this Order.

Wherefore, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. in this
day of

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Questions - 3 pages

83040373200



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22101

Re: MUR 1192 (80)

Dear Mr. Herge:

The Commission is in receipt of your letter dated January 9, 1981 wherein you advised the Office of General Counsel that your client respectfully declines to answer the questions enclosed in a letter dated December 22, 1980. As you are aware, the Commission on September 3, 1980 found reason to believe that CALL violated 2 U.S.C. § 441b(a) by making corporate expenditures in connection with the 1980 Democratic presidential primary elections. The questions which CALL declines to answer are relevant to the Commission's investigation into this matter.

Consequently, the Federal Election Commission has issued the attached order which requires CALL to answer questions and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971. It is required that CALL submit the requested information under oath and that CALL do so within ten days of receipt of this order.

In reference to your contention that the Commission failed to comply with 11 C.F.R. § 111.8(b) by not providing a copy of the staff report with notification of the Commission's reason to believe finding, it is the position of the Commission that neither the Act nor Commission Regulations require that a staff report be provided in matters that are generated by external complaints filed with the Commission. CALL received a copy of the complaint and pursuant to 2 U.S.C. § 437g(a)(1) was presented with

83040373201

Letter to J. Curtis Herge, Esquire
Page Two
MUR 1192 (80)

the opportunity to demonstrate that no action should be taken against CALL on the basis of the complaint. CALL availed itself of this opportunity. The Commission then proceeded to its reason to believe finding solely on the basis of information contained in the complaint and CALL's response. In such circumstances, the requirement of 11 C.F.R. § 111.8(b) is not applicable eventhough the violation cited in the complaint was other than found by the Commission.

If you have any questions please direct them to Robert Bogin, the attorney handling this matter at 202/523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

Order
Questions

83040373202



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance of an
order to the following person in connection with MUR 1192(80):

Conservatives Against Liberal Legislation
1500 Wilson Boulevard
Arlington, Virginia 22209

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Vernon W. Thomson
Commissioner

Joan D. Aikens
Commissioner

Robert O. Tiernan
Commissioner

83040573203

94794 RECEIVED
GCC#3725

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

31 JAN 14 P2:29

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

January 9, 1981

TWX/TELEX: 710-631-0896

CABLE: SEDAMHERGE

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

Attention: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

Dear Mr. Steele:

By letter, dated December 22, 1980, you requested that our client, Conservatives Against Liberal Legislation (CALL), respond to a number of additional questions on the stated rationale that the answers will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 of the United States Code. These additional questions were submitted in the context of a finding by the Commission of reason to believe that CALL may have violated 2 U.S.C. 441b(a).

By letters, dated September 12, 1980 and September 29, 1980, we noted that the finding of reason to believe that CALL may have violated 2 U.S.C. 441b(a) was an internally generated matter, 11 CFR 111.8, by reason of the fact that the original complaint filed in this matter made no reference to a possible violation of 2 U.S.C. 441b(a). As a consequence, we objected to the fact that the Commission failed to provide us with a copy of the staff report as required by 11 CFR 111.8(b). Nevertheless, while we preserved our objection to the foregoing failure, we provided a substantive reply to the allegation that CALL may have violated 2 U.S.C. 441b(a). Included in that reply were specific answers to the questions posed by the Commission in its letter to the undersigned dated September 10, 1980.

31 JAN 14 P3:07

RECEIVED
FEB 1 1981
FEDERAL ELECTION COMMISSION

83040373204

The Honorable Charles N. Steele
Page Two
January 9, 1981

It is the position of CALL that the Commission has been voluntarily provided with all the information and documentation necessary to enable it to make a considered judgment whether there is probable cause to believe that CALL may have violated 2 U.S.C. 441b(a). The additional questions submitted with your letter of December 22, 1980, venture beyond the parameters of that inquiry for the following reasons:

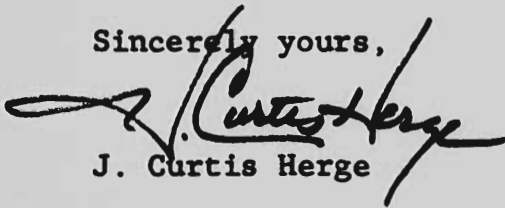
- (a) Questions 1, 2, 5, 6 and 10 would appear to be relevant only if CALL had indicated a desire to enter into negotiations directed towards reaching a conciliation agreement pursuant to 11 CFR 111.18(d). CALL has denied it violated 2 U.S.C. 441b(a) and has not elected to proceed under the provisions of 11 CFR 111.18(d).
- (b) Questions 3, 4, 11, 12, 13 and 14 do not appear relevant either to conciliation negotiations or to a determination whether there is probable cause to believe that CALL violated 2 U.S.C. 441(a).
- (c) Questions 8 and 9 do not appear relevant either to conciliation negotiations or to a determination whether there is probable cause to believe that CALL violated 2 U.S.C. 441b(a). Furthermore, the issue of a possible relationship between CALL and National Conservative Political Action Committee was laid to rest by the Commission at its meeting on September 3, 1980. (See, letter from Chairman Friedersdorf to the undersigned dated September 10, 1980.)
- (d) Question 7 was answered in our letter of September 29, 1980. To avoid any ambiguity, however, we confirm that the subject expenditures were made from CALL's general treasury.

830403373205

The Honorable Charles N. Steele
Page Three
January 9, 1981

For the foregoing reasons, CALL respectfully declines to respond further to the additional questions. This position finds support in the decision of the Court in Felice M. Gelman, et al. v. Federal Election Commission, United States District Court for the District of Columbia, No. 80-2471, October 24, 1980.

Sincerely yours,



J. Curtis Herge

83040373206

03040573207
SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

**The Honorable Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463**

**Attention: Robert Bogin, Esq.
Office of General Counsel**



ROUTING SLIP FOR RTB LETTERS

OK
SM

TO: Chairman/Vice Chairman

FROM: Elissa T. Garr
OGC Enforcement Docket

DATE: 8 September 1980

MUR # 1192

8 Date RTB Found 9/3

0 Date Cert. Rec'd in OGC 9/4/80

2 Staff Assigned Bob Bogen

STAFF CHECK:

RB Accuracy

RB Enclosures

RB Certification

3 Date Rec'd in OGC From Chairman/Vice Chairman

6 9-10 80



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge
Sedam and Herge
7600 Old Springhouse Road
McLean, VA 22102

RE: MUR 1192

Dear Mr. Herge:

The Federal Election Commission notified your clients, National Conservative Political Action Committee ("NCPAC") and Conservatives Against Liberal Legislation ("CALL") on March 24, 1980, of a complaint which alleges that your clients may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, the Commission, on September 3, 1980, determined that there is no reason to believe that NCPAC or CALL violated 2 U.S.C. § 441d. In addition, the Commission decided to take no action at this time with respect to alleged violations of 2 U.S.C. § 434 and former § 435(b). However, the Commission found reason to believe that CALL violated 2 U.S.C. § 441b(a). Section 441b(a) makes it unlawful for any corporation to make an expenditure in connection with any federal election. Specifically, it appears that CALL's expenditures for its Kennedy Truth Squad mailing and solicitation were made in connection with the Presidential primary elections of 1980.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In addition, please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

83040373209

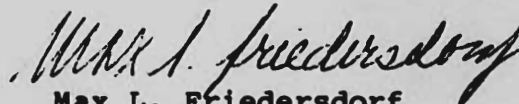
Letter to J. Curtis Herge
Page 2
MUR 1192 .

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Robert Bogin, at 202/523-4529.

Sincerely,



Max L. Friedersdorf
Chairman

Enclosure

Interrogatories

83040373210

FEDERAL ELECTION COMMISSION

MUR 1192: QUESTIONS TO BE ANSWERED BY CALL.

1. What was the total cost of preparing and mailing the letter and solicitation entitled Kennedy Truth Squad that was attached to the complaint? (costs include but are not limited to materials, staff time, stamps, etc.)

2. How many of these letters and solicitations were mailed?

3. What was the source of funding for these expenditures?

4. Were these costs paid for out of the general treasury of CALL?

5. How much money did CALL gross as a result of its Kennedy Truth Squad solicitation?

6. Please submit any other document paid for by CALL in connection with its Kennedy Truth Squad project?

83040373211

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Conservative Political) MUR 1192
Action Committee (NCPAC))

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session on September 3, 1980, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1192:

1. Take no action at this time with respect to 2 U.S.C. §434 and former §435(b).
2. Find no reason to believe that NCPAC violated 2 U.S.C. §441d.
3. Find reason to believe that CALL violated 2 U.S.C. §441b.
4. Approve and send the letter and questions to counsel for CALL, as submitted with the General Counsel's August 15, 1980 report on MUR 1192.

Attest:

9/5/80
Date

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

83040373212

August 15, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1192

Please have the attached First GC Report distributed
to the Commission on a 48 hour tally basis. Thank you.

83040373213

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

80 AUG 15 All: 12

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 8-15-80

MUR # 1192
DATE COMPLAINT RECEIVED
BY OGC March 19, 1980
STAFF MEMBER
Robert Bogin

COMPLAINANT'S NAME: Kennedy for President Committee

RESPONDENT'S NAME: National Conservative Political Action Committee
(NCPAC)

RELEVANT STATUTE: 2 U.S.C. § 441d, §434 and former § 435(b);
2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: NCPAC reports, AOs, MURs 957, 1183

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

That NCPAC and CALL having been set up by the same group of persons should be treated as a single political committee, namely NCPAC, and that NCPAC violated the Federal Election Campaign Act of 1971, as amended, by failing to file reports with the Commission in accordance with 2 U.S.C. § 434; by failing to include a notice of literature in accordance with 2 U.S.C. § 435(b); and by failing to include a notice on communications in accordance with 2 U.S.C. § 441d.

FACTUAL ANALYSIS

On March 19, 1980, the Kennedy for President Committee (Committee) through its General Counsel, John E. Nolan, filed a complaint with the Commission. (Attachment I). Attached to the complaint are two documents. (Attachments II and III). Attachment II is a letter sent by the Kennedy Truth Squad, a project of Conservatives Against Liberal Legislation (CALL). Attachment III is an advertisement published in the Manchester Union Leader by the Kennedy Truth Squad, a project of the National Conservative Political Action (NCPAC).

The National Director of CALL is Chairman of NCPAC, and both NCPAC and CALL operate from the same building in different suites. These two facts plus the fact that both NCPAC and CALL sponsored projects called Kennedy Truth Squad leads the Committee to believe that NCPAC and CALL have been set up by the same group of persons

83040373214

and should therefore be treated as a single political committee. The complaint alleges that NCPAC and CALL are to be considered a single political committee, namely NCPAC, and that NCPAC violated 2 U.S.C. § 434 by failing to file the proper reports, and 2 U.S.C. § 435(b) and § 441d by failing to include the required notice on a solicitation and the required notice on a communication (the solicitation/communication is appended as Attachment II).

Counsel for NCPAC and CALL responded to the Committee's complaint in a letter dated April 3, 1980 (Attachment IV). Counsel submits that CALL is a section 501(c)(4) Virginia corporation. 1/ The purpose of CALL 2/ is to "serve the public interest and to promote social welfare by fostering and developing greater public participation in governmental affairs in order to achieve efficient operation and delivery of governmental services which benefit the community, business and citizens in all walks of life". NCPAC is a 26 U.S.C. § 527 3/ District of Columbia corporation and a multicandidate political committee under 2 U.S.C. § 431(4)(A) and § 441a(a)(4).

LEGAL ANALYSIS

The complainant alleges that NCPAC and CALL should be treated as a single political committee and that any expenditures made by CALL should be reported by NCPAC. Based on the complaint by the Kennedy for President Committee and the response by counsel for NCPAC and CALL, there appears to be evidence of a close relationship between NCPAC and CALL. However, it is not necessary for the Commission to address the question of possible affiliation between CALL and NCPAC inasmuch as CALL is a discrete corporate entity, independent of NCPAC. Since CALL is a corporation it is the recommendation of this Office that the Commission find reason to believe that the expenditure connected with the mailing of the letter and solicitation by CALL is a violation of 2 U.S.C. § 441b(a).

The letter attributed to CALL which purportedly was mailed in the Fall of 1979 has as its single subject Senator Kennedy. It

- 1/ 26 U.S.C. § 501(c)(4) describes civic organizations operated "exclusively for the promotion of social welfare" which are exempted from taxation. The statute does not contain language prohibiting political activity. Contributions to a § 501(c)(4) organization are not deductible by the contributor.
- 2/ Before September, 1979, CALL was known as National Conservative Public Affairs Council (NCPAC).
- 3/ 26 U.S.C. § 527 provides for separate tax treatment of organizations "organized and operated primarily for the purpose of . . . accepting contributions and making expenditures for . . . influencing . . . the selection . . . of any individual to any . . . public office."

8 3 0 4 0 3 7 3 2 1 5

33040373216

should be noted that at the time of the CALL mailing, Senator Kennedy had repeatedly disavowed being a candidate for the Democratic nomination for President. Nonetheless, this was a period of intense political activity by Draft Kennedy forces to induce the Senator to run. CALL's activities seem designed to counter the Draft Kennedy impetus. Page four of the letter states: "We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious plans come to a head." Although, the response provided by CALL states that the letter "consisted of an expression of views on the legislative policies of Senator Kennedy . . .," it is the opinion of the Office of the General Counsel that the letter coming at the time that it did, when there was much speculation about Senator Kennedy running for the Democratic nomination and when the Draft Kennedy movement was active, appears to have been made in connection with the 1980 presidential election, whether or not Senator Kennedy was a candidate at that time. 4/ Therefore the cost of preparing and mailing the letter by CALL is in violation of 2 U.S.C. § 441b(a) which prohibits corporations from making any expenditure in connection with federal elections. This analysis is consistent with that found in the General Counsel's reports for MURs 957 and 1183.

This Office recommends that given the corporate status of CALL, the Commission find reason to believe that CALL violated 2 U.S.C. § 441b(a). However, in order not to preclude the Commission's ability to pursue wherever the investigation directs, we are recommending that the Commission take no action at this time with respect to the 2 U.S.C. § 434 and former § 435(b) violations. As for the § 441d violation, it is the recommendation of this Office that the Commission find no reason to believe this provision has been violated. The Commission should make this finding inasmuch as Senator Kennedy was not a candidate at the time the letter was published.

RECOMMENDATION

It is recommended that the Commission:

- 1) Take no action at this time with respect to 2 U.S.C. § 434 and former § 435(b).
- 2) Find no reason to believe that NCPAC violated 2 U.S.C. § 441d.
- 3) Find reason to believe that CALL violated 2 U.S.C. § 441b.

4/ Analogous reasoning was adopted by the Commission in MUR 1038, where the Commission found reason to believe that the two committees supporting the Draft Kennedy movement were political committees subject to 2 U.S.C. § 433 because they were receiving contributions and making expenditures for the purposes of influencing the 1980 presidential election, even though Kennedy was not yet a candidate for that office.

4) Approve and send the attached letter and questions to counsel for CALL.

Attachments

- I. Complaint
- II. Letter from CALL
- III. Advertisement of NCPAC
- IV. Response from CALL and NCPAC
- V. Letter to CALL

83040373217

KENNEDY FOR PRESIDENT

MUR 119

I

March 17, 1980

80 MAR 19 P 2:53

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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

Dear Mr. Steele:

It has come to the Committee's attention that the Kennedy Truth Squad has distributed the attached letter by mail. According to the letter, the Kennedy Truth Squad is a project of Conservatives Against Liberal Legislation. It has also come to the Committee's attention that the Kennedy Truth Squad has published the attached advertisement in the Manchester Union Leader. According to the advertisement, the Kennedy Truth Squad is a project of the National Conservative Political Action Committee.

As the attached reports indicate, the National Director of Conservatives Against Liberal Legislation, John T. Dolan, is a salaried employee of the National Conservative Political Action Committee. Both the Conservatives Against Liberal Legislation and the National Conservative Political Action Committee operate from the same address -- namely, 1500 Wilson Boulevard, Arlington, Virginia 22209.

The National Conservative Political Action Committee has filed a statement of organization with the Commission. Neither the Conservatives Against Liberal Legislation nor the Kennedy Truth Squad has filed a statement of organization.

It appears that the National Conservative Political Action Committee, the Conservatives Against Liberal Legislation, and the Kennedy Truth Squad have been set up by the same group of persons and should therefore be treated as a single political committee. That committee, it seems, should properly be called the National Conservative Political Action Committee.

1250 22ND STREET N.W. WASHINGTON D.C. 20037 TELEPHONE: (202) 861-6000

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.

I

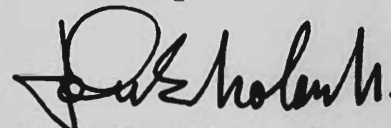
Charles N. Steele, Esquire
March 17, 1980
Page Two

It also would appear that the National Conservative Political Action Committee has committed the following violations of the Federal Election Campaign Act of 1971, as amended, in that it has failed to:

- (1) file reports with the Commission in accordance with 2 U.S.C. § 434;
- (2) include a notice of literature in accordance with 2 U.S.C. § 435(b); and further that it has failed to
- (3) include a notice on communications in accordance with 2 U.S.C. § 441(d).

I am hopeful that your office will be able to give immediate attention to this matter.

Sincerely,

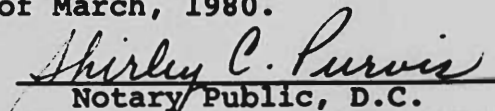


John E. Nolan, Jr.

Enclosures

District of Columbia, ss:

Subscribed and sworn to before me this
17th day of March, 1980.



Notary Public, D.C.

My commission expires 4/14/80

B 3 0 4 0 3 7 3 2 1 9



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

II

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your MESSAGE to Kennedy is that you're putting him on notice: Kennedy can no longer hide his radical record of ultra-liberal policies.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to help spread the truth about Kennedy's liberalism.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls.

Our group, Conservatives Against Liberal Legislation, is made up of experienced and dedicated conservatives who can and will expose liberal programs in their true light.

What's more our Kennedy Truth Squad is the only project geared up and ready to go now to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join our Kennedy Truth Squad because I feel you strongly disagree with Kennedy's liberal policies.

So I invite you to join our project which gets right to the heart of the liberals' strategy.

Will you help us now to send some of America's

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

II

83040373210

top Conservatives across the country to warn Americans about Edward Kennedy?

Won't you sit down right now and do two things for me:

- 1) Sign the MESSAGE TO KENNEDY.
- 2) Fill in the Reply Memo I've attached to the MESSAGE and send it with your gift to get the Truth Squad launched.

The American people don't know how radical Kennedy's policies are because the major TV and radio networks and newspapers are on his side.

Consider these facts:

- ** Kennedy's support for Big Labor bosses on Common Situs picketing and the repeal of the Hatch Act shows he'll tag along with anything the unions want. He needs big labor support at the polls. We and other conservative groups helped stop Common Situs picketing and repeal of the Hatch Act, but it's clear KENNEDY'S PROGRAMS HAVE BIG LABOR'S SEAL OF APPROVAL.
- ** Kennedy's socialized medicine scheme threatens to break the backs of you and me, the taxpayers. Its price tag: at least \$63 billion. In the first year of the program alone.
- ** Kennedy leads the liberal campaign against the American family. He supports federal funds for abortion. He supports "gay rights". He wants to extend the time to ratify the Equal Rights Amendment (E.R.A.)
- ** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending.
- ** Kennedy has a long record of undermining America's defenses. He's opposed the B-1 Bomber, the Minuteman Missile, the Trident Submarine, the Safeguard Missile System. He wants close relations with Castro's Cuba even though the Soviets have combat troops and MiGs there now, just 90 miles from our shores.

Unless we join forces right now, Kennedy will be more powerful than ever.

So it's up to you and me to warn our fellow-Americans.

83040373221

Starting this fall, the Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's ultra-liberal policies.

- 1) Leading Congressmen, military men and other top conservatives can hold news conferences and travel the country to warn and educate Americans about Kennedy's schemes.

But the Kennedy Truth Squad needs your dollars to pay our speakers' travel expenses.

- 2) We've scheduled TV, radio and full-page newspaper ads along the lines of the sample I've enclosed, to expose Kennedy's big spending.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- 3) We'll mail letters in key areas to concerned citizens who've already shown they'll work and act to stop liberal legislation.

Our Truth Squad about Kennedy's liberal policies will take months.

So it's vital we start to educate America about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our group played a vital role in stopping a bill for taxpayer financing of elections by postcard mailing to U.S. Congressmen. Now we're in the forefront of a "Stop SALT II" campaign through mailings to Senators.

With your help we can cover the nation with our message about Kennedy this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$ 4,600 or more.

But we can get the other side, the true side, of the Kennedy

83040373222

story across only if we spend the money for television, radio and newspaper ads and voter mailings.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious plans come to a head. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on a major station	\$ 4,000 each
* Spot radio commercial	\$ 310 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, you and I will have to live with his liberal program for a long, long time.

If you can afford to invest \$100 or \$50, your check will go a long way to spread the Kennedy Truth Squad's message. But if you can send \$25, \$15 or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

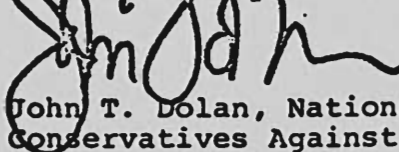
Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy Kennedy on the run today.

Thank you in advance for helping tell America the truth about Kennedy's big-spending, anti-family, anti-defense liberalism.

With warm appreciation for your help.

Most sincerely



John T. Dolan, National Director
Conservatives Against Liberal Legislation

TD/gvl

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

8 3 0 4 0 3 7 3 2 2 4

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your radical policies on:

- 1) disarmament
- 2) socialized medicine
- 3) abortion and ERA
- 4) pro-union boss legislation

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide.

HERE'S MY INVESTMENT IN YOUR TRUTH SQUAD:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$___ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

CF/Mgv

0 4 0 3 7 3 2 1
this on TV and in major newspapers

Edward Kennedy: Ultra-Liberal

Look at his voting record
in the Senate:

FOR: big spending welfare programs

FOR: Common Situs picketing and repeal of the Hatch Act

FOR: federal funds for ABORTION

FOR: more time to ratify the Equal Rights Amendment (E.R.A.)

FOR: close relations with CASTRO'S CUBA



AGAINST: a strong America: against
the B-1 Bomber, the
Minuteman Missile, the
Trident Submarine, the
Safeguard Missile Defense.

AGAINST: ties with Taiwan

AGAINST: tax cuts

Senator Kennedy votes anti-
taxpayer, anti-family, anti-defense
and pro-Big Labor bosses.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

III

MANCHESTER (N.H.) UNION LEADER — Friday, February 22, 1980

7

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

(Political Advertisement)

QUESTIONS THE NEW HAMPSHIRE MEDIA SHOULD ASK TED KENNEDY

We urge the New Hampshire media to begin a serious analysis of what a Kennedy presidency would mean to America. We want the media to give the same scrutiny they give to any candidate for president by asking tough questions.

We challenge the media to ask Senator Kennedy...

3040373226
III

would mean to America. We want the media to give the same scrutiny they give to any candidate for president by asking tough questions.

We challenge the media to ask Senator Kennedy the following questions before the New Hampshire Primary and throughout his campaign:

LEADERSHIP

Senator Kennedy, when you were Majority Whip for the Democratic Party you were unceremoniously deposed by a former member of the KKK. You have been in the U.S. Senate for 18 years, and yet not one major piece of legislation bears your name. You haven't even been able

to get a national health insurance bill out of your own subcommittee. Your personal background shows very little to be proud of in leadership qualities, particularly under pressure. With this type of record, what makes you think you have the leadership abilities to be president?

EXTREME LIBERALISM

According to the liberal ADA and COPE, as well as the conservative ACA and ACU you rank as the most extremely liberal member of the entire U.S. Senate. You have always supported huge deficits which have

caused inflation, the energy crisis and the decline of our dollar. What makes you think that an extreme liberal like yourself is able to be a good president?

WOULD JACK KENNEDY VOTE FOR TED KENNEDY?

Jack Kennedy was elected on the missile gap. He supported strong defense spending. He organized the boycott of Cuba. He was on constant alert against Russian aggression around the world. He proposed a dramatic 30% tax cut and opposed bureaucratic government regulations. You on the other hand have constantly voted against defense appropriations. You have a 0% rating from the American Security

Council ranking you as the most anti-defense member of the Senate. You favored the Panama Canal Treaties, SALT, and establishing diplomatic relations with Cuba. You even voted against the same tax cut your brother proposed as president. Don't you think this shows that the similarities between Ted and Jack Kennedy go no further than the last names?

CHAPPAQUIDDICK

There are numerous inconsistencies between what you told the police about Chappaquiddick and your television statement on the incident. Will you consent to an unedited interview to discuss the entire affair? Since you have nothing to hide, will you take a lie detector test during

this interview? Will you assist in getting all legal records on the matter made public? Will you encourage everyone associated with the affair to speak out publicly?

THE SOCIAL ISSUES

There are numerous inconsistencies between what you told the police about Chappaquiddick and your television statement on the incident. Will you consent to an unedited interview to discuss the entire affair? Since you have nothing to hide, will you take a lie detector test during this interview? Will you assist in getting all legal records on the matter made public? Will you encourage everyone associated with the affair to speak out publicly?

THE SOCIAL ISSUES

You chose to announce your candidacy in Boston, a city which opposes and has known the effects of forced busing, government enforced racial quotas, and federally-funded abortion. Yet in the Senate

you support busing and quotas more than anyone else. How do you square your position on these issues with the overwhelming majority of the Americans who disagree?

AMERICA DESERVES AN ANSWER TO THESE QUESTIONS

We're the Kennedy Truth Squad, a project of the National Conservative Political Action Committee. Even if the liberal dominated media won't ask these questions, we will undertake an independent effort to make sure the people of America know Ted Kennedy's record. Help us put newspaper ads like this as well as television and radio ads and independent truth squads all over the country to expose Ted Kennedy for what he is.

If you would like more information call
The Kennedy Truth Squad
FREE
1-800-621-5800

- ☐ Yes, I want to help inform the American public of Ted Kennedy's liberal record.
 - ☐ Yes, I want to volunteer.
 - ☐ Enclosed is my contribution of \$_____ to help buy t.v., radio, and newspaper ads like this that expose Ted Kennedy's liberal policies.
 - ☐ I am enclosing a list of other individuals who would be interested in helping.
- Name _____
Address _____
Occupation _____
Principal Place of Business _____
Phone _____

OR SEND TO:
KENNEDY TRUTH SQUAD, A PROJECT OF
THE NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
1500 WILSON BLVD. SUITE 513
ARLINGTON, VIRGINIA 22209

Paid for by the Kennedy Truth Squad, a project of the National Conservative Political Action Committee and not by any candidate. A copy of our report is in the back of the PNC and available for purchase from the PNC, Arlington, VA.

8304037322

IV

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
JOHN J. FLOOD (D.C. ONLY)
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

April 3, 1980

Bogin
GCC# 936
RECEIVED

1700 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

'80 APR 7 AM 9:40

TELEX 80-6388 (AEMPOWER WHEN)

TWX 710-628-0633 (TELETYPE 800)

337297

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

ATTENTION: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

Dear Sirs:

This letter is written on behalf of our clients, National Conservative Political Action Committee and Conservatives Against Liberal Legislation, in response to the letters to our clients from the General Counsel of the Federal Election Commission, dated March 24, 1980, relative to a complaint filed by Kennedy for President. This matter has been designated MUR 1192.

In its complaint, Kennedy for President reported that Conservatives Against Liberal Legislation had produced and distributed letters under the caption, "Kennedy Truth Squad, a project of Conservatives Against Liberal Legislation"; and, that National Conservative Political Action Committee had produced and published a political advertisement under the caption, "Kennedy Truth Squad, a project of National Conservative Political Action Committee." Kennedy for President then alleges that neither Conservatives Against Liberal Legislation nor the Kennedy Truth Squad has filed a Statement of Organization under 2 U.S.C. 433; that National Conservative Political Action Committee, Conservatives Against Liberal Legislation and the Kennedy Truth Squad are affiliated under 2 U.S.C. 441a(a)(5); and, National Conservative Political Action Committee failed to file reports under 2 U.S.C. 434 and to include notices on its literature as required by the Act prior to the enactment of Pub. L. No. 96-187.

IV

83040373229

RECEIVED
OFFICE OF
GENERAL COUNSEL

8 3 0 4 0 3 7 3 2 3 0

Federal Election Commission
Page Two
April 3, 1980

We appreciate having this opportunity to respond to the complaint and to demonstrate that no action should be taken against either National Conservative Political Action Committee or Conservatives Against Liberal Legislation in response to the complaint.

National Conservative Political Action Committee and Conservatives Against Liberal Legislation are independent legal entities. National Conservative Political Action Committee is a corporation which was organized on August 12, 1975 under and by virtue of the District of Columbia Non-profit Corporation Act. A copy of its Articles of Incorporation is submitted herewith as Exhibit 1. Furthermore, National Conservative Political Action Committee is a multicandidate political committee under 2 U.S.C. 431(4)(A) and 2 U.S.C. 441a(4).

Conservatives Against Liberal Legislation is a corporation which was organized on September 23, 1977 under and by virtue of the Virginia Nonstock Corporation Act. Furthermore, it has been determined by the Internal Revenue Service to be an organization described in section 501(c)(4) of the Internal Revenue Code. A copy of its Articles of Incorporation, as amended, and a copy of the determination by the Internal Revenue Service are submitted herewith as Exhibit 2.

In the fall of 1979, Conservatives Against Liberal Legislation sponsored and conducted a program which was designated and known as "Kennedy Truth Squad, a project of Conservatives Against Liberal Legislation." The subject matter of the program, as reflected in the letter submitted with the complaint, consisted of an expression of views on the legislative policies of Senator Kennedy. It is submitted that the letter and the additional communications referred to therein did not expressly advocate the election or defeat of a clearly identified candidate. (See, Federal Election Commission v. Central Long Island Tax Reform Immediately Committee et al., No. 79-3014 (CA-2 1980).) Furthermore, as stated in the affidavit of the Chairman of Conservatives Against Liberal Legislation which is submitted herewith as Exhibit 3, the program was conducted prior to the time that

8 3 0 4 0 3 7 3 2 3 1

Federal Election Commission
Page Three
April 3, 1980

Senator Kennedy became a candidate for election as President. As a result, neither the communication, the expenses incurred in connection with the program, nor the contributions received to conduct the program was or is subject to the provisions of the Federal Election Campaign Act of 1971, as amended.

