DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

RECEIVED
82 NOV 7 AM 11:01

Name of Committee (in Full): NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

Report Covering the Period: From: 10/16/80 to 11/24/80

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	977,475.83	5,058,821.33
(Memo Entry Unitemized $ 642,089.83)		
(b) Political Party Committees	300.00	300.00
(c) Other Political Committees	5,000.00	5,000.00
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	982,775.83	5,064,121.33
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED	5,000.00	9,900.00
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	3,728.08	28,182.04
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	991,503.91	5,102,203.37
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	241,798.45	2,001,739.08
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	45,041.57	178,786.65
22. INDEPENDENT EXPENDITURES (Use Schedule E)	820,173.36	2,861,123.14
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE	200.00	6,700.00
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	6,535.00	13,400.00
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	6,535.00	13,400.00
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	1,113,748.38	5,061,748.87
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	982,775.83	5,064,121.33
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	6,535.00	13,400.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	976,240.83	5,050,721.33
32. TOTAL OPERATING EXPENDITURES from Line 19	241,798.45	2,001,739.08
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	3,728.08	28,182.04
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	238,070.37	1,973,557.04

93040209

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

National Conservative Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Peri
Cluff & Kompany 1160 South State #200 Orem, Utah 84057	Printing	11/13/80	275.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Peri
Admiral Limousine Service 1243 First Street, S.E. Washington, D.C. 20003	Contributor Services	11/13/80	94.38
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Peri
Kitty Auer 2937 Daniel Dallas, Texas 75205	Consultant Fee	11/13/80	600.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Peri
Hotel Washington 15th & Penn. Ave., N.W. Washington, D.C. 20004	Metting Expense	11/13/80	4,578.89
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Peri
Arthur J. Finkelstein & Associates 117 Smith Avenue Mt. Kisco, N.Y. 10549	Voter Survey	11/13/80	10,200.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Per
Laura Cruz 1701 Mass. Ave., N.W. Washington, D.C. 20036	Payroll	11/14/80	102.81
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Per
Karen Admas 1701 S. 26th Street Arlington, VA 22206	Payroll	11/17/80	54.17
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Per
James K. Altman 5340 N. 37th Street Arlington, VA 22207	Payroll	11/17/80	168.24
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Per
Mary Ella Andrukonis 6036 N 25th Street Arlington, VA 22207	Payroll	11/17/80	315.72
SUBTOTAL of Disbursements This Page (optional)			16,389.21

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ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

National Conservative Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This P
A. Full Name, Mailing Address and ZIP Code Jim Bradshaw Committee 3521 Locke Fort Worth, TX 76107	Contribution TX-12 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/04/80 Ag. yr to	$500.00 date: (2,35
B. Full Name, Mailing Address and ZIP Code Hal Wick Campaign RR 4, Box 133 Souix Falls, S.D. 57101	Contribution STATE Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	10/29/80 Ag. yr to	350.00 date: (350.
C. Full Name, Mailing Address and ZIP Code Arthur J. Finkelstein & Assoc 117 Smith Ave. Mt Kisco, N.Y. 10549	Survey - In Kind to Kull SD Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/13/80 Ag. yr to	250.00 date: (250.
D. Full Name, Mailing Address and ZIP Code Arthur J. Finkelstein & Assoc	Survey - In Kind to Roberts SD2 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/13/80 Ag. yr to	250.00 date: (125c
E. Full Name, Mailing Address and ZIP Code Lisa Stoltenberg 51 D Street, S.E. Washington, D.C. 20003	Payroll - In Kind to Pauken TX-5 Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/07/80 Ag. Yr to	273.25 date: (773
F. Full Name, Mailing Address and ZIP Code Dianna Hubbard 10874 Hampton Road Fairfax Station, VA 22039	Consultant fee & Tele reimb. IN KIND D'Amato NY Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/19/80 Ag. yr to	565.70 date: (5,15
G. Full Name, Mailing Address and ZIP Code Federal Express Corp. P.O. Box 727, Dept. A Memphis, TN 38194	Air Freight - In Kind to Barron FL State Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/19/80 Ag. yr to	40.75 date: (40.
H. Full Name, Mailing Address and ZIP Code Airborne P.O. Box 662 Seattle, Washington 98111	Airfreight - In Kind to Hawkins FL Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/19/80 Ag. yr to	20.00 date: (3,73
I. Full Name, Mailing Address and ZIP Code Travelworld, Inc. 1500 Wilson Blvd. Arlington, VA 22209	Travel Expenses - In Kind to Hultman IA Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	11/20/80 Ag. yr to	269.00 date: (26c
SUBTOTAL of Disbursements This Page (optional)			2,516.7
TOTAL (This Period (last page only) enter line number only)			

8304012093

SEDAM & HERON
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

8304042093

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

82 MAR 29 P1:41

SEHAM & HENOK
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 550
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

NORTHERN VIRGINIA
PM
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Ms. Anne Weissenborn
Federal Election Commissio
1325 K Street, N.W.
Washington, D.C. 20463

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Gcc# 7430
82 MAR 29 P1:47

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-831-0886

CABLE: SEDAMHERGE

March 26, 1982

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

Re: MUR 1252/1299; National Conservative Political Action Committee

Dear Anne:

In response to the matters that you and I discussed on the telephone recently, I advise you as follows:

1. Mr. Dolan has no recollection whether he made the telephone call to Utah at telephone number (801) 867-5014. NCPAC has not learned who else might have made that telephone call.

2. NCPAC is unable to locate any internal memorandum governing the conduct of NCPAC's employees in any contacts with agents of the official Reagan campaign.

3. NCPAC is unable to locate any telephone logs for the period January 1, 1979 to election day, 1980.

4. The following persons, other than Mr. Dolan, were authorized to change telephone calls to NCPAC during the time period at issue:

   (a) George Maloney: 11520 Westhill Drive, Rockville, Maryland 20852; (301)881-0389; now press secretary to Congressman Duncan Hunter.

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(b) Roger Reed: now with Council for Inter-American Security, 305 4th Street, N.E., Washington, D.C. 20002; 546-6622.

(c) Spitz Channel - NCPAC.

(d) Brent Bozell - NCPAC.

Please feel free to call me if you have any questions or comments on this matter.

Sincerely,

Robert R. Sparks, Jr.

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A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
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B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000
TELEX: 710-831-0866
CABLE: SEDAMHERGE

January 22, 1982

82 JAN 25 P 1:06

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

Re: Arthur J. Finkelstein Polls

Dear Anne:

In reference to our telephone conversation of today, this is to confirm that the price for the additional NCPAC poll will be $121.40. Therefore, the full amount due is $188.40.

If you have any questions, please feel free to call me.

Sincerely,

Carolyn G. Cecchini

Carolyn G. Cecchini
Secretary to Mr. Sparks

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SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 800
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

RECEIVED

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

83040420941

Arthur J. Finkelstein & Associates
117 Smith Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

SOUTH CAROLINA - SEPTEMBER, 1979

1. Media market

   1. Columbia 2. Rest

2. Are you registered and expecting to vote in the next general election?

   1. Yes 2. No/All other responses (TERMINATE)

3. If you were to label yourself, would you say you are a Liberal, a Moderate or a Conservative in your political beliefs?

   1. Liberal 2. Moderate 3. Conservative 4. Don't know/Refu

4. What is the most important issue facing the United States today?

   _____

5. What is the most important issue facing the state of South Carolina today?

   _____

6. Now I am going to read you a list of names. Will you please tell me if you have a favorable or unfavorable opinion of each? If you have no opinion or have never heard of the person, just say so.

	Favorable	Unfavorable	No Opinion	Never Heard Of
a. Jimmy Carter				
b. Strom Thurmond				
c. Ernest F. Hollings				
d. Richard Riley				
e. Floyd Spence				
f. Kenneth L. Holland				
g. Eddie Chiles				
h. The Western Company				

7. Can you tell me what the Western Company does?

   _____

8304042091 2

8. Who or what is most responsible for our energy crisis?

---

9. Who do you think can best handle our energy problems - the Government or private industry?

1. Government 2. Private industry 3. Don't know/ Refuse

10. What percent of profit do you think the oil companies net on the sale of gasoline?

1. Between 0-5% 2. Between 6-10% 3. Between 11-20%

4. Between 21-30% 5. Between 31-40% 6. Between 41-50%

7. Over 50% 8. Don't know/Refused

11. Do you think there are too many, too few or just the right amount of government regulations concerning energy?

1. Too many 2. Too few 3. Right amount 4. Don't know

12. What one person if any do you most associate with the oil industry?

---

13. Would you please tell me if you agree or disagree with each of the following statements?

	Agree	Disagree	Don't know
a. The oil companies have been good for America			
b. The oil companies are making far too much profit and should be taxed heavily			
c. There really is not an energy crisis at all			
d. 20 million Americans share in the oil companies' profits			

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14. Could you tell me if you approve or disapprove of each of the following?

	Approve	Disapprove	Don't know
a. A special windfall profit tax on oil companies			
b. Decontrol of oil and gas prices			
c. Gas rationing			
d. Nationalizing all oil companies			
e. Deregulation of the oil industry			

15. Which of the following would make you more likely and which would make you less likely to vote for a candidate running for high public office?

	More Likely	Less Likely	No Difference	Don't know
a. A socialist				
b. An incumbent				
c. A liberal				
d. A bureaucrat				
e. A politician				

16. Could you tell me if you agree or disagree with the following statements?

	Agree	Disagree	Don't know
a. Ernest Hollings is a socialist			
b. Ernest Hollings is a liberal			

17. What radio station do you listen to most often?

_____

18. With wich political party are you affiliated?

1. Republican 2. Democrat 3. Independent

4. Other (specify)_____ 5. Don't know/Refused

8304042091 4

19. Would you say you always vote Democrat, usually vote Democrat, vote for as many Democrats as Republicans, usually vote Republican or always vote Republican?

1. Always Democrat 2. Usually Democrat 3. Democrat/Republi

4. Usually Republican 5. Always Republican 6. Don't know/Refus

20. What is the last grade of formal education you have completed?

1. Grade school or less 2. Some high school 3. High school gra

4. Some college 5. College graduate 6. Refused

21. Do you or does any member of your family who lives in this household belong to a labor union?

1. Yes 2. No 3. Don't know/Refu

22. What is your annual family income - Is it under $8,000, between $8,001 & $15,000, between $15,001 & 20,000, between $20,001 & $30,000 or over $30,000?

1. Under $8,000 2. Between $8,001 & $15,000

3. Between $15,001 & $20,000 4. Between $20,001 & $30,000

5. Over $30,000 6. Don't know/Refused

23. What is your religion?

1. Protestant 2. Catholic 3. Jewish 4. Atheist/Agnostic

5. Other 6. Don't know/Refused

24. What is your race?

1. White 2. Black 3. Other

25. What is your age?

1. 18-25 2. 26-40 3. 41-55 4. 56-65 5. Over 65

6. Refused

8304209 45

26. Sex?

1. Male 2. Female

Respondent's Name_____

Street_____

Phone #_____

City_____ State_____ Zip_____

Interviewer's Name_____

8304042094 6

1002593 GCC# 6083

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

McLEAN, VIRGINIA 22102

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SUITE 270
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 821-1000

TELEX: 710-831-0896

CABLE: SEDAMHERGE

January 12, 1982

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

Re: MUR 1252-1299/NCPAC

Dear Anne:

This is to advise you that there is available at my offices a complete poll conducted by Arthur J. Finkelstein & Associates concerning the 6th Congressional District in South Carolina. The document is bulky; accordingly, I am not forwarding it to you, but will keep it at my offices for pick up at your convenience. Please recall that I wrote you several weeks ago advising you that a similar poll was available for pick up on behalf of Fund For A Conservative Majority.

I do not yet know the cost of duplication of the NCPAC poll, but I will have it for you in the next few days. I look forward to hearing from you.

Sincerely,

R. R. Sparks

Robert R. Sparks, Jr.

3304209117

JAN 18 P4:54

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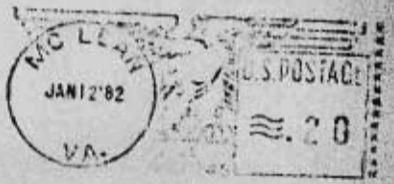
SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
6300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22101



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

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82 JAN 15 A7:48

Gen# 5 513

Milton Reporting, Inc.

R.E. Milton
President
F.R. Joyce
V.P. & General Mgr.
M.M. Hope
Treasurer

General Stenotype Reporting
Suite 301
1601 Connecticut Ave., N.W.
Washington, D.C. 20009

Phone:
202-833-3598
202-833-3599

Notary Public
D.C.-Va.-Md.

December 11, 1981

DEC 29 All: 08

Mr. John T. Dolan
3129 South 14th Street
Arlington, Virginia 22204

Dear Mr. Dolan:

On behalf of counsel who took your deposition on December ?, 1981, you are hereby notified that the transcript of your deposition is now ready and available at the above address for reading and signing, as requested by you.

If by January 26, 1982 we have not received any request for extension of time or otherwise heard from you, it will be assumed that reading and signing are no longer desired, and the deposition will be filed.

Please contact Mr. Fred Joyce when you come to the office for directions on the procedure and rules for making any changes.

Sincerely,

William J. Allen

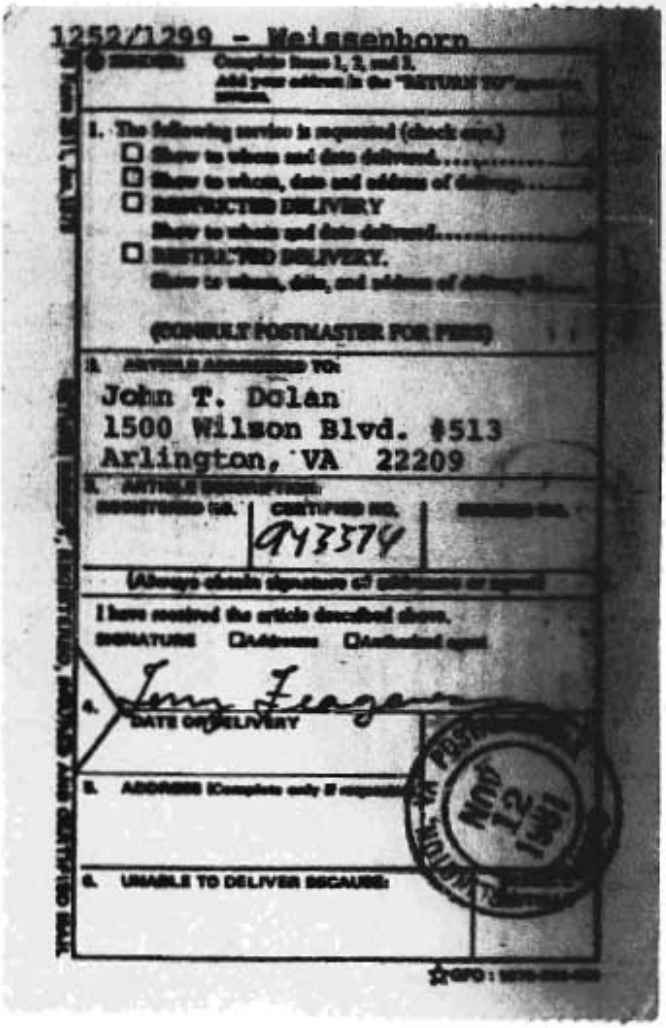
William J. Allen
Reporter/Notary

cc. Ms. Weissenborn, file

8304020919

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463


1252/1299 - Weissenborn

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

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery.....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
John T. Dolan
1500 Wilson Blvd. #513
Arlington, VA 22209

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 943574 | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Jerry Feage

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN TO SENDER, IF UNABLE TO DELIVER AS ADDRESSED, POSTAGE AND FEES WILL BE CHARGED

GPO: 1979-289-538

3304209350

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 10, 1981

John T. Dolan, Chairman
National Conservative Political
Action Committee
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209

RE: MUR 1252/1299

Dear Mr. Dolan:

On September 25, 1980, you received notification that the Commission had found reason to believe that your committee had violated 2 U.S.C. §§ 432(e)(4) and 441a(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 26 U.S.C. § 9012(f). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on December 2, 1981, at 10:00 a.m., which will assist 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

If you have any questions, please direct them to Anne A. Weissenborn, the attorney handling this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

8304042093 1

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO APPEAR FOR DEPOSITION
UPON ORAL EXAMINATION

In the Matter of	)	
	)	
Ronald Reagan	)	
Reagan for President General Election Committee	)	MUR 1252/1299
Republican National Committee	)	
Americans for Change	)	
Fund for a Conservative Majority	)	
National Conservative Political Action Committee	)	

TO:

John T. Dolan
National Conservative Political
Action Committee
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for oral deposition with regard to the Commission's investigation of MUR 1252/1299 relating to possible violations of 2 U.S.C. 432(e)(4), 441a(a), 441a(f) and 26 U.S.C. §§ 9012(b)(1) and 9012(f) by the above named respondents.