In December, 1979, National Conservative Political Action Committee commenced a program of making independent expenditures in opposition to the election of Senator Kennedy. A sample of one communication, which was produced and published by National Conservative Political Action Committee as an independent expenditure, was attached to the complaint. That advertisement, which appeared in the Manchester (N.H.) Union Leader on February 22, 1980, carried a disclaimer, "Paid for by the Kennedy Truth Squad, a project of National Conservative Political Action Committee and not by any candidate."

While the complaint filed by Kennedy for President appears to suggest the existence of an entity known as the Kennedy Truth Squad, no such separate entity exists. In its activities, which took place prior to the time Senator Kennedy became a candidate for President, all communications issued by Conservatives Against Liberal Legislation made it clear that the Kennedy Truth Squad was "a project of Conservatives Against Liberal Legislation." In its activities, which took place subsequent to the time Senator Kennedy became a candidate for President, all communications issued by National Conservative Political Action Committee made it clear that the Kennedy Truth Squad was a "project of National Conservative Political Action Committee" and that it was not authorized by any candidate. The common use of a phrase such as "Kennedy Truth Squad" neither constitutes, nor precipitates, a violation of any law. (Furthermore, there is no violation of 2 U.S.C. 432(e)(4) by reason of the fact the corporate and registered name of National Conservative Political Action Committee does not include the name of any candidate.)

In conclusion, it is submitted that no action should be taken against either National Conservative Political Action Committee or Conservatives Against Liberal Legislation in response to the complaint, because:

- (1) Conservatives Against Liberal Legislation, a Virginia corporation, undertook a program designed to express its views on legislative policies. Those expressions did not expressly advocate the election or defeat of a clearly identified candidate. This conduct is permissible under section 501(c)(4) of the Internal Revenue Code and it is not conduct subject to the provisions of the Federal Election Campaign Act of 1971, as amended.
- (2) Conservatives Against Liberal Legislation is not a political committee as defined in 2 U.S.C. 431(4) and it is not a connected organization relative to National Conservative Political Action Committee as defined in 2 U.S.C. 431(7).
- (3) As a result of the foregoing, Conservatives Against Liberal Legislation is not required to file a Statement of Organization under 2 U.S.C. 433 and it is not required to include notices on its literature as required by the Act prior to the enactment of Pub. L. No. 96-187.
- (4) By reason of the fact that Conservatives Against Liberal Legislation is not a political committee, it cannot be "affiliated" with National Conservative Political Action Committee under 2 U.S.C. 441(a)(5).
- (5) There is no separate entity known as Kennedy Truth Squad. Each organization identified itself on all communications for which it was responsible and made it clear that the Kennedy Truth Squad was "a project" of the sponsoring organization. The pursuit of common or similar goals or objectives is not prohibited and is not indicia of affiliation or connection.

83040373232

Federal Election Commission
Page Five
April 3, 1980

- (6) National Conservative Political Action Committee is a multicandidate political committee which has registered with, and which is reporting to, the Federal Election Commission. Its independent expenditure program in opposition to the election of Senator Kennedy has been conducted in accordance with 2 U.S.C. 431(17) and Part 109 of Title 11 of the Code of Federal Regulations.

Respectfully submitted on behalf of National Conservative Political Action Committee and Conservatives Against Liberal Legislation.

Sincerely,



J. Curtis Herge

Enclosures

83040373233

ARTICLES OF INCORPORATION

OF

NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL

RECEIVED

In compliance with the requirements of Chapter 20 APR 7 AM 9 40
of Title 13.1 of the Code of Virginia, the undersigned
hereby acts to form a non-stock corporation not for profit
and to that end sets forth the following:

ARTICLE I

The name of the corporation is: NATIONAL CONSERVATIVE
PUBLIC AFFAIRS COUNCIL, hereinafter referred to as the
Corporation.

ARTICLE II

The objects and purposes of the Corporation, which
is not formed for pecuniary profit or financial gain, shall
be exclusively to serve the public interest and to promote
social welfare by fostering and developing greater public
participation in governmental affairs in order to achieve
efficient operation and delivery of governmental services
which benefit the community, business and citizens in all
walks of life. To achieve those objects and purposes, the
Corporation shall conduct research on issues of public
importance; conduct conferences from time to time at which
members of the general public and representatives of government
may meet in a body for an exchange of views on matters of
public importance; report and disseminate the results of its
research, studies and conferences; and, promote and develop
cooperation among similar organizations, all to the end that
the general public may play a more enlightened role in the
activities of its government.

For the accomplishment of these purposes and
without, in any particular, limiting the generality of the
foregoing, the Corporation shall have the power to own,
operate, print, publish, manage and distribute such books,
magazines, papers and other literature for the dissemination

and exchange of information as will further the objects and purposes of the Corporation; to purchase, lease or otherwise acquire, and hold, own, use and operate, or mortgage or otherwise encumber, or sell, real and personal property as may be necessary to carry out the objects and purposes of the Corporation; to receive and maintain a fund or funds of real or personal property, or both, and, subject to the restrictions and limitations hereinafter set forth, to use and apply the whole or any part of the income therefrom and the principal thereof exclusively in furtherance of the objects and purposes of the Corporation.

No part of the net earnings of the Corporation shall inure to the benefit of any member, director or officer of the Corporation, or any private individual (except that reasonable compensation may be paid for services rendered to or for the Corporation affecting one or more of its purposes). The Corporation shall not participate in, nor intervene in (including the publication or distribution of statements), any political campaign on behalf of or in opposition to any candidate for public office.

Upon the dissolution of the Corporation or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively to organizations which would then qualify under the provisions of Section 501(c)(4), or successor Section, of the Internal Revenue Code and the Regulations thereunder as they now exist or as they may hereafter be amended. No member, director or officer of the Corporation, or any private individual, shall be entitled to share in the distribution or division of any of the corporate assets on dissolution of the Corporation.

Notwithstanding any other provision of this Certificate, the Corporation shall not conduct or carry on any activities not permitted to be conducted or carried on by an organization

~~exempt under Section 501(c)(4) of the Internal Revenue~~
Code and its Regulations as they now exist or as they may hereafter

be amended. Alternatively, the Corporation shall have the power to, and shall, conduct and carry on any activities required to be conducted or carried on in order to acquire and maintain a determination that it is an organization exempt under Section 501(c)(4). or successor Section, of the Internal Revenue Code and the Regulations thereunder as they now exist or as they may hereafter be amended.

ARTICLE III

The Corporation shall have no members.

ARTICLE IV

The Directors of the Corporation shall hold office for a term of one year, and until their respective successors have been elected and qualified, and shall, with the exception of the initial Directors, be elected by a majority vote of the Directors in office immediately preceding the expiration of each term. Any vacancy in the Board of Directors that still occur prior to the expiration of a term shall be filled by such person as shall be appointed by the Chairman of the Board of Directors and the person so appointed shall hold office until the expiration of the term to which he or she succeeded.

ARTICLE V

The post office address of the initial registered office is No. 7600 Old Springhouse Road, McLean, Virginia 22101, which is located in Fairfax County, Virginia. The name of its registered agent is J. Curtis Herge, who is a resident of Virginia and who is a member of the Virginia State Bar and whose business office is the same as the registered office of the Corporation.

ARTICLE VI

The number of Directors constituting the initial Board of Directors is three (3) and the names and addresses of the persons who are to serve as the initial Directors

Names

John T. Dolan

Addresses

3129 South 14th Street
Arlington, Virginia 22204

Roger J. Stone

20 East Windsor
Alexandria, Virginia 22301

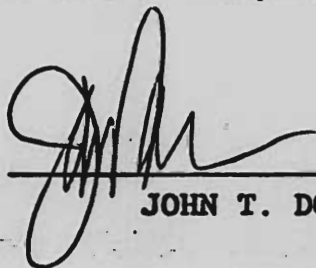
Frank J. Donatelli

1021 Arlington Boulevard
Arlington, Virginia 22209

ARTICLE VII

The period of duration of the Corporation is perpetual.

IN WITNESS WHEREOF, for the purpose of forming the Corporation under the laws of the Commonwealth of Virginia, the undersigned, Incorporator of the Corporation, has executed these Articles of Incorporation this 13th day of September, 1977.



JOHN T. DOLAN

STATE OF VIRGINIA)
COUNTY OF)

to-wit:

I, the undersigned Notary Public, in and for the State and County aforesaid, whose commission as such will expire on the 17th day of May, 1981, do hereby certify that on this day personally appeared before me in my said State and County, JOHN T. DOLAN, whose name is signed to the foregoing Articles of Incorporation of NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL, dated the 13th day of September, 1977, and he then and there acknowledged the same before me.

GIVEN under my hand and notarial seal this 13th day of September, 1977.


Notary Public



STATE CORPORATION COMMISSION

Richmond,

September 23, 1977

This is to Certify that the certificate of incorporation of

National Conservative Public Affairs Council

*was this day issued and admitted to record in this office
and that the said corporation is authorized to transact its
business subject to all the laws of the State applicable to
the corporation and its business.*

State Corporation Commission

George N. Bryant Jr.
First Assistant Clerk of the Commission

8304037238

ARTICLES OF AMENDMENT
OF
NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL

NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL, a Corporation organized and existing under and by virtue of the provisions of Chapter 2 of Title 13.1 of the Code of Virginia, hereby acts to amend its Articles of Incorporation and to that end sets forth the following:

A. The name of the Corporation is: NATICNAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL.

B. The amendment so adopted is to change the name of the Corporation from National Conservative Public Affairs Council to:

CONSERVATIVES AGAINST LIBERAL LEGISLATION

C. The Corporation has no members.

D. The amendment was adopted at a meeting of the Board of Directors held on August 15, 1979, at which time said amendment received the vote of at least two-thirds of the Directors in office.

E. The registered office of the Corporation is located in Fairfax County, Virginia.

IN WITNESS WHEREOF, the Corporation has caused these Articles to be executed by the Chairman of its Board of Directors and by its Secretary this 27th day of August, 1979.

NATIONAL CONSERVATIVE PUBLIC
AFFAIRS COUNCIL

By:

Rhonda K. Statton
Chairman

By:

Marilla Statton
Secretary

8304037240

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
OFFICE OF THE CLERK

RICHMOND, VA. 23209

September 5, 1979

10.00

RECEIVED OF

J. Curtis Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Ten and no/100----- DOLLARS

FOR National Conservative Public Affairs Council (changing name to
Conservatives Against Liberal Legislation)

on account of fees in connection with articles filed by the above corporation:

Filing Fee, \$5.00; Charter Fee, \$ --- ; Recording Fee, \$ 5.00

The certificate of AMENDMENT

was issued and admitted to record in this office on the date above written.

William C. Young

Clerk of the Commission

111
2
3
4
5
6
7
8

Address any reply to: 31 Hopkins Plaza, Baltimore, Md. 21201

Department of the Treasury

District Director

Internal Revenue Service

Date: **MAR 6 1978**

In reply refer to:

Telephone: (301) 962-4773

▷ **National Conservative Public Affairs
Council
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22205**

Internal Revenue Code: **Section 501(c) (1)**
Form 990 Required: ☒ Yes ☐ No
Accounting Period Ending: **December 31**

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under the provisions of the Internal Revenue Code section indicated above.

Unless specifically excepted, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$50 or more to each of your employees during a calendar quarter. And, unless excepted, you are also liable for tax under the Federal Unemployment Tax Act on remuneration of \$50 or more to each of your employees during a calendar quarter if, during the current or preceding calendar year, you have one or more employees at any time in each of 20 calendar weeks or pay wages of \$1,500 or more in any calendar quarter. If you have any questions about excise, employment, or other Federal taxes, please address them to this office.

If your purposes, character, or method of operation is changed, you must let us know so we can consider the effect of the change on your exempt-status. Also, you must inform us of all changes in your name or address.

The block checked at the top of this letter shows whether you must file Form 990, Return of Organization Exempt From Income Tax. If the Yes box is checked, you are only required to file Form 990 if your gross receipts each year are normally more than \$10,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, for failure to file the return on time.

8 3 0 4 0 3 7 3 2 1 3

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

Please keep this determination letter in your permanent records.
(Please see caveat below).

Sincerely yours.

Gerald G. Portney
District Director

As a social welfare organization contributions to you are not deductible by donors. You should advise your contributors to that effect.

cc: Mr. J. Curtis Henge
7600 Old Springhouse Road
Malvern, Virginia 22101

Address any reply to: 31 Hopson Plaza, Baltimore, Md. 21201

Department of the Treasury

**District Director
Internal Revenue Service**

Date: **MAR 21 1980** In reply refer to: **CSB:Control II:J.Stru**
Telephone: **(301) 962-3280**

▷ **Conservatives Against Liberal Legislation
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209**

Date of Exemption: **March 6, 1978**
Internal Revenue Code Section: **501(c)(4)**

Gentlemen:

Thank you for submitting the information shown below. We have made it a part of your file.

The changes indicated do not adversely affect your exempt status and the exemption letter issued to you continues in effect.

Please let us know about any future change in the character, purpose, method of operation, name or address of your organization. This is a requirement for retaining your exempt status.

Thank you for your cooperation.

Sincerely yours,

**Teddy R. Kern
District Director**

	<u>Item Changed</u>	<u>From</u>	<u>To</u>
Name		National Conservative Public Affairs Council	Above

cc: **J. Curtis Herge
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22101**

83040373244

8 3 4 0 3 7 3 2 4 5
This is to certify
corporation
very complete
very authentic
Virginia in
a law of

Office of Recorder of Deeds

CORPORATION DIVISION

WASHINGTON



This is to certify that the pages attached hereto constitute a full, true, and complete copy of CERTIFICATE AND ARTICLES OF INCORPORATION OF NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, AS RECEIVED AND FILED AUGUST 12, 1975.

as the same appears of record in this office.

In Testimony Whereof,

I have hereunto set my hand and caused the seal of this office to be affixed, this

the 13th day of

AUGUST

A. D. 1975

PETER S. RIDLEY,

Recorder of Deeds, D. C.

By

Louis H. Cole

Assistant Superintendent of Corporations, D. C.

P-3644

OFFICE OF RECORDER OF DEEDS. D. C.

Corporation Division
Sixth and D Streets, N. W.
Washington, D. C. 20001

CERTIFICATE

THIS IS TO CERTIFY that all provisions of the District of Columbia
Non-profit Corporation Act have been complied with and ACCORD-
INGLY this Certificate of Incorporation

is hereby issued to the NATIONAL CONSERVATIVE POLITICAL ACTION
COMMITTEE

as of the date hereinafter mentioned.

Date August 12, 1975

PETER S. RIDLEY,
Recorder, of Deeds, D. C.

David H. Cole
David H. Cole
Superintendent of Corporations

INDEXING FEE

2.00
8/3/75

ARTICLES OF INCORPORATION
OF
NATIONAL CONSERVATIVE POLITICAL
ACTION COMMITTEE

To: The Recorder of Deeds, D.C.
Washington, D.C.

We, the undersigned natural persons of the age of twenty-one years or more, acting as incorporators of a corporation under Title 29 Chapter 10 of the Code of Laws of the District of Columbia, the District of Columbia Nonprofit Corporation Act, adopt the following Articles of Incorporation for such corporation:

FIRST: The name of the corporation is NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE.

SECOND: The period of its duration is perpetual.

THIRD: The purposes for which the corporation is organized are as follows:

The corporation is organized and shall be operated primarily for the purpose of directly or indirectly accepting contributions or making expenditures or both for influencing or attempting to influence the selection, nomination, election or appointment of any individual to any Federal, State, or local public office or office in a political organization, or the election of Presidential or Vice-Presidential electors, whether or not such individual or electors are selected, nominated, elected, or appointed.

The corporation is organized and shall be operated to engage in any and all activities provided for and intended by 26 U.S.C. 5527.

The corporation may engage in any activity for

FILED

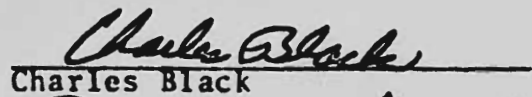
AUG 12 1975

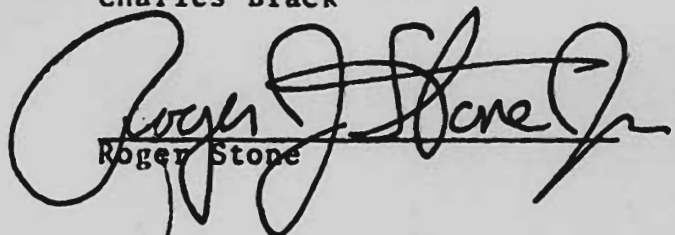
BY: ASHC

Arlington, Virginia 22204

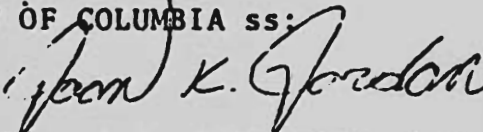
Date: August 12, 1975


J. David Nickles

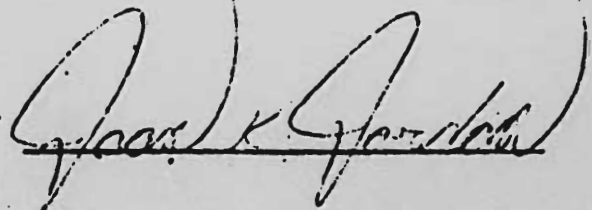

Charles Black


Roger Stone

DISTRICT OF COLUMBIA ss:

I, , a Notary Public in and for the District of Columbia, hereby certify that on the 12th day of August 1975, personally appeared before me, J. David Nickles, Charles Black, and Roger Stone who signed the foregoing document as incorporators, and stated that the statements herein contained are true.




Joan K. Jordan

which corporations may be organized under the District of Columbia Nonprofit Corporation Act and may carry on any other business in connection with the foregoing, and exercise all powers conferred by said Act.

The corporation shall have the power to do all things necessary and appropriate to carry out the above purposes under the laws of the District of Columbia and the United States for such a corporation.

FOURTH: The corporation shall have no members

FIFTH: The provisions for the regulation of the internal affairs of the corporation and the manner of the election or appointment of directors shall be established in the corporation's By-Laws.

SIXTH: The address, including street and number of the initial registered office of the corporation is 918 16th Street, N.W., Washington, D.C. 20006; and the name of its initial registered agent at such address is CT Corporation System.

SEVENTH: The number of directors constituting the initial Board of Directors is three and the names and addresses of persons who are to serve as the initial directors until their successors are elected and qualified are:

<u>Names</u>	<u>Addresses</u>
J. David Nickles	430 M Street, S.W. Washington, D.C. 20021
Charles Black	3709 Colonial Avenue Alexandria, Virginia 22309
Roger Stone	5907 S. 5th Road Arlington, Virginia 22204

EIGHTH: The name and address of each incorporator is:

<u>Names</u>	<u>Addresses</u>
J. David Nickles	430 M Street, S.W. Washington, D.C. 20021
Charles Black	3709 Colonial Avenue Alexandria, Virginia
Roger Stone	5907 S. 5th Road



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge
Sedam and Herge
7600 Old Springhouse Road
McLean, VA 22102

RE: MUR 1192

Dear Mr. Herge:

The Federal Election Commission notified your clients, National Conservative Political Action Committee ("NCPAC") and Conservatives Against Liberal Legislation ("CALL") on March 24, 1980, of a complaint which alleges that your clients may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, the Commission, on , 1980, determined that there is no reason to believe that NCPAC or CALL violated 2 U.S.C. § 441d. In addition, the Commission decided to take no action at this time with respect to alleged violations of 2 U.S.C. § 434 and former § 435(b). However, the Commission found reason to believe that CALL violated 2 U.S.C. § 441b(a). Section 441b(a) makes it unlawful for any corporation to make an expenditure in connection with any federal election. Specifically, it appears that CALL's expenditures for its Kennedy Truth Squad mailing and solicitation were made in connection with the Presidential primary elections of 1980.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. In addition, please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

83040373250

Letter to J. Curtis Herge
Page 2
MUR 1192

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Robert Bogin, at 202/523-4529.

Sincerely,

Max L. Friedersdorf
Chairman

Enclosure

Interrogatories

83040373251

FEDERAL ELECTION COMMISSION

MUR 1192: QUESTIONS TO BE ANSWERED BY CALL.

1. What was the total cost of preparing and mailing the letter and solicitation entitled Kennedy Truth Squad that was attached to the complaint? (costs include but are not limited to materials, staff time, stamps, etc.)

2. How many of these letters and solicitations were mailed?

3. What was the source of funding for these expenditures?

4. Were these costs paid for out of the general treasury of CALL?

5. How much money did CALL gross as a result of its Kennedy Truth Squad solicitation?

6. Please submit any other document paid for by CALL in connection with its Kennedy Truth Squad project.

83040373252



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MW*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: OCTOBER 24, 1980
SUBJECT: MUR 1192 - Interim Investigative Report #1,
dated 10-22-80; Received in OCS 10-22-80,
2:57

The above-named document was circulated to the
Commission on a no-objection basis at 11:00, October 23, 1980.

There were no objections to the Interim Investigative
Report at the time of the deadline.

83040373253

October 22, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1192

Please have the attached Interim Invest Report distributed to the Commission. Thank you.

83040673254

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OCT 22 1980
P 2: 57

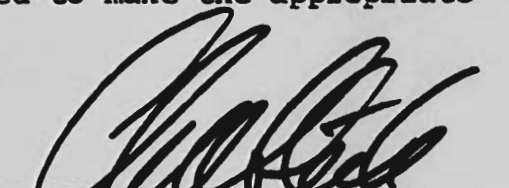
In the Matter of)
)
Conservatives Against)
Liberal Legislation)

MUR 1192

INTERIM INVESTIGATIVE REPORT #1

On September 3, 1980, the Commission found reason to believe that Conservatives Against Liberal Legislation violated 2 U.S.C. § 441b by making expenditures from general treasury funds in connection with the Democratic Presidential primaries of 1980. The Commission sent respondent a letter of notification as well as some interrogatories. In a letter dated September 29, 1980, counsel for CALL responded to the Commission's reason to believe finding. This response included answers to the interrogatories. The Office of General Counsel is in the process of reviewing counsel's response and will be prepared to make the appropriate recommendation in three weeks.

22 Oct 1980
Date


Charles N. Steele
General Counsel

83040373255



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: DECEMBER 16, 1980
SUBJECT: MUR 1192 - Interim Investigative Report #2,
dated 12-12-80; Received in OCS 12-15-80,
1:08

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 4:00, December 15, 1980.

There were no objections to the Interim Investigative Report at the time of the deadline.

83040373256

December 1,5 1980

MEMORANDUM TO: Marjorie W. Emons

FROM: Elissa T. Garr

SUBJECT: MUR 1192

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

83040373257

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
COMMISSION SECRETARY

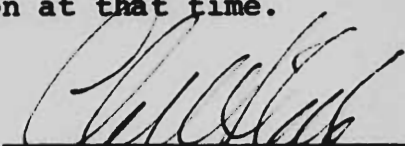
In the Matter of
Conservatives Against Liberal
Legislation (CALL)

) 80 DEC 15 P 1: 08
)
)
)
)

INTERIM INVESTIGATIVE REPORT #2

Counsel for CALL responded to the questions accompanying the Commission's reason to believe notification. This response raised further questions concerning CALL's activities and whether these activities were in connection with a federal election. Consequently questions have been drafted and sent to counsel. We will forward any response received from CALL to the Commission and make the appropriate recommendation at that time.

12 December 1980
Date



Charles N. Steele
General Counsel

83040373258



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 22, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22101

RE: MUR 1192 (80)

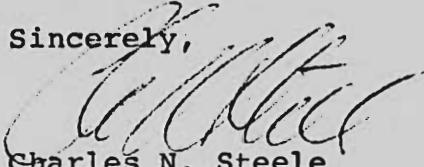
Dear Mr. Herge:

On September 10, 1980, Conservatives Against Liberal Legislation (CALL) received notification that the Commission had found reason to believe that CALL had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. At that time, CALL was requested to answer certain questions and to supply information in connection with the alleged violation. The Commission is in receipt of your letter dated September 29, 1980, wherein you answer the questions posed. The answers to these questions were not entirely responsive. Specifically, you did not state whether the expenditures for CALL's undertakings were from its general treasury.

In order to proceed in its investigation, the Commission needs information concerning CALL's finances. Consequently, additional questions are enclosed which require CALL to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended and Chapters 95 and 96 of Title 26, U.S. Code.

The Commission requires that CALL submit the information under oath and that CALL do so within ten days of receipt of this letter. If you have any questions please direct them to Robert I. Bogin, the attorney handling this matter, at 202/523-4000.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

830403732239

83040373260

Bogus MUR 1172

Form 3811, Jan. 1975

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:
J. Curtis Hoge

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO.
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE *Donna O. Hoge* CLASSROOM CLASSIFIED COPY

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

★ GPO : 1975-200-000

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

FEDERAL ELECTION COMMISSION

QUESTIONS

RHONDA K. STAHLMAN

MUR 1192 (80)

Attached to these questions are Exhibits I-VI which were submitted by CALL in response to a request that all documents paid for by CALL in connection with its Kennedy Truth Squad project be submitted to the Federal Election Commission. Please refer to these Exhibits when responding to the questions below.

1. a. For each of the following exhibits state on or about what date did CALL mail, distribute or otherwise disseminate the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
 - g. Exhibit VII?
2. a. For each of the following exhibits state what was the total cost (costs include, but are not limited to, materials, labor, overhead, stamps, salaries, etc.) of preparing and disseminating the papers marked as:
 - a. Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?

83040373261

3. Does CALL have a checking account(s)? If so, please state the name of the bank and the account number of each account maintained by CALL.
4. Does CALL have a savings account(s)? If so, please state the name of the bank and account number of each savings account maintained by CALL.
5. On July 24, 1980, which is the date that the first Kennedy Truth Squad communications were issued, how much "cash on hand", as that term is defined at 11 C.F.R. § 104.3(a)(1), did CALL have?
6.
 - a. How much money did CALL gross as a result of its Kennedy Truth Squad solicitation marked as Exhibit I?
 - b. Exhibit II?
 - c. Exhibit III?
 - d. Exhibit IV?
 - e. Exhibit V?
 - f. Exhibit VI?
7.
 - a. Did CALL make any expenditures out of its general treasury funds in connection with any of the Kennedy Truth Squad projects?
 - b. If the answer to 7a. is yes, what was the total amount of these expenditures?
8. What is the relationship, if any, between CALL and the National Conservative Political Action Committee (NCPAC)? In your answer please explain the role that John T. Dolan plays with respect to CALL and whether CALL and NCPAC share common office space, employees, and/or offices.
9.
 - a. Has CALL ever received money or anything of value from the National Conservative Political Action Committee (NCPAC)? If so, please state the date, circumstances, and amount of money or value received.
 - b. Has NCPAC ever loaned CALL money or anything of value? If so, please state the date, circumstances and amount of the loan.

83040373262

Rhonda K. Stahlman
Page Three
Questions - MUR 1192 (80)

10. Other than money received through the solicitation efforts of the Kennedy Truth Squad projects, what other source of monies does CALL have?
11. Does CALL have any members? If so, do these members pay dues? How many members does CALL have? What are the standards for membership in CALL? What is the dues structure?
12. List all officeholders of CALL and office held since January 1, 1979.
13. Who were the principal authors of Exhibits I-VI?
14. How was it decided which people were to be sent Exhibits I-VI?

8 3 0 4 0 3 7 3 2 6 3



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Patriot,

Will you help us buy television time and send some of America's leading patriots across the country to warn our fellow Americans about Edward Kennedy's disarmament record? Please -- nobody has taken on this obligation yet. But we must -- soon.

As the Russian menace grows, Senator Edward Kennedy lends his powerful voice to the Liberals' SALT II chorus.

"The military power of the United States remains unequalled in the world," Kennedy says in speeches to the American people.

But Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, strongly disagrees with Kennedy. General Rowny has resigned from the armed forces, after dozens of years of distinguished service, in order to warn America about SALT II.

And here at home, Jimmy Carter and Kennedy have joined forces on a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any felony. How much longer can our nation survive if the FBI's work becomes a crime?

And Kennedy has harmed our national security in many more ways with his leftist votes.

* He has helped give American technological aid to Russia, even though he knows that the Communists will use our technology to make bigger and better weapons.

* Kennedy pushes for relations with Castro's Cuba,

-more-

EXHIBIT I

pg 1 of 4

83040373264

even though FBI reports show that Cuba has trained American terrorists like the Weathermen.

And Kennedy ignores this chilling fact: Last year Cuba took delivery of 18 Russian MIG Bombers. Skilled Soviet pilots have also been sent to Cuba -- only 90 miles away from our southern shore. There are no American air defenses in the southern United States -- or anywhere else in the nation, thanks to liberal leaders like Kennedy.

* Kennedy helped kill the magnificent new B-1 Bomber and improved Minuteman Missile. He helped slow the new Trident Submarine in the production line. Military experts warn that we must have all three weapons right away.

* Moreover, it was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System this country had.

There will be many more crucial national security battles in the next year. SALT II could be ratified. Kennedy will play a major role in the Liberals' disarmament crusade. He could influence millions of voters -- unless we warn our fellow Americans.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular?

I think the answer is simple: Most Americans don't know what Senator Kennedy is really up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his dangerous disarmament record.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help if we are to succeed in spreading the truth about Kennedy.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Leading Congressmen and military men will sign on. Three media and advertising experts (who are also dedicated patriots) have joined the Kennedy Truth Squad. We are ready to warn the nation. All we need is the money to do the job.

Using your dollars, Congressmen and retired officers

83040373235

can travel the nation to warn Americans who don't know about Edward Kennedy's disarmament record.

We will also run TV, radio, and newspaper ads exposing Kennedy's leading role in disarming the United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full page newspaper ads in towns and cities across the country.

Unless we pay for trips by leading patriots to towns and cities across America.

So please support the Kennedy Truth Squad with a generous contribution today. Please invest in America's future -- before time runs out.

If you can afford to invest \$1000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for you help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order payable to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

And please sign the enclosed Message to Edward Kennedy and send it back to us with your contribution. We will deliver your Message and thousands of other Messages to Senator Kennedy himself.

P.P.S. If you have contributed to the Kennedy Truth Squad and would like to see the scripts of our radio and television ads -- or a list of the stations we have scheduled to run these ads, please write to: Chairman's Office, Conservatives against Liberal Legislation, Suite 515, 1500 Wilson Blvd., Arlington, Virginia 22209.

83040573256

Z1

Statement of Support

SENATOR KENNEDY: I OPPOSE YOUR DISARMAMENT
POLICIES. I SUPPORT THE Kennedy Truth Squad.

(Signed)

(Please do not rip off Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's disarmament policies to the American people.

Here's my investment in your campaign:

____ \$500	____ \$400	____ \$300	____ \$200
____ \$100	____ \$50	____ \$40	____ \$30
____ \$20	____ \$	Other	

My check is made out to the National Conservative Public
Affairs Council, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy. Please send information to: (Use other side - do not write on back of Statement of Support.)

pg 4 of 4



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading conservatives across the country to warn our fellow Americans about Edward Kennedy's liberal policies? Please -- nobody has taken on this obligation yet. But we must -- soon.

If the American people knew how radical Senator Edward Kennedy really is, he would not be their first choice in the Presidential Polls. But the news media like Teddy. So voters have never heard the truth about Kennedy.

Kennedy's Senate staff is bigger than any other Senator's or Congressman's. In fact, Kennedy's staff is bigger than Vice President Mondale's staff. Obviously, Kennedy has big plans.

Consider what he has done already:

** As the Russian menace grows, Kennedy adds his powerful voice to the liberals' SALT II chorus -- and takes a leading role selling the disarmament pact to the American people.

It doesn't bother Kennedy that Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, has resigned from the armed forces, after dozens of years of service, in order to warn our fellow Americans about SALT II.

** With Jimmy Carter's help, Kennedy has drafted a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any

-more-

EXHIBIT II

ps 1 of 6

8304037326E

8 3 0 4 0 3 7 3 2 6 9
felony.

How much longer can our nation survive if the FBI's work becomes a crime?

** It was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System the United States had.

** It was Kennedy who helped stop the magnificent new B-1 Bomber in production and slow the indestructible Trident Submarine. And he opposed modernization of our Minuteman Missiles, which were put together during the era his brother was President.

But Edward Kennedy is not satisfied with the ruin he's helped make of our national security.

Consider:

** His socialized medicine scheme threatens to break the back of the taxpayer. Its pricetag: at least \$63 billion -- in the first year of the program alone.

** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending...while even liberal Time magazine calls for smaller federal budgets.

** Kennedy favors federal funding of abortion. He voted NO to Senator Orrin Hatch's bill to stop federal funding. And he uses his influence to hurt the Pro-Life Movement.

** Kennedy has been a leader in the feminists' fight to impose the Equal Rights Amendment on America. He voted to extend ERA ratification time. The ERA is still losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side. Will he be more powerful than ever?

Unless we join forces soon, I think he will be.

Why?

I think the answer is simple: Most Americans don't know what Senator Kennedy is up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his most outrageous schemes.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help

if we are to succeed in spreading the truth about Kennedy.

Leading Congressmen, military men, economists, doctors, lawyers, and students will sign on. Three conservative media and advertising experts are ready to go to work. The Kennedy Truth Squad is ready to warn the nation. All we need now is money to do the job.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Congressmen and other conservative leaders will travel the nation to explain to the American people what Edward Kennedy is up to.

We will also run television, radio, and newspaper ads exposing Kennedy's leading role in disarming America and pushing not only SALT II, but also federal funding of abortion, even higher taxes, socialized medicine, and the Equal Rights Amendment.

Senator Kennedy gets free media time from his friends at the major television and radio networks and newspapers.

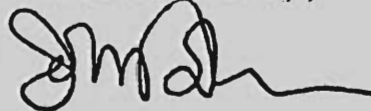
But we can't get the true side of the Kennedy story across unless we spend the money for television and radio ads. Unless we spend the money for full page newspaper ads in towns and cities across the country. Unless we send Kennedy Truth Squad speakers to towns and cities across the country.

So please support the Kennedy Truth Squad with a generous contribution today. Invest in America's future - before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20, you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to

Conservatives against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

Copies of the radio and television scripts and a
list of the stations we have scheduled to run ads, may
be obtained by sending a self-addressed envelope to
the Office of the Chairman at the above address.

P.P.S. Please sign the enclosed Message to Edward
Kennedy and return it to us with your contribution.
I will personally deliver your Message to Senator Kennedy
himself...along with thousands of other Messages. So
please help us reach our fellow Americans today. Be as
generous as you can.

83040373271

Message to Edward Kennedy

Senator Kennedy: I oppose your radical policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's radical policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 5 of 6

8 3 0 4 0 3 7 3 2 7 3

pg 6 of 6



NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Taxpayer,

Let's not kid ourselves: Proposition 13 and talk of a tax limitation amendment haven't helped.

The government still takes a big bite out of your paycheck. And government-caused inflation takes another huge bite of your income.

Senator Edward Kennedy's spending schemes -- his campaign for over one hundred billion dollars more government spending each year -- threaten us more than any liberal force in the country. Right now -- Senator Kennedy is more dangerous than any liberal.

Yet Kennedy's future is bright.

Many polls (not all of them liberal polls) show the American people want Kennedy to be our next President.

Teddy gets good publicity from CBS, NBC, and ABC. Most of the major radio networks and newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV, radio, and in the newspapers. They don't know...

-- that Kennedy's socialized medicine scheme would cost us at least \$63 billion in its first year alone

-- about Kennedy's role in the forced taxpayer loan to New York City that cost us at least \$2.3 billion

-- that Kennedy cost us \$25-30 billion when he helped beat the Kemp-Roth 33% tax cut plan

-- that Kennedy loudly campaigns against any kind

-more-

EXHIBIT III

pg 1 of 5

83040373274

of tax limitation or federal budget balancing

-- that Kennedy's staff -- larger than any other Senate staff, and larger even than Vice President Mondale's staff -- has a mountain of new bureaucracy proposals ready for Teddy to push. He likes to call them "antitrust" laws. They'll ruin many a good business, and they'll cost hundreds of millions to enforce.

Our fellow taxpayers don't know these facts about Kennedy. And of course, CBS, NBC, and ABC aren't telling them.

So it is up to us to warn our fellow taxpayers. And unless we warn them very soon, I think Kennedy will grow more powerful than ever.

But we can stop Teddy and his liberal policies cold.

The Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

We are ready to warn the nation. Leading Congressmen and economists can travel the country to warn taxpayers who don't know about Kennedy's big spending record. But we need your dollars to pay their travel expenses.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in bankrupting the taxpayer.

Three media and advertising experts have joined the Kennedy Truth Squad. The work they do could make the difference.

To turn the country against Kennedy's liberal policies, I think it will take a matter of a few months of warnings to taxpayers across the country that Kennedy is helping to bankrupt them.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

We must cover the nation with our message. Television ads can reach hundreds of thousands of voters at once. Radio ads are an excellent investment -- they reach tens of thousands.

Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page Kennedy

-more-

pg 2 of 5

8304037327

ad in the Washington Post will cost us at least \$8,000!

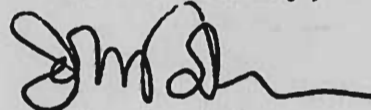
So please -- support the Kennedy Truth Squad today, and be as generous as you possibly can.

Your contribution is an investment in the future of America: If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water. And then America dies.

So please, if you can afford to invest \$1,000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. Even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself... along with thousands of other Messages. So please help us reach our fellow taxpayers today. Be as generous as you can.

Message to Edward Kennedy

Senator Kennedy: I oppose your big spending policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's big spending policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5



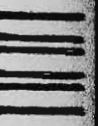
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION



NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



Pg 5 of 5

8 3 0 4 0 3 7 3 2 7 8



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading pro-family leaders across the country to warn our fellow Americans about Edward Kennedy's anti-family record?

Please -- nobody has taken on this obligation yet. But we must -- soon.

It is hard to blame one liberal for destroying family life in America. For rampant homosexuality. For the six million abortions in the United States since 1973. For the Equal Rights Amendment threat.

We certainly cannot blame Senator Edward Kennedy for all this.

But Senator Kennedy is popular and very influential. For example, many polls (not all of them liberal polls) show the American people today choose Kennedy over any other candidate for President.

Yet consider how dangerous Kennedy's policies are:

--- He voted to extend ratification time for ERA. When the National Organization for Women plots strategy, they can count on Teddy. Yes, the ERA is losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side, more powerful than ever, if we don't act now.

--- Senator Orrin Hatch tried to stop federal funding of abortion with his bill. Senator Kennedy voted NO -- and has helped rally abortionists ever since.

--- Senator Kennedy helped beat Senator Jessie Helms' school prayer bill. He called Helms' bill a

-more-

EXHIBIT IV

pg 1 of 5

830403373279

threat to the Constitution.

--- If you call Senator Kennedy's office and ask for Kennedy's position on homosexuals, you will get this answer: Kennedy believes in "equal protection under the law for all citizens."

In other words, Kennedy wants homosexuals to enjoy all the same rights as normal Americans.

Any Senator who takes positions like these is dangerous, but what makes Kennedy especially dangerous is this: He has big plans.

His liberal staff is bigger than any other Senator's or Congressman's -- and bigger even than Vice President Mondale's staff.

But CBS, NBC, and ABC aren't saying a bad word about Teddy's obvious power grab. They (and most of the press) hide Teddy's far left policies, too.

Worse, few on our side protest Kennedy's policies -- even though he is probably the single biggest enemy of family life in the United States today.

But now we have the Kennedy Truth Squad. Good Congressmen and several defenders of family life will join forces. Three media and advertising experts have signed on to do TV, radio, and full-page newspaper ads that expose Kennedy's record.

The Kennedy Truth Squad is ready to warn the nation. Frankly, all we need now is money to do the job. Please help today.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular? I think you already know the answer: Most Americans don't know what Kennedy is up to.

I think it is up to us to warn the nation right away. The Kennedy Truth Squad will do just that. But we must have your help.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away -- before it's too late.

Using your dollars, some of the most distinguished

conservative members of Congress and other respected defenders of family life will travel the country, visiting towns and cities to warn Americans about Kennedy's record on abortion, the ERA, school prayer, and homosexuals.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in ruining family life and the moral health of our beloved United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full-page newspaper ads in towns and cities across the country.

Unless we pay for trips to towns and cities by leading conservatives and defenders of family life.

So please support the Kennedy Truth Squad with a generous contribution today. Please -- invest in America's future. Before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Sincerely,

Rhonda K. Stahlman
Rhonda K. Stahlman
Chairman

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself...along with thousands of other Messages. So please help us reach our fellow Americans today. Be as generous as you can.

pg 3 of 5

83040373281

Message to Edward Kennedy

Senator Kennedy: I oppose your anti-family policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's anti-family policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

pg 4 of 5



BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES

Pg 5 of 5

2 8 2 3 7 3 0 4 0 3 0 3 8



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

I want to deliver a personal MESSAGE to Edward Kennedy
from you.

Your MESSAGE is that you're putting him on notice: he
can no longer hide his liberal policies of big spending and
tax raises.

Please sign your MESSAGE to Kennedy and send it back
to me.

And please join our Kennedy Truth Squad to help spread
the truth about Kennedy's inflationary tax policy.

Our group, Conservatives Against Liberal Legislation,
is made up of experienced conservatives who can and will
educate Americans about the liberals' programs.

What's more, our Kennedy Truth Squad is the ONLY project
geared up and ready to go NOW to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join the Kennedy Truth
Squad because you've already shown your commitment to lower
taxes.

Let's not kid ourselves: Proposition 13 and talk of a
Tax Limitation Amendment have not yet stopped your taxes
going up. The government still takes a big bite out of
your income. And government-caused inflation takes another
huge bite.

Kennedy's future is bright.

If the American people knew how radical Kennedy's policies
really are he wouldn't be their first choice in the Presidential
polls.

As you know, Teddy gets free publicity from the major

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT V

pg 1 of 7

TV and radio networks. Many newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV and radio and read in the papers. They don't know that:

- Kennedy's SOCIALIZED MEDICINE SCHEME would cost us at least \$63 billion in its first year alone.
- Kennedy's role in the forced TAXPAYER BAIL-OUT of NEW YORK CITY cost us at least \$2.3 billion.
- Kennedy cost us \$25-80 billion when he helped BEAT the Kemp-Roth tax cut plan.
- Kennedy loudly campaigns AGAINST any kind of tax limitation or federal budget balancing.
- Kennedy's staff is larger than any other Senate staff, and larger even than Vice President Mondale's staff.
- Kennedy is pushing for new "anti-trust" laws. But you know they'll ruin many a good business. And they'll cost us taxpayers hundreds of millions to enforce.

So it's up to you and me to educate our fellow-taxpayers. And unless we tell them right now, Kennedy will grow more powerful than ever.

But we can expose Teddy's anti-taxpayer policies.

Starting this fall, the Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

- * Leading Congressmen are scheduling news conferences about Kennedy's policies. They plan to travel the country to warn taxpayers about Kennedy's big spending record.
- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in bankrupting you, the taxpayer.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas to concerned taxpayers who've already shown they'll work and act to stop Kennedy.

To turn the country against Kennedy's liberal policies will take months of warnings. So we must start right now.

Can we do it? Yes, recently our group played a vital role

Page three

in stopping taxpayer financing of elections. We successfully ran a voter-mailing campaign to influence U.S. Congressmen.

Now, with your help, we must cover the nation this fall with our Kennedy message:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$4,600 or more.

Kennedy gets free media time from his friends at the major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television and radio ads and voter mailings.

Only if we spend money for full-page newspaper ads in towns and cities across the country.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in a leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 320 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water.

If you can afford to invest \$100 or \$50, your check will go a long way toward spreading the Kennedy Truth Squad's message.

But even if you can send just \$25, \$15, even \$10 at this

pg 3 of 7

Page four

time, you'll help greatly to get the Truth Squad launched right now.

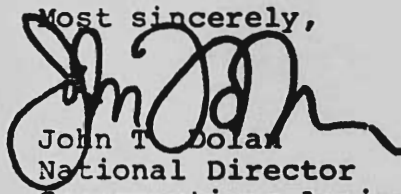
And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation. Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell America about Kennedy's big-spending liberalism.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director
Conservatives Against Liberal Legislation

TD/tpv

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

831040373237

With your help we can place ads like this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE — and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

Cuts in federal budget authority and outlays in 1980

AMOUNT
\$1 BILLION

Cuts in foreign aid, countercyclical public service jobs, health programs, federal travel spending, categorical state grants.

\$10 BILLION

Cuts in transportation, economic development, health, social programs, welfare, categorical state grants totalling:

\$24.4 BILLION



Cuts to provide "no real growth" in federal spending

\$12 BILLION

1% attrition in the federal work force and cuts in bureaucrats' overtime pay, film making and travel expenses.

\$1.1 BILLION

TOTAL

\$48.5 BILLION

When it comes to cutting YOUR taxes, Senator Kennedy says NO!

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll send you FREE a copy of our TV and radio scripts about Teddy Kennedy's liberal programs.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044

pg 5 of 7

AD/tp

8 4 0 3 7 3 2 8 9

Message to Senator Edward Kennedy
Senator Kennedy:

I oppose your big-spending anti-taxpayer policies.

Your socialized medicine plans will cost the taxpayer \$63 billion the first year.

You've voted against

- * the Kemp-Roth tax cut plan
- * tax limitation
- * federal budget balancing

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy's policies.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH
ABOUT KENNEDY'S LIBERAL PROGRAMS:

() \$500 () \$250 () \$100 () \$50

() \$25 () \$15 () \$10 () \$ Other.

My check is made out to Conservatives
Against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

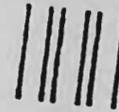
City _____ State _____ Zip _____

pg 6 of 7

CF/Mtp

3040373200

B-tp



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit #11973
Washington, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044



pg 7 of 7



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy
from you.

Your message is that you're putting him on notice:
Kennedy can no longer hide his record of voting the BIG
LABOR BOSSES' LINE.

Please sign your MESSAGE to Kennedy and send it back
to me.

And please join our Kennedy Truth Squad to spread the
truth about Kennedy's support for Big Labor.

Quite frankly, I want you to join the Kennedy Truth
Squad because I feel you are strongly opposed to big labor
control of our economy and politics.

If the American people knew how radical Kennedy's
policies are, he wouldn't be their first choice in the
Presidential polls.

Yet, the AFL-CIO gives Kennedy a 100% rating: he's voted

FOR: Common Situs picketing to let building workers
strike a whole construction site against one contractor

FOR: repeal of the Hatch Act, to let bureaucrats and postal
workers get involved in politics

FOR: "labor law reform", a thinly disguised license for
big unions to undermine the right to work.

Our group, Conservatives Against Liberal Legislation,
(C.A.L.L.), is made up of experienced conservatives who can
and will expose liberal programs for what they are.

What's more, our Kennedy Truth Squad is the only project
geared up and ready to go NOW to expose Kennedy's pro-union

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

EXHIBIT VI

pg 1 of 6

83040373221

Page two

bosses policies.

No one else has taken on this responsibility.

Yet big labor has adopted Kennedy as its Crown Prince. Look at William Winpisinger, a self-confessed ideological socialist. He and his International Association of Machinists are promoting Kennedy almost as if they were his staff members.

Kennedy voted FOR big labor on:

- 1) increasing the minimum wage by 50% or pegging it to inflation
- 2) guaranteed full employment - jobs for everyone whether they're needed or not (the Humphrey-Hawkins bill)
- 3) collective bargaining and union recognition in the Civil Service
- 4) a separate Department of Education. If you thought H.E.W. was a hive of bureaucracy, imagine this new creation, beloved of the left-leaning National Education Association.

By contrast Kennedy voted AGAINST:

- 1) protecting the right to work of non-union teachers, and against
- 2) Senator Thurmond's bill to outlaw military unions.

Union bosses like George Meany, Jerry Wurf of the American Federation of State, County, and Municipal Employees, William Winpisinger, all rely on Kennedy to carry out their wishes.

If we don't join forces soon, Kennedy's programs will grow more widespread than ever.

Why is Kennedy so popular?

Simple. Most Americans don't know how really liberal Kennedy's policies are.

So it's up to you and me to warn our fellow Americans.

Together we can educate millions of Americans about Teddy's pro-Big Labor voting record.

Our Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's stance on unions. We aim to start this fall.

* We're ready to warn the nation. Leading Congressmen like Ron Paul from Texas, and Bill Royer from California are scheduling news conferences and speaking tours.

Can we do it? Yes, recently our group played a vital role

pg 2 of 6

83040373292

Page three

- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in support of the repeal of the Hatch Act, common situs picketing and many more big labor schemes.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas where we know concerned Americans like you will fight the union bosses' power.

To turn the country against Kennedy's liberal policies will take months of warnings. Educating Americans that Kennedy will go along with just about any scheme the union bosses promote.

So it's vital we educate Americans about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our postcard mailing campaign to Congressmen played a crucial role in stopping taxpayer financing of elections.

What's more, right now our "STOP SALT II" mailing campaign to Senators has rallied many Senators who were wavering.

Now we must cover the nation with our message about Kennedy's liberal schemes this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a leading local paper like the paper you may read will cost us \$4,600 or more.

Senator Kennedy gets free media time from his friends at major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television, radio and newspaper ads and mailings to inform voters.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before

pg 3 of 6

Page four

Kennedy's ambitious plans begin to come to a head.

Here's what it costs to get the Kennedy Truth Squad launched:

- * Speaking tour of major cities \$ 5,000
- * Full-page ad in leading local paper \$ 4,600 each
- * 1-Minute TV ad on major station \$ 4,000 each
- * Spot radio commercial \$ 310 each
- * 50,000 voter mailings \$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we know the union bosses can count on Kennedy to do their bidding.

If you can afford to invest \$100 or \$50, your check will go a long way to spreading the Kennedy Truth Squad's message. But even if you can send \$25, \$15, or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell the truth about Kennedy's anti-right to work, pro-union boss policies.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director
Conservatives Against Liberal Legislation

TD/ub

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

pg 4 of 6

Message to Senator Edward Kennedy
Senator Kennedy:

I oppose your pro-union boss policies on:

- 1) repeal of the Hatch Act
- 2) common situs picketing
- 3) "labor law reform"
- 4) inflationary minimum wage and guaranteed full employment
- 5) a separate Department of Education

I support the Kennedy Truth Squad

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH ABOUT KENNEDY:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$ Other

My check is made out to Conservatives Against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss

Address

City State Zip

CF/Mub

pg 5 of 6

83040373296

82-2



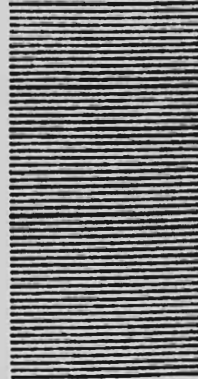
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



910369

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7800 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

GLENN J. SEDAM, JR.
J. CURTIS HERGE

(703) 821-1000

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER

September 29, 1980

RECEIVED
GCC#2838
80 OCT 1 PM 1:10

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX: 710-631-0896

CABLE: SEDAMHERGE

83040373297

The Honorable Max L. Friedersdorf
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Attention: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

80 OCT 1 PM 1:14

Dear Mr. Friedersdorf:

This letter is written on behalf of our client, Conservatives Against Liberal Legislation, in response to your letter, dated September 10, 1980, relative to the above-captioned matter.

On March 19, 1980, Kennedy for President filed a complaint with the Federal Election Commission in which it was alleged that National Conservative Political Action Committee and Conservatives Against Liberal Legislation had apparently violated the provisions of 2 U.S.C. 434, 2 U.S.C. 441d and former Section 435(b). The respondents denied those allegations and, on September 3, 1980, the Commission determined that there is no reason to believe that the respondents violated 2 U.S.C. 441d. In addition, the Commission decided to take no action at this time with respect to the alleged violations of 2 U.S.C. 434 and former Section 435(b).

In your letter of September 10, 1980 you also reported that the Commission found reason to believe that Conservatives Against Liberal Legislation violated the provisions of 2 U.S.C. 441b(a). It will be noted, however, that there was no reference or suggestion in the complaint filed by Kennedy for President of a possible violation of 2 U.S.C. 441b(a). Thus, this finding was based upon a

The Honorable Max L. Friedersdorf
Page Two
September 29, 1980

83040373278
recommendation to the Commission from the General Counsel. As an internally generated matter, we respectfully suggest that your letter of September 10, 1980 should have included a copy of a staff report setting forth the legal basis and the alleged facts which support the Commission's action. See, 11 CFR 111.8(b). In view of the fact that a copy of a staff report was not included with your letter, Conservatives Against Liberal Legislation reserves any right which it may have to challenge this procedural defect at a later date. In the interim, and confident that the activities of our client cannot support a finding of probable cause to believe that they were conducted "in connection with" an election, we shall respond to your request for any factual or legal materials which we believe are relevant to the Commission's analysis of this matter.

Conservatives Against Liberal Legislation is an organization which has been organized and which is administered to (1) engage in direct and grass roots lobbying activities in support of, or in opposition to, legislation and legislative issues; and (2) educate the public on matters of concern before their legislative councils which have a direct bearing on the efficient operation of government and the effective delivery of government services to the citizens of the United States. These programs, as reported to the Internal Revenue Service in its Application for Recognition of Exemption, include the compilation and publication of the voting records of members of Congress, of the public statements of members of Congress on critical issues, of the provisions of the important bills pending before Congress and of the status of key legislation pending before Congress. Philosophically, Conservatives Against Liberal Legislation is concerned about, and functions in opposition to, legislation, issues and policies which it views as being "liberal."

As part of its program, Conservatives Against Liberal Legislation determined that an effective means of bringing its philosophical concerns to the attention of the public would be to attribute a personal nature or character to the legislative policies it opposes. In the belief that Senator Kennedy's policies and programs were the antitheses of its own, Conservatives Against Liberal Legislation utilized Senator Kennedy to personify its legislative concerns. Thus, the Kennedy Truth Squad was created as a mechanism whereby the public could be alerted to the activities in Congress.

33040373279
The Honorable Max L. Friedersdorf
Page Three
September 29, 1980

When the program commenced, Senator Kennedy was not a candidate for election to any Federal office. In fact, it will be recalled that Senator Kennedy was making numerous public statements to the effect that he was not and would not be a candidate. In fact, the files of the Federal Election Commission contain a series of disavowals of candidacy filed by Senator Kennedy under 11 CFR 100.3(a)(3) and its predecessor section. Furthermore, in the communications published by Conservatives Against Liberal Legislation, Senator Kennedy is not once identified as a candidate, or potential candidate, for election to Federal office; there is no reference to a campaign; and, there is not a single reference to the election or defeat of Senator Kennedy.

The sole thrust of the communications is that Senator Kennedy is the epitome of legislative policies and programs which Conservatives Against Liberal Legislation finds objectionable. They discuss votes, "Kennedy...policies" and "Kennedy's liberalism." Given the text of the communications, there is not a modicum of evidence to suggest that they were "in connection with" any election.

Conservatives Against Liberal Legislation reports, furthermore, that the first Kennedy Truth Squad communications were issued on or about July 24, 1979. The program was terminated and discontinued on November 7, 1979. (See the affidavit of Rhonda K. Stahlman, Chairman of Conservatives Against Liberal Legislation, filed in this matter with our letter dated April 3, 1980.) The reason the program terminated on November 7, 1979 is because that was the day that Senator Kennedy made a formal declaration of his candidacy for election as President. (See the November 8, 1979 issue of The Washington Post, the relevant portion of which is enclosed herewith.) The single reason why Conservatives Against Liberal Legislation terminated the project on that day is because it did not even wish to create the appearance of conducting its program "in connection with" the election.

In response to the specific questions submitted with your letter of September 10, 1980, Conservatives Against Liberal Legislation responds as follows:

1. Answer to question 1: \$43,595.75
2. Answer to question 2: 188,690 pieces

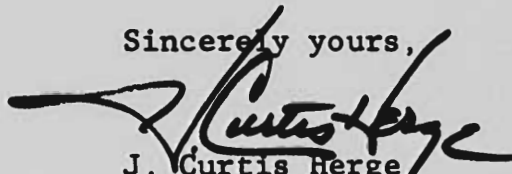
The Honorable Max L. Friedersdorf
Page Four
September 29, 1980

3. Answer to question 3: Net revenues received in response to the mailings.
4. Answer to question 4: See answer to question 3.
5. Answer to question 5: \$72,076.50
6. Response to question 6: Submitted herewith are copies of communications issued by Conservatives Against Liberal Legislation, in connection with the project, in addition to that which was attached to the complaint.

As a consequence, it is evident that Conservatives Against Liberal Legislation discharged its activities by attacking legislative policies and issues, communications which are clearly privileged under the First Amendment of the Constitution. See, First National Bank of Boston v. Bellotti, 98 S.Ct. 1407 (1978). In addition, the communications issued in connection with the program did not identify Senator Kennedy as a candidate or a potential candidate, and they did not advocate the election or defeat of a clearly identified candidate. See, Federal Election Commission v. Central Long Island Tax Reform Immediately Committee, et al., 616 F.2d 45 (CA-2 1980). Nevertheless, the program was terminated, out of an abundance of caution, at the time Senator Kennedy declared his candidacy in order to obviate the very objections which it now finds itself obligated to answer.

Based upon the foregoing, it is evident that there is no probable cause to believe that Conservatives Against Liberal Legislation violated the provisions of 2 U.S.C. 441b(a).

Sincerely yours,



J. Curtis Herge
Counsel to Conservatives
Against Liberal Legislation

83040373300



THE KENNEDY RECORD ON
CONSERVATIVE KEY ISSUES
1971 - 1979

Budgeting
& Spending

H.R. 2534	Amendment to require balanced federal budget	3/26/79	Against
S.C.R. 80	Amendment to require a balanced federal budget for FY 79	4/25/78	Against
S.C.R. 80	Amendment to cut HEW budget by \$2.1 million	4/26/78	Against
H.R. 12426	Bill to provide \$1.5 billion in guaranteed loans to NYC	6/29/78	For
S.C.R. 109	Proposal to cut federal budget overall by \$6.8 billion	4/12/76	Against
S. 3295	Bill to authorize \$3.3 billion for public housing projects	4/27/76	For
C.R. 32	Amendment to cut the 1976 budget deficit by \$25 billion	4/29/75	Against
H.R. 2559	Congressional and executive level pay raise	7/29/75	For

Tax Issues

H.R. 2534	Amendment to require an annual reduction in federal taxes	3/27/79	Against
S.C.R. 80	Amendment to reduce federal taxes by \$25 billion with concurrent budget cuts	4/25/78	Against
Revenue Act of 1978	Kemp-Roth bill to cut individual income taxes by 7%	7/13/78	Against
H.R. 9346	Increase in Social Security taxes by \$227 billion over the next decade	12/15/77	For
H.R. 3477	Bill to reduce federal income taxes by 10% across the board	4/27/79	Against
H.R. 10612	Amendment to index tax tables to rate of inflation	8/3/76	Against
H.R. 10612	Amendment to increase personal income tax exemption to \$1,000	8/6/76	Against
H.R. 10612	Amendment allowing tax deductions for persons who send children to private schools	8/5/76	Against

Bureaucracy
& Regulation

S. 210	Amendment to include a 'Sunset' provision for the new Department of Education	4/30/79	Against
S. 2104	Deregulation of natural gas	10/4/77	Against

Social
Issues

S. 210	Motion to kill amendment to allow school prayer	4/9/79	For
S. 721	Amendment to prohibit court ordered busing	6/7/79	Against
H.J.R. 638	Extension of the deadline for ratification of the ERA by 39 months	10/6/78	For
S. 1437	Kennedy sponsored motion to kill amendment allowing for imposition of the death penalty for murder and kidnapping	1/25/78	For
S.R. 18	Statement opposing pardon of Viet Nam era draft evaders	1/25/77	Against
H.R. 7555	Amendment to abolish federal affirmative action racial and sex quotas	6/28/77	Against
H.R. 7555	Amendment to maintain the federal power to mandate forced busing for racial integration	6/29/77	For

S. 287	Amendment to remove authority of Federal courts to order busing for school children	4/1/76	Against
H.R. 5901	Amendment to prohibit HEW from mandating integration by sex of P.E. classes, and sororities and fraternities	6/17/75	Against
	Bill to restore the death penalty for murder, treason, and espionage	3/13/79	Against

Abortion

	Labor HEW Appropriations - Amendment to prohibit the use of federal funds to perform abortions in most cases	9/27/78	Against
H.R. 7555	Amendment to prohibit use of federal funds to perform abortions in most cases	6/29/77	Against
H.R. 14232	Motion to agree to a ban on the use of Federal funds for abortion in most cases	9/17/76	For
H.S. 66	Amendment to ban the use of federal funds to encourage or pay for abortions in most cases	4/10/75	Against

International Issues

S. R. 61	Motion to assure U.S. protection for Taiwan	3/8/79	Against
S. 586	Bill to cut off U.S. support for some U.N. activities	5/15/79	Against
S. 428	Motion in support of lifting trade sanctions against Rhodesia	6/12/79	Against
S. 3076	Motion to sever economic and diplomatic ties with Cuba until Cuban forces are withdrawn from Africa	6/28/79	Against
Panama Canal Resolution	Resolution to ratify transfer of Panama Canal	4/18/79	For
H.R. 6689	Amendment prohibiting U.S. aid or reparations to North Viet Nam	6/16/79	Against

Defense Issues

	Amendment to cut defense budget by \$1.7 billion and transfer \$1 billion to social programs	4/24/79	For
C.R. 22	Amendment to cut defense budget by \$1.7 billion and transfer \$1 billion to social programs	4/24/79	For
S.C.R. 80	Amendment to increase defense appropriations by \$1.2 billion	4/26/78	Against
H.R. 9375	Motion to delete funding for B-1 Bomber	2/1/78	For
Warnke Confirmation	Move to confirm Paul Warnke as head of U.S. delegation to SALT II talks	3/9/77	For
H.R. 7933	Amendment to delete funding for B-1 Bomber	7/18/77	For
H.R. 7553	Amendment to prohibit funding for neutron bomb	7/31/77	For
H.R. 12438	Amendment to ban funds from B-1 Bomber proposal	5/20/76	For
H.R. 14262	Kennedy sponsored amendment to withhold funds for further Minuteman III missile production	8/2/76	For
H.R. 14262	Amendment to reduce DOD funding by \$1 billion	8/2/76	For
S. 920	Amendment to delete funds for the development of the B-1 Bomber	6/5/75	For
H.R. 9681	Kennedy amendment to dismantle U.S. ABM air defenses	11/18/75	For
	Amendment to defense procurement bill to eliminate funding for the Trident submarine	9/27/73	For

Additional copies of scripts, ads, and voting records are available. Please indicate # of copies desired and be sure to include your name and address.