The deposition shall take place at the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., on December 2, 1981, at 10:00 a.m.

WHEREAS, the Chairman of the Federal Election Commission has hereto set his hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this 3rd day of Nov., 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8304042093

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John T. Dolan, Chairman
National Conservative Political
Action Committee
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209

RE: MUR 1252/1299

Dear Mr. Dolan:

On September 25, 1980, you received notification that the Commission had found reason to believe that your committee had violated 2 U.S.C. §§ 432(e)(4) and 441a(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 26 U.S.C. § 9012(f). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on December 2, 1981, at 10:00 a.m., which will assist 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.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

If you have any questions, please direct them to Anne A. Weissenborn, the attorney handling this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

AW
11/9/81

8304042095

D
RAD 80L-1[illegible]

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OUTSIDE COMPLAINT

DATE July 14, 1981

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Anne Weissenborn

TEAM CHIEF Bobby Werfel BW

COMPLIANCE REVIEW FS

THROUGH: STAFF DIRECTOR BC

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JD.

MUR No. 1252

DATE OF ORIGINAL REFERRAL 7/2/80

**PURPOSE:

INFORMATION:

National Conservative Political Action Committee (NCPAC) 30 Day Post-General Election Report showing independent expenditure on Schedule E to David Keene for $4,500. ATTACHMENT #1

NCPAC - 30 Day Post-General Election Report Amendment showing debt owed to Keene Communications with a payment this period of $4,500. (This debt was not included in the original report.) #2

RESULTS OF RAD ACTION:

NCPAC - RFAI sent on 6-10-81, 30 Day Post-General Election Report Amendment. #3

NCPAC - Response of 6-12-81 indicating that a payment of $4,500 to David Keene was to satisfy the debt to Keene Communications. #4

OUTCOME: (if applicable)

3304042095

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

ATTACHMENT #1

8304042093

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 16 of 51 Pages

Name of Committee (in Full): National Conservative Political Action Committee

I.D. No.: C00024687

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
MediAmerica, Inc.	Printing	10/16/80	1,055.38	Bayh U.S. Senate IN ☐ Support X ☐ Oppose
MediAmerica, Inc.	Printing	10/16/80	1,054.00	Eagleton U.S. Senate MO ☐ Support X ☐ Oppose
MediAmerica, Inc.	Mail List Rental and Telephone fundraising	10/16/80	29,996.64	Reagan President X ☐ Support ☐ Oppose
Dianna Hubbard 10874 Hampton Road Fairfax Station, VA 22039	Consultant Fee	10/17/80	150.00	Reagan President X ☐ Support ☐ Oppose
Dianna Hubbard	Consultant Fee	10/17/80	290.00	Bayh U.S. Senate IN ☐ Support X ☐ Oppose
* David Keene 10874 Hampton Rd. Fairfax Station, VA 22039	Consultant Fee	10/17/80	4,500.00	Reagan President X ☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 37,045.02

(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 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 committees or their agents.

_____ Signature

_____ Date

Subscribed and sworn to before me this _____ Day of

_____, 19____

My Commission expires

_____ NOTARY PUBLIC

83042093536

ATTACHMENT #2

8304042095 57

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
National Conservative Political Action Committee				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Keene Communications 10874 Hampton Rd. Fairfax Station, VA 22039	187.98	5,000.00	4,500.00	687.98
Nature of Debt (Purpose): Consulting Fee; Travel/Accts. Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Churchill Computer Corp. 500 Eighth Ave., St. 403 New York, NY	-0-	1,647.68	-0-	1,647.68
Nature of Debt (Purpose): A/P Mail Services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Cumberland Press 7242 Wisconsin Ave. Bethesda, MD 20014	-0-	1,319.00	-0-	1,319.00
Nature of Debt (Purpose): A/P Printing				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor CL-Co, Inc. 101 Park Washington Ct. Falls Church, VA 22046	170.00	663.92	683.92	150.00
Nature of Debt (Purpose): A/P Mail Services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Welsh Printing 439 S. Washington St. Falls Church, VA	-0-	2,272.55	-0-	2,272.55
Nature of Debt (Purpose): A/P Printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union Telegraph Co. P.O. Box 26208 Richmond, VA 23260	-0-	3,336.34	-0-	1,336.34
Nature of Debt (Purpose): A/P Telegrams				
1) SUBTOTALS This Period This Page (optional)				7,413.55
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

* 83042093E

ATTACHMENT #3

8304042093 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1981

Lisa Stoltenberg, Treasurer
National Conservative
Political Action Committee
1500 Wilson Boulevard
Suite 513
Arlington, VA 22209

Identification No: C00024687

Reference: 30 Day Post-General Election Amendment (10/16/80 to 11/24/80) dated May 5, 1981

Dear Ms. Stoltenberg:

This letter is prompted by the Commission's preliminary review of your 30 Day Post-General Election Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-On the debt schedule (Schedule D), you have shown debts owed to Mail Technology Services and Keene Communications with payments this period of $1,122 and $4,500 respectively. However, a review of the expenditure schedules (Schedules B and E) fails to disclose any payments made to the above-mentioned creditors.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

9120409360

ATTACHMENT #4

8304042093 61

RECEIVED
HAND DELIVERED
JUN 19 AM 8:46

National Conservative Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

June 12, 1981

Mark Kleinman
Reports Analysis Division
Federal Election Commission
1325 K St. NW
Washington, D.C. 20463

Reference: 30 Day Post-General Amendment (10/16/80 to 11/24/80)
dated May 5, 1981

Dear Mr. Kleinman:

This letter is written in response to the Commission's preliminary review of the National Conservative Political Action Committee's (NCPAC's) 30 Day Post-General Amendment.

On Schedule D, Debts and Obligations, NCPAC shows debts owed to Mail Technology Services and Keene Communications with payments this period of $1,122.90 and $4,500.00 respectively. The Commission has stated that a review of expenditure schedules fails to disclose any payments to the above-mentioned creditors.

On Schedule E, Page 18 of 51, payment of $4,500.00 was made to David Keene to satisfy the debt to Keene Communications. The payment to Mail Technology Services of $1,122.90 was voided. This resulted because Mail Technology Services' accounts payable ledger account was improperly credited with an invoice from Mail Marketing Services of Rockville. Payment this period for Mail Technology Services should be -0- and amount incurred this period should be $2,517.39. Totals on this schedule were not affected.

For your convenience, I have resubmitted Schedule D in its entirety with adjustments to Mail Technology Services. If you should have any questions regarding this Amendment, please feel free to contact me.

Sincerely,

Candace M. Tew

Candace M. Tew
Asst. Treasurer

8103197244

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1
LINE NUMBER 5
Print separate schedules for each numbered line

Name of Committee (in Full) National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor American Mail List Corp. 7777 Leesburg Pike Falls Church, VA 22043	15,610.87	8,351.06	16,610.87	7,351.06
Nature of Debt (Purpose): Mail List Rental/ Accounts Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Berlin & Jones Co., Inc. P.O. Box 4294 New York, N.Y. 10049	26,647.18	11,060.80	26,647.18	11,060.80
Nature of Debt (Purpose): Printing / Accounts Payable				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor D.C. Lithographers 7942 - L Angus Court Springfield, VA 22153	8,510.20	-0-	8,510.20	-0-
Nature of Debt (Purpose): Printing / Accounts Payable				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Directech, Inc. 11300 Rockville Pike Rockville, MD 20852	12,978.14	20,017.89	16,106.21	16,889.82
Nature of Debt (Purpose): Batching, Caging & Computer Serv./ Accts. Payable				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Diversified Direct, Inc. c/o U.V.B. Box 179 Alexandria, VA 22314	17,109.85	1,524.34	14,921.13	3,713.06
Nature of Debt (Purpose): Printing / Accounts Payable				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Diversified Mailing Services 7777 Leesburg Pike Falls Churhc, VA 22043	71,349.16	16,229.55	56,696.80	30,801.91
Nature of Debt (Purpose): Mailing & Computer Services / Accounts Payable				
1) SUBTOTALS This Period This Page (optional)				$69,896.6
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				

8 1 0 3 1 0 7 2 1 4 8 2 4 0 4 2 0 9 3

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 2 of 3 for
LINE NUMBER 10
Enter amounts reported
for each numbered line

Name of Committee (in Full) National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Metro Printing & Mailing P.O. Box 262 Sterling, VA 22170	11,909.47	1,245.56	9,286.61	3,868.42
Nature of Debt (Purpose): Printing / Accounts Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Mail Advertising Services 300 North Stonestreet Avenue Rockville, MD 20850	-0-	1,690.20	-0-	1,690.20
Nature of Debt (Purpose): Mailing Services / Accounts Payable				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Mount Vernon Publishing Co. 810 North Fairfax Street Alexandria, VA 22314	2,455.65	-0-	2,455.65	-0-
Nature of Debt (Purpose): Printing / Accounts Payable				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Prep, Inc. 2611 Shirlington Road Arlingotn, VA 22206	25,907.91	4,437.28	21,199.69	9,145.50
Nature of Debt (Purpose): Printing / Accounts Payable				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor The Viguerie Company 7777 Leesburg Pike Falls Church, VA 22043	185,957.78	93,969.39	178,756.39	101,170.78
Nature of Debt (Purpose): Mail List Rental, Mail fee & Computer Serv./ A.P.				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Tri-State Envelope Corp. 6900 Faigle Road Beltsville, MD 20705	2,995.87	-0-	2,995.87	-0-
Nature of Debt (Purpose): Supply and/or Printing Envelopes / Accounts Payable				
1) SUBTOTALS This Period This Page (optional)				$115,874.90
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

81031971409

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 3 of 5 10
LINE NUMBER
Use separate schedules for each numbered item

Name of Committee (as Filed) National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Wiland & Associates 1101 International Parkway P.O. Box 5445 Fredericksburg, VA 22401	22,757.23	1,062.86	19,024.21	4,795.88
Nature of Debt (Purpose): Batching, Caging & Computer Service/Acct. Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor MediAmerica, Inc. 1900 N. Beauregard St. Alexandria, VA 22311	173,702.74	34,569.34	202,805.10	5,466.98
Nature of Debt (Purpose): Media Buys, Mail Serv. & Production/Accts. Payable				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Pyramid Video 340 National Press Bldg. Washington, DC 20045	1,163.69	-0-	-0-	1,163.69
Nature of Debt (Purpose): Production Costs/Accts. Payable				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Political Communications, Inc. Stanton Park 420 C Street, NE Washington, DC 20002	-0-	1,708.46	-0-	1,708.46
Nature of Debt (Purpose): Production Costs/Accts. Payable				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Mail Technology Services 138 Church St. NE Vienna, VA 22180	-0-	2,517.39	-0-	2,517.39
Nature of Debt (Purpose): A/P Postage; Mail Services				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bedford Printing Co. 1107 Downtown Blvd. Raleigh, NC 27603	-0-	3,013.25	-0-	3,013.25
Nature of Debt (Purpose): Printing/Accts. Payable				
1) SUBTOTALS This Period This Page (optional)				18,665.65
2) TOTAL This Period (last page this line only)				

81031270144

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 4 of 5 pgs.
LINE NUMBER 10
Enter amounts whenever for each numbered item

Name of Committee (in Full) National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Keene Communications 10874 Hampton Rd. Fairfax Station, VA 22039	187.98	5,000.00	4,500.00	687.98
Nature of Debt (Purpose): Consulting Fee; Travel/Accts. Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Churchill Computer Corp. 500 Eighth Ave., St. 403 New York, NY	-0-	1,647.68	-0-	1,647.68
Nature of Debt (Purpose): A/P Mail Services				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Cumberland Press 7242 Wisconsin Ave. Bethesda, MD 20014	-0-	1,319.00	-0-	1,319.00
Nature of Debt (Purpose): A/P Printing				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor CL-Co, Inc. 101 Park Washington Ct. Falls Church, VA 22046	170.00	663.92	683.92	150.00
Nature of Debt (Purpose): A/P Mail Services				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Welsh Printing 439 S. Washington St. Falls Church, VA	-0-	2,272.55	-0-	2,272.55
Nature of Debt (Purpose): A/P Printing				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union Telegraph Co. P.O. Box 26208 Richmond, VA 23260	-0-	3,336.34	-0-	1,336.34
Nature of Debt (Purpose): A/P Telegrams				
1) SUBTOTALS This Period This Page (optional)				7,413.55
2) TOTALS This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS (from Schedule C) (last page only)				

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32240120964

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 5 of 5 for
LINE NUMBER 11
Enter amounts entered for each numbered item

Name of Committee (in Full) National Conservative Political Action Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Western Union Electronic Mail 1651 Old Meadow Rd. McLean, VA 22102	-0-	24,305.20	21,067.70	3,237.50
Nature of Debt (Purpose): Mailgrams/Accts. Payable				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				3,237.50
2) TOTAL This Period Past page (the line only)				215,068.25
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				

81031072144

100848 6614897

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
81 JUN 16 AM 11:14

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
8180 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-831-0898
CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE

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

June 16, 1981

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

Re: MUR 1252/1299

Dear Ms. Weissenborn:

Herewith, NCPAC's responses to the Commission's Document Requests and Interrogatories in the referenced matter, in paragraphs numbered and lettered to correspond to the paragraphs of the Commission's discovery requests:

6. NCPAC and/or the Ronald Reagan Victory Fund ("NCPAC") did not have a written contract with Diversified Direct, Inc. ("Diversified Direct"), Tri-State Envelope Corporation ("Tri-State"), or Arthur Finkelstein and Associates ("Finkelstein"). Diversified Direct and Tri-State are suppliers of NCPAC. Invoices for services and supplies rendered are submitted by those suppliers to NCPAC in response to written or oral purchase orders to them from NCPAC. Copies of those invoices are attached.

Finkelstein provided polling services to NCPAC as and when requested by NCPAC.

7. NCPAC did not expend any funds for the dissemination, distribution or republication of any of the listed materials.

8. See response to 7, above.

10. I have at my offices in McLean, Virginia, available for pick-up by someone from your office, copies of NCPAC's telephone bills from January, 1980 to the date of the Commission's request.