If you can possibly send a check to help cover the costs of printing and postage, please do. If you can afford to send as much as \$100, \$50, or \$25 it will help us buy media time for our radio, TV, and newspaper ads.

We simply must get the word out!

8 0 4 0 3 7 3 3 0 3 MEDIANERICA

5300 Eisenhower Avenue, Suite 1980, Alexandria, Virginia 22304
(703) 823-1661

CALL/Kennedy 60 sec. TV spot
VIDEO

Congressman _____

sitting behind desk in
Congressional office.

Holds up bills Kennedy
sponsored, supports, or
opposes, one by one as he
talks.

Stands, looks directly at
camera and walks toward it.

Hold up copy of Vote Record
Brochure.

Address on screen:

CALL

P.O. Box 7580

Washington, DC 20044

MC sits on edge of desk.

Dissolve to:

Paid for by Conservatives

Against Liberal Legislation

P.O. Box 7580

Washington, DC 20044

AUDIO

Congressman _____:

Did you know that Senator Teddy Kennedy:

- Wants to spend over \$63 billion in 1980
alone on a socialized medicine scheme
- Supports federal funds for abortions
- Opposes tax cuts for you
- Supports spending billions of our tax
dollars on more government spending

Although Senator Kennedy represents Massachusetts,
he is destroying the economy, national security,
and family life of all Americans.

If you disagree with these ultra-liberal programs,
please let your Congressman and Teddy Kennedy
know -- now! Write them today. Then maybe
they'll think twice about pushing some of his
big-spending, disarmament, anti-family programs.

And help us fight these programs in Congress
and alert thousands of other Americans by
placing radio and TV spots throughout the country.

For your free copy of Teddy Kennedy's vote record
on crucial tax-cut, disarmament, and anti-family
votes, or to send a check to help us cover the
costs of media time like this, write Conservatives
Against Liberal Legislation at this address.

Please help today.

What will happen to America if Kennedy's programs
become the law of the land!



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

**With your help we can place ads like
this on TV and in major newspapers**

Edward Kennedy: Ultra-Liberal

**Look at his voting record
in the Senate:**

FOR: big spending welfare programs

FOR: Common Situs picketing and repeal of the Hatch Act

FOR: federal funds for ABORTION

FOR: more time to ratify the Equal Rights Amendment (E.R.A.)

FOR: close relations with CASTRO'S CUBA



AGAINST: a strong America: against
the B-1 Bomber, the
Minuteman Missile, the
Trident Submarine, the
Safeguard Missile Defense.

AGAINST: ties with Taiwan

AGAINST: tax cuts

**Senator Kennedy votes anti-
taxpayer, anti-family, anti-defense
and pro-Big Labor bosses.**

**Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044**

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

**PLEASE PRINT
(Mr./Mrs./Miss)**

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

After a Decade of Feints, Kennedy Becomes a Candidate

CANDIDATE, From A1

Kennedy complained that Carter had "reverted to the problems in heretofore," citing presidential aide Robert S. Stronach and Alfred Kahn and former secretary James R. Schlesinger.

"Well, I think Bob Stronach is a nice guy," Kennedy laughed. "I think even the Schlesingers might be a nice guy. But they aren't elected presidents of the United States—Jimmy Carter was."

Although Kennedy blasted the Democrats, prevalent with a notion that he is an ardent Republican would admit, he is the top choice of Democratic politicians for the presidency, according to opinion polls.

An old campaign member of the nation's best known political family, Kennedy has an enormous edge over other politicians.

But if he is a member of a famous family he is also a man of his times. This is evident when comparing his devotion of candidacy yesterday with that of his older brother.

John F. Kennedy's declaration in 1960 was marked by a sense of grandeur it would sound tonight, even tonight. In the presidency, he said, "we entered the pages of the future."

Robert F. Kennedy declared in 1960 with an effort of passionate intensity. He said that America would determine "our right to the moral leadership of this planet."

Edward Kennedy's announcement today was focused almost to being, dealing almost entirely with current economic problems and the need for a "forceful, effective presidency" to solve them.

Kennedy said aside his normal speaking style and delivered the address in subdued, almost stifled tones.

The formal announcement, held in an upstairs, off-limits dining room where patriots planned the Amer-

ican revolution, had the aura of a family wedding.

The invited guests were led to their seats first, and then members of the Kennedy family—Sergeant and Eunice Shriver, with their children, Robert Kennedy, with some of his children, and Jacqueline Kennedy Onassis—filed in through corridors lined with photographers.

In his announcement, Kennedy offered some insight into his reasons for seeking the White House.

"The energies of our people must be mobilized toward a larger purpose, and that can only be done from the White House. Only the president can provide the sense of direction needed by the nation. . . . The most important task of presidential leadership is to release the creative energy of the people."

As he has done previously, Kennedy devoted efforts to make his state specifically how he would solve from Carter in helping economic problems.

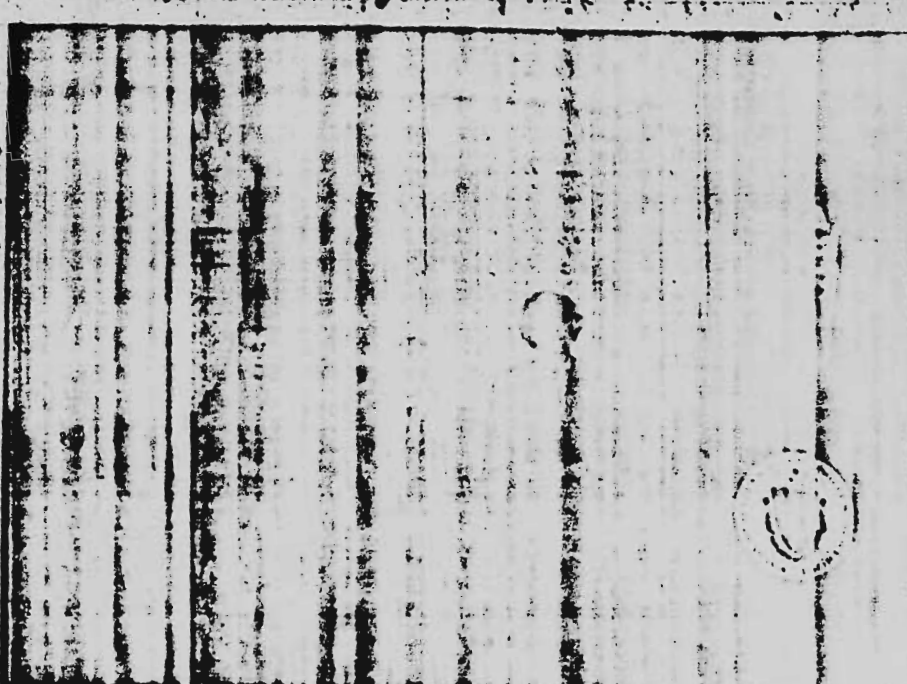
But the day did provide a specific answer to one recurrent question.

When Kennedy was asked in Boston this morning what role he would play in the campaign, he turned to her and asked her to provide the answer. John Kennedy walked slowly to the lectern, and it was evident that she was especially nervous. But her answer was short.

"Well, I campaign for my husband. I look forward to campaigning for him," she said as he stood behind her with a smile of pride and satisfaction.

"I look forward very much to working with my husband's being a candidate and the next president of the United States," she said.

Kennedy's long day ended at a rally in Chicago. By then he had lost his voice, and he was greeted with a few paragraphs by his standard bearer, the crowd wandered around him drowsily. Many left while he was still speaking.



Sen. Kennedy announces his candidacy at Faneuil Hall, accompanied by his wife, Jean, and their children, Robert, Eunice, and John.

IF IT'S ABOUT HOME DELIVERY OF THE POST . . . THIS IS THE NUMBER THAT GETS ACTION . . . 682-7111 200-4100



Jackdressing is pleated and pretty. Double breasted, belted, glazer open, great thing for coordinating dress. Short skirt in a V-neck with elastic waist and pleated skirt. Black or navy. Jacket dress, size 12 to 14. \$30

LANE BRYANT

Lower level, Downtown and Branches 500 P St., NW • 682-7111 • 200-4100 • Landmark • Springfield • Tyson Center • Capitol • Montgomery Mall • Shop Downtown Tuesday 10-10 Pm • High fare with your parking after 6 pm • Downtown Open late the year long Special Charge • After Charge • More Great Group

CARLTON'S Veteran's Day SALE

TODAY Through SATURDAY



Unmistakably Sloane

We specialize in providing the Washington area with the finest English and European hand-crafted imports. These unique pieces are now specially reduced for the upcoming holiday season.



8 3 0 0 5 7 3 3 0 7

The Goal: 'Preserve the Old Dream Against New Dangers'

KENNEDY, FROM A1

Sen. Edward M. Kennedy (D-Mass.) today said the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

The senator, who is running for reelection in 1972, said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

Kennedy and Wife Report \$702,697 Income for 1978

Sen. Edward M. Kennedy (D-Mass.) today said that he and his wife, Eunice, reported a total income of \$702,697 for 1978.

The income was reported on a joint return filed with the Internal Revenue Service.

The couple's income was made up of \$100,000 in salary from the U.S. Senate, \$100,000 in salary from the U.S. House of Representatives, and \$502,697 in other income.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.



He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

He said that the only way to preserve the old dream of a free society is to preserve the old dream of a free society.

Johnston & Murphy Veterans' Day Shoe Sale

At our Georgetown Store

After a busy selling season and for the Veterans' Day Sale



BRILLIANT INVESTMENTS

A fine business opportunity for sale. Call 1-800-555-1234 for more information.

3 0 4 0 3 7 3 3 0 8
With your help we can place ads like
this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE —
and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

Cuts in federal budget authority and outlays in 1980

AMOUNT

\$1 BILLION

Cuts in foreign aid, countercyclical public service jobs,
health programs, federal travel spending, categorical
state grants.

\$10 BILLION



Cuts in transportation, economic
development, health, social pro-
grams, welfare, categorical state
grants totalling:

\$24.4 BILLION

Cuts to provide "no
real growth" in
federal spending

\$12 BILLION

1% attrition in the
federal work force and
cuts in bureaucrats'
overtime pay, film
making and travel
expenses.

\$1.1 BILLION

TOTAL

\$48.5 BILLION

When it comes to cutting YOUR taxes, Senator Kennedy says NO!

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal
policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

**With your help we can place ads like
this on TV and in major newspapers**

Edward Kennedy: Ultra-Liberal

**Look at his voting record
in the Senate:**

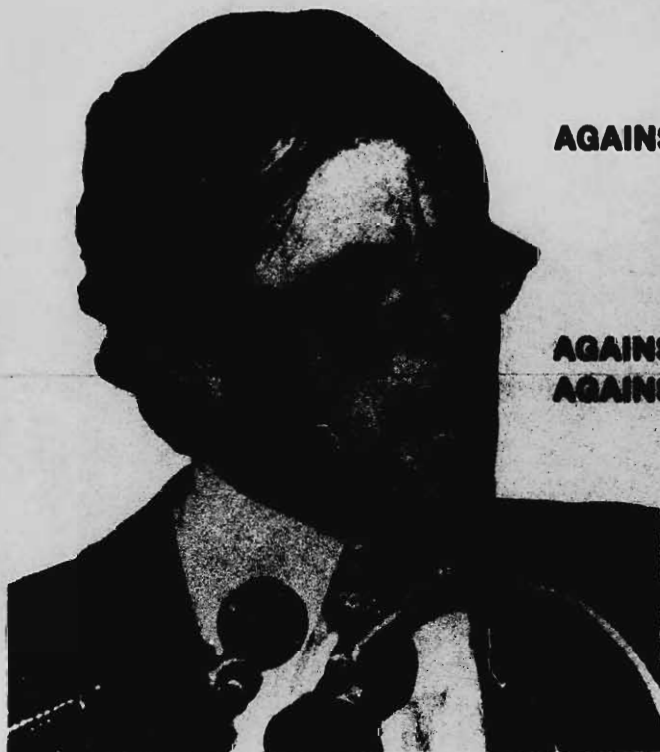
FOR: big spending welfare programs

FOR: Common Situs picketing and repeal of the Hatch Act

FOR: federal funds for ABORTION

FOR: more time to ratify the Equal Rights Amendment (E.R.A.)

FOR: close relations with CASTRO'S CUBA



**AGAINST: a strong America: against
the B-1 Bomber, the
Minuteman Missile, the
Trident Submarine, the
Safeguard Missile Defense.**

AGAINST: ties with Taiwan

AGAINST: tax cuts

**Senator Kennedy votes anti-
taxpayer, anti-family, anti-defense
and pro-Big Labor bosses.**

**Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044**

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

**PLEASE PRINT
(Mr./Mrs./Miss)**

Name _____

Address _____

City _____ **State** _____ **Zip** _____

**As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.**



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading pro-family leaders across the country to warn our fellow Americans about Edward Kennedy's anti-family record?

Please -- nobody has taken on this obligation yet. But we must -- soon.

It is hard to blame one liberal for destroying family life in America. For rampant homosexuality. For the six million abortions in the United States since 1973. For the Equal Rights Amendment threat.

We certainly cannot blame Senator Edward Kennedy for all this.

But Senator Kennedy is popular and very influential. For example, many polls (not all of them liberal polls) show the American people today choose Kennedy over any other candidate for President.

Yet consider how dangerous Kennedy's policies are:

--- He voted to extend ratification time for ERA. When the National Organization for Women plots strategy, they can count on Teddy. Yes, the ERA is losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side, more powerful than ever, if we don't act now.

--- Senator Orrin Hatch tried to stop federal funding of abortion with his bill. Senator Kennedy voted NO -- and has helped rally abortionists ever since.

--- Senator Kennedy helped beat Senator Jessie Helms' school prayer bill. He called Helms' bill a

-more-

8304037310

conservative members of Congress and other respected defenders of family life will travel the country, visiting towns and cities to warn Americans about Kennedy's record on abortion, the ERA, school prayer, and homosexuals.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in ruining family life and the moral health of our beloved United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full-page newspaper ads in towns and cities across the country.

Unless we pay for trips to towns and cities by leading conservatives and defenders of family life.

So please support the Kennedy Truth Squad with a generous contribution today. Please -- invest in America's future. Before time runs out.

If you can afford to invest \$1000, \$500, \$100, or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Sincerely,

Rhonda K. Stahlman
Rhonda K. Stahlman
Chairman

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself...along with thousands of other Messages. So please help us reach our fellow Americans today. Be as generous as you can.

83040373311

Message to Edward Kennedy

Senator Kennedy: I oppose your anti-family policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

830403331
I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's anti-family policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:



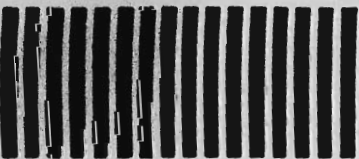
NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7590
Washington, D.C. 20044



A Product of CONSERVATIVE FAMILIAL EDUCATION

1 3 0 0 4 0 2 8



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Taxpayer,

Let's not kid ourselves: Proposition 13 and talk of a tax limitation amendment haven't helped.

The government still takes a big bite out of your paycheck. And government-caused inflation takes another huge bite of your income.

Senator Edward Kennedy's spending schemes -- his campaign for over one hundred billion dollars more government spending each year -- threaten us more than any liberal force in the country. Right now -- Senator Kennedy is more dangerous than any liberal.

Yet Kennedy's future is bright.

Many polls (not all of them liberal polls) show the American people want Kennedy to be our next President.

Teddy gets good publicity from CBS, NBC, and ABC. Most of the major radio networks and newspapers are on his side. No wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV, radio, and in the newspapers. They don't know...

-- that Kennedy's socialized medicine scheme would cost us at least \$63 billion in its first year alone

-- about Kennedy's role in the forced taxpayer loan to New York City that cost us at least \$2.3 billion

-- that Kennedy cost us \$25-30 billion when he helped beat the Kemp-Roth 33% tax cut plan

-- that Kennedy loudly campaigns against any kind

-more-

8304037314



of tax limitation or federal budget balancing

-- that Kennedy's staff -- larger than any other Senate staff, and larger even than Vice President Mondale's staff -- has a mountain of new bureaucracy proposals ready for Teddy to push. He likes to call them "antitrust" laws. They'll ruin many a good business, and they'll cost hundreds of millions to enforce.

Our fellow taxpayers don't know these facts about Kennedy. And of course, CBS, NBC, and ABC aren't telling them.

So it is up to us to warn our fellow taxpayers. And unless we warn them very soon, I think Kennedy will grow more powerful than ever.

But we can stop Teddy and his liberal policies cold.

The Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

We are ready to warn the nation. Leading Congressmen and economists can travel the country to warn taxpayers who don't know about Kennedy's big spending record. But we need your dollars to pay their travel expenses.

We will also run TV, radio, and full-page newspaper ads exposing Kennedy's leading role in bankrupting the taxpayer.

Three media and advertising experts have joined the Kennedy Truth Squad. The work they do could make the difference.

To turn the country against Kennedy's liberal policies, I think it will take a matter of a few months of warnings to taxpayers across the country that Kennedy is helping to bankrupt them.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

We must cover the nation with our message. Television ads can reach hundreds of thousands of voters at once. Radio ads are an excellent investment -- they reach tens of thousands.

Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page Kennedy

-more-

8304037331E

ad in the Washington Post will cost us at least \$8,000!

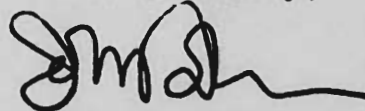
So please -- support the Kennedy Truth Squad today, and be as generous as you possibly can.

Your contribution is an investment in the future of America: If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water. And then America dies.

So please, if you can afford to invest \$1,000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. Even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for your help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order out to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

Copies of the radio and television scripts and a list of the stations we have scheduled to run ads, may be obtained by sending a self-addressed envelope to the Office of the Chairman at the above address.

P.P.S. And please sign the enclosed Message to Edward Kennedy and return it to us with your contribution. I will personally deliver your Message to Senator Kennedy himself... along with thousands of other Messages. So please help us reach our fellow taxpayers today. Be as generous as you can.

83040373316

Message to Edward Kennedy

Senator Kennedy: I oppose your big spending policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's big spending policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

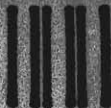
Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

3 0 4 0 3 7 3 3 1 8



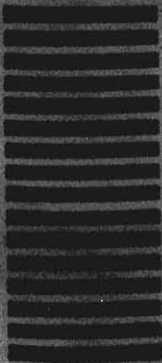
NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7590
Washington, D.C. 20044



OK Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Fellow American,

Will you help us buy television time and send some of America's leading conservatives across the country to warn our fellow Americans about Edward Kennedy's liberal policies? Please -- nobody has taken on this obligation yet. But we must -- soon.

If the American people knew how radical Senator Edward Kennedy really is, he would not be their first choice in the Presidential Polls. But the news media like Teddy. So voters have never heard the truth about Kennedy.

Kennedy's Senate staff is bigger than any other Senator's or Congressman's. In fact, Kennedy's staff is bigger than Vice President Mondale's staff. Obviously, Kennedy has big plans.

Consider what he has done already:

** As the Russian menace grows, Kennedy adds his powerful voice to the liberals' SALT II chorus -- and takes a leading role selling the disarmament pact to the American people.

It doesn't bother Kennedy that Jimmy Carter's military adviser at the SALT II talks, General Edward Rowley, has resigned from the armed forces, after dozens of years of service, in order to warn our fellow Americans about SALT II.

** With Jimmy Carter's help, Kennedy has drafted a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any

-more-

8 3 0 4 0 3 7 3 3 1 9



felony.

How much longer can our nation survive if the FBI's work becomes a crime?

**** It was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System the United States had.**

**** It was Kennedy who helped stop the magnificent new B-1 Bomber in production and slow the indestructible Trident Submarine. And he opposed modernization of our Minuteman Missiles, which were put together during the era his brother was President.**

But Edward Kennedy is not satisfied with the ruin he's helped make of our national security.

Consider:

**** His socialized medicine scheme threatens to break the back of the taxpayer. Its pricetag: at least \$63 billion -- in the first year of the program alone.**

**** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending...while even liberal Time magazine calls for smaller federal budgets.**

**** Kennedy favors federal funding of abortion. He voted NO to Senator Orrin Hatch's bill to stop federal funding. And he uses his influence to hurt the Pro-Life Movement.**

**** Kennedy has been a leader in the feminists' fight to impose the Equal Rights Amendment on America. He voted to extend ERA ratification time. The ERA is still losing, but I think Bella Abzug and company may try again -- and Teddy will be at their side. Will he be more powerful than ever?**

Unless we join forces soon, I think he will be.

Why?

I think the answer is simple: Most Americans don't know what Senator Kennedy is up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his most outrageous schemes.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help

-more-

83040373320

83040373320

Conservatives against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

Copies of the radio and television scripts and a
list of the stations we have scheduled to run ads, may
be obtained by sending a self-addressed envelope to
the Office of the Chairman at the above address.

P.P.S. Please sign the enclosed Message to Edward
Kennedy and return it to us with your contribution.
I will personally deliver your Message to Senator Kennedy
himself...along with thousands of other Messages. So
please help us reach our fellow Americans today. Be as
generous as you can.

23040373321

Message to Edward Kennedy

Senator Kennedy: I oppose your radical policies.
I support the KENNEDY TRUTH SQUAD.

(Signed)

(Please do not rip off. Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's radical policies to the American people.

Here's my investment in our campaign: _____ \$1,000

_____ \$500 _____ \$400 _____ \$300 _____ \$200

_____ \$100 _____ \$50 _____ \$40 _____ \$30

_____ \$20 _____ \$ _____ Other

My check is made out to Conservatives Against Liberal Legislation,
P.O. Box 7580, Washington, D.C. 20044.

Mr., Mrs., Miss _____

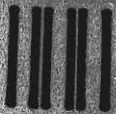
Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy.
Please send information to:

03040373323



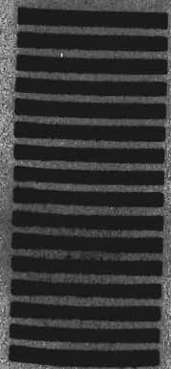
BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

Kennedy Truth Squad

Post Office Box 7580
Washington, D.C. 20044

NO POSTAGE
NECESSARY IF
MAILED IN THE
UNITED STATES



A Project of CONSERVATIVES AGAINST LIBERAL LEGISLATION



Kennedy Truth Squad

A Project of
CONSERVATIVES AGAINST
LIBERAL LEGISLATION

Dear Patriot,

Will you help us buy television time and send some of America's leading patriots across the country to warn our fellow Americans about Edward Kennedy's disarmament record? Please -- nobody has taken on this obligation yet. But we must -- soon.

As the Russian menace grows, Senator Edward Kennedy lends his powerful voice to the Liberals' SALT II chorus.

"The military power of the United States remains unequalled in the world," Kennedy says in speeches to the American people.

But Jimmy Carter's military adviser at the SALT II talks, General Edward Rowny, strongly disagrees with Kennedy. General Rowny has resigned from the armed forces, after dozens of years of distinguished service, in order to warn America about SALT II.

And here at home, Jimmy Carter and Kennedy have joined forces on a new FBI Charter that all but eliminates effective spying on terrorists and foreign agents.

If this Kennedy-Carter plan becomes law, most break-ins by our FBI agents could be treated like any felony. How much longer can our nation survive if the FBI's work becomes a crime?

And Kennedy has harmed our national security in many more ways with his leftist votes.

* He has helped give American technological aid to Russia, even though he knows that the Communists will use our technology to make bigger and better weapons.

* Kennedy pushes for relations with Castro's Cuba,

-more-

83040373324

even though FBI reports show that Cuba has trained American terrorists like the Weathermen.

And Kennedy ignores this chilling fact: Last year Cuba took delivery of 18 Russian MIG Bombers. Skilled Soviet pilots have also been sent to Cuba -- only 90 miles away from our southern shore. There are no American air defenses in the southern United States -- or anywhere else in the nation, thanks to liberal leaders like Kennedy.

* Kennedy helped kill the magnificent new B-1 Bomber and improved Minuteman Missile. He helped slow the new Trident Submarine in the production line. Military experts warn that we must have all three weapons right away.

* Moreover, it was Kennedy who led the radicals' successful fight to dismantle the only Safeguard Defensive Missile System this country had.

There will be many more crucial national security battles in the next year. SALT II could be ratified. Kennedy will play a major role in the Liberals' dis-armament crusade. He could influence millions of voters -- unless we warn our fellow Americans.

Unless we join forces very soon, I think Kennedy will grow more powerful than ever.

Why is Kennedy so popular?

I think the answer is simple: Most Americans don't know what Senator Kennedy is really up to. CBS, NBC, and ABC aren't telling us -- they are on Teddy's side. They gloss over his dangerous disarmament record.

So it is up to us to warn America. The Kennedy Truth Squad will do just that. But we need your help if we are to succeed in spreading the truth about Kennedy.

Federal law forbids us to attack Edward Kennedy as a candidate for President. So it is vital that we warn America about Senator Kennedy's leftist policies right away, before it's too late.

Leading Congressmen and military men will sign on. Three media and advertising experts (who are also dedicated patriots) have joined the Kennedy Truth Squad. We are ready to warn the nation. All we need is the money to do the job.

Using your dollars, Congressmen and retired officers

can travel the nation to warn Americans who don't know about Edward Kennedy's disarmament record.

We will also run TV, radio, and newspaper ads exposing Kennedy's leading role in disarming the United States of America.

Senator Kennedy gets free media time from his friends at the major TV and radio networks and newspapers.

But we can't get the true side of the Kennedy story across unless we spend the money for TV and radio ads.

Unless we spend the money for full page newspaper ads in towns and cities across the country.

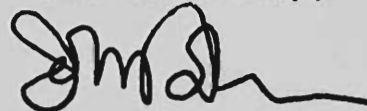
Unless we pay for trips by leading patriots to towns and cities across America.

So please support the Kennedy Truth Squad with a generous contribution today. Please invest in America's future -- before time runs out.

If you can afford to invest \$1000, \$500, \$100 or \$50, that will go a long way toward spreading the Kennedy Truth Squad's message. But even if you can only send \$30 or \$20 you will help greatly.

Thank you in advance for you help.

Most sincerely,



John T. Dolan
National Director

P.S. Please make your check or money order payable to Conservatives against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044.

And please sign the enclosed Message to Edward Kennedy and send it back to us with your contribution. We will deliver your Message and thousands of other Messages to Senator Kennedy himself.

P.P.S. If you have contributed to the Kennedy Truth Squad and would like to see the scripts of our radio and television ads -- or a list of the stations we have scheduled to run these ads, please write to: Chairman's Office, Conservatives against Liberal Legislation, Suite 515, 1500 Wilson Blvd., Arlington, Virginia 22209.

830403733226

Statement of Support

SENATOR KENNEDY: I OPPOSE YOUR DISARMAMENT
POLICIES. I SUPPORT THE Kennedy Truth Squad.

(Signed)

(Please do not rip off! Kennedy Truth Squad office staff will detach.)

I will join the Kennedy Truth Squad today. Please travel the country with our warning. Take out full page newspaper ads, and use television and radio to bring the truth about Edward Kennedy's disarmament policies to the American people.

Here's my investment in your campaign:

_____ \$500	_____ \$400	_____ \$300	_____ \$200
_____ \$100	_____ \$50	_____ \$40	_____ \$30
_____ \$20	_____ \$ _____	Other	

My check is made out to the National Conservative Public
Affairs Council, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

Telephone _____

I know at least one friend or neighbor who is opposed to Senator Kennedy. Please send information to: (Use other side - do not write on back of Statement of Support.)



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your message is that you're putting him on notice: Kennedy can no longer hide his record of voting the BIG LABOR BOSSES' LINE.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to spread the truth about Kennedy's support for Big Labor.

Quite frankly, I want you to join the Kennedy Truth Squad because I feel you are strongly opposed to big labor control of our economy and politics.

If the American people knew how radical Kennedy's policies are, he wouldn't be their first choice in the Presidential polls.

Yet, the AFL-CIO gives Kennedy a 100% rating: he's voted

FOR: Common Situs picketing to let building workers strike a whole construction site against one contractor

FOR: repeal of the Hatch Act, to let bureaucrats and postal workers get involved in politics

FOR: "labor law reform", a thinly disguised license for big unions to undermine the right to work.

Our group, Conservatives Against Liberal Legislation, (C.A.L.L.), is made up of experienced conservatives who can and will expose liberal programs for what they are.

What's more, our Kennedy Truth Squad is the only project geared up and ready to go NOW to expose Kennedy's pro-union

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

833040373328

Page two

bosses policies.

No one else has taken on this responsibility.

Yet big labor has adopted Kennedy as its Crown Prince. Look at William Winpisinger, a self-confessed ideological socialist. He and his International Association of Machinists are promoting Kennedy almost as if they were his staff members.