3304209568

Interrogatory E. The date and location of fund-raisers held by NCPAC which related in any way to the election of Ronald reagan or which aided in the defeat of any other 1980 presidential candidate are listed below:

Date	Location
August 20, 1980	Jackson, Mississippi
August 21, 1980	Santa Barbara, California
August 23 & 23, 1980	New Orleans, Louisiana
August 28, 1980	Bloomington, Illinois
September 25, 1980	Bloomington, Illinois
October 5 & 6, 1980	Jackson, Mississippi
October 7, 1980	Houston, Texas
October 7, 1980	Baton Rouge, Louisiana
October 9, 1980	Jacksonville, Florida
October 9, 1980	Kansas City, Missouri
October 10, 1980	New Orleans, Louisiana
October 17, 1980	Atlanta, Georgia
October 22, 1980	Tulsa, Oklahoma

Further to our recent telephone conversation on this matter, NCPAC will continue to produce the information and documents requested by the Commission. We are, however, reviewing the Commission's request no. 1 and Interrogatory F concerning associations, if any, between NCPAC and the listed individuals and entities in light of the recent 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, 1980). You will recall that Judge Pratt upheld the Commission's subpoena to NCPAC on the basis of the now-reversed District Court's decision in the Machinists case. In addition to no. 1 and F, above, Commission Interrogatory B also requests information which may impinge on the First Amendment associational freedoms recognized in Machinists. Ironically, NCPAC produced that information to the Commission on May 18, 1981, one day prior to the Court's decision in Machinists.

Sincerely,

Robert R. Sparks, Jr.

8304042095

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 818, 1900 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

The [illegible] National Bank
[illegible], Virginia

1669

June 6, 1980

68-727
514

Pay N.C.P.A.C 1600 00 cts Dollars $1,600.00

To the order of
Diversified Direct, Inc.
U.V.B. Box #179
Alexandria, VA 22314

Signature NOT NEGOTIABLE

⑈001600⑈ ⑆056805514⑆ 0100133086⑈01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE FORM WB-3 V-3

DATE	DESCRIPTION	AMOUNT
4/15/80	Invoice #1913 Partial Payment Balance $1,521.56	
	#524C IE Reagan	$1,600.00

3040 02 07

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

NATIONAL CONSERVATIVE
SUITE 618, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

1748

July 3, 1980

PAY N.C.P.A.C. 2220 00/100 DOLLARS $2220.00

TO THE ORDER OF
Diversified Direct, Inc.
c/o DVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DATE	DESCRIPTION	AMOUNT
6/19/80	For partial payment of invoice #A2061 #824C IE Reagan	$2220.00

8304042007

NATIONAL CONSERVATIVE
SUITE 513, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

1767

July 14, 19 80

PAY N.C.P.A.C. 600 00 CTS DOLLARS $ 600.00

TO THE ORDER OF
Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

:0051402071: 0100133086:01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVO-3 V-8

DATE	DESCRIPTION	AMOUNT
5/19/80	For partial payment of invoice #A2061 #524C IB Ranjen	$900.00

8304029697

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 512, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

The [illegible] Bank
Culpeper, Virginia

1776

July 25, [illegible] 80

PAY N.C.P.A.C. 1839 DOLS 15 CTS DOLLARS $ 1839.15

TO THE ORDER OF
Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

Susa NOT NEGOTIABLE, Jen

⑆055403207⑆ 0100133086⑈01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DETACH - FORM WVO-S V-8

DATE	DESCRIPTION	AMOUNT
5/19/80	For partial payment and balance of invoice #A2061	$1839.15
	#524C IE Reagan	

30400297

Bal

$1,839.15

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 WILSON BLVD., NO. 513
ARLINGTON, VIRGINIA 22200

№ 1036

October 17, 1980

PAY Three Thousand Three Hundred Fourteen and 56/100---------- $ 2,314.56
TO THE ORDER OF

Diversified Direct, Inc.
2936 Prosperity Avenue
Fairfax, Virginia 22031

NON NEGOTIABLE

"001036" :055000320: 0158047768"

8/12/80	Paymetn of Invoice #2424		
9/19/30	Partial Paymetn of Invoice #2454		
	#524C IE Reagan	$1,000.00	
	IE Eagleton	262.92	
	IE Bayh	262.91	
	IE Cranston	262.91	
	IE Church	262.91	
	IE Culver	262.91	$2,314.56

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2424

DATE Aug 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C987C NCPAC 9640	8/8/80	11082	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, COMPUTER LETTERS.		
63 M	Computer letters, with 2 color face and 1 color back.	19.75/M	1244.25
1 M	Additional:	same	19.75
			1264.00
	4% Va. tax:		50.56
	TOTAL INVOICE:		$1314.56

1 180 (Eagleton)

262.91 x4
262.92 x1

8304120097

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 - (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2454

DATE Aug 19, 1980

TO:

Naitonal Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C377A NCPAC 9477	8/4/80	11042	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTTNG SERVICES, COMPUTER LETTERS.		
146 M	Computer letters, with 3 color face and 1 color back.	17.14/M	2502.44
2 M	Additional:	same	34.23
			2536.72
	Authors Alterations:		
	Labor: stripping:		24.00
			2560.72
	#534C		
	4% Va. tax:		102.43
	TOTAL INVOICE:		$2563.15
	Partial	10/17	1,000.00

Defeate Carter

8304204097

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2454

DATE Aug 19, 1980

TO:

Naitonal Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C977A NCPAC 9473	8/4/80	11042	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, COMPUTER LETTERS.		
146 M	Computer letters, with 3 color face and 1 color back.	17.14/M	2502.44
2 M	Additional:	same	34.28
			2536.72
	Authors Alterations:		
	Labor: stripping:		24.00
			2560.72
	4% Va. tax:		102.43
	TOTAL INVOICE:		$2663.15
		10/17	$ 1,000.00
			1,663.15
		10/24	1,000.00
			663.15

#524C

Delegate Carter

3304042097

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1928

Sept. 5, 1 80

7,622.04

Diversified Direct, Inc,
c/o U.V.B., Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

(830420978 (

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

8/12/80	Payment of Invoice #A 2415			
6/20/80	Balance DUe Invoice #A 2176			
7/30/80	Payment of Invoice #A 2386			
8/19/80	Payment of Invoice #A 2452	#524C IE Reagan	$4,724.35	
8/12/80	Payment of Invoice #A 2423	#524C IE McGovern	101.18	
7/18/80	Payment fo Invoice #A 2321	#524C IE Bayh	101.18	
7/24/80	Payment of Invoice #A 2336	#524C IE Culver	101.19	
7/24/80	Payment of Invoice #A 2349	#524C IE Cranston	101.19	
		#524C IE Church	101.19	
		#524D	2,391.76	$7,622.04

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2415

DATE Aug. 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, VA. #513 Suite
22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D007 NCPAC 9566	8/7/80	11069	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, COMPUTER LETTERS.		
18 M	Computer letters, with 2 color face and 1 color back.	45.07/M	811.26
1.8 M	Additional:	same	81.12
			892.38
	4% Va. tax:		35.69
	TOTAL INVOICE:		$928.07

Reagan

SAVC

Total
Reagan $4724.35
T'80
(2) 101.18 ea.
(3) 101.19 ea
D - $2391.76

8304042097

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2336

DATE July 24, 1980

TO:

National Political Action Comm.
1500 Wilson Blvd. Suite 513
Arlington, VA. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C910B NCPAC 9186	7/18/80	10976	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
5.5 M	Computer forms, with 2 color face and black back.	65.05/M	357.77
.5 M	Additional:	same	32.52
			390.29
	4% Va. tax:		15.61
	TOTAL INVOICE:		$405.90

5340420930

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2321

DATE July 18, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C910A NCPAC 9105	7/17/80	10955	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS. D		
71.5 M	Computer forms, with 2 color face and black back.	19.50/M	1394.25
	4% Va. tax:		55.77
	TOTAL INVOICE:		$1450.02

524D

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WHITE--CLIENT GREEN--REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2423

DATE Aug 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISION JOB NO.	SALESMAN	TERMS
~~NCPAC 9642~~ C987A-C	8/7/80	11081	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, CHESHIRE LABELS.		
10 M	Cheshire labels with 1 color face only.	46.84/M	468.40
1 M	Additional:	same	46.84
			515.24
	4% Va. tax:		20.60
			$535.84

8304209838

524 D

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2452

DATE Aug 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Virginia 22209

SHIPPED TO:

Mediamerica
Alex., Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C989 NCPAC 9403	8/1/80	11037	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
10 M	Letters, with 2 color face and 1 color back.	68.26/M	682.60
1 M	Additional:	same	68.26
	Authors Alterations:		
	Line shots:		4.00
	Labor: stripping:		60.00
			814.86
	4% Va. tax:		32.59
	TOTAL INVOICE:		$847.45

524C

Reagan

8304209 8

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2386

DATE July 30, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C 978 C / C977A-C	7/30/80	11013	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, CHESHIRE FORMS.		
10 M	Cheshire forms:, with 1 color face.	53.08/M	530.80
1 M	Additioanl:	same	53.08
			583.88
	4% Va. tax:		23.35
	TOAL INVOICE:		$607.23

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WHITE--CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK--DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2176

DATE June 20, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C897	6/17/80	- / 10823	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
498 M	Computer forms, with 2 color face and black back.	15.08/M	7509.84
2 M	Additional:	same	30.16
			7540.00
	4% Va. tax:		301.60
	TOTAJ. INVOICE:		$7841.60
		8/8 →	1,000.00
		8/22	2500.00
			$ 4341.60
		8/29	2,000.00
			2,341.60

330420 28

529 C - Independent Expenditure

~~Independent Expenditure~~

Rec'd

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2349

DATE July 24, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C885 NCPAC 9187	7/18/80	10974	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, COMPUTER FORMS.		
11 M	Computer forms, with 2 color face and back Coded: LH81.	40.54/M	445.94
1 M	AdditionaL:	same	40.54
			486.48
	4% Va. tax:"		19.45
	TOTAL INVOICE:		$505.93

7/18/80

101.18
$505.93
0
005
43

(2) - 101.18
(3) 101.19

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1967

Sept. 19, 80

4841.95

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

30420987

8/11/80 | For payment 66 invoices: 2427, 2441, 21071, 21073, 21082 | $4841.95

#524C IE Reagan $834.10
#524B $4007.85

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2427

DATE Aug 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

DMS

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D007 NCPAC 9565	8/11/80	11070	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
36 M	Letters, with 1 color face and 2 color back.	21.95/M	790.20
2 M	Additional:	same	43.90
	TOTAL INVOICE:		$834.10

3304209 3

524 C

Reg Ops

354 8600

WHITE--CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD--DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2441

DATE Aug 18, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C987AB NCPAC 9641	8/12/80	11080	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS. D		
87 M	Computer letters, with 2 color face and 1 color back.	18.25/M	1587.75
2 M	Additional:	same	36.50
	Authors Alterations:		
	Labor: stripping:		108.00
	Line shots:		5.40
	Blueline & color sep.		27.00
			1764.65
	4% Va. tax:		70.59
	TOTAL INVOICE:		$1835.24

4007.85

8304209306

WHITE - CLIENT GREEN - REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

DIVERSIFIED MAIL MARKETING, INC.

INVOICE

777 Leesburg Pike, Falls Church, Virginia 22043 (703) 893-1380

NO. CMP · [illegible]

DATE 4/[illegible]/70

TO:

NCTAC
1800 Wilson Blvd.
Arlington, VA. 22209
Attn: [illegible]

SHIPPED TO:

DMS Waldorf
[illegible]

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DMMI JOB NO. / DMMI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/70	3784 / 7715	[illegible]	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, Batch Letter		
55M	2 Sheet Letters 8 1/4 x 11 2/c Face & Back on 50 # Jetstream	16.29	$895.95
	Authors Alterations		43.14
	Sub Total		$939.09
	2% of Total	18.35	
	5% Md Sales Tax or 2%		.94
	Total Invoice		$943.23

$943.23

8304042099 0

ITE—CLIENT CANARY—REMITTANCE BLUE—ACCOUNTING GOLDENROD—DMMI CHRONOLOGICAL GREEN—DMMI JOB JACKET
PINK—DIVISIONAL JOB JACKET WHITE—DIVISIONAL CHRONOLOGICAL

Diversified

DIVERSIFIED MAIL MARKETING, INC.

INVOICE

777 Leesburg Pike, Falls Church, Virginia 22043 (703) 893-1380

NO. CMP · [illegible]

DATE 4/21/78

TO:

NCPAC
1500 Wilson Blvd.
Arlington, VA 2220
Suite 511

SHIPPED TO:

DMS Waldorf
Maryland

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DMMI JOB NO. / DMMI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/78	[illegible] / 3766 / 7727	DE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, MARRIOTT BATTELLE [illegible]		
55M	Brochures 81/4 x 13 1/c Face		
	on 50 Recycled 100	13.76	$756.80
	2% on Total	15.14	
	5% MD Tax On 2%		.76
	TOTAL INVOICE		$757.56
			757.56

8304209

WHITE—CLIENT CANARY—REMITTANCE BLUE—ACCOUNTING GOLDENROD—DMMI CHRONOLOGICAL GREEN—DMMI JOB JACKET
PINK—DIVISIONAL JOB JACKET WHITE—DIVISIONAL CHRONOLOGICAL

Diversified

DIVERSIFIED MAIL MARKETING, INC.

INVOICE

777 Leesburg Pike, Falls Church, Virginia 22043 (703) 893-1380

NO. CMP · 21052

DATE 4/20/78

TO:

NCPAC
1500 Wilson Blvd.
Suite 513
Arlington, Virginia

SHIPPED TO:

DMS
Walcorf

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DMMI JOB NO. / DMMI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS NET—30
	4/20/78	[illegible] / 3765 / 7141	VT	

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	Harriott Pub Note		
	[illegible] PRINTING SERVICES PERFORMED FOR PUB NOTE		
55M	Pub Notes [illegible]		
	On 40# White Sidco [illegible]	8.57/M	$471.35
	2% of Total	9.43	
	5% MD Sales Tax On 2%		.47
	TOTAL INVOICE		$471.82

$471.82

$2172.61

8304209

WHITE—CLIENT CANARY—REMITTANCE BLUE—ACCOUNTING GOLDENROD—DMMI CHRONOLOGICAL GREEN—DMMI JOB JACKET
PINK—DIVISIONAL JOB JACKET WHITE—DIVISIONAL CHRONOLOGICAL

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 WILSON BLVD., NO. 513
ARLINGTON, VIRGINIA 22209

№ 1075

October 31, 19 80

PAY TO THE ORDER OF N.C.P.A.C. I0269 DOLS 44 CTS $10,269.44

Diversified Direct, Inc.
c/o U.V.B., Box 179
Alexandria, VA 32314

NON-NEGOTIABLE

8/19/80	Balance Due Invocie #2454		
XXXXXXXX			
8/27/80	Invoice #2507		
8/28/80	Invoice #2511	#524C IE Reagan 9636.29	
		#524C IE Carter 663.15	
			$10,269.44

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2507

DATE Aug 27, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C986A NCPAC 9745	8/15/80	11102	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
524 M	Letters, with 3 color face and 1 color back.	13.18/M	6906.32
3 M	Additional:	same	39.54
	Authors Alterations:		
	Line shots:		2.00
	Labor: stripping:		30.00
			6977.86
	4% Va. tax:		279.11
	TOTAL INVOICE:		$7256.97

#524 C
Reagan

8304042099

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2511

DATE Aug 28, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D047 NCPAC 0029	8/28/80	11136	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
150 M	Letteres, with 1 color face and back.	14.96/M	$ 2244.00
1 M	Additional:	same	14.96
			2258.96
	4% Va. tax:		90.36
	TOTAL INVOICE:		$2349.32

Reagan #524C

8304209

WHITE--CLIENT GREEN--REMITTANCE CANARY—ACCOUNTING PINK--DDI CHRONOLOGICAL
GOLDENROD--DDI JOB JACKET

1867

August 22, 80

N.C.P.A.C. 3162.84

Diversified Direct
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

NATIONAL CONSERVATIVE

8360420996

7/15-7/20	For payment of invoice #2280 and partial payment of #2176 (2500.00)	$3162.84
	#524D $662.84	
d	#894C IE Reagan $2500.00	

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2280

DATE July 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C910c NCPAC 9089	7/15/80	10954	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
10.5M	Computer forms, with 2 color face and back.	60.70/M	637.35
	4% Va. tax:		25.49
	TOTAL INVOICE:		$662.84

524D

8330420907

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1913

August 29, 80

2,000.00

Diversified Diredt, Inc.
c/o U.V.B. Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

83042097E

6/20/80	Partial Payment of Invoice #2176		
		#524C IE Reagan	$2,000.00

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2176

DATE June 20, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C397	6/17/80	10323	53	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
8304209	RE: PRINTING SERVICES, COMPUTER FORMS.		
499 M	Computer forms, with 2 color face and black back.	15.03/M	7509.84
1 M	Additional:	same	30.16
			7540.00
	4% Va. tax:		301.60
	TOTAL INVOICE:		$7841.60

524 C - Independent Expenditure
~~Independent Expenditure~~
Reason?

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1791

August 1, 80

3,400.00

Diversified Direct, Inc.
%U.V.B. Box 179
Alexandria, VA
22314

NOT NEGOTIABLE

8/1/30	Partial Payment of Invoice 2095	$3,400
	Independent Expenditure Reagan 524C	

C00420210

1830

August 8, 80

N.C.P.A.C. 3,172 DOLS 24 CTS 3,172.24

Diversified Direct, Inc.
c/o U.V.B. Box #179
Alexandria, VA 22314

NOT NEGOTIABLE

8304-0421001

5/15/80	Payment of Invoice #A2049	$ 940.36	#524D	
6/20/80	Partial Payment on Invoice #A2176	$1,000.00	#524C IE Reagan	
5/22/80	Balance Due Invoice #A2095	$1,231.88	#524C IE Reagan	$3,172.24

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2095

DATE May 22, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C833G NCPAC 8158	5/21/80	1534 10701	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
218 M	Computer forms, with 1 color face and black back. COded: L20G3.	20.43/M	4453.74
	4% Va. tax;		178.14
	TOTAL INVOIE:		$4631.88
		8/1	3400.00
			$1,231.88

#524C
IE Reagan

Bal 8/8

830421005

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE A2049

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C832bef NCPAC 8104	5/14/80	1522 / 10692	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
16.5 M	Computer forms, with 2 color face and black back. Coded: LC82.	54.80/M	904.20
	4% Va. tax:		36.16
	TOTAL INVOICE:		$940.36

8304042100

#524D

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1513

May 23, 80

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 1513.80

Diversified Direct, Inc.
c/o U.V.B. Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

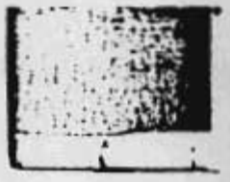
NATIONAL CONSERVATIVE

DELUXE - FORM VVBG-VB

830-4021004

4/15/80	For payment of invoice #A 1919	$1513.80

#524C
IE Reagan



Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1919

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7269	4/10/80	1692 10563	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, POSTCARDS.		
348 M	Postcards, with 2 color face and 1 color back.	4.35/M	1,513.80
	TOTAL INVOICE:		$1,513.80

71,000 305.85 — 870

-7,000 305.85 — 8701

-206.00 896.10 — 20D

524 C IE Reagan

L3356

330401210025

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK--DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1776

July 25, 80

N.C.P.A.C. [illegible] 1839.15

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

(830404210086

5/19/80	For partial payment and balance of invoice #A2061	$1839.15
	#524C IE Reagan	

1729

June 27, 80

3,200.00

Diversified Direct, Inc.
2936 Prosperity Avenue
Fairfax, VA 22031

NOT NEGOTIABLE

8364042100 07

5/19/80	Partial Payment on Invoice #A2061	
	#524C IE Reagan	$3,200.00

Diversified Direct, Inc.

INVOICE A2061

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. [illegible]6169

DATE May 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilsonblvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
[illegible]	5/14/80	1513 / 10687	32	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMP. FORMS.		
444	Computer forms, with 1 color face and back. Code: L20H.	17.02/M	7556.88
	4% Va. tax:		302.27
	TOTAL INVOICE:		$7859.15
		Partial 6/27	3.200.00
		7/8	2.200.00
		7/11	600.00
			$1,839.15

#524C
IE Reagan

Bal

930404210003

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1748

July 3, 80

N.C.P.A.C. [illegible] BOOKS 2220.00

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

[illegible] NATIONAL CONSERVATIVE [illegible] COMMITTEE

[illegible]

7/19/80	For partial payment of invoice #A2061	$2220.00
	#824C IE Reagan	

C830404210009

1767

July 14, 80

600.00

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

-8 3 6 4 0 4 2 1 0 1 0

5/19/80	For partial payment of invoice #A2061 #524C IB Reagan	$900.00

Diversified Direct, Inc.

INVOICE A2061

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C833e,f NCPAC 8103	5/14/80	1518 / 10687	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMP. FORMS.		
444 M	Computer forms, with 1 color face and back. Code: L20H.	17.02/M	7556.88
	4% Va. tax:		302.27
	TOTAL INVOICE:		$7859.15
	6/1 Partial ←		3200.00
	7/3 partial		2220.00
	7/11		600.00

#524C
IE Reagan

3304042011

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1686

June 13, 80

N.C.P.A.C. 7528.24

7528.24

Diversified Direct
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

8 30 40 42 1,8 1 2

NATIONAL CONSERVATIVE

4/15/80	For payment of invoice #1942 and partial payment of invoice #1913	$7528.24
	#524C IE Reagan	

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1913

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd,
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7271	4/15/80	1691 10567	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, ADS.		
348 M	Reagan ads, with 1 color face on 1 side only.	8.97/M	3,121.56
	TOTAL INVOICE:		$3,121.56
		Bal	1,600.00
			1,521.56
			62.43

$71.00 / $136.57 — $71.00 / $56.87 — $26.000 / $347.82

87W - 8701 - 20D

#524 C IE Reagan

930421013

WHITE--CLIENT GREEN--REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1942

DATE April 15, 1980

TO:

National Political Action Committee.
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7270	4/10/80	1681 10562	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER LETTERS.		
205 M	Comp. letters with 1 color face and 1 color back. Coded: L 20 D.	16.38/M	3,357.90
143 M	Comp letters same specs. Coded: LW7	16.38/M	2,342.34
			5,700.24
	4% Va. tax:		228.00
	TOTAL INVOICE:		$5,928.24

8704 87401 (NCPAC) 870 - 87401 = 524 · C · Reagan

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1669

June 6, 80

N.C.P.A.C. [illegible] 1,600.00

Diversified Direct, Inc.
U.V.B. Box #179
Alexandria, VA 22314

NOT NEGOTIABLE

- 8304021 01 -

NATIONAL CONSERVATIVE [illegible]

4/15/80	Invoice #1913 Partial Payment	Balance $1,521.56	
		#524C IE Reagan	$1,600.00

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1913

DATE April 15, 1980

TO:

[illegible]ational Conservative Political
[illegible]ction Committee
1300 Wilson Blvd,
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO. [illegible]	DATE SHIPPED/ MAILED. 4/15/80	DDI JOB NO. / DDI P.O. NO. 1691 / DIVISIONAL JOB NO. 10567	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, ADS.		
[illegible]	Reagan ads, with 1 color face on 1 side only.	8.97/M	3,121.56
	TOTAL DUE:		$3,121.56

$10 - $7401 - 20D

21324 - DE Reagan

830404210162

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

1605

May 16, 80

N.C.P.A.C. 2652.91

Diversified Direct, Inc.
c/o U.V.B. Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

0040421017

NATIONAL CONSERVATIVE

03/31/80	For payment of invoices:	#A 1875	
		#A 1887	#2652.91
		#524D	

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1875

DATE March 31, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C766C NCPAC 7128	3/28/80	1397 / 10505	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
27.5 M	Computer forms, with 2 color face and black back. Coded: LS72.	36.60/M	1,006.50
	Authors Alterations: Labor: stripping:		24.00
			1,030.50
	4% Va. tax: 524D		41.22
	TOTAL INVOICE:		$1,071.72

8304210 1E

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1887

DATE March 31, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER C766A ORDER NO. C766B NCPAC 7125,7125	DATE SHIPPED/ MAILED. 3/28/80	DDI JOB NO. DDI P.O. NO. DIVISIONAL JOB NO. 10504	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
27.5 M	Computer forms, with 2 color face and black back. Coded: L-S71.	27.15/M	746.62
.5 M	Additional:	same	13.57
27.5 M	Computer forms, with same specs. Coded: L-S7.	27.15/M	746.62
.5 M	AdditionaL:	same	13.57
			1,520.38
	4% Va. tax:		60.81
	TOTAL INVOICE:		$1,581.19

524D

8304212015

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

1563

May 2, 80

N.C.P.A.C. - DCCS $6,500.00

Diversified Mailing Services
7777 Leesburg Pike
Falls Church, VA 22043

NOT NEGOTIABLE

8304042102

1/25/80	Partial Payment of Invoice #009532		
		#554D	$6,500.00

Diversified Mailing Services

P.O. Box 537/Waldorf Industrial Park/Acton Lane
Waldorf, Maryland 20601
301/645-5664 • 202/843-8330

A Division of Diversified Mail Marketing, Inc.

PLEASE REMIT TO: DIVERSIFIED MAIL MARKETING, INC., 7777 LEESBURG PIKE, FALLS CHURCH, VA 22043

M 009532

INVOICE

DATE 1/25/90
TERMS Net 30 Days
CUSTOMER ORDER NO. See Below
DATE MAILED See Below
JOB NUMBER See Below

QUANTITY SHIPPED	DESCRIPTION	UNIT PRICE	AMOUNT
8304042102	[illegible]		
	[illegible]	$37.05/M	$3,503.31
	[illegible]		
	[illegible]	$44.25/M	$4,023.01 60.00 $7,586.32
	[illegible]		
	TOTAL		$7,586.32

#6,500 partial
5541

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 613, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

1745

July 3, 19 80

PAY N.C.P.A.C. 1682.76 DOLLARS $ 1682.76

TO THE ORDER OF
Tri-State Envelopes
6900 Faigle Road
Baltsville, MD 20705

NOT NEGOTIABLE

:051402071: 0100133086:01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVD-3 V-3

DATE	DESCRIPTION	AMOUNT
5/16/80	For payment of the balance of invoice #10932	$1682.76
	#524C IE Reagan	

830402

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 10932

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"	
5-16-80	5-1017-80M	NCPAC 8097 C-833 C,D	x		DMS MD	1 1 1

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO:
National Conservative Political Committee
1500 Wilson Blvd. #513
Arlington VA 22209

8304212 0

QUANTITY	DESCRIPTION	PRICE	AMOUNT
420,000	#10 24 BK OS DS Std Sty Wdw	13.75M	5775.00
	plates		18.10
			5793.10
	MD 5%		289.66
	Total		6082.76
		6/20/80	- 2,800.00
			3282.76
BL# 13279 Dave		6/27/80	- 1600.00
			1,682.76

#524C
IE Reagan

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

1745

July 3, 80

N.C.P.A.C. 1682.76

Tri-State Envelopes
6900 Faigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

-8304210024

7/16/80	For payment of the balance of invoice #10932	$1682.76
	#524C IE Reagan	

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER **10932**

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
5-15-00	5-1017-80M	NCPAC 0097 C-833 C,D	X		DHS MD

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

SOLD TO
National Conservative Political Committee
1500 Wilson Blvd. #513
Arlington VA 22209

8304042102

QUANTITY	DESCRIPTION	PRICE	AMOUNT
420,000	#10 24 BK OS DS Std Stg Wdw	13.75M	5775.00
	plates		18.10
			5793.10
	MD 5%		289.66
	Total		6082.76
			2800.00

#524C
IE Reagan
Partial

BL# 13279 Dave

CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

1714

June 20, 80

2800.00

Tri- State Envelope Corp.
6900 Faigle Road
Beltsville, MD. 20705

NOT NEGOTIABLE

5/16/80	For partial payment of invoice #10932	$2800.00
	#524C IE Reagan	

1724

June 27, 80

U.C.P.A. Contributions 1,600.00

Tri-State Envelope Corp. of MD
6900 Faigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

(8304042186227 (

5/16/80	Partial Payment of Invoice #10932	
	#524C IE Reagan	$1,600.00

1871

August 22, 80

3923.09

N.C.P.A.C.