Kennedy voted FOR big labor on:

- 1) increasing the minimum wage by 50% or pegging it to inflation
- 2) guaranteed full employment - jobs for everyone whether they're needed or not (the Humphrey-Hawkins bill)
- 3) collective bargaining and union recognition in the Civil Service
- 4) a separate Department of Education. If you thought H.E.W. was a hive of bureaucracy, imagine this new creation, beloved of the left-leaning National Education Association.

By contrast Kennedy voted AGAINST:

- 1) protecting the right to work of non-union teachers, and against
- 2) Senator Thurmond's bill to outlaw military unions.

Union bosses like George Meany, Jerry Wurf of the American Federation of State, County, and Municipal Employees, William Winpisinger, all rely on Kennedy to carry out their wishes.

If we don't join forces soon, Kennedy's programs will grow more widespread than ever.

Why is Kennedy so popular?

Simple. Most Americans don't know how really liberal Kennedy's policies are.

So it's up to you and me to warn our fellow Americans.

Together we can educate millions of Americans about Teddy's pro-Big Labor voting record.

Our Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's stance on unions. We aim to start this fall.

- * We're ready to warn the nation. Leading Congressmen like Ron Paul from Texas, and Bill Royer from California are scheduling news conferences and speaking tours.

Can we do it? Yes, recently our group played a vital role

Page three

- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in support of the repeal of the Hatch Act, common situs picketing and many more big labor schemes.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas where we know concerned Americans like you will fight the union bosses' power.

To turn the country against Kennedy's liberal policies will take months of warnings. Educating Americans that Kennedy will go along with just about any scheme the union bosses promote.

So it's vital we educate Americans about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our postcard mailing campaign to Congressmen played a crucial role in stopping taxpayer financing of elections.

What's more, right now our "STOP SALT II" mailing campaign to Senators has rallied many Senators who were wavering.

Now we must cover the nation with our message about Kennedy's liberal schemes this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a leading local paper like the paper you may read will cost us \$4,600 or more.

Senator Kennedy gets free media time from his friends at major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television, radio and newspaper ads and mailings to inform voters.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before

Page four

Kennedy's ambitious plans begin to come to a head.

Here's what it costs to get the Kennedy Truth Squad launched:

- | | |
|---------------------------------------|---------------|
| * Speaking tour of major cities | \$ 5,000 |
| * Full-page ad in leading local paper | \$ 4,600 each |
| * 1-Minute TV ad on major station | \$ 4,000 each |
| * Spot radio commercial | \$ 310 each |
| * 50,000 voter mailings | \$12,500 |

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we know the union bosses can count on Kennedy to do their bidding.

If you can afford to invest \$100 or \$50, your check will go a long way to spreading the Kennedy Truth Squad's message. But even if you can send \$25, \$15, or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell the truth about Kennedy's anti-right to work, pro-union boss policies.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director
Conservatives Against Liberal Legislation

TD/ub

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your pro-union boss policies on:

- 1) repeal of the Hatch Act
- 2) common situs picketing
- 3) "labor law reform"
- 4) inflationary minimum wage and guaranteed full employment
- 5) a separate Department of Education

I support the Kennedy Truth Squad

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH ABOUT KENNEDY:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$ other

My check is made out to Conservatives Against Liberal Legislation, P.O. Box 7580, Washington, D.C. 20044

Mr., Mrs., Miss

Address

City State Zip

CF/Mub

8304037332

83040373333

BR-2

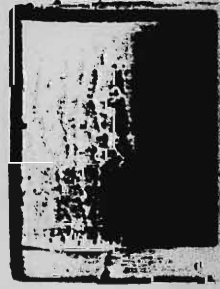


BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

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



time, you'll help greatly to get the Truth Squad launched right now.

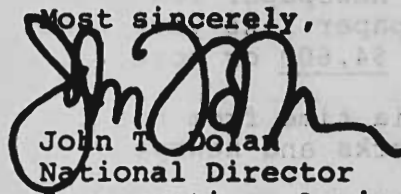
And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

Please make your check out to Conservatives Against Liberal Legislation. Don't delay. Let's get Teddy on the run today.

Thank you in advance for helping tell America about Kennedy's big-spending liberalism.

With warm appreciation for your help.

Most sincerely,



John T. Dolan
National Director
Conservatives Against Liberal Legislation

TD/tp

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some **NEGATIVE PUBLICITY** in the media for Kennedy's policies.

830403334



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
300 515 1500 Wilson Boulevard, Arlington, Va. 22209

3D

Mr Joseph L Litalien
17261 Sunburst St
Northridge Ca 91325

John T. Dolan
National Director

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your MESSAGE is that you're putting him on notice: he can no longer hide his liberal policies of big spending and tax raises.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to help spread the truth about Kennedy's inflationary tax policy.

Our group, Conservatives Against Liberal Legislation, is made up of experienced conservatives who can and will educate Americans about the liberals' programs.

What's more, our Kennedy Truth Squad is the ONLY project geared up and ready to go NOW to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join the Kennedy Truth Squad because you've already shown your commitment to lower taxes.

Let's not kid ourselves: Proposition 13 and talk of a Tax Limitation Amendment have not yet stopped your taxes going up. The government still takes a big bite out of your income. And government-caused inflation takes another huge bite.

Kennedy's future is bright.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls.

As you know, Teddy gets free publicity from the major

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

3304037335

TV and radio networks. Many newspapers are on his side. We wonder Americans today want Kennedy to be President. They don't know any better.

Most taxpayers believe what they see and hear on TV and radio and read in the papers. They don't know that:

- Kennedy's SOCIALIZED MEDICINE SCHEME would cost us at least \$63 billion in its first year alone.
- Kennedy's role in the forced TAXPAYER BAIL-OUT OF NEW YORK CITY cost us at least \$2.3 billion.
- Kennedy cost us \$25-80 billion when he helped BEAT the Kemp-Roth tax cut plan.
- Kennedy loudly campaigns AGAINST any kind of tax limitation or federal budget balancing.
- Kennedy's staff is larger than any other Senate staff, and larger even than Vice President Mondale's staff.
- Kennedy is pushing for new "anti-trust" laws. But you know they'll ruin many a good business. And they'll cost us taxpayers hundreds of millions to enforce.

So it's up to you and me to educate our fellow-taxpayers. And unless we tell them right now, Kennedy will grow more powerful than ever.

But we can expose Teddy's anti-taxpayer policies.

Starting this fall, the Kennedy Truth Squad, with your help, will tell taxpayers about Kennedy's plans to spend their money.

- * Leading Congressmen are scheduling news conferences about Kennedy's policies. They plan to travel the country to warn taxpayers about Kennedy's big spending record.
- * With your help, we'll also run TV, radio and full-page newspaper ads exposing Kennedy's leading role in bankrupting you, the taxpayer.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- * We'll mail letters in key areas to concerned taxpayers who've already shown they'll work and act to stop Kennedy.

To turn the country against Kennedy's liberal policies will take months of warnings. So we must start right now.

Can we do it? Yes, recently our group played a vital role

8304037336

in stopping taxpayer financing of elections. We successfully ran a voter-mailing campaign to influence U.S. Congressmen.

Now, with your help, we must cover the nation this fall with our Kennedy message:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$4,600 or more.

Kennedy gets free media time from his friends at the major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television and radio ads and voter mailings.

Only if we spend money for full-page newspaper ads in towns and cities across the country.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in a leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 320 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water.

If you can afford to invest \$100 or \$50, your check will go a long way toward spreading the Kennedy Truth Squad's message.

But even if you can send just \$25, \$15, even \$10 at this

in stopping taxpayer financing of elections. We successfully ran a voter-mailing campaign to influence U.S. Congressmen.

Now, with your help, we must cover the nation this fall with our Kennedy message:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$4,600 or more.

Kennedy gets free media time from his friends at the major television and radio networks and newspapers, almost any time he wants it.

But we can get the other side, the true side, of the Kennedy story across only if we spend the money for television and radio ads and voter mailings.

Only if we spend money for full-page newspaper ads in towns and cities across the country.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious legislative plans come to ahead. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in a leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on major station	\$ 4,000 each
* Spot radio commercial	\$ 320 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, we taxpayers don't stand a chance of keeping our heads above water.

If you can afford to invest \$100 or \$50, your check will go a long way toward spreading the Kennedy Truth Squad's message.

But even if you can send just \$25, \$15, even \$10 at this

8 3 0 4 0 3 7 3 3 3 9

With your help we can place ads like
this on TV and in major newspapers

Edward Kennedy: Big Spender!

In April, 1979 these budget cuts were proposed in the U.S. SENATE —
and Kennedy voted "NO!" to all of them:

KENNEDY VOTED "NO!" TO THESE CUTS:

Cuts in federal budget authority and outlays in 1980

AMOUNT

\$1 BILLION

Cuts in foreign aid, countercyclical public service jobs,
health programs, federal travel spending, categorical
state grants.

\$10 BILLION

Cuts in transportation, economic
development, health, social pro-
grams, welfare, categorical state
grants totalling:

\$24.4 BILLION



Cuts to provide "no
real growth" in
federal spending

\$12 BILLION

1% attrition in the
federal work force and
cuts in bureaucrats'
overtime pay, film
making and travel
expenses.

\$1.1 BILLION

TOTAL

\$48.5 BILLION

When it comes to cutting **YOUR** taxes, Senator Kennedy says **NO!**

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you **FREE** a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your big-spending anti-taxpayer policies.

Your socialized medicine plans will cost the taxpayer \$63 billion the first year.

You've voted against

- * the Kemp-Roth tax cut plan
- * tax limitation
- * federal budget balancing

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy's policies.
- * Send out voter mailings nation-wide

HERE'S MY INVESTMENT TO SPREAD THE TRUTH
ABOUT KENNEDY'S LIBERAL PROGRAMS:

() \$500 () \$250 () \$100 () \$50

() \$25 () \$15 () \$10 () \$___ Other

My check is made out to Conservatives
Against Liberal Legislation, P.O. Box 7580,
Washington, D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

CF/Mtp

83040373341

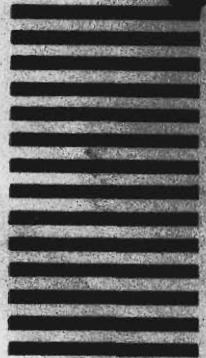


BUSINESS REPLY MAIL
First Class Permit #11973
Washington, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE

Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES





PM 922313



65 OCT 1 AM: 29

30403342
FIRST CLASS MAIL

SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

To:

The Honorable Max L. Friedersdorf
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

FIRST CLASS MAIL

65 OCT 1 AM: 29

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER

September 12, 1980

RECEIVED

8 SEP 15 49: 50

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX: 710-831-0696

CABLE: SEDAMHERGE

The Honorable Max L. Friedersdorf
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Robert Bogin

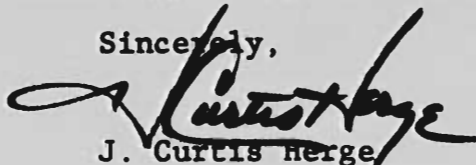
Re: MUR 1192

Dear Mr. Friedersdorf:

This letter is written in acknowledgment of the receipt of your letter, dated September 10, 1980, in which you reported that the Federal Election Commission found reason to believe that Conservatives Against Liberal Legislation (CALL) violated 2 U.S.C. 441b(a). In your letter, you reported that it appears that CALL's expenditures for its Kennedy Truth Squad mailing and solicitation were made in connection with the Presidential primary elections of 1980.

In order to respond to the finding of the Commission and to be of assistance to the Commission in the conduct of its investigation, we would appreciate it if you would provide us with the alleged factual basis supporting the finding as required by 11 CFR 111.9(a). While we appreciate the fact that this matter was not internally generated, it would be helpful to secure a copy of the staff report. See, 11 CFR 111.8(b). In any event, the statement that it appears that CALL's expenditures were made in connection with a Federal election is a legal supposition; and, it does not provide us with the alleged factual basis supporting the finding.

Sincerely,


J. Curtis Herge

30 SEP 15 41: 38

RECEIVED
GENERAL COUNSEL

8304067343

8304037334

SEDAM & HERGE

ATTORNEYS AT LAW

7800 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102

RECEIVED

SEP 15 A9:50



RECEIVED



80SEP15 A8:46

The Honorable Max L. Friedersdorf
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Robert Bogin

CCC#912

National Conservative Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

April 3, 1980

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

Attention: Marsha Genter, Esquire
Office of General Counsel

Re: MUR 1192

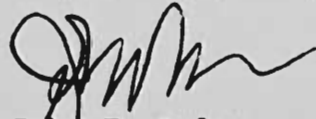
Dear Sirs:

This letter is written with reference to the complaint filed by Kennedy for President, dated March 17, 1980, which has been designated MUR 1192.

You are hereby advised that National Conservative Political Action Committee has engaged counsel to represent it in this matter, such counsel being authorized to receive any notifications and other communications from the Commission. Our counsel is:

J. Curtis Herge, Esq.
Sedam & Herge
7600 Old Springhouse Rd.
McLean, Virginia 22102

Very truly yours,



John T. Dolan
Chairman

JTD:md

APR 3 4:24

RECEIVED
FBI
APR 3 1980

3304057315

6
National Conservative
Political Action Committee

7500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

8
3
0
4
0
3
7

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

ATTENTION: Marsha Genter, Esquire
Office of General Counsel

**CONSERVATIVES
AGAINST
LIBERAL
LEGISLATION**
CALL

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

ATTENTION: Marsha Genter, Esq
Office of General Counsel

Re: MUR 1192

Dear Sirs:

The purpose of this letter is to advise you that Conservatives Against Liberal Legislation has engaged J. Curtis Herge, Esq., Sedam & Herge, 7600 Old Springhouse Road, McLean, Virginia 22102 (821-1000), to represent it before the Federal Election Commission in connection with MUR 1192. You are authorized to send any notifications and correspondence to Mr. Herge and to otherwise communicate with him in connection with this matter.

Very truly yours,

Rhonda K. Stahlman

Rhonda K. Stahlman,
Chairman

RKS:ss

507341

30 APR 8 4:32 PM

RECEIVED
FEDERAL ELECTION COMMISSION
APR 8 1988

3304037347

8
0
4
0
3
7
3
3
4
8

CONSERVATIVES
AGAINST
FEDERAL
LEGISLATION
CATE

Federal Election Commission
1325 K Street, NW
Washington, DC 20463

ATTENTION: Marsha Genter, Esq.
Office of General Counsel

1500 WILSON BLVD. SUITE 515 ARLINGTON, VA. 22209



SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

7800 OLD SPRINGHOUSE ROAD

McLEAN, VIRGINIA 22108

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
JOHN J. FLOOD (D.C. ONLY)
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

April 3, 1980

RECEIVED

1700 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

'80 APR 7 AM 9:40

TELEX 88-8388 (AEMPOWER WHEN)

TWX 710-828-0888 (TELETYPE 800)

307297

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

ATTENTION: Robert Bogin, Esq.
Office of General Counsel

Re: MUR 1192

Dear Sirs:

This letter is written on behalf of our clients, National Conservative Political Action Committee and Conservatives Against Liberal Legislation, in response to the letters to our clients from the General Counsel of the Federal Election Commission, dated March 24, 1980, relative to a complaint filed by Kennedy for President. This matter has been designated MUR 1192.

In its complaint, Kennedy for President reported that Conservatives Against Liberal Legislation had produced and distributed letters under the caption, "Kennedy Truth Squad, a project of Conservatives Against Liberal Legislation"; and, that National Conservative Political Action Committee had produced and published a political advertisement under the caption, "Kennedy Truth Squad, a project of National Conservative Political Action Committee." Kennedy for President then alleges that neither Conservatives Against Liberal Legislation nor the Kennedy Truth Squad has filed a Statement of Organization under 2 U.S.C. 433; that National Conservative Political Action Committee, Conservatives Against Liberal Legislation and the Kennedy Truth Squad are affiliated under 2 U.S.C. 441a(a)(5); and, National Conservative Political Action Committee failed to file reports under 2 U.S.C. 434 and to include notices on its literature as required by the Act prior to the enactment of Pub. L. No. 96-187.

RECEIVED
GENERAL COUNSEL

83040373349

8304037330

Federal Election Commission
Page Two
April 3, 1980

We appreciate having this opportunity to respond to the complaint and to demonstrate that no action should be taken against either National Conservative Political Action Committee or Conservatives Against Liberal Legislation in response to the complaint.

National Conservative Political Action Committee and Conservatives Against Liberal Legislation are independent legal entities. National Conservative Political Action Committee is a corporation which was organized on August 12, 1975 under and by virtue of the District of Columbia Non-profit Corporation Act. A copy of its Articles of Incorporation is submitted herewith as Exhibit 1. Furthermore, National Conservative Political Action Committee is a multicandidate political committee under 2 U.S.C. 431(4)(A) and 2 U.S.C. 441a(4).

Conservatives Against Liberal Legislation is a corporation which was organized on September 23, 1977 under and by virtue of the Virginia Nonstock Corporation Act. Furthermore, it has been determined by the Internal Revenue Service to be an organization described in section 501(c)(4) of the Internal Revenue Code. A copy of its Articles of Incorporation, as amended, and a copy of the determination by the Internal Revenue Service are submitted herewith as Exhibit 2.

In the fall of 1979, Conservatives Against Liberal Legislation sponsored and conducted a program which was designated and known as "Kennedy Truth Squad, a project of Conservatives Against Liberal Legislation." The subject matter of the program, as reflected in the letter submitted with the complaint, consisted of an expression of views on the legislative policies of Senator Kennedy. It is submitted that the letter and the additional communications referred to therein did not expressly advocate the election or defeat of a clearly identified candidate. (See, Federal Election Commission v. Central Long Island Tax Reform Immediately Committee et al., No. 79-3014 (CA-2 1980).) Furthermore, as stated in the affidavit of the Chairman of Conservatives Against Liberal Legislation which is submitted herewith as Exhibit 3, the program was conducted prior to the time that

304037331
Federal Election Commission
Page Three
April 3, 1980

Senator Kennedy became a candidate for election as President. As a result, neither the communication, the expenses incurred in connection with the program, nor the contributions received to conduct the program was or is subject to the provisions of the Federal Election Campaign Act of 1971, as amended.

In December, 1979, National Conservative Political Action Committee commenced a program of making independent expenditures in opposition to the election of Senator Kennedy. A sample of one communication, which was produced and published by National Conservative Political Action Committee as an independent expenditure, was attached to the complaint. That advertisement, which appeared in the Manchester (N.H.) Union Leader on February 22, 1980, carried a disclaimer, "Paid for by the Kennedy Truth Squad, a project of National Conservative Political Action Committee and not by any candidate."

While the complaint filed by Kennedy for President appears to suggest the existence of an entity known as the Kennedy Truth Squad, no such separate entity exists. In its activities, which took place prior to the time Senator Kennedy became a candidate for President, all communications issued by Conservatives Against Liberal Legislation made it clear that the Kennedy Truth Squad was "a project of Conservatives Against Liberal Legislation." In its activities, which took place subsequent to the time Senator Kennedy became a candidate for President, all communications issued by National Conservative Political Action Committee made it clear that the Kennedy Truth Squad was a "project of National Conservative Political Action Committee" and that it was not authorized by any candidate. The common use of a phrase such as "Kennedy Truth Squad" neither constitutes, nor precipitates, a violation of any law. (Furthermore, there is no violation of 2 U.S.C. 432(e)(4) by reason of the fact the corporate and registered name of National Conservative Political Action Committee does not include the name of any candidate.)

In conclusion, it is submitted that no action should be taken against either National Conservative Political Action Committee or Conservatives Against Liberal Legislation in response to the complaint, because:

- 8 3 0 4 0 3 7 3 3 5 2
- (1) Conservatives Against Liberal Legislation, a Virginia corporation, undertook a program designed to express its views on legislative policies. Those expressions did not expressly advocate the election or defeat of a clearly identified candidate. This conduct is permissible under section 501(c)(4) of the Internal Revenue Code and it is not conduct subject to the provisions of the Federal Election Campaign Act of 1971, as amended.
 - (2) Conservatives Against Liberal Legislation is not a political committee as defined in 2 U.S.C. 431(4) and it is not a connected organization relative to National Conservative Political Action Committee as defined in 2 U.S.C. 431(7).
 - (3) As a result of the foregoing, Conservatives Against Liberal Legislation is not required to file a Statement of Organization under 2 U.S.C. 433 and it is not required to include notices on its literature as required by the Act prior to the enactment of Pub. L. No. 96-187.
 - (4) By reason of the fact that Conservatives Against Liberal Legislation is not a political committee, it cannot be "affiliated" with National Conservative Political Action Committee under 2 U.S.C. 441(a)(5).
 - (5) There is no separate entity known as Kennedy Truth Squad. Each organization identified itself on all communications for which it was responsible and made it clear that the Kennedy Truth Squad was "a project" of the sponsoring organization. The pursuit of common or similar goals or objectives is not prohibited and is not indicia of affiliation or connection.

Federal Election Commission
Page Five
April 3, 1980

- (6) National Conservative Political Action Committee is a multicandidate political committee which has registered with, and which is reporting to, the Federal Election Commission. Its independent expenditure program in opposition to the election of Senator Kennedy has been conducted in accordance with 2 U.S.C. 431(17) and Part 109 of Title 11 of the Code of Federal Regulations.

Respectfully submitted on behalf of National Conservative Political Action Committee and Conservatives Against Liberal Legislation.

Sincerely,



J. Curtis Herge

Enclosures

83040373333

ARTICLES OF INCORPORATION
8 300 4 0 3 7 3 3 5 4
OF

NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL

RECEIVED

In compliance with the requirements of Chapter 200 APR 7 AM 9 40
of Title 13.1 of the Code of Virginia, the undersigned
hereby acts to form a non-stock corporation not for profit
and to that end sets forth the following:

ARTICLE I

The name of the corporation is: NATIONAL CONSERVATIVE
PUBLIC AFFAIRS COUNCIL, hereinafter referred to as the
Corporation.

ARTICLE II

The objects and purposes of the Corporation, which
is not formed for pecuniary profit or financial gain, shall
be exclusively to serve the public interest and to promote
social welfare by fostering and developing greater public
participation in governmental affairs in order to achieve
efficient operation and delivery of governmental services
which benefit the community, business and citizens in all
walks of life. To achieve those objects and purposes, the
Corporation shall conduct research on issues of public
importance; conduct conferences from time to time at which
members of the general public and representatives of government
may meet in a body for an exchange of views on matters of
public importance; report and disseminate the results of its
research, studies and conferences; and, promote and develop
cooperation among similar organizations, all to the end that
the general public may play a more enlightened role in the
activities of its government.

For the accomplishment of these purposes and
without, in any particular, limiting the generality of the
foregoing, the Corporation shall have the power to own,
operate, print, publish, manage and distribute such books,
magazines, papers and other literature for the dissemination

and exchange of information as will further the objects and purposes of the Corporation; to purchase, lease or otherwise acquire, and hold, own, use and operate, or mortgage or otherwise encumber, or sell, real and personal property as may be necessary to carry out the objects and purposes of the Corporation; to receive and maintain a fund or funds of real or personal property, or both, and, subject to the restrictions and limitations hereinafter set forth, to use and apply the whole or any part of the income therefrom and the principal thereof exclusively in furtherance of the objects and purposes of the Corporation.

No part of the net earnings of the Corporation shall inure to the benefit of any member, director or officer of the Corporation, or any private individual (except that reasonable compensation may be paid for services rendered to or for the Corporation affecting one or more of its purposes). The Corporation shall not participate in, nor intervene in (including the publication or distribution of statements), any political campaign on behalf of or in opposition to any candidate for public office.

Upon the dissolution of the Corporation or the winding up of its affairs, the assets of the Corporation shall be distributed exclusively to organizations which would then qualify under the provisions of Section 501(c)(4), or successor Section, of the Internal Revenue Code and the Regulations thereunder as they now exist or as they may hereafter be amended. No member, director or officer of the Corporation, or any private individual, shall be entitled to share in the distribution or division of any of the corporate assets on dissolution of the Corporation.

Notwithstanding any other provision of this Certificate, the Corporation shall not conduct or carry on any activities not permitted to be conducted or carried on by an organization ~~exempt under Section 501(c)(4) of the Internal Revenue~~

Code and its Regulations as they now exist or as they may hereafter

be amended. Alternatively, the Corporation shall have the power to, and shall, conduct and carry on any activities required to be conducted or carried on in order to acquire and maintain a determination that it is an organization exempt under Section 501(c)(4). or successor Section, of the Internal Revenue Code and the Regulations thereunder as they now exist or as they may hereafter be amended.

ARTICLE III

The Corporation shall have no members.

ARTICLE IV

The Directors of the Corporation shall hold office for a term of one year, and until their respective successors have been elected and qualified, and shall, with the exception of the initial Directors, be elected by a majority vote of the Directors in office immediately preceding the expiration of each term. Any vacancy in the Board of Directors that still occur prior to the expiration of a term shall be filled by such person as shall be appointed by the Chairman of the Board of Directors and the person so appointed shall hold office until the expiration of the term to which he or she succeeded.

ARTICLE V

The post office address of the initial registered office is No. 7600 Old Springhouse Road, McLean, Virginia 22101, which is located in Fairfax County, Virginia. The name of its registered agent is J. Curtis Herge, who is a resident of Virginia and who is a member of the Virginia State Bar and whose business office is the same as the registered office of the Corporation.

ARTICLE VI

The number of Directors constituting the initial Board of Directors is three (3) and the names and addresses of the persons who are to serve as the initial Directors

Names

John T. Dolan

Addresses

3129 South 14th Street
Arlington, Virginia 22204

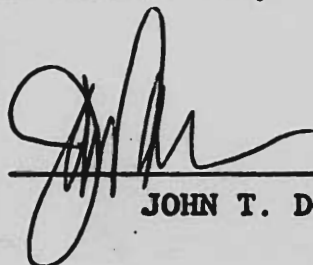
Roger Stone 20 East Windsor
8 0 4 0 5 Alexandria, Virginia 22301

Frank J. Donatelli 1021 Arlington Boulevard
Arlington, Virginia 22209

ARTICLE VII

The period of duration of the Corporation is perpetual.

IN WITNESS WHEREOF, for the purpose of forming the Corporation under the laws of the Commonwealth of Virginia, the undersigned, Incorporator of the Corporation, has executed these Articles of Incorporation this 13th day of September, 1977.

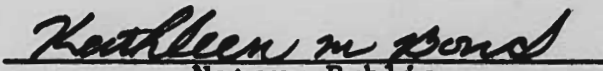


JOHN T. DOLAN

STATE OF VIRGINIA)
COUNTY OF) to-wit:

I, the undersigned Notary Public, in and for the State and County aforesaid, whose commission as such will expire on the 17th day of May, 1981, do hereby certify that on this day personally appeared before me in my said State and County, JOHN T. DOLAN, whose name is signed to the foregoing Articles of Incorporation of NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL, dated the 13th day of September, 1977, and he then and there acknowledged the same before me.

GIVEN under my hand and notarial seal this 13th day of September, 1977.


Notary Public



STATE CORPORATION COMMISSION

Richmond,

September 23, 1977

This is to Certify that the certificate of incorporation of

National Conservative Public Affairs Council

*was this day issued and admitted to record in this office
and that the said corporation is authorized to transact its
business subject to all the laws of the State applicable to
the corporation and its business.*

State Corporation Commission

George N. Bryant, Jr.
First Assistant Clerk of the Commission

8304033338

ARTICLES OF AMENDMENT
OF
NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL

NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL, a Corporation organized and existing under and by virtue of the provisions of Chapter 2 of Title 13.1 of the Code of Virginia, hereby acts to amend its Articles of Incorporation and to that end sets forth the following:

A. The name of the Corporation is: NATIONAL CONSERVATIVE PUBLIC AFFAIRS COUNCIL.

B. The amendment so adopted is to change the name of the Corporation from National Conservative Public Affairs Council to:

CONSERVATIVES AGAINST LIBERAL LEGISLATION

C. The Corporation has no members.

D. The amendment was adopted at a meeting of the Board of Directors held on August 15, 1979, at which time said amendment received the vote of at least two-thirds of the Directors in office.

E. The registered office of the Corporation is located in Fairfax County, Virginia.

IN WITNESS WHEREOF, the Corporation has caused these Articles to be executed by the Chairman of its Board of Directors and by its Secretary this 2nd day of August, 1979.

NATIONAL CONSERVATIVE PUBLIC
AFFAIRS COUNCIL

By:

Rhonda K. Statton
Chairman

By:

Marilla Statton
Secretary

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
OFFICE OF THE CLERK

RICHMOND, VA. 23209

September 5, 1979

\$ 10.00

RECEIVED OF

J. Curtis Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Ten and no/100----- DOLLARS

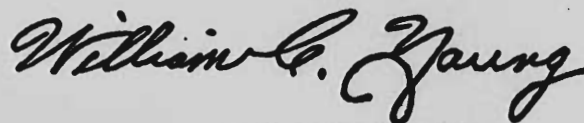
FOR National Conservative Public Affairs Council (changing name to
Conservatives Against Liberal Legislation)

on account of fees in connection with articles filed by the above corporation:

Filing Fee, \$5.00; Charter Fee, \$ --- ; Recording Fee, \$ 5.00

The certificate of AMENDMENT

was issued and admitted to record in this office on the date above written.



Clerk of the Commission

83040370361

Address any reply to: 31 Hopkins Plaza, Baltimore, Md. 21201

Department of the Treasury

District Director

Internal Revenue Service

Date: **MAR 6 1978**

In reply refer to:

Telephone: (301) 962-4773

► **National Conservative Public Affairs
Council
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22205**

Internal Revenue Code: Section 501(c) (1)

Form 990 Required: ☒ Yes ☐ No

Accounting Period Ending: **December 31**

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under the provisions of the Internal Revenue Code section indicated above.

Unless specifically excepted, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$50 or more to each of your employees during a calendar quarter. And, unless excepted, you are also liable for tax under the Federal Unemployment Tax Act on remuneration of \$50 or more to each of your employees during a calendar quarter if, during the current or preceding calendar year, you have one or more employees at any time in each of 20 calendar weeks or pay wages of \$1,500 or more in any calendar quarter. If you have any questions about excise, employment, or other Federal taxes, please address them to this office.

If your purposes, character, or method of operation is changed, you must let us know so we can consider the effect of the change on your exempt-status. Also, you must inform us of all changes in your name or address.