Tri-State Envelope Corp.
6900 Faigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

8304042102 (

6/24/30	For balance payment of invoice #11966	$3923.09

#524D

1615

August 8, 80

N.C.P.A.C. [illegible] 3,869.40

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

NOT NEGOTIABLE

NATIONAL CONSERVATIVE
[illegible]

8504021029

6/24/80	Partial Payment of Invoice #11966	($2,300.00)	#524D
6/27/80	Balance Due - Invoice #12019	($1,569.40)	#524C IE Reagan
			$3,869.40

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12019

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
6-27-20	6-1305-80MN	COAC 8696	x		DMS	MD	1	1	1	

JOB C912

SOLD TO
National Conservative Political Action Committee
1500 Wilson Blvd
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
22,500	Copy was changed by customer after 22,500 envelopes had already been run on the press. These envelopes were bailed per Sandy at RAVCO.		
272,000	#9 24 WW OS DS Std Sty Wdw		
294,500	Total billed for	16.00M	4712.00
	plates		106.00
	restripping		10.00
BL# 13987 (170,000) 14149 (102,000)	Lot 1 Lot 2 Dave		4828.00
	MD 5%		241.40

BL NO	SLSM	CUT CHG	FRT. CHG.	SUB-TOTAL	TAX	TOTAL
						5069.40

PLEASE PAY

#534C
TE Reagan

5/1 — 3500.00
1569.40 Bal 8/8

8304210356

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 11966

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"	
6-24-80	6-1289-80m	Ncpac 8680	x		DMS MD	1 1 1

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO
National Conservative Political Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

8304042103

QUANTITY	DESCRIPTION	PRICE	AMOUNT
755,000	3-5/8 x 7-3/4 24 Golden Rod OS DS Regular BRE	7.85M	5926.75
	MD 5%		296.34
	Total		6223.09
		8/8 —	2300.00
			$3923.09
BL# 13354 (460,000) 14091 (295,000)	Dave		

B.L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

1799

August 1, 80

$7038.40

[illegible] Envelope Corp.
6900 Paigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

8304042103

[illegible] CONSERVATIVE

6/27/80	Partial Payment of Invoice #12019	($3,500.00)		
/27/80	Payment of Invoice #11027			
		$4,269.20	#524C IE Reagan	
		$1,769.20	#524D	$7,038.40

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER **12019**

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
6-27-80	6-1305-80	NCOAC 8696 J088 C913	x		DHS	MD	1	1	1	

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

SOLD TO:
National Conservative Political Action Committee
1500 Wilson Blvd
Arlington VA 22209

B30042 0 5

QUANTITY	DESCRIPTION	PRICE	AMOUNT
22,500	Copy was changed by customer after 22,500 envelopes had already been run on the press. These envelopes were bailed per Sandy at RAVCO.		
272,000	#9 24 WW OS DS Std Sty Wdw		
294,500	Total billed for	16.00M	4712.00
	plates		106.00
	restripping		10.00
BL# 13987 (170,000) 14149 (102,000)	Lot 1 Lot 2 Dave		4828.00
	MD 5%		241.40

B.L. NO.	SLSM	CUT CHG	FRT. CHG.	SUBTOTAL	TAX	TOTAL
						5069.40

PLEASE PAY

CUSTOMER COPY

1929

Sept. 5, 80

2,822.65

Tri-State Envelppe Corp. of MD
6900 Faigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

8304042105

6/30/80	Payment of Balance of Invoice #12031	
	#524D IE Reagan	$2,822.65

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12031

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"	
6-30-80	6-1290-80	NCPAC 8681 C897	x		DMS MD	1

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO
National Conservative Political Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

8304021

QUANTITY	DESCRIPTION	PRICE	AMOUNT
450,000	#9 24 BK OS DS Std Sty Wdw	10.10M	4545.00
	plates		48.00
			4593.00
	MD 5%		229.65
	Total		4822.65
		8/29	2000.00
			2822.65

#524C
TE Reagan

BL# 14112 (175,000)
13853 (275,000) Dave

B.O.P.	SLSM	CUT CHG	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

1911

August 29, 80

2,000.00

Tri-State Envelope Corp.
6900 Paigle Road
Beltsville, Maryland 20705

NOT NEGOTIABLE

6304042103376

6/30/80	Partial Payment of Invoice #12031		
		#524C IE Reagan	$2,000.00

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12031

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
6-30-80	6-1290-90	NCPAC 8681 C897	x		DMS MD

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

National Conservative Political Action Committee
1500 Wilson Blvd#513
Arlington VA 22209

QUANTITY	DESCRIPTION	PRICE	AMOUNT
450,000	#9 24 BK OS DS Std Sty Wdw	10.10M	4545.00
	plates		48.00
			4593.00
	MD 5%		229.65
	Total		4822.65

BL# 14112 (175,000)
13353 (275,000) Dave

S	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

1911

August 29, 80

2,000.00

Tri-State Envelope Corp.
6900 Faigle Road
Beltsville, Maryland 20705

NOT NEGOTIABLE

(830042106 (

6/30/80	Partial Payment of Invoice #12031	
	#524C IE Reagan	$2,000.00

1969

Sept. 19, 80

U.C.P.A. [illegible] 850.00

Tri-State Envelope Corp.
6900 Faigle Road
Beltsville, MD 20705

NOT NEGOTIABLE

(830404210039

NATIONAL CONSERVATIVE

9/80	For partial payment of invoice #12145	$850.00
	#520C IE Reagan	

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12145

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
7-9-80	6-1347-80M	NCPAC 8712	x		DMS md	1	1	1		

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

SOLD TO

National Conservative Polotocal Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

8304042101C

QUANTITY	DESCRIPTION	PRICE	AMOUNT
140,000	3-5/8 x 7-3/4 24 WW OS DS Regular Split Gum	10.60M	1484.00
	plates		10.00
			1494.00
	520C MD 5%		74.70
	JE Reagan Total		1568.70
		9/19	850.00
BL# 14278 (35,000) 13989 (35,000) 14281 (70,000) Dave			

B/L NO.	S/SM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 WILSON BLVD., NO. 513
ARLINGTON, VIRGINIA 22209

№ 1031

October 17, 1980

52-220
550

PAY Seven Hundred Eighteen and 70/100---------- $718.70
TO THE ORDER OF

Tri-State Envelope Corp.
6900 Faigle Road
Beltsville, MD 20705

NON NEGOTIABLE

"0010311" [illegible]

8304042 1 0

7/9/80	Payment of Balance due of Invoice #12145	
	#524C IR Reagan	$718.70

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER **12145**

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
7-9-80	6-1347-80N	NCPAC 8712	x		DMS md

SOLD TO
National Conservative Polotocal Action Committee
1500 Wilson Blod #513
Arlington VA 22209

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
140,000	3-5/8 x 7-3/4 24 WW OS DS Regular Split Gum	10.60M	1484.00
	plates		10.00
			1494.00
	AD 58		74.70
	Total		1568.70
		9/19	850.00
			718.70
BL# 14278 (35,000) 13989 (35,000) 13281 (70,000) Dave			

Reagan Supply & Print

B-L NO.	SLSM.	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

OFSF 6 Shipping 0 4 2 1 0 4 1 3

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 WILSON BLVD., NO. 513
ARLINGTON, VIRGINIA 22209

№ 1063

October 24, 19 80

65-328
550

PAY TO THE ORDER OF N.C.P.A.C. 864 02 CTS $ 864.02

Tro-State Envelope Corp. of MD.
6900 Paigle Road
Beltsville, MD 20705

NON NEGOTIABLE

Carolyn M. Kay

830404210

7/23/80	Paymetn of Invoice #12301			
7/16/80	Payment of Invoice #12222			
7/03/80	Payment of Invoice #12087	#524C Reagan	456.02	
		#524D	408.40	$864.02

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12301

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
7-23-80	7-1583-80M	NCPAC 9258	x		DMS MD	1	1	1		

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

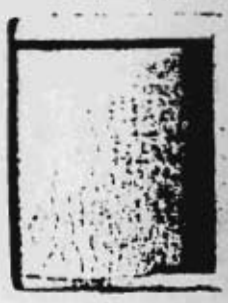
SOLD TO
National Conservative Political Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

QUANTITY	DESCRIPTION	PRICE	AMOUNT
10,500	#9 24 WW OS DS Regular	12.00M	126.00
	MD 5%		6.30
	Total		132.30
	PLATES INCLUDED #524 D		
BL# 14482 Dave			

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

830404210444



tri-state envelope corporation of maryland

ENVELOPE MANUFACTURER

700 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

INVOICE

NUMBER 12222

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
7-16-80	7-1494-80M	NCPAC 9093	x		DMS	MD	1	1	1	

JOB# C910

SOLD TO
National Conservative Political Action Comm
1500 Wilson Blvd #513
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
10,500	#9 24 WW OS DS Std Sty Wdw	23.50M	246.75
	plates		16.20
			262.95
	MD 5%		13.15
	Total		276.10
	#524		
BL# 14360 Dave			

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

8304210

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12087

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
7-3-80	6-1920-80M	NCPAC 8681	x		DMS MD	1	2	1		

SOLD TO

JOB C897
National Conservative Political Action Comm
1500 Wilson Blvd #513
Arlington VA 22209

1 = PREPAID 2 = COLLECT
1 = COMPLETE 2 = PARTIAL
1 = F.O.B. DESTINATION 2 = F.O.B. OUR PLANT
X = CUT CHARGES TO FOLLOW
X = FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
43,000 20K-KY 21T 21J	#9 24 BK OS DS Std Sty Wdw	10.10M	434.30
498,000. 21K 22A 22B	MD 5%		21.72
	Total		456.02
	#524c Reagan		
BL# 14115 Dave			

B L NO	S/SM	CUT CHG	FRT. CHG	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

8304042101K

tri-state envelope corporation INVOICE

ENVELOPE MANUFACTURERS • ASHLAND, PENNSYLVANIA 17921 • (717) 875-0433

Toll-Free Plant Numbers 800 233-0513/233-0514

NUMBER 580

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
4/10/80	3-2098-80	NCPAC-7122 Job #C-766D	X		Media America Alexandria, VA	1	1	1		

1=PREPAID 2=COLLECT

1=COMPLETE 2=PARTIAL

1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT

X=CUT CHARGES TO FOLLOW

X=FREIGHT CHARGES TO FOLLOW

SOLD TO

National Conservative Political Action Committee
1500 Wilson Boulevard #513
Arlington, VA 22209

8304042|10

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	87T		
5,100	6 3/4, 24 LB. Laid Bond White, OS, Ptd 87T	$28.00	$142.80
	+Plate Chg.		$ 10.00
			$152.80
	+ 4% Tax		$ 6.11
			$158.91
	#5241		

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB TOTAL	TAX	TOTAL
05846	DZ					

PLEASE PAY

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 10438

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA: OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
4-7-80	3-0621-80M	NCPAC 7123	x		Media Amer. VA	1	1	1		

JOB# 0766 D

SOLD TO:
National Conservative Political Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

830402 10

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	87T		
5,000	7-3/4 24 White Laid Bond OS DS Regular	29.00%	145.00
	plates		15.30
			160.30
	VA 4%		6.41
	Total		166.71
	#5241		

BL= 12549 Dave

BL NO	SISM	CUT CHG	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

1673

June 6, 80

N.C.F.A. 325.62 CTS 325.62

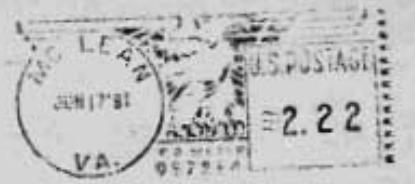
Tri-State Envelope Corp. of Md.
6900 Faigle Road
Beltsville, Md. 20705

NOT NEGOTIABLE

(8304042107

4/7/80	Invoice #10438		
4/10/80	Invoice # 580		
		$524D	$325.62

8304042 1050



FIRST CLASS

SEDAM & HERGE, P.C.
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

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

FIRST CLASS MAIL

FIRST CLASS

100564

RECEIVED
GCC#4714
81 MAY 19 AM : 57

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
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III

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

TWX/TELEX: 710-831-0898

CABLE: SEDAMHERGE

May 18, 1981

RECEIVED
GENERAL COUNSEL
81 MAY 19 P1:49

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

Re: MUR 1252

Dear Ms. Weissenborn:

I enclose NCPAC's responses to Commission Interrogatories B and B(1)-B(3). You will recall that on October 14, 1980, I submitted to you NCPAC's responses to Commission Interrogatories A and C in this matter. I will forward to you additional documents and information requested by the Commission as those items are produced by NCPAC. NCPAC is currently searching its records in an effort to produce the requested information.

Sincerely,

Robert R. Sparks, Jr.

Robert R. Sparks, Jr.

enclosure

8304021031

RECEIVED
81 MAY 19 All : 57

INTERROGATORY B

8304042103 2

RECEIVED
81 MAY 19 P1:51

Name & Address	Position Held at NCPAC	Date of Employment	Last Known Employer	Supervisor
Karen Adams 1707 South 26th Street Arlington, VA	Caller	9/80 - 5/81	NCPAC	J. Lopretto
James Altman 5340 North 37th St. Arlington, VA 22207	Caller	2/80 - 2/81	NCPAC	J. Lopretto
John Andruknois 6036 North 25th Street Arlington, VA	Caller	6/80 Present	NCPAC	J. Lopretto
Mary Andrukonis 6036 North 25th Street Arlington, VA 22207	Caller	1978 Present	NCPAC	J. Lopretto
Barbara Augustus 1500 Massachusetts #322 Washington, DC	Caller	9/80- 1/81	NCPAC	J. Lopretto
Sandra Augustus 1500 Massachusetts #322 Washington, DC	Caller	8/80 - 12/80	NCPAC	J. Lopretto
Elizabeth Aquino 1121 Arlington Blvd. Arlington, VA	Caller	1/80 - 6/80	NCPAC	J. Lopretto
Margaret Baker 7026 Round Tree Rd. Falls Church, VA	Caller	10/79 - Present	NCPAC	J. Lopretto
Stacy Ballin 147 Seth Low Mtn.Rd. Ridgefield, CT 06877	Caller	6/80 - 10/80	NCPAC	J. Lopretto
Gloria Balthrop 1717 R Street, NW #101 Washington, DC	Caller	10/80 - 3/81	NCPAC	J. Lopretto
Mary Bilian 18901 Devonshire Burmingham, MC 48009	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Norma P. Bell 1523 No. 16th Rd, #3 Arlington, VA 22209	Caller	12/79 - 12/79	NCPAC	J. Lopretto
Randall Bergen 5601 Seminary Rd. #2114-N Falls Church, VA 22041	Caller	12/79 - 9/81	NCPAC	J. Lopretto
Albert Biddle III 501 Haven Lane Great Falls, VA 22066	Caller	5/80 - 9/80	NCPAC	J. Lopretto
Brent Bozell 317 Rock Springs Rd Warrenton, VA	Fundraiser	5/80 - Present	NCPAC	C. Channell

8304210

Susanne Buchanan 1823 North 14th Street Arlington, VA	Caller	1978 - Present	NCPAC	J. Lopretto
Pamela Bynum 4660 Martin Luther King Ave, SW #A903 Washington, DC	Caller	9/80 - 12/80	NCPAC	J. Lopretto
W. R. Campbell 1344 G Street, SE Washington, DC	Fundraiser	6/80 - Present	NCPAC	C. Channell
Beatrice Cothran 4430 - 14th Street, NE Washington, DC	Caller	3/80 - Present	NCPAC	J. Lopretto
Celeste Cruz 1701 Massachusetts Ave,NW Washington, DC	Caller	6/80 - Present	NCPAC	J. Lopretto
Laura Cruz 1701 Mass. Ave, NW Washington, DC	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Donna L. Daly College Park, MD	Caller	1978 - 9/80	NCPAC	J. Lopretto
Frederick S. Daly 8610 - 34th Avenue College Park, MD	Caller	1978 - Present	NCPAC	J. Lopretto
Anthony Dailey 425 Edgewood St, NE C-8 Washington, DC	Caller	8/80 - 10/80	NCPAC	J. Lopretto
June Dempsey 3087 Brinkley Rd. Temple Hills, MD	Caller	9/80 - Present	NCPAC	J. Lopretto
Anne Dohrs 2916 Olive Street, NW Washington, DC	Coordinator	6/80 - Present	NCF	J. Dolan
John T. Dolan 3129 South 14th St. Arlington, VA	National Chairman		NCPAC	N/A
Lois Doyle 1011 Arlington Blvd 704W Arlington, VA	Caller	1978 - Present	NCPAC	J. Lopretto
Christine Estes 1833 N.Hampshire Ave,NW Apt #104 Washington, DC	Caller	1978 - 12/80	NCPAC	J. Lopretto
Tristin Evans 800 N. Wayne Street Arlington, VA	Asst.Supervisor	11/79 - Present	NCPAC	J. Lopretto

8304210354

Richard M. Farrell 3412 "P" Street, NW Washington, DC	Caller	6/80 - 9/80	NCPAC	J. Lopretto
Terry S. Feaganes 2603 Fairhaven Avenue Alexandria, VA	Clerk	1978 - Present	NCPAC	J. Lopretto
Jacqueline Fox 5863 Monticello Rd. Alexandria, VA	Clerk	1978 - Present	NCPAC	J. Lopretto
Michael Freeman 1309 North Ode St #502 Arlington, VA	Caller	10/79 - 9/80	NCPAC	J. Lopretto
Scott Gardner 1602 Elson St. W. Hyattsville, MD	Caller	12/80 - 12/80	NCPAC	J. Lopretto
Brian M. Goray Box 401 Rt. #4 Chaple Hill, NC	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Eleanor Hannegan 9378 Tartan View Dr. Fairfax, VA	Head Bookkeeper	4/80 - Present	NCPAC	C. Taw
Susan S. Hannegan 6519 Newington Rd. Lorton, VA	Head Bookkeeper (Former Treasurer)	4/80 - 2/81	NCPAC	C. Taw
Edna Healey 4928 S. 14th Street Arlington, VA	Administrative Assistant	1/80 - Present	NCPAC	C. Channell
Toni Ingram 1627 N. Abingdon St. Arlington, VA	Caller	10/79 - 12/80	NCPAC	J. Lopretto
Richard Jones Box 3-374, Bldg 403 Ft. Myer, VA	Caller	1/80 - 12/80	NCPAC	J. Lopretto
Susan Kardaras 4719 Southland Avenue Alexandria, VA	Caller	12/79 - Present	NCPAC	J. Lopretto
Thomas Kardaras 4719 Southland Avenue Alexandria, VA	Caller	12/79 - Present	NCPAC	J. Lopretto
Joanne Kay 915 Crittenden, NW Washington, DC	Caller	8/80 - 12/80	NCPAC	J. Lopretto
Daniel Curt Kerekes 1315 NW "T" Street Washington, DC	Caller	9/80 - 10/80	NCPAC	J. Lopretto

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Benjamin Kinard 3430 25th Avenue Hillcrest Heights, MD	Caller	11/80 Present	NCPAC	J. Lopretto
Tracey Kirksey 4309 East 131st Street Cleveland, OH	Caller	9/80 - Present	NCPAC	J. Lopretto
Christopher Kraut 6015 Crater Place Alexandria, VA	Caller	2/79 - Present	NCPAC	J. Lopretto
Christine Kraut 6015 Crater Place Alexandria, VA	Caller	1978 Present	NCPAC	J. Lopretto
Catherine Evans 800 N. Wayne St. #302 Arlington, VA	Caller	11/80 - Present	NCPAC	J. Lopretto
Velma Lane 1700 Jasmine Terract #19-208 Hyattsville, MD	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Tommy Lee 1121 24th Street, NW Washington, DC	Caller	11/80 - Present	NCPAC	J. Lopretto
David Lopretto 4327 Ravensworth Rd #618 Annandale, VA	Caller	9/79 - Present	NCPAC	J. Lopretto
Jaquelene Lopretto 4327 Ravensworth Rd. #618 Annandale, VA	Supervisor Phone Bank	1978 - Present	NCPAC	J. Dolan
Stuart MacLean 126 North Brookside Dr. Arlington, VA	Researcher	9/80 - 11/80	NCPAC	L. Stoltenberg
Gary Maloney 1111 Arlington Blvd. #429 Arlington, VA	Researcher	9/80 - 11/80	NCPAC	L. Stoltenberg
John Marr 2201 L Street, NW #810 Washington, DC	Assistant Supervisor	6/80 - Present	NCPAC	J. Lopretto
Kim McCaldon 1143 N. Frederick Street Arlington, VA	Caller	8/79 - 4/81	NCPAC	J. Lopretto
Maria McCarthy 1660-B Beckman Pl., NW Washington, DC	Caller	12/80 - 4/81	NCPAC	J. Lopretto

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Mary McIntire 5550 North Morgan St. Alexandria, VA	Secretary	2/80 - 12/80	NCPAC	C. Channell
Chreyl Melvin 162 Todd Place, NE Washington, DC	Caller	8/80 - 10/80	NCPAC	J. Lopretto
Nancy Meyer 5000 South 14th Street Arlington, VA	Secretary	8/80 - 3/81	NCPAC	L. Stoltenberg
Wanda Mickett [illegible]59 Jennings St. Woodbridge, VA	Caller	9/80 - 1/81	NCPAC	J. Lopretto
Donald Parschalk 8631 Village Way Alexandria, VA	Caller	8/80 - Present	NCPAC	J. Lopretto
Licille Phillips 1278 Delafield Place, NE Washington, DC	Clerk	2/80 - Present	NCPAC	J. Lopretto
Paula Phillips 1278 Delafield, Pl., NE Washington, DC	Clerk	2/80 - 12/80	NCPAC	J. Lopretto
Tammy Phillips 1278 Delafield Place, NE Washington, DC	Clerk	1/80 - 10/80	NCPAC	J. Lopretto
Manolito Ramirez 8515 Grubb Road Silver Springs, MD	Caller	7/80 - 10/80	NCPAC	J. Lopretto
Leigh Ramsay 2116 N. Key Blvd. #938 Arlington, VA	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Roger Reed Route 1, Box 8 Hayti, Missouri	Researcher	5/80 - 10/80	NCPAC	L. Stoltenberg
Brenda Riggins 2108 Country Road #1 District Heights, MD	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Betty Lou Roan 7800 Tayloe Drive, #70 Manassas, VA	Caller	7/79 - 12/79	NCPAC	J. Lopretto
Scott Robinson 2608 South Grant Street Arlington, VA	Caller	11/79 - 12/79	NCPAC	J. Lopretto
Paula Scaringi 2725 - 39th St., NW #406 Washington, DC	Caller	7/79 - 8/80	NCPAC	J. Lopretto

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Edward Smith 6409 Elliot Place Hyattsville, MD	Caller	12/80 - 12/80	NCPAC	J. Lopretto
Lisa Stoltenberg 716 Queen Street Alexandria, VA	Political Director (Treasurer)	7/79 - Present	NCPAC	J. Dolan
Helen Strojek 1727 Mass. Avenue, NW Washington, DC	Secretary	9/80 - 11/80	NCPAC	C. Channell
Lillie Sullivan 1745 "T" St, SE #201 Washington, DC	Caller	1/80 - 1/81	NCPAC	J. Lopretto
Candace Taw 2024 South Quincy Arlington, VA	Office Manager (Asst. Treasurer)	5/80 - Present	NCPAC	J. Dolan
Elizabeth Valdivia 1020 - 19th Street, NW Washington, DC	Caller	8/80 - 9/80	NCPAC	J. Lopretto
Peter Wages 4801 No. 26th Street Arlington, VA	Caller	7/80 - 1/81	NCPAC	J. Lopretto
John Wildberger 2009 Park Road, NW Washington, DC	Caller	1978 - Present	NCPAC	J. Lopretto
Guyton Williams 1728 N. Troy Street Arlington, VA	Caller	12/80 - Present	NCPAC	J. Lopretto
Andrew Winkler 4300 Old Dominion Drive Apt. 210 Arlington, VA	Caller	12/80 - 12/80	NCPAC	J. Lopretto
Melanie Wright 3813 Tall Oak Ct. Annandale, VA	Caller	12/79 - 4/81	NCPAC	J. Lopretto
Chreyl Bendis 470 Taylor St., #H-13 Washington, DC	Secretary	4/81- Present	NCPAC	L. Stoltenberg
Linda Kaieforth 5510 Crossrail Court Burke, VA	Secretary	4/81- Present	NCPAC	C. Channell
Barbara Golding 3101 Wessynton Way Alexandria, VA	Secretary	3/81 - Present	NCPAC	C. Channell
Lisa Dudley 3139 Cofer Road Falls Church, VA	Secretary	2/81 - Present	NCPAC	C. Channell

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Amy Eshleman 214 North Alfred Alexandria, VA	Receptionist	3/81 - Present	NCPAC	C. Taw
Judith Gorny 1802 Wilson Lane #203 McLean, VA	Secretary	12/80 - Present	NCPAC	C. Channell
Karen Grant 7905 Dassett Court #301 Annandale, VA	Assistant Bookkeeper	3/81 - 5/81	NCPAC	C. Taw
Leif Noren 7717 Donnybrook Ct. #201 Annandale, VA	Assistant To Office Mgr.	1/81 - Present	NCPAC	C. Taw
Knut Rostad 13925 Esworthy Road Germantown, MD	Researcher	1/81 - Present	NCPAC	L. Stoltenberg
Mary Adams 818 North Jackson St. Arlington, VA	Caller	9/79 - 7/80	NCPAC	J. Lopretto
Maria Amas 6950 North 28th St. Arlington, VA	Caller	8/79 - 1/80	NCPAC	J. Lopretto
Linda Andrukonis 6036 N. 25th Street Arlington, VA	Caller	7/80 - 8/80	NCPAC	J. Lopretto
Daniel C. Beck 7481 Lee Highway #815 Falls Church, VA	Caller	2/80 - 3/80	NCPAC	J. Lopretto
Mary Bilian 18910 Davonshire Burmingham, Michigan	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Robin Bolden 8121 Manson Street Landover, MC	Receptionist	4/80 - 7/80	NCPAC	C. Taw
Bruce Bombere 723 N. Ivy Arlington, VA	Caller	1/80 - 2/80	NCPAC	J. Lopretto
Becki Burlingame 2729 Gallows Rd. #301 Vienna, VA	Head Bookkeeper	1978 - 3/80	NCPAC	J. Dolan
Peter Corrigan 106 South Lexington St Arlington, VA	Caller	4/80 - 5/80	NCPAC	J. Lopretto
Jeanne Dodge 7815 Falstaff Rd. McLean, VA	Receptionist	1/80 - 4/80	NCPAC	L. Stoltenberg

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Martha Duncan 1762 Preston Rd. Alexandria, VA	Office Manager	3/80 - 4/80	NCPAC	J. Dolan
Lillian Faulkner 1500 North 16th Rd. #2A Arlington, VA	Caller	1/80 - 9/80	NCPAC	J. Lopretto
Mark Florio 701 Marshall Rd., SW Vienna, VA	Researcher	11/79 - 1/80	CALL	J. Dolan
Debra Fox 58363 Monticello Rd. Alexandria, VA	Caller	2/80 - 4/80	NCPAC	J. Lopretto
Donna Goray 18731 Glenwood Lathrup Village, MI	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Harry Hannah 5113 Scarsdale Rd. Bethesda, MD	Intern	6/80 - 8/80	NCPAC	L. Stoltenberg
Winnifred Henley 152 Birch St. #C-1 Falls Church, VA	Caller	8/79 - 1/80	NCPAC	J. Lopretto
Joseph Jackson 606 Acker St. Basm't. Washington, DC	Caller	6/80 - 6/80	NCPAC	J. Lopretto
Robert Jewett 6206 - 12th Rd. Arlington, VA	Caller	1/79 - 1/80	NCPAC	J. Lopretto
Samuel Jones, Jr. 501 Slaters Lane Alexandria, VA	Caller	12/80 - 1/81	NCPAC	J. Lopretto
Sheila Lewis 5142 Williamsburg Blvd. Arlington, Va	Caller	1/80 - 2/80	NCPAC	J. Lopretto
Leslie Lynch 1135 Belmont Avenue Wyomissing, PA	Caller	9/79 - 5/80	NCPAC	J. Lopretto
Silas Manuel 8229 Russell Rd. Alexandria, VA	Caller	6/80 - 8/80	NCPAC	J. Lopretto
Debbie Mitchell 6840 Stoneybrooke Lane Alexandria, VA	Caller	1/80 - 1/80	NCPAC	J. Lopretto
Georgie Mitchell 1515 South Jefferson Davis Highway Arlington, VA	Caller	6/80 - 7/80	NCPAC	J. Lopretto

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Deborah Moore 611 Edgewood Terrace, NE Apt 901 Washington, DC	Caller	1/80 - 1/80	NCPAC	J. Lopretto
Leslie Neely 1312 Illinois St., N. Arlington, VA	Asst. Bookkeeper	9/79 - 2/80	NCPAC	B. Burlingame
Bobby Owens 302 Youngs Cliff Rd. Sterling, VA	Support Staff- Clerical	3/80 - 4/80	NCPAC	C. Channell
Patricia Owens 302 Youngs Cliff Rd. Sterling, VA	Secretary	12/79 - 6/80	NCPAC	C. Channell
Sharon Pelton 2018 Sweetbriar Avenue Nashville, TN	Caller	3/80 - 6/80	NCPAC	J. Lopretto
Geraldine Persaud 905 N. Pollard St #7 Arlington, VA	Caller	8/80 - 8/80	NCPAC	J. Lopretto
Shirlene Peters 10815 Bucknell Drive Wheaton, MD	Caller	1/80 - 1/80	NCPAC	J. Lopretto
Muriel Homme Arlington Towers 1111 Madison Bldg. Arlington, VA	Caller	12/79 - 3/80	NCPAC	J. Lopretto
Richard Rattner 9308 Coronado Fairfax, VA	Caller	2/80 - 5/80	NCPAC	J. Lopretto
Joanne Rang 1637 N. 21st Road Arlington, VA	Caller	6/80 - 8/80	NCPAC	J. Lopretto
Deborah Riley 16000 Stonefoot Road Accokeek, MD	Caller	5/80 - 5/80	NCPAC	J. Lopretto
Alan Scafuri 30540 N. Greenbriar Franklin, MI	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Catherine Scruggs 6310 Lee Highway Arlington, VA	Caller	1978 - 3/80	NCPAC	J. Lopretto
Grant Smith 1382 Melbourne Burmingham, MI	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Susan Stricklin 701 Marshall Road Vienna VA	Caller	3/80 - 6/80	NCPAC	J. Lopretto

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Elizabeth Valdivia 1020 - 19th St. NW Washington, DC	Caller	8/80 - 9/80	NCPAC	J. Lopretto
Rita Wittig 6800 Fleetwood Rd. McLean, VA	Caller	1978 - 3/80	NCPAC	J. Lopretto
Bryan Wirwicz 4112 South - 36th Street Arlington, VA	Fundraiser	1/80 - 5/80	NCPAC	C. Channell
Peter Asmar 318 South Whiting St, Apt N-14 Alexandria, VA	Head Bookkeeper	2/81 - 3/81	NCPAC	C. Taw
John Andrukonis 6036 N. 25th Street Arlington, VA	Caller	6/80 - Present	NCPAC	J. Lopretto
Garen Babajanian 800 North Wayne Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
George Hawkins, Jr. 8903 Crandall Road Lanham, MD	Caller	2/81 - Present	NCPAC	J. Lopretto
Ronald Leighton 1506 North Scott St. #10 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Maurice Marshall 6841 Riverdale Rd, #A202 Riverdale, MD	Caller	1/81 - Present	NCPAC	J. Lopretto
Theresa Nave 1615 South 28th Street #10 Arlington, VA	Caller	12/80 - Present	NCPAC	J. Lopretto
Amalia Noguera 4141 Henderson Rd. #514 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Richard Paulson 806 South Orme Street Arlington, VA	Caller	2/81 - Present	NCPAC	J. Lopretto
Helaine Roberts 2251 Pimmit Drive Falls Church, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Valarie Schreck 1405 A North Van Dorn Alexandria, VA	Caller	5/81 - Present	NCPAC	J. Lopretto
Danita Audrey Selph 1617 South 28th Street, #6 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto

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Christina Slaney 437 Argyle Drive Alexandria, VA	Caller	3/81 - Present	NCPAC	J. Lopretto
Richard Slaney 4501 Arlington Blvd. Apt #920 Arlington, VA	Caller	1/81 - Present	NCPAC	J. Lopretto
Kristina Sohail-Ahmed 8308 Tobin Road Annandale, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Patricia A. Swinson 4809 North 17th Street Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Robin Wagner 6525 Halleck Street District Heights, MD	Caller	4/81 - Present	NCPAC	J. Lopretto
Leigh Huff, Jr. 110 W. Masonic View Avenue Alexandria, VA	Intern	3/81 - 4/81	NCPAC	L. Stoltenberg
Calvin Amburgey 4920 Lombard Lane Dale City, VA	Caller	8/79 - 11/79	NCPAC	J. Lopretto
Susan Anderson 6143 King Louis Drive Alexandria, VA	Caller	3/79 - 12/79	NCPAC	J. Lopretto
Mary Carter 1301 15th Street, NW Washington, DC	Caller	10/79 - 10/79	NCPAC	J. Lopretto
Caroln Cason 3320 Curtis Drive #202 Hillcrest Heights, MD	Caller	1978 - 10/79	NCPAC	J. Lopretto
E. William Coombs Idylwood Towers W, #402 Falls Church, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto
Aubrey H. Jones 1204 South Washington St. Alexandria, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto
Josephine Lamont 1212 North Cleveland Street Arlington, VA	Caller	9/79 - 9/79	NCPAC	J. Lopretto
Robert Noet 1511 North Highland Arlington, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto

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Phillip Pipkin 106 Morris Drive #303 Laurel, MD	Caller	12/79 - 12/79	NCPAC	J. Lopretto
Steven Richfield 1201 North Stuart Street Arlington, VA	Caller	7/79 - 9/79	NCPAC	J. Lopretto
Vivian Sadtler 425 E. Columbia Street Falls Church, VA	Caller	11/79 - 12/79	NCPAC	J. Lopretto
Diane Simmons 4203 Oglethorpe St. #103 Hyattsville, MD	Caller	8/79 - 9/79	NCPAC	J. Lopretto
Phyllis Tinsley 7252 #1 Fairchild Drive Alexandria, VA	Caller	10/79 - 10/79	NCPAC	J. Lopretto
J. Curtis Herge Sedham & Herge 7600 Old Springhouse Rd. McLean, VA	Secretary of Board of Directors		Sedham & Herge	N/A
Carl Channell 2032 Belmont Rd. Washington, DC	Consultant	1978 - Present	NCPAC	J. Dolan

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Rhonda Stahlman CALL 5707 Seminary Rd. Suite 308 Bailey's Crossroads, VA	Executive Committee Member	N/A	CALL	N/A
Curt Clinkscales CLCo 101 Washington Court Falls Church, VA	Executive Committee Member	N/A	CLCo	N/A
Robert L. Shortley 310 North Pitt Alexandria, VA	Executive Committee Member	N/A		N/A
David Keene 10874 Hampton Rd. Fairfax Station, VA	Consultant	N/A		N/A
Richard Gueske %MediAmerica 1900 North Beauregard Alexandria, VA	MediaBuyer	N/A	MediAmerica	N/A
Jimmie Walker %Time & Space Media Services 5350 Poplar Avenue Suite 512, Box 7 Memphis, Tennessee	MediaBuyer	N/A		N/A

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INTERROGATORY B(1)

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INTERROGATORY B(1)

John T. Dolan

Lisa Stoltenberg

Carl Channell

David Keene

Jimmie Walker

Richard Gueske

Stuart McLean

Candace Taw

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INTERROGATORY B(2)

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Viguerie

INTERROGATORY B(2)

John T. Dolan

Lisa Stoltenberg

David Keene

Richard Gueske

Candace Taw

Stuart McLean

Carl Channell

The Viguerie Company

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INTERROGATORY B(3)

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INTERROGATORY B(3)

John T. Dolan

Lisa Stoltenberg

David Keene

Carl Channell

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SEDAM & HERGE, P.C.
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

To:

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

FIRST CLASS MAIL

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GCC #4537

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

81 APR22 AM : 09

FEDERAL ELECTION COMMISSION,

Petitioner,

v.

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE,

Respondent.

MISC. ACTION NO. 81-0019

FILED

APR 21 1981

JAMES F. DAVEY, Clerk

81 APR 22 AM 9:09

ORDER

Upon consideration of Respondent's Motion to Stay Pending Appeal and Petitioner's Memorandum in Opposition Thereto:

IT IS HEREBY ORDERED that the Motion for Stay Pending Appeal is denied;

IT IS FURTHER ORDERED that Respondent comply with Petitioner's Subpoena and Order immediately.

16 April 81
DATE

UNITED STATES DISTRICT COURT JUDGE

8304042107

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,

Petitioner,

v.

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE,

Respondent.

Miscellaneous Action No. 81-0019

FILED

FEB 26 1981

JAMES F. DAVEY, Clerk

ORDER

This matter having come before the Court for hearing on February 26, 1981, upon the Federal Election Commission's petition for an order to show cause why its subpoena should not be enforced and the Court having heard argument by counsel for their parties;

IT IS HEREBY ORDERED that the Commission's petition be, and hereby is, granted, and

IT IS FURTHER ORDERED that respondent National Conservative Political Action Committee produce for inspection and copying all of the documents and materials and answers to written questions requested by said Commission subpoena to the National Conservative Political Action Committee on March 27, 1981, at Room 701, 1325 K Street, N.W., Washington, D.C.

26 Feb. 81
Date

J. H. Pratt
United States District Court Judge

United States District Court
for the District of Columbia
A TRUE COPY

JAMES F. DAVEY, CLERK
By Sharon L. Moore
Deputy Clerk

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION, Petitioner,	)	
v.	)	Miscellaneous Action No. 81-0019
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, Respondent.	)	

ERRATA

On February 23, 1981, the Federal Election Commission submitted its Reply To Respondent's Opposition To Petition To Show Cause Why Subpoena Should Not Be Enforced. Attached as Exhibit 2 was a Memorandum Opinion of this court which was not copied correctly and which is therefore incomplete. Attached herewith is a complete copy of this document which the Commission asks be substituted as Exhibit 2.

Respectfully submitted,

Charles N. Steele
General Counsel

Thomas J. Whitehead
Assistant General Counsel

Anne A. Weissenborn
Attorney

Vincent J. Convery, Jr.
Attorney

Dated:

83040421 0 AUG 7 AM 11:43
910380
GCC 3849

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

U.S. D.C. 2100 Pa. Ave. NW 20001 2:04

FEDERAL ELECTION COMMISSION, :

Petitioner, :

v. : Miscellaneous Action No. 80-0203

CITIZENS FOR LAROUCHE :

Respondent. :

FILED
SEP 3 1980
JAMES E. DAVEY, Clerk

MEMORANDUM ORDER

Petitioner, Federal Election Commission (the Commission) has applied to this Court for enforcement of its subpoena issued to respondent, Citizens for Larouche (CFL) pursuant to 2 U.S.C. § 437 d (a)(i) in connection with its investigation of possible violations of the Presidential Primary Matching Payment Account Act.[1]

This Act provides for limited public funding of Presidential primary elections, obtained from the general fund of the Treasury through designation of one or two dollars, respectively, by individual taxpayers on their individual or joint income tax returns, and it authorizes federal matching payments for certain small contributions to eligible candidates. Eligibility requirements are specific and include, inter alia, an agreement of the candidate that the FEC will be provided any requested evidence or documentation regarding qualified campaign expenses and that the candidate will maintain and furnish the Commission any other information or records it may request, Committee to Elect Lyndon LaRouche v. Federal Election Commission, , 613 F.2d 834 (D.C. Cir. 1979), cert. denied 100 S. Ct. 1019 (1980).

CFL, a political committee, although responding in part, has refused full compliance with the demand that it produce certain documents and respond to various questions. The respondents assert that the subpoena is fatally defective in that it was issued illegally in part, is overbroad and violates the attorney-client privilege, and is burdensome and issued for the purpose of

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[1] 26 U.S.C. § 9037(a) (1976).

continuing harassment.

On March 27, 1980, pursuant to 2 U.S.C. §437g(a)(2)(A), the Commission found "reason to believe" that the CFR and its Treasurer, one Felice Gelman, had violated 26 U.S.C. §9042(c) by "knowingly and willfully submitting false information and evidence [by a money order and written document attributed to a Harold M. Harper] to the Commission on behalf of CFR." That date the Commission issued its Matter Under Review (MUR) 1186 and on June 9, 1980, authorized the issuance of the subpoena to CFL to produce documents and answer written questions. On June 27, 1980, the Commission's representatives were informed that certain documents would not be produced. On July 7, 1980, the Commission's Office of the General Counsel received CFL's answers to 16 of the 18 interrogatories earlier propounded. CFL refused to respond to two interrogatories (A and B) on the grounds of irrelevancy and inquiry into possible privileged matter. Interrogatory A requests identification of one Susan Pennington and her association with CFL; Interrogatory B seeks identification of the individual who processed the receipt by CFL of $40.00 charged to a specific VISA account on February 15, 1979.

According to CFL the above unanswered interrogatories, as well as document requests 9 and 10, each relate to the matter of one L. Pruett Pemberton and have "nothing to do with the subject of this MUR" (1186) (relating to the contribution of one Harold Harper). See respondent's Memorandum of Law filed August 27, 1980. The Commission claims that the material related to the Pemberton transaction is evidence raising questions about the validity of contributions submitted to the Commission by CFL for verification to receive matching funds in connection with the 1980 Presidential election. Therefore, the Commission contends that those related inquiries are relevant and within the scope of its subpoena power.

An examination of the Notification of Reason to Believe Finding which accompanied MUR 1186 reveals the factual background for the Commission's suspicion that CFL had violated 26 U.S.C. § 9042. The Notification details a concern over 12 money orders

sent from an Oregon address with a contributor's name which did not contain either a signature thereon or any other documentation exhibiting a signature. It recites that Harold M. Harper was one of those individuals. The background statement of the Notification satisfies the Commission's duty under 2 U.S.C. § 437g(a)(2) that it give full notice of the legal and factual background of its allegations. There is, however, no mention in this document of the Pemberton transaction.

Although the Commission must have sufficient elasticity to fulfill its mandate to proceed expeditiously in enforcing campaign finance laws, 2 U.S.C. § 432g(a)(3)(A), it also bears responsibility to grant the full measure of due process notification to the respondent for an inquiry that suggests that there may have been additional violations of the law.

The seminal case of United States v. Morton Salt Co., 338 U.S. 632 (1950), and its progeny, remind governmental agencies that in their investigative and accusatory process, they may be so over-zealous in using broad subpoena powers so as to deny due process. Morton Salt laid down the guidelines for determining whether a subpoena exceeds the bounds of due process. The Court declared, "[I]t is sufficient if the inquiry is within the authority of the agency, the demand is not too indefinite, and the information sought is reasonably relevant." Id. at 652.

Based on its review of the record as submitted, this Court is of the view that the subpoena is enforceable. It is readily apparent that the inquiry into the Pemberton transaction is within the broad authority of the Commission as set out in 2 U.S.C. § 437g(a)(2), which provides

> The Commission upon receiving any complaint under paragraph (1) [of this section], and if it has reason to believe that any person has committed a violation of this Act or of chapter 95 or of chapter 96 of the Internal Revenue Code of 1954, or, if the Commission, on the basis of information ascertained in the normal course of carrying out its responsibilities, has reason to believe that such a violation has occurred, shall notify the person involved of such alleged violation and shall make an investigation of such alleged violation in accordance with the provisions of this section.

Id. The Commission in the course of its investigation into the

Oregon money orders discovered the Pemberton letter, which, although not rising to the dignity of a verified complaint, suggests impropriety, if not illegality, in the same area under scrutiny of false statements to obtain matching campaign funds. Accordingly, investigation of the Pemberton matter is fully appropriate. This case bears similarity to Jones v. Unknown Agents of Federal Election Commission, 613 F.2d 864 (D.C. Cir. 1979), where it was recently held that § 437g(a)(2) gave the Commission the power to conduct field interviews despite the lack of an express grant in the statute to do so. The same statutory analysis supports a finding that the subpoena of the Pemberton materials falls within the scope of the agency's authority.

The subpoena describes with sufficient specificity the materials sought, and CFL has not made the requisite showing that compliance would be unduly burdensome. See Federal Trade Commission v. Texaco, Inc., 555 F.2d 862 (D.C. Cir.) (en banc), cert. denied 431 U.S. 974 (1977).

It appears also from the materials submitted by the Commission that the inquiry into the Pemberton transaction is reasonably relevant to the MUR 1186, as that investigation, although focused on transactions from Oregon, was aimed at discovering the practices of CFL to determine whether it violated the Act. The subpoena for the Pemberton matter also is aimed at determining whether CFL has violated the Act. Both the Harper and Pemberton transactions come under the broad scope of the inclusive investigation into whether CFL submitted false information to the Commission.

CFL's other objections to the subpoena are groundless. The claims on the demand for documents (numbers 6, 7, and 8--concerning the Harper matter) of a blanket attorney-client privilege are rejected because CFL refused to follow the procedures set out in 11 C.F.R. 111.15 for objections to subpoenas on the ground of privilege. As to the request for the original document signed and dated by Harold M. Harper, CFL has represented to this Court that it believes, but has no records to back up this belief, that it turned over the original to the Commission. The

Commission denies that it has the document, claiming that it has a copy only and that since the authenticity of the document is questioned, it is appropriate to have the original document produced for examination. It is difficult to comprehend that such casual record-keeping practices (including random notes in shoeboxes) characterize a presidential campaign operated, according to CFL's counsel, with the assistance of computerized record retrieval.[2] This Court can only direct CFL to keep searching for the original, but CFL's inability to find it at this time does not excuse its failure to comply with the subpoena ultimately. Should the original document be found, it must promptly be turned over to the Commission pursuant to demand 5 of the request for documents.

The subpoena and the request for production of documents directed to CFL are legitimate, within the authority of the Commission, not unduly burdensome, and reasonably relevant to the investigation, mandating the enforcement of the subpoena.

It is therefore, this 30th day of September, 1980,

ORDERED that the respondent, Citizens for Larouche, shall comply by October 14, 1980 in all respects to the June 9, 1980, subpoena and order of the Federal Election Commission.

The matter is dismissed.

Joyce Hens Green
JOYCE HENS GREEN
United States District Judge

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[2] It should also be noted that CFL is no stranger to the courts, and thus, presumably, to the strict demands for documents and materials necessitated by administrative and legal proceedings. CFL or related organizations have been parties to a variety of suits over the past few years. See, e.g., Committee to Elect Lyndon Larouche v. Federal Election Commission, 613 F.2d 834 (D.C. Cir. 1979), cert. denied 100 S.Ct. 1019 (1980); Federal Election Commission v. Committee to Elect Lyndon Larouche, 613 F.2d 849 (D.C. Cir. 1979), cert. denied 100 S.Ct. 1019 (1980); Jones v. Unknown Agents of the Federal Election Commission; 613 F.2d 864 (D.C. Cir. 1979). For the future, it is expected that CFL will "straighten up its shoeboxes" to provide accurate records of its transaction.

8304042108

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION, Petitioner, v. NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, Respondent.	)	Miscellaneous Action No 81-0019

CERTIFICATE OF SERVICE

This is to certify that I caused to be served by hand delivery on February 25, 1981, a copy of Petitioner Federal Election Commission's Errata to its Reply to Respondent's Opposition to Enforcement of Administrative Subpoena to the following counsel:

Robert R. Sparks, Jr.
J. Curtis Herge
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Counsel for National Conservative
Political Action Committee

Anne A. Weissenborn

Anne A. Weissenborn

MEMORANDUM

TO: The File

FROM: Anne Weissenborn

DATE: January 7, 1981

SUBJECT: Telephone conversations with Robert Sparks, Counsel for FCM and NCPAC

Mr. Sparks called to say that our letters of December 19, 1980, informing the above committees of the Commission's decisions to deny their motions to quash or amend, were received on December 31, 1980. He stated that he is to meet with his clients today, and that he was requesting an extension of time for document production until January 14. I stated that I would check with my supervisor and call him back.