The block checked at the top of this letter shows whether you must file Form 990, Return of Organization Exempt From Income Tax. If the Yes box is checked, you are only required to file Form 990 if your gross receipts each year are normally more than \$10,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, for failure to file the return on time.

83040073350

cc: Mr. J. Curtis Hays
7600 Old Springhouse Road
Malvern, Virginia, 22101

Address any reply to: 31 Hopkins Plaza, Baltimore, Md. 21201

Department of the Treasury

District Director

Internal Revenue Service

Date:

MAR 21 1980

In reply refer to:

CSB:Control II:J.Strud

Telephone: (301) 962-3280

▷ **Conservatives Against Liberal Legislation**
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209

Date of Exemption:

March 6, 1978

Internal Revenue Code Section:

501(c)(4)

Gentlemen:

Thank you for submitting the information shown below. We have made it a part of your file.

The changes indicated do not adversely affect your exempt status and the exemption letter issued to you continues in effect.

Please let us know about any future change in the character, purpose, method of operation, name or address of your organization. This is a requirement for retaining your exempt status.

Thank you for your cooperation.

Sincerely yours,

Teddy R. Kern
District Director

Item Changed

From

To

Name

National Conservative
Public Affairs Council

Above

cc: J. Curtis Herge
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22101

3 0 4 0 3 7 3 3
*This is to be
corporation
ving comp
reby author
Virginia in
a laws of the*

Office of Recorder of Deeds

CORPORATION DIVISION

WASHINGTON



This is to certify that the pages attached hereto constitute a full, true, and complete copy of CERTIFICATE AND ARTICLES OF INCORPORATION OF NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, AS RECEIVED AND FILED AUGUST 12, 1975.

as the same appears of record in this office.

In Testimony Whereof,

I have hereunto set my hand and caused the seal of this office to be affixed, this

the 13th day of

AUGUST

A. D. 1975

PETER S. RIDLEY,

Recorder of Deeds, D. C.

By

Louis H. Cole

Assistant Superintendent of Corporations, D. C.

P-3644

OFFICE OF RECORDER OF DEEDS, D. C.

Corporation Division
Sixth and D Streets, N. W.
Washington, D. C. 20001

CERTIFICATE

THIS IS TO CERTIFY that all provisions of the District of Columbia
Non-profit Corporation Act have been complied with and ACCORD-
INGLY this Certificate of Incorporation

is hereby issued to the NATIONAL CONSERVATIVE POLITICAL ACTION
COMMITTEE

as of the date hereinafter mentioned.

Date August 12, 1975

PETER S. RIDLEY,
Recorder of Deeds, D. C.

David H. Cole
David H. Cole
Superintendent of Corporations

INDEXING FEE

2.00

ARTICLES OF INCORPORATION
OF
NATIONAL CONSERVATIVE POLITICAL
ACTION COMMITTEE

To: The Recorder of Deeds, D.C.
Washington, D.C.

We, the undersigned natural persons of the age of twenty-one years or more, acting as incorporators of a corporation under Title 29 Chapter 10 of the Code of Laws of the District of Columbia, the District of Columbia Nonprofit Corporation Act, adopt the following Articles of Incorporation for such corporation:

- FIRST: The name of the corporation is NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE.
- SECOND: The period of its duration is perpetual.
- THIRD: The purposes for which the corporation is organized are as follows:

The corporation is organized and shall be operated primarily for the purpose of directly or indirectly accepting contributions or making expenditures or both for influencing or attempting to influence the selection, nomination, election or appointment of any individual to any Federal, State, or local public office or office in a political organization, or the election of Presidential or Vice-Presidential electors, whether or not such individual or electors are selected, nominated, elected, or appointed.

The corporation is organized and shall be operated to engage in any and all activities provided for and intended by 26 U.S.C. §527.

The corporation may engage in any activity for

FILED

AUG 12 1975

BY:

which corporations may be organized under the District of Columbia Nonprofit Corporation Act and may carry on any other business in connection with the foregoing, and exercise all powers conferred by said Act.

The corporation shall have the power to do all things necessary and appropriate to carry out the above purposes under the laws of the District of Columbia and the United States for such a corporation.

FOURTH: The corporation shall have no members

FIFTH: The provisions for the regulation of the internal affairs of the corporation and the manner of the election or appointment of directors shall be established in the corporation's By-Laws.

SIXTH: The address, including street and number of the initial registered office of the corporation is 918 16th Street, N.W., Washington, D.C. 20006; and the name of its initial registered agent at such address is CT Corporation System.

SEVENTH: The number of directors constituting the initial Board of Directors is three and the names and addresses of persons who are to serve as the initial directors until their successors are elected and qualified are:

<u>Names</u>	<u>Addresses</u>
J. David Nickles	430 M Street, S.W. Washington, D.C. 20021
Charles Black	3709 Colonial Avenue Alexandria, Virginia 22309
Roger Stone	5907 S. 5th Road Arlington, Virginia 22204

EIGHTH: The name and address of each incorporator is:

<u>Names</u>	<u>Addresses</u>
J. David Nickles	430 M Street, S.W. Washington, D.C. 20021
Charles Black	3709 Colonial Avenue Alexandria, Virginia
Roger Stone	5907 S. 5th Road

Arlington, Virginia 22204

Date: August 12, 1975

J. David Nickles
 J. David Nickles

Charles Black
 Charles Black

Roger Stone Jr.
 Roger Stone

DISTRICT OF COLUMBIA ss:

I, *Joan K. Jordan*, a Notary Public in and for the District of Columbia, hereby certify that on the 12th day of August 1975, personally appeared before me, J. David Nickles, Charles Black, and Roger Stone who signed the foregoing document as incorporators, and stated that the statements herein contained are true.



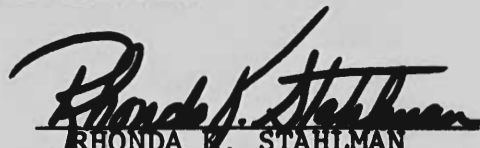
Joan K. Jordan

2304037370

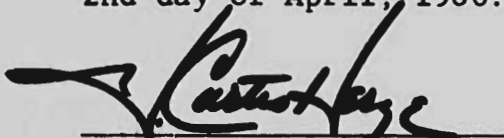
AFFIDAVIT, made this 2nd day of April, 1980,
by RHONDA K. STAHLMAN, who, being duly sworn, deposes and
says:

1. That she is the Chairman of Conservatives
Against Liberal Legislation, a corporation
organized and existing under and by virtue
of the Virginia Nonstock Corporation Act.
2. That she is familiar with the program of
Conservatives Against Liberal Legislation which
was designated and known as "Kennedy Truth Squad,
a project of Conservatives Against Liberal
Legislation."
3. That Conservatives Against Liberal Legislation
produced and mailed letters in connection with
the said program on September 27, 1979; October 17,
1979; and, November 6, 1979.
4. That Conservatives Against Liberal Legislation
terminated and discontinued the said program on
November 7, 1979.

IN WITNESS WHEREOF, this affidavit has been signed
on the day and date first above written.


RHONDA K. STAHLMAN

Sworn to before me this
2nd day of April, 1980.


Notary Public

My Commission Expires:

August 8, 1980

RECEIVED

'80 APR 7 AM 9:33

304037337

FIRST CLASS

SEDAM & HERGE

ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

To:

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

ATTENTION: Robert Bogin, Esq.
Office of General Counsel

FIRST CLASS MAIL





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Conservative Political Action
Committee
1500 Wilson Boulevard #513
Arlington, Virginia 22209

Re: MUR 1192

Dear Sir or Madam:

This letter is to notify you that on March 19, 1980, the Federal Election Commission received a complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1192. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

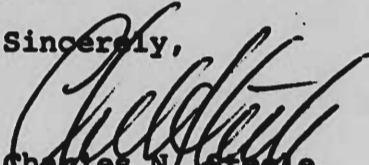
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

8304037372

Letter to NCPAC
Page 2

If you have any questions, please contact Marsha Gentner, the attorney assigned to this matter at 202-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Complaint
Procedures

83040373373



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John T. Dolan
National Director
Conservatives Against Liberal
Legislation
Suite 515
1500 Wilson Boulevard
Arlington, Virginia 22209

Re: MUR 1192

Dear Mr. Dolan:

This letter is to notify you that on March 19, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1192. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

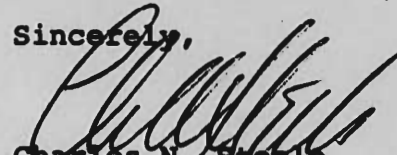
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040673374

Letter to Dolan
Page 2

If you have any questions, please contact Marsha Genter, the attorney assigned to this matter at 202-523-4057. For your information, we have attached a brief description of the Commission's preliminary procedure for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Complaint
Procedures

8304037337



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John T. Dolan
National Director
Kennedy Truth Squad
Suite 515
1500 Wilson Boulevard
Arlington, Virginia 22209

Re: MUR 1192

Dear Mr. Dolan:

This letter is to notify you that on March 19, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1192. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against you in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

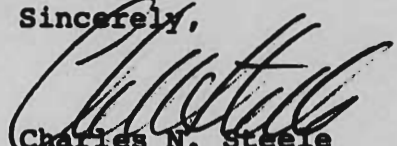
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

3 3 0 4 0 3 7 3 3 7 6

Letter to Dolan
Page 2

If you have any questions, please contact Marsha Gentner, the attorney assigned to this matter at 202-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Complaint
Procedures

8 3 0 4 0 3 7 3 3 7 7



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John E. Nolan, Jr.
General Counsel
Kennedy for President
1250 22nd Street, N.W.
Washington, D.C. 20037

Dear Mr. Nolan:

This letter is to acknowledge receipt of your complaint of March 17, 1980, against the National Conservative Political Action Committee, the Conservatives Against Liberal Legislation and the Kennedy Truth Squad which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8304037378

KENNEDY FOR PRESIDENT

MUR 1192

March 17, 1980

80 MAR 19 P 2: 53

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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

Dear Mr. Steele:

It has come to the Committee's attention that the Kennedy Truth Squad has distributed the attached letter by mail. According to the letter, the Kennedy Truth Squad is a project of Conservatives Against Liberal Legislation. It has also come to the Committee's attention that the Kennedy Truth Squad has published the attached advertisement in the Manchester Union Leader. According to the advertisement, the Kennedy Truth Squad is a project of the National Conservative Political Action Committee.

As the attached reports indicate, the National Director of Conservatives Against Liberal Legislation, John T. Dolan, is a salaried employee of the National Conservative Political Action Committee. Both the Conservatives Against Liberal Legislation and the National Conservative Political Action Committee operate from the same address -- namely, 1500 Wilson Boulevard, Arlington, Virginia 22209.

The National Conservative Political Action Committee has filed a statement of organization with the Commission. Neither the Conservatives Against Liberal Legislation nor the Kennedy Truth Squad has filed a statement of organization.

It appears that the National Conservative Political Action Committee, the Conservatives Against Liberal Legislation, and the Kennedy Truth Squad have been set up by the same group of persons and should therefore be treated as a single political committee. That committee, it seems, should properly be called the National Conservative Political Action Committee.

1250 22ND STREET N.W. WASHINGTON D.C. 20037 TELEPHONE: (202) 861-6000

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.

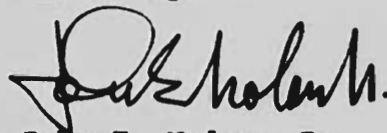
Charles N. Steele, Esquire
March 17, 1980
Page Two

It also would appear that the National Conservative Political Action Committee has committed the following violations of the Federal Election Campaign Act of 1971, as amended, in that it has failed to:

- (1) file reports with the Commission in accordance with 2 U.S.C. § 434;
- (2) include a notice of literature in accordance with 2 U.S.C. § 435(b); and further that it has failed to
- (3) include a notice on communications in accordance with 2 U.S.C. § 441(d).

I am hopeful that your office will be able to give immediate attention to this matter.

Sincerely,

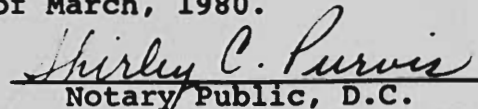


John E. Nolan, Jr.

Enclosures

District of Columbia, ss:

Subscribed and sworn to before me this
17th day of March, 1980.


Notary Public, D.C.

My commission expires 4/14/80

8304037330



Kennedy Truth Squad

a project of Conservatives Against Liberal Legislation (C.A.L.L.)
Suite 515, 1500 Wilson Boulevard, Arlington, Va. 22209

John T. Dolan
National Director

Dear Fellow American,

I want to deliver a personal MESSAGE to Edward Kennedy from you.

Your MESSAGE to Kennedy is that you're putting him on notice: Kennedy can no longer hide his radical record of ultra-liberal policies.

Please sign your MESSAGE to Kennedy and send it back to me.

And please join our Kennedy Truth Squad to help spread the truth about Kennedy's liberalism.

If the American people knew how radical Kennedy's policies really are he wouldn't be their first choice in the Presidential polls.

Our group, Conservatives Against Liberal Legislation, is made up of experienced and dedicated conservatives who can and will expose liberal programs in their true light.

What's more our Kennedy Truth Squad is the only project geared up and ready to go now to expose Kennedy's policies.

No one else has taken on this responsibility.

Quite frankly, I want you to join our Kennedy Truth Squad because I feel you strongly disagree with Kennedy's liberal policies.

So I invite you to join our project which gets right to the heart of the liberals' strategy.

Will you help us now to send some of America's

Officers: Rhonda Stahlman, Chairman; John T. Dolan, National Director; B. Annette Burlingame, Treasurer

8304067331

top Conservatives across the country to warn Americans about Edward Kennedy?

Won't you sit down right now and do two things for me:

- 1) Sign the MESSAGE TO KENNEDY.
- 2) Fill in the Reply Memo I've attached to the MESSAGE and send it with your gift to get the Truth Squad launched.

The American people don't know how radical Kennedy's policies are because the major TV and radio networks and newspapers are on his side.

Consider these facts:

- ** Kennedy's support for Big Labor bosses on Common Situs picketing and the repeal of the Hatch Act shows he'll tag along with anything the unions want. He needs big labor support at the polls. We and other conservative groups helped stop Common Situs picketing and repeal of the Hatch Act, but it's clear KENNEDY'S PROGRAMS HAVE BIG LABOR'S SEAL OF APPROVAL.
- ** Kennedy's socialized medicine scheme threatens to break the backs of you and me, the taxpayers. Its price tag: at least \$63 billion. In the first year of the program alone.
- ** Kennedy leads the liberal campaign against the American family. He supports federal funds for abortion. He supports "gay rights". He wants to extend the time to ratify the Equal Rights Amendment (E.R.A.)
- ** Kennedy opposes tax cuts like the Kemp-Roth 33% cut. And he brashly calls for over one hundred billion dollars more government spending.
- ** Kennedy has a long record of undermining America's defenses. He's opposed the B-1 Bomber, the Minuteman Missile, the Trident Submarine, the Safeguard Missile System. He wants close relations with Castro's Cuba even though the Soviets have combat troops and MiGs there now, just 90 miles from our shores.

Unless we join forces right now, Kennedy will be more powerful than ever.

So it's up to you and me to warn our fellow-Americans.

8304037332

Starting this fall, the Kennedy Truth Squad, with your help, will tell concerned Americans about Kennedy's ultra-liberal policies.

- 1) Leading Congressmen, military men and other top conservatives can hold news conferences and travel the country to warn and educate Americans about Kennedy's schemes.

But the Kennedy Truth Squad needs your dollars to pay our speakers' travel expenses.

- 2) We've scheduled TV, radio and full-page newspaper ads along the lines of the sample I've enclosed, to expose Kennedy's big spending.

Three top media experts have joined the Kennedy Truth Squad to design a national advertising campaign.

- 3) We'll mail letters in key areas to concerned citizens who've already shown they'll work and act to stop liberal legislation.

Our Truth Squad about Kennedy's liberal policies will take months.

So it's vital we start to educate America about Kennedy's leftist policies right away.

Can we do it in time?

Yes, earlier this year our group played a vital role in stopping a bill for taxpayer financing of elections by postcard mailing to U.S. Congressmen. Now we're in the forefront of a "Stop SALT II" campaign through mailings to Senators.

With your help we can cover the nation with our message about Kennedy this fall:

- 1) Television ads can reach hundreds of thousands of voters at once.
- 2) Radio ads are an excellent investment: they can reach tens of thousands.
- 3) Full-page newspaper ads capture the attention of thousands of newspaper readers. But a full-page ad in a newspaper like your leading local newspaper will cost us \$ 4,600 or more.

But we can get the other side, the true side, of the Kennedy

story across only if we spend the money for television, radio and newspaper ads and voter mailings.

Only if we finance trips to towns and cities across America by leading Kennedy Truth Squad speakers.

We must launch the Kennedy Truth Squad this fall before Kennedy's ambitious plans come to a head. Here's what it costs to get the Kennedy Truth Squad launched:

* Speaking tour of major cities	\$ 5,000
* Full-page ad in leading local newspaper	\$ 4,600 each
* 1-Minute TV ad on a major station	\$ 4,000 each
* Spot radio commercial	\$ 310 each
* 50,000 voter mailings	\$12,500

So please support the Kennedy Truth Squad with your generous gift today. If Kennedy gets any more popular and successful, you and I will have to live with his liberal program for a long, long time.

If you can afford to invest \$100 or \$50, your check will go a long way to spread the Kennedy Truth Squad's message. But if you can send \$25, \$15 or even \$10 at this time, you'll help greatly to get the Truth Squad launched right now.

And I'll be happy to send you FREE copies of the radio and television scripts we're going to use.

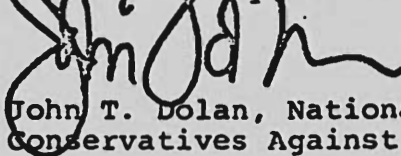
Please make your check out to Conservatives Against Liberal Legislation.

Don't delay. Let's get Teddy Kennedy on the run today.

Thank you in advance for helping tell America the truth about Kennedy's big-spending, anti-family, anti-defense liberalism.

With warm appreciation for your help.

Most sincerely



John T. Dolan, National Director
Conservatives Against Liberal Legislation

TD/gvl

P.S. Send us the enclosed MESSAGE TO KENNEDY with your gift today. I'll go personally with other Truth Squad members to Kennedy to hand over MESSAGES from you and thousands of concerned Americans. We'll invite the news media along. And for once let's get some NEGATIVE PUBLICITY in the media for Kennedy's policies.

8 3 0 4 0 3 7 3 3 3 5

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your radical policies on:

- 1) disarmament
- 2) socialized medicine
- 3) abortion and ERA
- 4) pro-union boss legislation

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide.

HERE'S MY INVESTMENT IN YOUR TRUTH SQUAD:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$____ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

CF/Mgv

Message to Senator Edward Kennedy

Senator Kennedy:

I oppose your radical policies on:

- 1) disarmament
- 2) socialized medicine
- 3) abortion and ERA
- 4) pro-union boss legislation

I support the Kennedy Truth Squad.

signature

(Please do not detach. Kennedy Truth Squad office staff will remove.)

TO: John T. Dolan, National Director
Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

Dear John,

I'M JOINING THE KENNEDY TRUTH SQUAD TODAY!

Let's bring the truth about Kennedy's
radical policies to the American people.

- * Please travel the country with my warning.
- * Take out full-page newspaper ads.
- * Use TV and radio to tell the truth about Kennedy.
- * Send out voter mailings nation-wide.

HERE'S MY INVESTMENT IN YOUR TRUTH SQUAD:

() \$500 () \$250 () \$100 () \$50
() \$25 () \$15 () \$10 () \$ ____ Other

My check is made out to Conservatives Against
Liberal Legislation, P.O. Box 7580, Washington,
D.C. 20044.

Mr., Mrs., Miss _____

Address _____

City _____ State _____ Zip _____

CF/Mgv

83040373386

422 FIRST STREET, S.E.
WASHINGTON, D.C. 20003

8 3 0 4 0 3 7 3 3 3 7

To: Dick Dwyer
From: Cook

**20 Questions for
Teddy Kennedy — before he goes too far**

389
1018

WAMU-FM
86
10:11

Kennedy Truth Squad

A project of
Conservatives Against Liberal Legislation
Post Office Box 7580 Washington, D.C. 20044

NONPROFIT ORG



84-1



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 11973 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY ADDRESSEE



Conservatives Against Liberal Legislation
P.O. Box 7580
Washington, D.C. 20044

83040373388

8 3 0 4 0 3 7 3 3 3 9
this on TV and in major newspapers

Edward Kennedy: Ultra-Liberal

Look at his voting record
in the Senate:

FOR: big spending welfare programs

FOR: Common Situs picketing and repeal of the Hatch Act

FOR: federal funds for ABORTION

FOR: more time to ratify the Equal Rights Amendment (E.R.A.)

FOR: close relations with CASTRO'S CUBA



AGAINST: a strong America: against
the B-1 Bomber, the
Minuteman Missile, the
Trident Submarine, the
Safeguard Missile Defense.

AGAINST: ties with Taiwan

AGAINST: tax cuts

**Senator Kennedy votes anti-
taxpayer, anti-family, anti-defense
and pro-Big Labor bosses.**

Sponsored by the Kennedy Truth Squad
a project of Conservatives Against Liberal Legislation (C.A.L.L.)
P.O. Box 7580, Washington, D.C. 20044

Would you like to help buy more ads like this to tell the truth about Kennedy's ultra-liberal policies? Please clip and mail this coupon with your gift to the above address.

PLEASE PRINT
(Mr./Mrs./Miss)

Name _____

Address _____

City _____ State _____ Zip _____

As a "Thanks!" for your gift, we'll
send you FREE a copy of our TV
and radio scripts about Teddy
Kennedy's liberal programs.

AD/all

QUESTIONS

THE NEW HAMPSHIRE MEDIA
SHOULD ASK

TED KENNEDY

We urge the New Hampshire media to begin a serious analysis of what a Kennedy presidency would mean to America. We want the media to give the same scrutiny they give to any candidate for president by asking tough questions.

We challenge the media to ask Senator Kennedy...

83040373320

would mean to America. We want the media to give the same scrutiny they give to any candidate for president by asking tough questions.

We challenge the media to ask Senator Kennedy the following questions before the New Hampshire Primary and throughout his campaign:

LEADERSHIP

Senator Kennedy, when you were Majority Whip for the Democratic Party you were unceremoniously deposed by a former member of the KKK. You have been in the U.S. Senate for 18 years, and yet not one major piece of legislation bears your name. You haven't even been able

to get a national health insurance bill out of your own subcommittee. Your personal background shows very little to be proud of in leadership qualities, particularly under pressure. With this type of record, what makes you think you have the leadership abilities to be president?

EXTREME LIBERALISM

According to the liberal ADA and COPE, as well as the conservative ACA and ACU you rank as the most extremely liberal member of the entire U.S. Senate. You have always supported huge deficits which have

caused inflation, the energy crisis and the decline of our dollar. What makes you think that an extreme liberal like yourself is able to be a good president?

WOULD JACK KENNEDY VOTE FOR TED KENNEDY?

Jack Kennedy was elected on the missile gap. He supported strong defense spending. He organized the boycott of Cuba. He was on constant alert against Russian aggression around the world. He proposed a dramatic 30% tax cut and opposed bureaucratic government regulations. You on the other hand have constantly voted against defense appropriations. You have a 0% rating from the American Security

Council ranking you as the most anti-defense member of the Senate. You favored the Panama Canal Treaties, SALT, and establishing diplomatic relations with Cuba. You even voted against the same tax cut your brother proposed as president. Don't you think this shows that the similarities between Ted and Jack Kennedy go no further than the last names?

CHAPPAQUIDDICK

There are numerous inconsistencies between what you told the police about Chappaquiddick and your television statement on the incident. Will you consent to an unedited interview to discuss the entire affair? Since you have nothing to hide, will you take a lie detector test during

this interview? Will you assist in getting all legal records on the matter made public? Will you encourage everyone associated with the affair to speak out publicly?

THE SOCIAL ISSUES

There are numerous inconsistencies between what you told the police about Chappaquiddick and your television statement on the incident. Will you consent to an unedited interview to discuss the entire affair? Since you have nothing to hide, will you take a lie detector test during

THE SOCIAL ISSUES

You chose to announce your candidacy in Boston, a city which opposes and has known the effects of forced busing, government enforced racial quotas, and federally-funded abortion. Yet in the Senate

this interview? Will you assist in getting all legal records on the matter made public? Will you encourage everyone associated with the affair to speak out publicly?

you support busing and quotas more than anyone else. How do you square your position on these issues with the overwhelming majority of the Americans who disagree?

AMERICA DESERVES AN ANSWER TO THESE QUESTIONS

We're the Kennedy Truth Squad, a project of the National Conservative Political Action Committee. Even if the liberal dominated media won't ask these questions, we will undertake an independent effort to make sure the people of America know Ted Kennedy's record. Help us put newspaper ads like this as well as television and radio ads and independent truth squads all over the country to expose Ted Kennedy for what he is.

If you would like more
information call
The Kennedy Truth Squad
FREE
1-800-621-5800

- ☐ Yes, I want to help inform the American public of Ted Kennedy's liberal record.
- ☐ Yes, I want to volunteer.
- ☐ Enclosed is my contribution of \$_____ to help buy t.v., radio, and newspaper ads like this that expose Ted Kennedy's liberal policies.
- ☐ I am enclosing a list of other individuals who would be interested in helping.

Name _____ Phone _____
Address _____
Occupation _____
Principal Place of Business _____

OR SEND TO:
KENNEDY TRUTH SQUAD, A PROJECT OF
THE NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
1500 WILSON BLVD. SUITE 513
ARLINGTON, VIRGINIA 22209

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

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

Page 11 of 18 to
 Line Number 20

File Separate Schedules for
 each numbered line

Name of Candidate or Committee in Full

National Conservative Political Action Committee

Full Name, Mailing Address and ZIP Code Becki C. Burlingame	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 413.84
Full Name, Mailing Address and ZIP Code John T. Dolan	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 657.59
Full Name, Mailing Address and ZIP Code Mark A. Florio	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 204.36
Full Name, Mailing Address and ZIP Code Jaqueline Lopretto 5340 Holmes Run Pkwy #704 Alexandria, VA 22304	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 395.90
Full Name, Mailing Address and ZIP Code Leslie A. Neely	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 371.58
Full Name, Mailing Address and ZIP Code Lisa G. Stoltenberg	Particulars of Expenditure Salary Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 419.07
Full Name, Mailing Address and ZIP Code American Mailing Lists Corp.	Particulars of Expenditure List Rental Expenses Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 1526.08
Full Name, Mailing Address and ZIP Code Berlin & Jones Co., Inc.	Particulars of Expenditure Printing Services Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year) 12/28/79	Amount of each expendi- ture this period 2440.62
SUBTOTAL of expenditures this page (optional)			\$ 6429.04
TOTAL this period (last page this line number only)			8

GENERAL 8
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20003

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

Page 7 of 18 to
Line Number 20

File Separate Schedules for
each numbered line

Name of Candidate or Committee in Full			
National Conservative Political Action Committee			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Encelopes Unlimited 649 North Horners Lane Rockville, MD 20850	Printing Expense Expenditure for: ☐ Primary ☐ General ☐ Other	12/7/79	1621.63
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Metro Printing & Mailing	Printing Expense Expenditure for: ☐ Primary ☐ General ☐ Other	12/7/79	1280.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wiland & Associates, Inc. 219 East Davis Street Culpeper, VA 22701	Mail handling and computer services Expenditure for: ☐ Primary ☐ General ☐ Other	12/7/79	2974.98
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
John T. Dolan 3129 S. 14th Street Arlington, VA 22205	Petty Cash Expenditure for: ☐ Primary ☐ General ☐ Other	12/10/79	84.44
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Postmaster	Postage on account Expenditure for: ☐ Primary ☐ General ☐ Other	12/11/79	2000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Postmaster	Postage on account Expenditure for: ☐ Primary ☐ General ☐ Other	12/11/79	500.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Charter Leasing Corp. P.O. Box 6966, 2100 Dabney Rd Richmond, VA 23230	Telephone Expense Expenditure for: ☐ Primary ☐ General ☐ Other	12/12/79	569.49
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Advanced Techniques & Systems	Postage for mailing Expenditure for: ☐ Primary ☐ General ☐ Other	12/13/79	1000.00
SUBTOTAL of expenditures this page (optional)			\$10,030.54
TOTAL this period (last page this line number only)			\$

SCHEDULE B
REVISED
 January, 1978
 Federal Election Commission
 1235 K Street, N.W.
 Washington, D.C. 20003

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

Page 10 of 18 for
 Line Number 20

(Use Separate Schedule for
 each numbered line)

Name of Candidate or Committee in Full

National Conservative Political Action Committee

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Diversified Mail Marketing Inc. Postage Escrow Acct.	Postage Expense Expenditure for: ☐ Primary ☐ General ☐ Other	12/18/79	5880.00
U.S. Postmaster	Postage for account Expenditure for: ☐ Primary ☐ General ☐ Other	12/14/79	2000.00
Guyton Williams 1728 N. Troy Arlington, VA 22201	Reimbursed Expense Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	26.93
Becki C. Burlingame	Bonus Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	100.00
John T. Dolan	Bonus Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	100.00
Mark A. Florio 701 Marshall Road, SW Vienna, VA 22180	Bonus Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	100.00
Leslie Neely	Bonus Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	100.00
Lisa G. Stoltenberg	Bonus Expenditure for: ☐ Primary ☐ General ☐ Other	12/19/79	100.00
SUBTOTAL of expenditures this page (optional)			\$ 8406.93
TOTAL this period (last page this line number only)			\$

734037330

GENERAL E
REVISED
January, 1978
Federal Election Commission
1025 K Street, N.W.
Washington, D.C. 20543

ITEMIZED INDEPENDENT EXPENDITURES
FOR LINE 23, FEC FORM 3

(See Reverse Side for Instructions)

Page 2 of 11 Pages

Name of Candidate or Committee in Full National Conservative Political Action Committee		I.D. No. C00024687		
Full Name, Mailing Address and ZIP Code National Conservative Political Action Committee 1500 Wilson Blvd. #513 Arlington, VA 22209		Is this a Separate Report by a Committee filing on FEC Form 3a? <u>No</u>		
Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.				
Full Name, Mailing Address & ZIP Code of Each Payee	Particulars of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Composition Systems, Inc. 1011 Arlington Blvd. #W141 Arlington, VA 22209	Printing Expense	12/14/79	255.11	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Diversified Direct, Inc. c/o U.V.B. Box 179 Alexandria, VA 22314	Printing Expense	12/14/79	1593.03	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Diversified Mailing Service 7777 Leesburg Pike Falls Church, VA 22043	Mailing Service	12/14/79	858.49	Cranston U.S. Senate California ☐ Support ☒ Oppose
Diversified Mailing Service	Mailing Service	12/14/79	858.49	Culver U.S. Senate Iowa ☐ Support ☒ Oppose
Diversified Mailing Service	Mailing Service	12/14/79	856.49	Bayh U.S. Senate Indiana ☐ Support ☒ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$4423.61	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	
(c) TOTAL Independent Expenditures				\$

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

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

**SCHEDULE C
REVISED**

January, 1978

Federal Election Commission
1235 K Street, N.W.
Washington, D.C. 20543

**ITEMIZED INDEPENDENT EXPENDITURES
FOR LINE 23, FEC FORM 3**

(See Reverse Side for Instructions)

Page 17 of 41 pages

Name of Candidate or Committee on Full	I.D. No.
National Conservative Political Action Committee	C00024687
Full Name, Mailing Address and ZIP Code	Is this a Separate Report by a Committee
National Conservative Political Action Committee 1500 Wilson Blvd. #513 Arlington, VA 22209	Filed on FEC Form 2a? <u>Yes</u>

Itemize independent expenditures which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & ZIP Code of Each Payee	Form of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Lois E. Doyle 1011 Arlington Blvd. #704W Arlington, VA 22209	Payroll	12/3/79	339.41	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Christine Estes 1833 New Hampshire Ave #104 Washington, DC 20009	Payroll	12/3/79	131.52	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Tristin. Evans 6174 Leesburg Pike Falls Church, VA 22044	Payroll	12/3/79	68.08	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Terry S. Feaganes 2603 Fairhaven Avenue Alexandria, VA 22303	Payroll	12/3/79	481.49	Ted Kennedy U.S. President ☐ Support ☒ Oppose
Jacqueline A. Fox 5863 Monticello Road Alexandria, VA 22303	Payroll	12/3/79	325.43	Ted Kennedy U.S. President ☐ Support ☒ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures \$1345.93
 (b) SUBTOTAL of Unitemized Independent Expenditures \$ _____
 (c) TOTAL Independent Expenditures \$ _____

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

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

SCHEDULE B
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005
ITEMIZED EXPENDITURES
**(Operating, Transfer 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 19 for
Line Number 20**
**Also Report Schedule for
each numbered line**
Name of Candidate or Committee in Full
National Conservative Political Action Committee
Full Name, Mailing Address and ZIP Code
TravelWorld, Inc.
Particulars of Expenditure
airfare expense
**Date (month,
day, year)**
11/13/79
**Amount of each expendi-
ture this period**
710.00
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
**John T. Dolan
3129 S. 14th St.
Arlington, VA 22205**
Particulars of Expenditure
travel expenses
**Date (month,
day, year)**
11/13/79
**Amount of each expendi-
ture this period**
47.00
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
**Jaqueline Lopretto
5340 Holmes Run Pkwy.
Alexandria, VA 22304**
Particulars of Expenditure
salary
**Date (month,
day, year)**
11/15/79
**Amount of each expendi-
ture this period**
395.90
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
**Carl R. Channell
2032 Belmont Rd. #210
Washington, DC 20006**
Particulars of Expenditure
fundraising consulting
**Date (month,
day, year)**
11/15/79
**Amount of each expendi-
ture this period**
500.00
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Jaqueline Lopretto
Particulars of Expenditure
fundraising bonus
**Date (month,
day, year)**
11/15/79
**Amount of each expendi-
ture this period**
448.40
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Mary Carol Adams
Particulars of Expenditure
payroll
**Date (month,
day, year)**
11/16/79
**Amount of each expendi-
ture this period**
58.15
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Maria Del Carmen Amas
Particulars of Expenditure
payroll
**Date (month,
day, year)**
11/16/79
**Amount of each expendi-
ture this period**
74.90
Expenditure for:
☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Calvin T. Amburgey
Particulars of Expenditure
payroll
**Date (month,
day, year)**
11/16/79
**Amount of each expendi-
ture this period**
144.65
Expenditure for:
☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)
\$
TOTAL this period (first page this line number only)
\$



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1192

Date Filmed 1/29/83 Camera No. --- 2

Cameraman CAB

830403739



FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1192.

8 3040414313



FEDERAL ELECTION COMMISSION

- 1) Materials related to conciliation
- 2) Intra-OGC routing slip
- 3) Routing Memo between OGC & Commission -
48 hr. tally

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

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

Signed

Date

Jonathan Levin
6/16/83

83040111314



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 10, 1983

Robert R. Sparks, Jr., Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1192

Dear Mr. Sparks:

This is in response to your letter of January 12, 1983, applying for an award under the Equal Access to Justice Act ("EAJA") of attorney's fees and other expenses incurred by CALL in the above-captioned matter. After consideration of the applicability of EAJA and the facts of this matter, the Commission has decided to deny your application.

In your letter, you cited the criteria of EAJA, stating that CALL was "the 'prevailing party' in an 'adversary adjudication' brought by an 'agency' of the United States, which proceeding was not 'substantially justified.'" The claim for fees based upon these criteria fails on several accounts.

The proceedings in this matter did not constitute an adversary adjudication under EAJA. According to 5 U.S.C. § 504(b)(1)(C), an "adversary adjudication" means an "adjudication under section 554" of title 5. Section 554 applies

in every case of adjudication required by statute to be determined on the record after opportunity for an agency hearing, except to the extent that there is involved --
(1) a matter subject to a subsequent trial of the law and the facts de novo in a court;

5 U.S.C. § 554(a)(1) (1978). (Other inapplicable exceptions are also listed). Under 2 U.S.C. § 437g, the description of the Commission's enforcement procedures, there is no provision for an "adjudication on the record after an opportunity for an agency hearing" or any language having the same meaning. See United States v. Allegheny-Ludlum Steel Corp., 406 U.S. 742, 757 (1972); United States v. Florida East Coast Railway Company, 410 U.S. 224, 237-238 (1973). Thus, on its face, EAJA does not apply. Furthermore, Commission proceedings are investigative in nature, not adjudicative. No legal rights are determined by the FEC in § 437g(a) proceedings; at most, the Commission may find probable cause to believe a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has occurred. See 2 U.S.C. § 437g(a)(4), (5), and (6). It is the court that ultimately determines whether or not a violation has been committed by the respondent if the Commission files civil suit to seek enforcement of the Act. See 2 U.S.C. § 437g(a)(6).

The complaint and investigative process under 2 U.S.C. § 437g(a)(1) and (2) is not contentious litigation or in any way adjudicative. See Bro. of Ry. & S.C. v. Ass'n for Ben. of Non-Con. Emp., 380 U.S. 650, 667 (1965); Inland Empire Dist. Council v. Mills, 325 U.S. 697, 706 (1945), reh denied 326 U.S. 803 (1945); Bowles v. Baer, 142 F.2d 787, 789 (7th Cir. 1943); 2 K. Davis, Administrative Law Treatise § 19.06, at 19-10 to 19-13 (2d ed. 1979). It is not a judicial or "quasi-judicial hearing at which opposing parties present their claims and evidence and have their controversies determined." Jordan v. American Eagle Fire Ins. Co., 169 F.2d 281 (D.C. Cir. 1948); Bowles v. Baer, 142 F.2d at 789.

Indeed, the fundamental nature of investigative agencies is inconsistent with the imposition of a full panoply of judicial procedures. Hannah v. Larche, 363 U.S. at 448; Reagan Bush Committee v. FEC, 525 F. Supp. at 1378. The administrative investigative role has frequently been likened to that of a Grand Jury. See e.g., Hannah v. Larche, 363 U.S. at 448; United States v. Morton Salt, 338 U.S. 632, 642-43 (1950); Oklahoma Press Pub. Co. v. Walling, 327 U.S. 186, 216 (1946). Just as the rights of appraisal, confrontation or cross-examination are not required in that context, so too these extensive procedural rights do not attach to administrative investigations. Hannah v. Larche, 363 U.S. at 448. Cf. FTC v. Standard Oil Co., 449 U.S. at 242-44; United States v. Morton Salt, 338 U.S. at 642-43.

Furthermore, even if a Commission investigation were considered to be adjudicative, it would come under the exception set out in § 554(a)(1), i.e., it would involve a matter subject to a subsequent trial of the law and the facts de novo in a court.

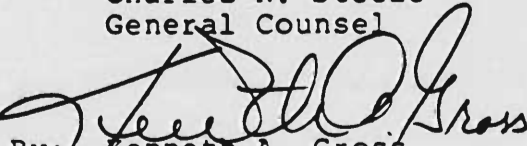
The Commission's actions in this matter were substantially justified. "The test of whether or not a Government action is substantially justified is essentially one of reasonableness." H.R. No. 1418, 96th Cong., 2d Sess. 10 (1980), reprinted in 1980 U.S. Code Cong. & Ad. News 4953, 4989. In this matter, the Commission received a complaint from the Kennedy for President alleging various violations by CALL. The subpoenas sent by the Commission requested financial information which was instrumental in determining the amount of CALL's dollar activity. It also requested the source of the funds for KTS expenditures (i.e., general treasury funds), the possible involvement of a political committee (i.e., NCPAC), and other issues that were pertinent not only to the § 441b issue but also to the § 434 issue raised by the complaint.

Furthermore, as OGC made clear in the General Counsel's Report recommending probable cause, the situation in MUR 1192 differed from the situations presented in MNPL, supra, and Florida for Kennedy Committee, supra. The courts in these cases were analyzing the "for the purpose of influencing" standard which applies to activities of individuals and other non-corporate, non-union persons and did not address the "in connection with" standard applicable to corporate activity.

Based on the foregoing analysis, it appears that CALL does not have a claim against the Commission for fees and other expenses under the Equal Access to Justice Act. If you have any questions, please contact Jonathan Levin at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1192

jl 6/9/83

Dear Mr. Sparks:

This is in response to your letter of January 12, 1983, applying for an award under the Equal Access to Justice Act ("EAJA") of attorney's fees and other expenses incurred by CALL in the above-captioned matter. After consideration of the applicability of EAJA and the facts of this matter, the Commission has decided to deny your application.

In your letter, you cited the criteria of EAJA, stating that CALL was "the 'prevailing party' in an 'adversary adjudication' brought by an 'agency' of the United States, which proceeding was not 'substantially justified.'" The claim for fees based upon these criteria fails on several accounts.

The proceedings in this matter did not constitute an adversary adjudication under EAJA. According to 5 U.S.C. § 504(b)(1)(C), an "adversary adjudication" means an "adjudication under section 554" of title 5. Section 554 applies

in every case of adjudication required by statute to be determined on the record after opportunity for an agency hearing, except to the extent that there is involved --

(1) a matter subject to a subsequent trial of the law and the facts de novo in a court;

8
1
3
1
1
1
0
4
0
0
3
8

5 U.S.C. § 554(a)(1) (1978). (Other inapplicable exceptions are also listed). Under 2 U.S.C. § 437g, the description of the Commission's enforcement procedures, there is no provision for an "adjudication on the record after an opportunity for an agency hearing" or any language having the same meaning. See United States v. Allegheny-Ludlum Steel Corp., 406 U.S. 742, 757 (1972); United States v. Florida East Coast Railway Company, 410 U.S. 224, 237-238 (1973). Thus, on its face, EAJA does not apply. Furthermore, Commission proceedings are investigative in nature, not adjudicative. No legal rights are determined by the FEC in § 437g(a) proceedings; at most, the Commission may find probable cause to believe a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has occurred. See 2 U.S.C. § 437g(a)(4), (5), and (6). It is the court that ultimately determines whether or not a violation has been committed by the respondent if the Commission files civil suit to seek enforcement of the Act. See 2 U.S.C. § 437g(a)(6).

The complaint and investigative process under 2 U.S.C. § 437g(a)(1) and (2) is not contentious litigation or in any way adjudicative. See Bro. of Ry. & S.C. v. Ass'n for Ben. of Non-Con. Emp., 380 U.S. 650, 667 (1965); Inland Empire Dist. Council v. Mills, 325 U.S. 697, 706 (1945), reh denied 326 U.S. 803 (1945); Bowles v. Baer, 142 F.2d 787, 789 (7th Cir. 1943); 2 K. Davis, Administrative Law Treatise § 19.06, at 19-10 to 19-13 (2d ed. 1979). It is not a judicial or "quasi-judicial hearing at which opposing parties present their claims and evidence and have their controversies determined." Jordan v. American Eagle Fire Ins. Co., 169 F.2d 281 (D.C. Cir. 1948); Bowles v. Baer, 142 F.2d at 789.

Indeed, the fundamental nature of investigative agencies is inconsistent with the imposition of a full panoply of judicial procedures. Hannah v. Larche, 363 U.S. at 448; Reagan Bush Committee v. FEC, 525 F. Supp. at 1378. The administrative investigative role has frequently been likened to that of a Grand Jury. See e.g., Hannah v. Larche, 363 U.S. at 448; United States v. Morton Salt, 338 U.S. 632, 642-43 (1950); Oklahoma Press Pub. Co. v. Walling, 327 U.S. 186, 216 (1946). Just as the rights of appraisal, confrontation or cross-examination are not required in that context, so too these extensive procedural rights do not attach to administrative investigations. Hannah v. Larche, 363 U.S. at 448. Cf. FTC v. Standard Oil Co., 449 U.S. at 242-44; United States Morton Salt, 338 U.S. at 642-43.

Furthermore, even if a Commission investigation were considered to be adjudicative, it would come under the exception set out in § 554(a)(1), i.e., it would involve a matter subject to a subsequent trial of the law and the facts de novo in a court.

The Commission's actions in this matter were substantially justified. "The test of whether or not a Government action is substantially justified is essentially one of reasonableness." H.R. No. 1418, 96th Cong., 2d Sess. 10 (1980), reprinted in 1980 U.S. Code Cong. & Ad. News 4953, 4989. In this matter, the Commission received a complaint from the Kennedy for President alleging various violations by CALL. The subpoenas sent by the Commission requested financial information which was instrumental in determining the amount of CALL's dollar activity. It also requested the source of the funds for KTS expenditures (i.e., general treasury funds), the possible involvement of a political committee (i.e., NCPAC), and other issues that were pertinent not only to the § 441b issue but also to the § 434 issue raised by the complaint.

Furthermore, as OGC made clear in the General Counsel's Report recommending probable cause, the situation in MUR 1192 differed from the situations presented in MNPL, supra, and Florida for Kennedy Committee, supra. The courts in these cases were analyzing the "for the purpose of influencing" standard which applies to activities of individuals and other non-corporate, non-union persons and did not address the "in connection with" standard applicable to corporate activity.

Based on the foregoing analysis, it appears that CALL does not have a claim against the Commission for fees and other expenses under the Equal Access to Justice Act. If you have any questions, please contact Jonathan Levin at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1192
Conservatives Against Liberal)
Legislation)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 9, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1192:

1. Deny CALL's application for an award of attorney's fees and other expenses under the Equal Access to Justice Act.
2. Approve the letter as attached to the General Counsel's June 6, 1983 Memorandum to the Commission.

Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively in this matter; Commissioner McDonald did not cast a vote.

Attest:

6/9/83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

6-6-83, 2:57
6-7-83, 11:00

33040411851

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

83 JUN 6 P 2: 57

June 6, 1983

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: CALL's Request for Equal Access to Justice
Act Fees in MUR 1192

On January 13, 1983, the Office of General Counsel received a request for an award of \$8,340 in attorney's fees and other expenses under the Equal Access to Justice Act ("EAJA") from counsel for Conservatives Against Liberal Legislation ("CALL") in MUR 1192. This matter involved expenditures by CALL, a corporation, on a project known as the Kennedy Truth Squad ("KTS") which sent out solicitations critical of Senator Kennedy and his impending Presidential candidacy. Citing criteria set out in EAJA, counsel states that CALL was "the 'prevailing party' in an 'adversary adjudication' brought by an 'agency' of the United States, which proceeding was not 'substantially justified,' as those terms are used in the Act."

Counsel claims that CALL was a "prevailing party" within the meaning of the Act because the Commission voted to take no further action and close the file

He also maintains that the investigation conducted by this agency constituted an "adversary adjudication."

Furthermore, counsel maintains that the Commission's votes, including the votes to investigate, to file a Petition to Show Cause why interrogatories should not be answered, and to find probable cause, were not "substantially justified" within the meaning of EAJA. While recalling that the Commission found reason to believe that 2 U.S.C. § 441b was violated after a review of CALL's response to the complaint, he maintains that the Commission's subsequent insistence on full discovery of the scope of CALL's KTS activities was needless because the Commission

8304011813

already had all the evidence it needed to find probable cause. He asserts that the financial information sought in the subpoena was unnecessary because the information appears "hardly at all" in the General Counsel's Brief. Furthermore, counsel cites the court decisions in FEC v. Machinists Non-Partisan Political League (MNPL), 655 F.2d 380 (D.C.Cir. 1981), cert. denied, 454 U.S. 897 (1981), and FEC v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982), which held that contributions to draft committees were not subject to limitation under the Federal Election Campaign Act of 1971, as amended ("the Act"). He considers these cases to be particularly relevant in that Kennedy's disavowal of candidacy was an important issue.

The Equal Access to Justice Act states the following as the standard for the award of fees and other expenses:

(a) (1) An agency that conducts an adversary adjudication shall award, to a prevailing party other than the United States, fees and other expenses incurred by that party in connection with that proceeding, unless the adjudicative officer of the agency finds that the position of the agency as a party to the proceeding was substantially justified or that special circumstances make an award unjust.

5 U.S.C. § 504(a) (1) (1980). Counsel invoked various standards set out above to state CALL's claim for recovery under EAJA. His claim fails on several accounts.

Counsel's characterization of the proceedings in this matter as an "adversary adjudication" is erroneous. According to 5 U.S.C. § 504(b) (1) (C), "adversary adjudication" means an "adjudication under section 554" of title 5. Section 554 applies

in every case of adjudication required by statute to be determined on the record after opportunity for an agency hearing, except to the extent that there is involved --

(1) a matter subject to a subsequent trial of the law and the facts de novo in a court;

5 U.S.C. § 554(a)(1) (1978) (Other inapplicable exceptions are also listed). Under 2 U.S.C. § 437g, the description of the Commission's enforcement procedures, there is no provision for an "adjudication on the record after an opportunity for an agency hearing" or any language having the same meaning. See United States v. Allegheny-Ludlum Steel Corp., 406 U.S. 742, 757 (1972); United States v. Florida East Coast Railway Company, 410 U.S. 224, 237-238 (1973). Thus, on its face, EAJA does not apply. Furthermore, Commission proceedings are investigative in nature, not adjudicative. No legal rights are determined by the FEC in § 437g(a) proceedings; at most, the Commission may find probable cause to believe a violation of the Act has occurred. See 2 U.S.C. § 437g(a)(4), (5), and (6). It is the court that ultimately determines whether or not a violation has been committed by the respondent if the Commission files civil suit to seek enforcement of the Act. See 2 U.S.C. § 437g(a)(6).

The complaint and investigative process under 2 U.S.C. § 437g(a)(1) and (2) is not contentious litigation or in any way adjudicatory. See Bro. of Ry. & S.C. v. Ass'n for Ben. of Non-Con. Emp., 380 U.S. 650, 667 (1965); Inland Empire Dist. Council v. Mills, 325 U.S. 697, 706 (1945), reh denied 326 U.S. 803 (1945); Bowles v. Baer, 142 F.2d 787, 789 (7th Cir. 1943); 2 K. Davis, Administrative Law Treatise § 19.06, at 19-10 to 19-13 (2d ed. 1979). It is not a judicial or "quasi-judicial hearing at which opposing parties present their claims and evidence and have their controversies determined." Jordan v. American Eagle Fire Ins. Co., 169 F.2d 281 (D.C. Cir. 1948); Bowles v. Baer, 142 F.2d at 789.

Indeed, the fundamental nature of investigative agencies is inconsistent with the imposition of a full panoply of judicial procedures. Hannah v. Larche, 363 U.S. at 448; Reagan Bush Committee v. FEC, 525 F.Supp. at 1378. The administrative investigative role has frequently been likened to that of a Grand Jury. See e.g., Hannah v. Larche, 363 U.S. at 448; United States v. Morton Salt, 338 U.S. 632, 642-43 (1950); Oklahoma Press Pub. Co. v. Walling, 327 U.S. 186, 216 (1946). Just as the rights of appraisal, confrontation or cross-examination are not required in that context, so too these extensive procedural rights do not attach to administrative investigations. Hannah v. Larche, 363 U.S. at 448. Cf. FTC v. Standard Oil Co., 449 U.S. at 242-44; United States Morton Salt, 338 U.S. at 642-43.

Furthermore, even if a Commission investigation were considered to be adjudicative, it would come under the exception set out in § 554(a)(1), i.e., it would involve a matter subject to a subsequent trial of the law and the facts de novo in a court.

The Commission's actions in this matter were substantially justified. "The test of whether or not a Government action is substantially justified is essentially one of reasonableness." H.R. No. 1418, 96th Cong., 2d Sess. 10 (1980), reprinted in 1980 U.S. Code Cong. & Ad. News 4953, 4989. In this matter, the Commission received a complaint from the Kennedy for President alleging various violations by CALL. The subpoenas sent by the Commission requested financial information which was instrumental in determining the amount of CALL's dollar activity. It also requested the source of the funds for KTS expenditures (i.e., general treasury funds), the possible involvement of a political committee (i.e., NCPAC), and other issues that were pertinent not only to the § 441b issue but also to the § 434 issue raised by the complaint.

Furthermore, as OGC made clear in the General Counsel's Report recommending probable cause, the situation in MUR 1192 differed from the situations presented in MNPL, supra, and Florida for Kennedy Committee, supra. The courts in these cases were analyzing the "for the purpose of influencing" standard which applies to activities of individuals and other non-corporate, non-union persons and did not address the "in connection with" standard applicable to corporate activity.

Based on the foregoing analysis, the General Counsel recommends that the Commission deny CALL's application for an award of attorney's fees and other expenses under the Equal Access to Justice Act. This office also recommends approval of the attached letter to CALL's counsel.

Recommendations

1. Deny CALL's application for an award of attorney's fees and other expenses under the Equal Access to Justice Act.
2. Approve the attached letter.

Attachments

1. Letter from CALL's counsel, dated January 12, 1983.
2. Proposed letter to CALL's counsel.

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 13 P 4: 07

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. SOCCELLA

SUITE 620
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000
TELEX: 710-831-0886
CABLE: SEDAMHERGE

January 12, 1983

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BY HAND

Re: MUR 1192/Conservatives
Against Liberal Legislation

Dear Chairman McDonald:

On behalf of Conservatives Against Liberal Legislation (CALL), and pursuant to the Equal Access to Justice Act ("the Act"),¹ the undersigned hereby applies for an award of attorney's fees and other expenses incurred by CALL in the referenced matter. The Federal Election Commission ("Commission") has not promulgated any rules governing the submission and consideration of an application by a prevailing party for award of fees and other expenses. Accordingly, CALL is submitting this application in its current form, providing for the Commission's consideration the facts required by the Act itself as a condition to recovery under the Act.

CALL is a not-for-profit, nonstock Virginia corporation, whose net worth was less than \$5 million at the time the adversary adjudication was initiated. 5 U.S.C. §504 (b) (1) (B).

Based on records maintained by counsel for CALL, 111.2 hours have been spent by counsel in representing CALL before the

¹/Pub. L. No. 96-481, 94 Stat. 2325 (1980), 5 U.S.C §504.

Attachment 1 - p. 1 of 18

Mr. Danny L. McDonald
Page Two
January 12, 1983

Commission in this matter. 5 U.S.C. §504(a)(2).^{2/} Accordingly, at the statutory rate of \$75.00 per hour (5 U.S.C. §504(b)(1)(A)), CALL hereby submits its claim for reimbursement of costs and other expenses in the total amount of \$8,340.00. A schedule of time actually spent and the rate at which fees and other expenses are computed is attached hereto as Attachment 1.

By letter dated December 21, 1982, Charles N. Steele, Esq., General Counsel to the Commission, informed counsel for CALL that on December 14, 1982 the Commission had voted to take no further action in this matter and to close the file. This matter first came before the Commission on a complaint filed March 19, 1980 by the Kennedy for President Committee alleging that CALL had violated a number of provisions of the Federal Election Campaign Act ("FECA") because of various mailings distributed by the Kennedy Truth Squad ("KTS"), a project of CALL. These mailings, made prior to the date on which Senator Kennedy announced his candidacy for President, invited the attention of the general public to Kennedy's legislative record in the United States Senate and to his political philosophy. As permitted by FECA and the Commission's regulations thereunder, CALL filed a response to that complaint, denying that it had engaged in any activities prohibited by law.

On September 3, 1980, the Commission voted to take no action on certain of the Kennedy Committee's allegations, and found no reason to believe that a violation of FECA had occurred with respect to the remaining allegations. However, because of the happenstance that CALL is a nonprofit corporation, the Commission found reason to believe that CALL had violated 2 U.S.C. §441b(a), which forbids corporate expenditures "in connection with" a federal election.

After finding reason to believe that CALL had violated FECA, the Commission propounded to CALL a number of interrogatories and requests for documents. CALL responded to certain of those discovery requests and resisted others. The Commission voted to file a Petition for an Order to Show Cause to

^{2/}This time includes 29.0 hours spent in preparing this application, for which time CALL seeks recovery. See Young v. Kenley, 641 F.2d 192, 195 (4th Cir. 1982) and the cases cited therein.

Mr. Danny L. McDonald
Page Three
January 12, 1983

compel CALL to respond to all requested discovery. As justification for its Petition, the General Counsel asserted that the requested discovery was needed because it was relevant to the conciliation process required by 2 U.S.C. 437g(a)(4)(A)(i). CALL opposed the General Counsel's request, in part because the request sought information which, in CALL's view, exceeded the stated scope of the Commission's investigation, and because the Commission had not yet even found probable cause, a necessary prerequisite to the conciliation process. CALL also contended that because Senator Kennedy had publicly disavowed his candidacy for President, it could not in any way be guilty of having expended funds "in connection with" that federal election. The United States District Court entered an order directing CALL to comply with all pending Commission discovery requests.

By letter dated May 18, 1981, CALL answered all of the Commission's outstanding discovery. Thus, the Commission, on notice of CALL's defense to the Commission's charge, obtained all that it wanted from CALL.

On July 8, 1981, the General Counsel submitted to CALL for response his brief to the Commission recommending that the Commission find probable cause to believe that CALL had violated 2 U.S.C. §441b(a) in connection with its KTS project. On July 31, 1981, CALL responded, noting, among other things, that the General Counsel had insisted that CALL respond to all discovery, but that the federal court's order compelling that discovery had come before the decision in F.E.C. v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981). That decision was crucial to CALL, and should be to the General Counsel, for it called into question the scope of the Commission's authority to enforce administrative subpoenas in aid of its investigations of alleged violations of federal election laws. It was particularly apposite in this matter because the Machinists case had to do with a Commission investigation of "draft-Kennedy" groups, and the decision in that case turned in large part on the fact that at the time of the Machinists Non-Partisan League's activities on behalf of Senator Kennedy, he had publicly disavowed his candidacy, 655 F.2d at

1 - p 3 of 18

Mr. Danny L. McDonald
Page Four
January 12, 1983

394-397, and was not then a candidate,^{3/} just as he was not a candidate during the time of CALL's KTS activities.^{4/}

In F.E.C. v. Florida For Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982), the Commission was again rebuffed in its attempts to enforce an investigation subpoena, again having to do with its investigation of a draft-Kennedy group. As in Machinists, the fact that Kennedy was not a candidate during the time of the challenged activities was critical to the Florida For Kennedy court's decision. 681 F.2d at 1285-1286, n.8.

The Commission was aware of CALL's contention that because Kennedy was not a candidate at the time of its KTS activities, those activities could not have violated 2 U.S.C. §441b(a). It was also aware that much of its investigation of groups whose activities preceded Kennedy's candidacy had been stopped in the courts on constitutional grounds. Nevertheless, on April 20, 1982, the Commission found probable cause to believe that CALL had violated 2 U.S.C. §441b(a) in connection with the 1980 presidential nomination.

^{3/}Indeed, the Commission had earlier ruled that the contributions limitations of 2 U.S.C. §441a(a)(1)(A) did not apply to draft-Kennedy groups because Kennedy was not a candidate for President. Advisory Opinion 1979-40 (August 17, 1979).

^{4/}CALL's KTS activities took place during the period July 24, 1979 - November 7, 1979. See CALL's September 29, 1980 letter to Chairman Friedersdorf, at page 3.

1- p. 4 of 18

(4)

Mr. Danny L. McDonald
Page Five
January 12, 1983

83040411860

1-p. 5 of 18.

(5)

Mr. Danny L. McDonald
Page Six
January 12, 1983

The Commission voted to conduct discovery, to enforce its discovery efforts in federal court, and to find probable cause - all without any information before it then that it did not have at the outset of the investigation. CALL admitted that it was a corporation and that it had made expenditures in connection with its KTS project. The only thing that was before the Commission at the end of the investigation that was not before it at the beginning was the extent of CALL's KTS expenditures.

CALL's position, simply put, is that the Commission's votes to conduct discovery, to file a Petition to Show Cause, and to find probable cause were not "substantially justified" within the meaning of the Act, and that the vote by the Commission to close the file in the manner that it did has made CALL a "prevailing party" within the meaning of the Act. The Commission's lengthy investigation was expensive to CALL - so expensive and burdensome, in fact, that CALL today is practically insolvent, due partly to this investigation. Moreover, now that the Commission's investigation is complete and the matter is closed, CALL is no more certain now than it was at the outset of the investigation about what it can and cannot do when it comes to publicizing Senator Kennedy's voting record and conduct in public office. No apparent public purpose has been served by this investigation and its curious outcome. The public has not been enlightened as to the permissible limits of expression concerning Senator Kennedy, nor have Senator Kennedy's interests been vindicated.

It was not necessary that the investigation proceed in the manner it did, or for as long as it did, after CALL admitted, on April 3, 1980 that it was a corporation, and that it had conducted its KTS project. Certainly after the Commission, on September 3, 1980, found reason to believe that CALL had violated 2 U.S.C. §441b(a), there was no point to the lengthy and expensive discovery proceedings voted by the Commission. The need to know the nature and extent of CALL's activities cannot be explained by the statutorily-mandated conciliation process, for that process was not then in progress and has now been abandoned.

The Commission began its investigation of CALL's KTS activities after a March 19, 1980 complaint filed by the Kennedy Committee. The Commission found the Committee's complaint to be insubstantial but found, instead, reason to believe that a violation of 2 U.S.C. §441b(a) had occurred, based on CALL's admissions in its response to the Kennedy Committee's

1 - p 6 of 18

⑥

Mr. Danny L. McDonald
Page Seven
January 12, 1983

complaint. Thereafter, the Commission needlessly pursued CALL by stubbornly insisting on full discovery of the scope of CALL's KTS activities after it already had all the evidence it needed to find probable cause to believe a violation had occurred. The General Counsel's own brief to the Commission relies almost exclusively on the language of CALL's KTS mailings to support its recommendation that the Commission find probable cause. The General Counsel had received those mailings from the Kennedy Committee as part of its original complaint. The Commission did not need to subpoena them from CALL in discovery as part of its investigation. In any event, they were promptly supplied by CALL in its first response to the discovery subpoena. The Commission's insistence in its December 22, 1980 letter, and in the litigation that ensued, that it needed information concerning CALL's finances is difficult to understand, since the information gained from that round of discovery appears hardly at all in the General Counsel's Brief, upon which the Commission presumably relied in finding probable cause.

There is another point the Commission should not overlook. In its probable cause brief to the Commission, the General Counsel made clear his reason for recommending a vote to find probable cause. After reviewing several excerpts from CALL's KTS mailings, the General Counsel observed:

A review of the preceding excerpts demonstrates that the purpose of the Kennedy Truth Squad project was to attack Senator Kennedy thereby reducing Senator Kennedy's popularity and the possibility of Senator Kennedy seeking his party's nomination for President. It is the opinion of the Office of General Counsel that the expenditures made on behalf of the Kennedy Truth Squad project were made in connection with the presidential primary election and that the Commission should find probable cause to believe that CALL violated 2 U.S.C. §441b(a). [General Counsel's Brief, at 6]

In short, the General Counsel is saying, if an activity by a corporation lessens the possibility that Senator Kennedy might get the Democratic presidential nomination, 2 U.S.C. §441b(a) forbids it if it requires the expenditure of money.

The General Counsel - already on notice from the Machinists and the Florida For Kennedy decisions that the federal courts were expressing constitutional reservations about the scope of the Commission's investigations of draft-Kennedy groups,

1-p 7 of 18

Mr. Danny L. McDonald
Page Eight
January 12, 1983

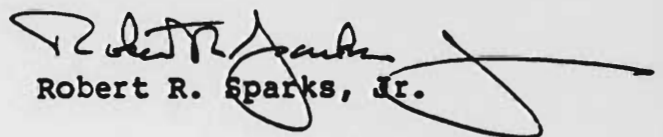
and on notice of CALL's complaint that the General Counsel's view of the applicability of 2 U.S.C. §441b(a) to CALL's KTS activities was unconstitutionally overbroad - nevertheless asserted exactly that overbroad view in support of his recommendation that the Commission find probable cause. Presumably, the Commission adopted that view as the rationale for its probable cause vote. It is CALL's position that the General Counsel's view of 2 U.S.C. §441b(a) (presumably adopted by the Commission) is so constitutionally suspect that the Commission's probable cause vote was not substantially justified. CALL's position is bolstered by the fact that the Commission subsequently abandoned this matter after CALL refused to conciliate.

Just as CALL feared, the worst has happened: CALL has spent its precious resources defending itself for almost two years against a charge known to the Commission from the outset, and has won a Pyrrhic victory. The Commission's investigation - so ardently and expensively pursued for so long - has been abruptly dropped. CALL has been indicted but not tried, denied its day in court - and has had to pay for the privilege.

The Commission was established to "administer [and] seek to obtain compliance with....[FECA]" 2 U.S.C. §437c(b)(1). That is not what the Commission has done in this matter. What it has done here is to pursue an unnecessary investigation over a two-year period, only to drop it after a finding of probable cause and efforts at conciliation.

CALL is now the "prevailing party" in an "adversary adjudication" in a proceeding brought by an "agency" of the United States, which proceeding was not "substantially justified," as those terms are used in the Act. Accordingly, CALL is entitled to recover its "fees and other expenses" incurred in that proceeding. 5 U.S.C. §504.

Sincerely,


Robert R. Sparks, Jr.

1 - p 8 of 18

⑧

ATTACHMENT I - MUR 1192

Itemized Statement of Actual Time Expended
and
Rate At Which Fees And Other Expenses Computed

<u>Period</u>	<u>Time Spent</u>	<u>Rate at Which Computed</u>	<u>Amount Claimed</u>
<u>1980</u>			
April	3.5	\$ 75.00	\$ 262.50
September	8.2	75.00	615.00
December	.7	75.00	52.50
<u>1981</u>			
January	4.3	75.00	322.50
March	6.2	75.00	465.00
April	9.7	75.00	727.50
May	5.5	75.00	412.50
June	1.8	75.00	135.00
July	10.8	75.00	810.00
August	4.0	75.00	300.00
<u>1982</u>			
April	2.3	75.00	172.50
May	5.8	75.00	435.00
July	10.2	75.00	765.00
September	3.3	75.00	247.50
October	5.3	75.00	397.50
November	.6	75.00	45.00
December	14.0	75.00	1,050.00

1-p. 9 of 18

9

ATTACHMENT I - MUR 1192
Page Two

1983

January

15.0

75.00

1,125.00

111.2

\$ 8,340.00

93040411355

1 - p. 10 of 18



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Sedam & Herge
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1192

Dear Mr. Sparks:

This is in response to your letter of January 12, 1983, applying for an award under the Equal Access to Justice Act ("EAJA") of attorney's fees and other expenses incurred by CALL in the above-captioned matter. After consideration of the applicability of EAJA and the facts of this matter, the Commission has decided to deny your application.

In your letter, you cited the criteria of EAJA, stating that CALL was "the 'prevailing party' in an 'adversary adjudication' brought by an 'agency' of the United States, which proceeding was not 'substantially justified.'" The claim for fees based upon these criteria fails on several accounts.

The proceedings in this matter did not constitute an adversary adjudication under EAJA. According to 5 U.S.C. § 504(b)(1)(C), an "adversary adjudication" means an "adjudication under section 554" of title 5. Section 554 applies

in every case of adjudication required by statute to be determined on the record after opportunity for an agency hearing, except to the extent that there is involved --
(1) a matter subject to a subsequent trial of the law and the facts de novo in a court;

Attachment 2 - p. 1 of 3

5 U.S.C. § 554(a)(1) (1978). (Other inapplicable exceptions are also listed). Under 2 U.S.C. § 437g, the description of the Commission's enforcement procedures, there is no provision for an "adjudication on the record after an opportunity for an agency hearing" or any language having the same meaning. See United States v. Allegheny-Ludlum Steel Corp., 406 U.S. 742, 757 (1972); United States v. Florida East Coast Railway Company, 410 U.S. 224, 237-238 (1973). Thus, on its face, EAJA does not apply. Furthermore, Commission proceedings are investigative in nature, not adjudicative. No legal rights are determined by the FEC in § 437g(a) proceedings; at most, the Commission may find probable cause to believe a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has occurred. See 2 U.S.C. § 437g(a)(4), (5), and (6). It is the court that ultimately determines whether or not a violation has been committed by the respondent if the Commission files civil suit to seek enforcement of the Act. See 2 U.S.C. § 437g(a)(6).

The complaint and investigative process under 2 U.S.C. § 437g(a)(1) and (2) is not contentious litigation or in any way adjudicative. See Bro. of Ry. & S.C. v. Ass'n for Ben. of Non-Con. Emp., 380 U.S. 650, 667 (1965); Inland Empire Dist. Council v. Mills, 325 U.S. 697, 706 (1945), reh denied 326 U.S. 803 (1945); Bowles v. Baer, 142 F.2d 787, 789 (7th Cir. 1943); 2 K. Davis, Administrative Law Treatise § 19.06, at 19-10 to 19-13 (2d ed. 1979). It is not a judicial or "quasi-judicial hearing at which opposing parties present their claims and evidence and have their controversies determined." Jordan v. American Eagle Fire Ins. Co., 169 F.2d 281 (D.C. Cir. 1948); Bowles v. Baer, 142 F.2d at 789.

Indeed, the fundamental nature of investigative agencies is inconsistent with the imposition of a full panoply of judicial procedures. Hannah v. Larche, 363 U.S. at 448; Reagan Bush Committee v. FEC, 525 F. Supp. at 1378. The administrative investigative role has frequently been likened to that of a Grand Jury. See e.g., Hannah v. Larche, 363 U.S. at 448; United States v. Morton Salt, 338 U.S. 632, 642-43 (1950); Oklahoma Press Pub. Co. v. Walling, 327 U.S. 186, 216 (1946). Just as the rights of appraisal, confrontation or cross-examination are not required in that context, so too these extensive procedural rights do not attach to administrative investigations. Hannah v. Larche, 363 U.S. at 448. Cf. FTC v. Standard Oil Co., 449 U.S. at 242-44; United States v. Morton Salt, 338 U.S. at 642-43.

Letter to Robert R. Sparks
Page 3

Furthermore, even if a Commission investigation were considered to be adjudicative, it would come under the exception set out in § 554(a)(1), i.e., it would involve a matter subject to a subsequent trial of the law and the facts de novo in a court.

The Commission's actions in this matter were substantially justified. "The test of whether or not a Government action is substantially justified is essentially one of reasonableness." H.R. No. 1418, 96th Cong., 2d Sess. 10 (1980), reprinted in 1980 U.S. Code Cong. & Ad. News 4953, 4989. In this matter, the Commission received a complaint from the Kennedy for President alleging various violations by CALL. The subpoenas sent by the Commission requested financial information which was instrumental in determining the amount of CALL's dollar activity. It also requested the source of the funds for KTS expenditures (i.e., general treasury funds), the possible involvement of a political committee (i.e., NCPAC), and other issues that were pertinent not only to the § 441b issue but also to the § 434 issue raised by the complaint.

Furthermore, as OGC made clear in the General Counsel's Report recommending probable cause, the situation in MUR 1192 differed from the situations presented in MNPL, supra, and Florida for Kennedy Committee, supra. The courts in these cases were analyzing the "for the purpose of influencing" standard which applies to activities of individuals and other non-corporate, non-union persons and did not address the "in connection with" standard applicable to corporate activity.

Based on the foregoing analysis, it appears that CALL does not have a claim against the Commission for fees and other expenses under the Equal Access to Justice Act. If you have any questions, please contact Jonathan Levin at 202-523-4529.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

2 - p 3 of 3

(21)

Call 9559

RI
SEDAM & HERGE
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

83 FEB 22 1983
8800 GREENBORO DRIVE
MCLEAN, VIRGINIA 22102 9

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. BOCCELLA

SUITE 620
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-8320896

CABLE: SEDAMHERGE

February 22, 1983

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1192/Conservatives
Against Liberal Legislation

Dear Chairman McDonald:

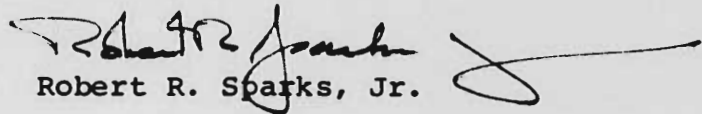
On January 12, 1983, I wrote to you requesting reimbursement for attorneys fees in the referenced matter. I noted in that letter that the Commission had not propounded regulations governing applications for attorneys fees, as required by the Equal Access to Justice Act, 5 U.S.C. §504. Nevertheless, of those agencies that have promulgated such regulations, most require that where an application for counsel fees is made, a response to that request is required within 30 days of the date of receipt of the request. Indeed, under certain regulations, a failure to respond within the 30 day period constitutes consent by the agency to the application for fees. It has been more than 30 days since I wrote to you requesting reimbursement of costs and fees under the Equal Access to Justice Act.

My purpose in writing is to ask when the Commission intends to respond to my request. Conservatives Against Liberal Legislation (CALL) has been genuinely aggrieved by the lengthy and expensive proceedings to which it was subjected by the Commission in this matter. It has experienced what, for it, was a substantial financial loss in the form of fees and costs incurred to defend the Commission's investigation. CALL strongly believes that it is entitled to reimbursement of those costs and fees.

Mr. Danny L. McDonald
Page Two
February 22, 1983

Please let me hear from you in the near future so
that CALL can make a decision as to how to proceed.

Sincerely,


Robert R. Sparks, Jr.

cc: Conservatives Against Liberal
Legislation

93040411870

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

8 SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

83040411

83 FEB 24 4:11:28

6cc# 9371

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 621-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. BOCCELLA

83 JAN 20 A10: 18

SUITE 620
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 621-1000
TELEX: 710-831-0896
CABLE: SEDAMHERGE

January 18, 1983

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W..
Washington, D.C. 20463

Re: MUR 1192/Conservatives Against
Liberal Legislation

Dear Chairman McDonald:

On January 13, 1983, this firm forwarded to you its application for reimbursement of fees and other expenses under the Equal Access to Justice Act, 5 U.S.C. §504.

I enclose herewith three corrected pages to that application, which I ask be inserted at the appropriate places, and that the appropriate pages now in the application be discarded. These replacement pages contain corrections of errors which were overlooked in the original application.

Sincerely,



Robert R. Sparks, Jr.

Enclosures

83040111872

Mr. Danny L. McDonald
Page Five
January 12, 1983

83040411873

Mr. Danny L. McDonald
Page Seven
January 12, 1983

complaint. Thereafter, the Commission needlessly pursued CALL by stubbornly insisting on full discovery of the scope of CALL's KTS activities after it already had all the evidence it needed to find probable cause to believe a violation had occurred. The General Counsel's own brief to the Commission relies almost exclusively on the language of CALL's KTS mailings to support its recommendation that the Commission find probable cause. The General Counsel had received those mailings from the Kennedy Committee as part of its original complaint. The Commission did not need to subpoena them from CALL in discovery as part of its investigation. In any event, they were promptly supplied by CALL in its first response to the discovery subpoena. The Commission's insistence in its December 22, 1980 letter, and in the litigation that ensued, that it needed information concerning CALL's finances is difficult to understand, since the information gained from that round of discovery appears hardly at all in the General Counsel's Brief, upon which the Commission presumably relied in finding probable cause.

There is another point the Commission should not overlook. In its probable cause brief to the Commission, the General Counsel made clear his reason for recommending a vote to find probable cause. After reviewing several excerpts from CALL's KTS mailings, the General Counsel observed:

A review of the preceding excerpts demonstrates that the purpose of the Kennedy Truth Squad project was to attack Senator Kennedy thereby reducing Senator Kennedy's popularity and the possibility of Senator Kennedy seeking his party's nomination for President. It is the opinion of the Office of General Counsel that the expenditures made on behalf of the Kennedy Truth Squad project were made in connection with the presidential primary election and that the Commission should find probable cause to believe that CALL violated 2 U.S.C. §441b(a). [General Counsel's Brief, at 6]

In short, the General Counsel is saying, if an activity by a corporation lessens the possibility that Senator Kennedy might get the Democratic presidential nomination, 2 U.S.C. §441b(a) forbids it if it requires the expenditure of money.

The General Counsel - already on notice from the Machinists and the Florida For Kennedy decisions that the federal courts were expressing constitutional reservations about the scope of the Commission's investigations of draft-Kennedy groups,

Mr. Danny L. McDonald
Page Eight
January 12, 1983

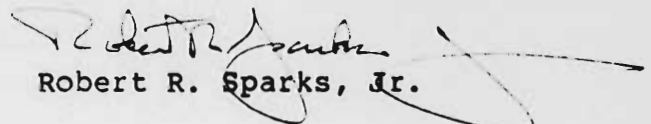
and on notice of CALL's complaint that the General Counsel's view of the applicability of 2 U.S.C. §441b(a) to CALL's KTS activities was unconstitutionally overbroad - nevertheless asserted exactly that overbroad view in support of his recommendation that the Commission find probable cause. Presumably, the Commission adopted that view as the rationale for its probable cause vote. It is CALL's position that the General Counsel's view of 2 U.S.C. §441b(a) (presumably adopted by the Commission) is so constitutionally suspect that the Commission's probable cause vote was not substantially justified. CALL's position is bolstered by the fact that the Commission subsequently abandoned this matter after CALL refused to conciliate.

Just as CALL feared, the worst has happened: CALL has spent its precious resources defending itself for almost two years against a charge known to the Commission from the outset, and has won a Pyrrhic victory. The Commission's investigation - so ardently and expensively pursued for so long - has been abruptly dropped. CALL has been indicted but not tried, denied its day in court - and has had to pay for the privilege.

The Commission was established to "administer [and] seek to obtain compliance with....[FECA]" 2 U.S.C. §437c(b)(1). That is not what the Commission has done in this matter. What it has done here is to pursue an unnecessary investigation over a two-year period, only to drop it after a finding of probable cause and efforts at conciliation.

CALL is now the "prevailing party" in an "adversary adjudication" in a proceeding brought by an "agency" of the United States, which proceeding was not "substantially justified," as those terms are used in the Act. Accordingly, CALL is entitled to recover its "fees and other expenses" incurred in that proceeding. 5 U.S.C. §504.

Sincerely,


Robert R. Sparks, Jr.

3040411876

SEDAM & HERGE

ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

To

Mr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FIRST CLASS MAIL

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

(703) 821-1000

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 13 P 4: 07

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHERJANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. BOCCELLA

January 12, 1983

SUITE 620
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000
TELEX: 710-831-0896
CABLE: SEDAMHERGEMr. Danny L. McDonald
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463BY HANDRe: MUR 1192/Conservatives
Against Liberal Legislation

Dear Chairman McDonald:

On behalf of Conservatives Against Liberal Legislation (CALL), and pursuant to the Equal Access to Justice Act ("the Act"), ^{1/} the undersigned hereby applies for an award of attorney's fees and other expenses incurred by CALL in the referenced matter. The Federal Election Commission ("Commission") has not promulgated any rules governing the submission and consideration of an application by a prevailing party for award of fees and other expenses. Accordingly, CALL is submitting this application in its current form, providing for the Commission's consideration the facts required by the Act itself as a condition to recovery under the Act.

CALL is a not-for-profit, nonstock Virginia corporation, whose net worth was less than \$5 million at the time the adversary adjudication was initiated. 5 U.S.C. §504(b)(1)(B).

Based on records maintained by counsel for CALL, 111.2 hours have been spent by counsel in representing CALL before the

^{1/} Pub. L. No. 96-481, 94 Stat. 2325 (1980), 5 U.S.C §504.

Mr. Danny L. McDonald
Page Two
January 12, 1983

Commission in this matter. 5 U.S.C. §504(a)(2).^{2/} Accordingly, at the statutory rate of \$75.00 per hour (5 U.S.C. §504(b)(1)(A)), CALL hereby submits its claim for reimbursement of costs and other expenses in the total amount of \$8,340.00. A schedule of time actually spent and the rate at which fees and other expenses are computed is attached hereto as Attachment 1.

By letter dated December 21, 1982, Charles N. Steele, Esq., General Counsel to the Commission, informed counsel for CALL that on December 14, 1982 the Commission had voted to take no further action in this matter and to close the file. This matter first came before the Commission on a complaint filed March 19, 1980 by the Kennedy for President Committee alleging that CALL had violated a number of provisions of the Federal Election Campaign Act ("FECA") because of various mailings distributed by the Kennedy Truth Squad ("KTS"), a project of CALL. These mailings, made prior to the date on which Senator Kennedy announced his candidacy for President, invited the attention of the general public to Kennedy's legislative record in the United States Senate and to his political philosophy. As permitted by FECA and the Commission's regulations thereunder, CALL filed a response to that complaint, denying that it had engaged in any activities prohibited by law.

On September 3, 1980, the Commission voted to take no action on certain of the Kennedy Committee's allegations, and found no reason to believe that a violation of FECA had occurred with respect to the remaining allegations. However, because of the happenstance that CALL is a nonprofit corporation, the Commission found reason to believe that CALL had violated 2 U.S.C. §441b(a), which forbids corporate expenditures "in connection with" a federal election.

After finding reason to believe that CALL had violated FECA, the Commission propounded to CALL a number of interrogatories and requests for documents. CALL responded to certain of those discovery requests and resisted others. The Commission voted to file a Petition for an Order to Show Cause to

^{2/}This time includes 29.0 hours spent in preparing this application, for which time CALL seeks recovery. See Young v. Kenley, 641 F.2d 192, 195 (4th Cir. 1982) and the cases cited therein.

Mr. Danny L. McDonald
Page Three
January 12, 1983

compel CALL to respond to all requested discovery. As justification for its Petition, the General Counsel asserted that the requested discovery was needed because it was relevant to the conciliation process required by 2 U.S.C. 437g(a)(4)(A)(i). CALL opposed the General Counsel's request, in part because the request sought information which, in CALL's view, exceeded the stated scope of the Commission's investigation, and because the Commission had not yet even found probable cause, a necessary prerequisite to the conciliation process. CALL also contended that because Senator Kennedy had publicly disavowed his candidacy for President, it could not in any way be guilty of having expended funds "in connection with" that federal election. The United States District Court entered an order directing CALL to comply with all pending Commission discovery requests.

By letter dated May 18, 1981, CALL answered all of the Commission's outstanding discovery. Thus, the Commission, on notice of CALL's defense to the Commission's charge, obtained all that it wanted from CALL.

On July 8, 1981, the General Counsel submitted to CALL for response his brief to the Commission recommending that the Commission find probable cause to believe that CALL had violated 2 U.S.C. §441b(a) in connection with its KTS project. On July 31, 1981, CALL responded, noting, among other things, that the General Counsel had insisted that CALL respond to all discovery, but that the federal court's order compelling that discovery had come before the decision in F.E.C. v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981). That decision was crucial to CALL, and should be to the General Counsel, for it called into question the scope of the Commission's authority to enforce administrative subpoenas in aid of its investigations of alleged violations of federal election laws. It was particularly apposite in this matter because the Machinists case had to do with a Commission investigation of "draft-Kennedy" groups, and the decision in that case turned in large part on the fact that at the time of the Machinists Non-Partisan League's activities on behalf of Senator Kennedy, he had publicly disavowed his candidacy, 655 F.2d at

Mr. Danny L. McDonald
Page Four
January 12, 1983

394-397, and was not then a candidate,^{3/} just as he was not a candidate during the time of CALL's KTS activities.^{4/}

In F.E.C. v. Florida For Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982), the Commission was again rebuffed in its attempts to enforce an investigation subpoena, again having to do with its investigation of a draft-Kennedy group. As in Machinists, the fact that Kennedy was not a candidate during the time of the challenged activities was critical to the Florida For Kennedy court's decision. 681 F.2d at 1285-1286, n.8.

03040411330
The Commission was aware of CALL's contention that because Kennedy was not a candidate at the time of its KTS activities, those activities could not have violated 2 U.S.C. §441b(a). It was also aware that much of its investigation of groups whose activities preceded Kennedy's candidacy had been stopped in the courts on constitutional grounds. Nevertheless, on April 20, 1982, the Commission found probable cause to believe that CALL had violated 2 U.S.C. §441b(a) in connection with the 1980 presidential nomination.

^{3/}Indeed, the Commission had earlier ruled that the contributions limitations of 2 U.S.C. §441a(a)(1)(A) did not apply to draft-Kennedy groups because Kennedy was not a candidate for President. Advisory Opinion 1979-40 (August 17, 1979).

^{4/}CALL's KTS activities took place during the period July 24, 1979 - November 7, 1979. See CALL's September 29, 1980 letter to Chairman Friedersdorf, at page 3.

Mr. Danny L. McDonald
Page Five
January 12, 1983

83040411831

Mr. Danny L. McDonald
Page Six
January 12, 1983

The Commission voted to conduct discovery, to enforce its discovery efforts in federal court, and to find probable cause - all without any information before it then that it did not have at the outset of the investigation. CALL admitted that it was a corporation and that it had made expenditures in connection with its KTS project. The only thing that was before the Commission at the end of the investigation that was not before it at the beginning was the extent of CALL's KTS expenditures.

CALL's position, simply put, is that the Commission's votes to conduct discovery, to file a Petition to Show Cause, and to find probable cause were not "substantially justified" within the meaning of the Act, and that the vote by the Commission to close the file in the manner that it did has made CALL a "prevailing party" within the meaning of the Act. The Commission's lengthy investigation was expensive to CALL - so expensive and burdensome, in fact, that CALL today is practically insolvent, due partly to this investigation. Moreover, now that the Commission's investigation is complete and the matter is closed, CALL is no more certain now than it was at the outset of the investigation about what it can and cannot do when it comes to publicizing Senator Kennedy's voting record and conduct in public office. No apparent public purpose has been served by this investigation and its curious outcome. The public has not been enlightened as to the permissible limits of expression concerning Senator Kennedy, nor have Senator Kennedy's interests been vindicated.

It was not necessary that the investigation proceed in the manner it did, or for as long as it did, after CALL admitted, on April 3, 1980 that it was a corporation, and that it had conducted its KTS project. Certainly after the Commission, on September 3, 1980, found reason to believe that CALL had violated 2 U.S.C. §441b(a), there was no point to the lengthy and expensive discovery proceedings voted by the Commission. The need to know the nature and extent of CALL's activities cannot be explained by the statutorily-mandated conciliation process, for that process was not then in progress and has now been abandoned.

The Commission began its investigation of CALL's KTS activities after a March 19, 1980 complaint filed by the Kennedy Committee. The Commission found the Committee's complaint to be insubstantial but found, instead, reason to believe that a violation of 2 U.S.C. §441b(a) had occurred, based on CALL's admissions in its response to the Kennedy Committee's

Mr. Danny L. McDonald
Page Seven
January 12, 1983

complaint. Thereafter, the Commission needlessly pursued CALL by stubbornly insisting on full discovery of the scope of CALL's KTS activities after it already had all the evidence it needed to find probable cause to believe a violation had occurred. The General Counsel's own brief to the Commission relies almost exclusively on the language of CALL's KTS mailings to support its recommendation that the Commission find probable cause. The General Counsel had received those mailings from the Kennedy Committee as part of its original complaint. The Commission did not need to subpoena them from CALL in discovery as part of its investigation. In any event, they were promptly supplied by CALL in its first response to the discovery subpoena. The Commission's insistence in its December 22, 1980 letter, and in the litigation that ensued, that it needed information concerning CALL's finances is difficult to understand, since the information gained from that round of discovery appears hardly at all in the General Counsel's Brief, upon which the Commission presumably relied in finding probable cause.

There is another point the Commission should not overlook. In its probable cause brief to the Commission, the General Counsel made clear his reason for recommending a vote to find probable cause. After reviewing several excerpts from CALL's KTS mailings, the General Counsel observed:

A review of the preceding excerpts demonstrates that the purpose of the Kennedy Truth Squad project was to attack Senator Kennedy thereby reducing Senator Kennedy's popularity and the possibility of Senator Kennedy seeking his party's nomination for President. It is the opinion of the Office of General Counsel that the expenditures made on behalf of the Kennedy Truth Squad project were made in connection with the presidential primary election and that the Commission should find probable cause to believe that CALL violated 2 U.S.C. §441b(a). [General Counsel's Brief, at 6]

In short, the General Counsel is saying, if an activity by a corporation lessens the possibility that Senator Kennedy might get the Democratic presidential nomination, 2 U.S.C. §441b(a) forbids it if it requires the expenditure of money.

The General Counsel - already on notice from the Machinists and the Florida For Kennedy decisions that the federal courts were expressing constitutional reservations about the scope of the Commission's investigations of draft-Kennedy groups,

Mr. Danny L. McDonald
Page Eight
January 12, 1983

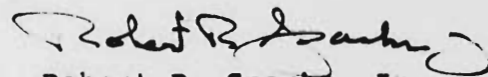
and on notice of CALL's complaint that the General Counsel's view of the applicability of 2 U.S.C. §441b(a) to CALL's KTS activities was unconstitutionally overbroad - nevertheless asserted exactly that overbroad view in support of his recommendation that the Commission find probable cause. Presumably, the Commission adopted that view as the rationale for its probable cause vote. It is CALL's position that the General Counsel's view of 2 U.S.C. §441b(a) (presumably adopted by the Commission) is so constitutionally suspect that the Commission's probable cause vote was not substantially justified. CALL's position is holstered by the fact that the Commission subsequently abandoned this matter after CALL refused to conciliate.

Just as CALL feared, the worst has happened: CALL has spent its precious resources defending itself for almost two years against a charge known to Commission from the outset, and has been won a Pyrrhic victory. The Commission's investigation - so ardently and expensively pursued for so long - has been abruptly dropped. CALL has been indicted but not tried, denied its day in court - and has had to pay for the privilege.

The Commission was established to "administer [and] seek to obtain compliance with....[FECA]" 2 U.S.C. §437c(b)(1). That is not what the Commission has done in this matter. What it has done here is to pursue an unnecessary investigation over a two-year period, only to drop it after a finding of probable cause and efforts at conciliation.

CALL is now the "prevailing party" in an "adversary adjudication" in a proceeding brought by an "agency" of the United States, which proceeding was not "substantially justified," as those terms are used in the Act. Accordingly, CALL is entitled to recover its "fees and other expenses" incurred in that proceeding. 5 U.S.C. §504.

Sincerely,


Robert R. Sparks, Jr.

ATTACHMENT I - MUR 1192

Itemized Statement of Actual Time Expended
and
Rate At Which Fees And Other Expenses Computed

<u>Period</u>	<u>Time Spent</u>	<u>Rate at Which Computed</u>	<u>Amount Claimed</u>
<u>1980</u>			
April	3.5	\$ 75.00	\$ 262.50
September	8.2	75.00	615.00
December	.7	75.00	52.50
<u>1981</u>			
January	4.3	75.00	322.50
March	6.2	75.00	465.00
April	9.7	75.00	727.50
May	5.5	75.00	412.50
June	1.8	75.00	135.00
July	10.8	75.00	810.00
August	4.0	75.00	300.00
<u>1982</u>			
April	2.3	75.00	172.50
May	5.8	75.00	435.00
July	10.2	75.00	765.00
September	3.3	75.00	247.50
October	5.3	75.00	397.50
November	.6	75.00	45.00
December	14.0	75.00	1,050.00

83040411833

ATTACHMENT I - MUR 1192
Page Two

1983

January	<u>15.0</u>	75.00	<u>1,125.00</u>
	111.2		\$ 8,340.00

03040411836

8 3 0 4 0 4 1 1 8 3 7

SEDAM & HERGE

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

To

Mr. Danny L. McDonald

Chairman

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

BY HAND

FIRST CLASS MAIL

RECEIVED AT THE FECA
83 JAN 13 12
P 3:54



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1192.

83040411838