After consultations with Tom Whitehead, Vincent Convery, Pat Bok and Marsha Gentner, I telephoned Mr. Sparks to say that we would hold NCPAC to the January 9th date set forth in our letter but that we would be willing to extend FCM's date to the 14th. Mr. Sparks indicated court is the likely next step given the quantity of the materials included in the subpoena - "You"ve asked for everything the Committee has". I said that we want to at least start on Friday the 9th, and this possibility seemed to soften his threat of the necessity of going to court, although he repeated that type of statement later.

He also questioned the Commission's authority to authorize this Office to go to court prior to a failure to comply with a subpoena.

8304021093

8004042083

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION Petitioner,	)	
v.	)	Miscellaneous Action No. 81-0019
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, Respondent.	)	

REPLY OF FEDERAL ELECTION COMMISSION
TO RESPONDENT'S OPPOSITION TO
PETITION FOR ORDER TO SHOW CAUSE
WHY SUBPOENA SHOULD NOT BE ENFORCED

INTRODUCTION

This action is before the court upon petition of the Federal Election Commission (hereinafter "FEC" or "the Commission") for an order to show cause why a Commission subpoena to produce documents and an order to answer written questions should not be enforced. The respondent in this matter, the National Conservative Political Action Committee (hereinafter "NCPAC" or "the Committee) has filed a memorandum in opposition to the Commission's petition, to which the Commission makes the following reply. 1/

STATEMENT OF FACTS

On July 2, 1980, the Carter-Mondale Reelection Committee (hereinafter "Carter-Mondale") filed a signed, sworn complaint with the Commission, alleging violations by NCPAC and others of 2 U.S.C. §§ 44la(a),

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1/ The Commission, in its Petition for Order to Show Cause, clearly showed that its subpoena meets the judicial standard for enforcement set forth by the Supreme Court. Therefore, this reply only addresses those issues raised by NCPAC in its response to the Petition for Order to Show Cause.

432(e)(4), and 434, and of 26 U.S.C. § 9012(f). 2/ Carter-Mondale alleged that NCPAC had made or would be making expenditures on behalf the candidacy of Ronald Reagan for the office of President of the United States in excess of the statutory contribution and expenditure limitations set forth at 2 U.S.C. § 441a(a) and at 26 U.S.C. § 9012(f). The allegedly excessive amounts of these expenditures/contributions resulted from what Carter-Mondale maintained was the non-independent nature of the NCPAC expenditures on behalf of Mr. Reagan. In support of its complaint Carter-Mondale cited the prior affiliation with NCPAC of certain individuals later associated with certain authorized Reagan committees and also the use of common vendors by NCPAC and the Reagan committees. 3/

2/ 2 U.S.C. § 441a(a) prohibits multicandidate political committees from making contributions to a candidate and his or her authorized committee in excess of $5,000 with respect to any election. 2 U.S.C. § 432(e)(4) prohibits an unauthorized committee from including the name of a candidate in its name. 2 U.S.C. § 434 requires all political committees to file reports with the Commission including all contributions received and disbursements made in excess of $200. 26 U.S.C. § 9012(f) prohibits unauthorized committees from knowingly and willfully incurring expenditures on behalf of political party candidates for President or Vice-President in a presidential election, if such candidates are eligible to receive public funds, in excess of $1,000.

3/ 2 U.S.C. § 431(17) and 11 C.F.R. § 109.1(a) define an independent expenditure as one made by a person expressly advocating the election or defeat of a clearly identified candidate which is not made in cooperation or consultation with a candidate or his or her authorized committees or agents, nor in concert with nor at the request or suggestion of such candidate, authorized committees or agents. 11 C.F.R. § 109.1(b) provides guidelines as to whether expenditures are independent or not, and lists indicia of non-independence, including common officers and the use of common agents. In Advisory Opinion 1979-80, the Commission determined that "common vendors" may be considered to be common agents for purposes of 11 C.F.R. § 109.1. See Exhibit 1.

The allegations of violations of 2 U.S.C. §§ 434 and 432(e)(4) involved respectively the alleged failure of NCPAC to report contributions and expenditures properly, and the use of the name "Ronald Reagan" in the name of the NCPAC "project", the Ronald Reagan Victory Fund; Carter-Mondale deemed this project a "discrete, unauthorized political committee". 4/

Pursuant to 2 U.S.C. § 437g(a)(2), the Commission found reason to believe that violations of 2 U.S.C. §§ 44la(a) and 432(e)(4) and of 26 U.S.C. § 9012(f) had occurred. NCPAC was notified of these findings and was provided with an analysis of the information upon which these findings were based. This analysis included the evidence contained in the complaint which the Office of General Counsel had deemed relevant to a finding of reason to believe that expenditures made by NCPAC on behalf of Mr. Reagan's candidacy were not "independent" expenditures but, rather, in-kind contributions. The analysis also included additional facts ascertained from reports filed by NCPAC with the Commission.

Following the above notification the Commission commenced an an investigation of the alleged violations, pursuant to 2 U.S.C. § 437g (a)(2). As part of this investigation and pursuant to 2 U.S.C. § 437g(a)(1) and (3) the Commission, on September 29, 1980, authorized the issuance of a subpoena and order which directed NCPAC to produce documents and to provide written answers to Commission questions. NCPAC complied in part with the Commission's subpoena and order but

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4/ If it is found that the Ronald Reagan Victory Fund is in fact a political committee in and of itself, it would be in violation of 2 U.S.C. § 432(e)(4) because of its use of the name of Ronald Reagan in its own name, without President Reagan's prior authorization.

refused to comply with those parts of the subpoena and order directing the Committee to provide documents or to answer interrogatories which deal with individuals, organizations, materials or activities not specifically cited in the analysis accompanying the Commission's notification of its findings of reason to believe that violations had occurred.

Because of such refusal the Commission, on January 23, 1981, filed the present action seeking an order of this court enforcing the Commission's subpoena and order.

ARGUMENT

I. THE SCOPE OF THE COMMISSION'S SUBPOENA AND ORDER IS STATUTORILY PROPER

NCPAC bases its opposition to the Commission's petition upon the premise that 2 U.S.C. § 437g(a)(2) requires that Commission investigations into alleged violations of federal election campaign laws be limited to the factual bases upon which reason to believe findings are made. This interpretation of 2 U.S.C. § 437g(a)(2) represents a misreading of the plain language of the statute and also a misunderstanding of the purpose of the 1979 amendment of this provision.

The Federal Election Campaign Act of 1971, as amended in 1979, provides that notifications of reason to believe findings by the Commission are to be sent to persons who allegedly have committed the violation at issue. "Such notification shall set forth the factual basis for such alleged violation. The Commission shall make an investigation of such alleged violation . . . ." 2 U.S.C. § 437g (a)(2)(emphasis added). Therefore the Commission's mandate clearly is to investigate an alleged violation of the statute, not merely the facts upon which the initial reason to believe finding is based. Such facts serve as the starting point of an investigation, not as its parameters. Obviously, since Congress has given the Commission

the authority, expertise, and mandate to investigate such alleged violations, it intended the Commission not only to investigate facts alleged in a complaint but also to see what other facts, if any, support or contradict the allegations of unlawful activity. If it were otherwise, the Commission would be limited to investigating only those facts a complainant could allege and of which it is already aware. Considering that a complainant does not have the expertise or investigative tools to do a full investigation, such a result would nullify much of the Commission's function.

This principle regarding the extension of investigations beyond the facts contained in the Commission's notification of a reason to believe finding was recently accepted by this court in Federal Election Commission v. Citizens for LaRouche, Misc. Action No. 80-0203 (D.D.C., September 30, 1980). (See Exhibit 2). This action involved enforcement of a Commission subpoena issued to a political committee as part of an investigation of the validity of certain contributions received by the committee in the form of money orders. The court approved inclusion in the subpoena of requests for information regarding a particular contribution/money order not specifically mentioned in the notification of reason to believe finding sent to the respondent. The court found that the inquiry into this additional transaction was "reasonably relevant" to the matter under review involved in that the "inquiry into [this additional] transaction is within the broad authority of the Commission as set out in 2 U.S.C. § 437h(a)(2)," as well as noting the "broad scope" of Commission investigations once a finding of reason to believe a violation has occurred is made by the Commission. Id. at 3-4

Furthermore, NCPAC overlooks the fact that at the time the 1979 amendments to the Federal Election Campaign Act (hereinafter "FECA") were before Congress, amendments which added to 2 U.S.C. §437g(a)(2) the requirement that the Commission provide respondents with "the factual basis for (the) alleged violations" with regard to which reason to believe has been found, there was concern that respondents in internally-generated compliance actions had not been receiving adequate information concerning the bases for Commission findings of reason to believe. 5/ Hence the addition of language to 2 U.S.C. § 437g(a)(2) requiring provision to respondents of such information. The legislative history of this amendment contains no indication that Congress intended to narrow the scope of Commission investigations; rather, it is clear that the intent was to assure that respondents would be informed of the initial facts which provided the justification for such investigations. 6/

The above demonstrates that the Commission subpoena issued to NCPAC as part of its investigation of alleged violations of 2 U.S.C. §§ 441a(a) and 432(e)(4) and of 26 U.S.C. § 9012(f) need not be limited to requests for documents, materials and other information related to the facts upon which the Commission's finding of reason to believe was based, but rather is appropriate in its requests for documents, materials and other information, beyond the above facts, which are reasonably related to its investigation of the violations alleged in the Carter-Mondale complaint. See United States v. Morton Salt Co., 338 U.S. 632 (1950).

5/ Internally-generated compliance actions are those initiated as a result of information ascertained in the normal course of the carrying out of the Commission's supervisory responsibilities, not as the result of submission of an external complaint.

6/ In accordance with the amendment of 2 U.S.C. § 437g(a)(2) the Commission's regulations now provide that if on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Commission finds reason to believe that a violation has occurred, a copy of a staff report setting forth the alleged facts and legal basis for such finding must be sent to the respondent. 11 C.F.R. § 111.8(c).

II. THE INFORMATION SOUGHT BY MEANS OF THE SUBPOENA AND ORDER IS REASONABLY RELEVANT TO THE COMMISSION'S INVESTIGATION

NCPAC also alleges that the Commission's subpoena and order "inquire into all manner of other, unrelated matters" beyond the facts set forth in the analysis accompanying the notification of the Commission's finding of reason to believe. To the contrary, the portions of the subpoena and order with regard to which NCPAC has refused compliance are indeed relevant to the Commission's investigation in that they involve possible relationships between the Committee and/or the Ronald Reagan Victory Fund on the one hand, and, on the other, certain named committees, individuals and vendors which were involved either directly, or allegedly indirectly, with Ronald Reagan's 1980 campaign. In addition, information is sought concerning the origins and activities of the Ronald Reagan Victory Fund. The above information is not only relevant, but necessary to a thorough investigation by the Commission of the allegations contained in the Carter-Mondale complaint concerning non-independence of Committee expenditures and misuse of the name of Ronald Reagan in the name of the Ronald Reagan Victory Fund.

The Carter-Mondale complaint makes a number of factual allegations of links between NCPAC and Ronald Reagan, his authorized committees and his agents or possible agents in support of its legal contention that the FECA and 26 U.S.C. § 9012(f) have been violated. Under such circumstances a wide range of investigation is necessary and appropriate. See Federal Trade Commission v. Texaco, Inc., 555 F.2d 862, 877 (D.C. Cir., 1977). In the present instance, in order to investigate thoroughly the allegations made in the complaint the Commission must examine and establish all facts pertinent to the

legal tests for independence or non-independence of expenditures found at 2 U.S.C. § 431(17) and 11 C.F.R. §§ 100.16 and 109.1. Therefore, documents and answers to questions concerning communications between NCPAC and Ronald Reagan's authorized committees, agents, or possible agents; information concerning the processes and individuals involved in NCPAC decisions to expend funds on behalf of Ronald Reagan's candidacy; information related to contractual relationships between NCPAC and/or the Ronald Reagan Victory Fund and certain vendors as they involved furtherance of Mr. Reagan's candidacy; information concerning any use by NCPAC of materials prepared or used by Ronald Reagan or his authorized committees or agents; solicitation materials used by NCPAC which were related to furtherance of Mr. Reagan's candidacy; and telephone bills or other records of telephone calls made or received by NCPAC are likely sources of such facts. Although any particular piece of evidence may not alone establish the non-independence of NCPAC expenditures, the facts may, when taken together, demonstrate a pattern amounting to unlawful activity, or, alternatively, substantiate a Commission finding that there is no probable cause to believe that such a violation occurred. 7/

Indeed, this court, in Federal Election Commission v. Machinists Non-Partisan Political League, Misc. Action No. 79-0291 (D.D.C. January 28, 1980) (Findings of Fact and Conclusions of Law) upheld enforcement of a subpoena which required production of documents and materials concerning communications between

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7/ In United States v. Morton Salt Co., supra, the Court likened the role of an investigatory agency to that of a Grand Jury which "can investigate merely on suspicion that the law is being violated or even just because it wants assurance that it is not." at 364. In the present instance it is important to that the Commission be able to support a finding of no probable cause to believe a violation has occurred. Under 2 U.S.C. § 437g(a)(8) Carter-Mondale may file an action in the district court for review of the Commission's action upon any subsequent dismissal of the Carter-Mondale complaint.

political committees as part of an investigation of alleged affiliation of committees. (See Exhibit 3). In fact, the kinds of information sought were almost identical to that sought in the present subpoena issued to NCPAC. Compare Exhibit 4 with Attachment I to the Commission's petition of January 23, 1981 to this court. With regard to the subpoena issued to the Machinists Non-Partisan Political League, this court stated, "(I)t seems to me without any question this information is reasonably relevant if the Commission is going to attempt to carry out its statutory duties as set forth in the Act." Id. The court is asked to make the same determination in the present matter involving statutory allegations which require similar analyses.

Likewise, the documents requested and questions in the Commission subpoena and order regarding the Ronald Reagan Victory Fund are designed to determine the manner in which solicitations for the Fund were presented to potential contributors and also to determine the relationships between the Fund and NCPAC. These facts are relevant to a finding of whether the Fund is in fact a political committee unto itself which has violated 2 U.S.C. § 432(e)(4).

CONCLUSION

The foregoing clearly demonstrates that the Commission subpoena and order to NCPAC meet the judicial standard of relevancy set forth for such an agency order. In light of this and of NCPAC's failure to provide ample grounds to the court to show why the Commission's subpoena and order should not be enforced, the Commission requests

that this court order NCPAC to comply fully with the Commission subpoena and order.

Respectfully submitted,

Charles N. Steele
General Counsel

Thomas J. Whitehead
Assistant General Counsel

Anne A. Weissenborn
Attorney

Vincent J. Convery, Jr.
Attorney

Dated:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

Petitioner, Federal Election Commission (the Commission) has applied to this Court for enforcement of its subpoena issued to respondent, Citizens for Larouche (CFL) pursuant to 2 U.S.C. § 437 d (a)(i) in connection with its investigation of possible violations of the Presidential Primary Matching Payment Account Act.[1]

This Act provides for limited public funding of Presidential primary elections, obtained from the general fund of the Treasury through designation of one or two dollars, respectively, by individual taxpayers on their individual or joint income tax returns, and it authorizes federal matching payments for certain small contributions to eligible candidates. Eligibility requirements are specific and include, inter alia, an agreement of the candidate that the FEC will be provided any requested evidence or documentation regarding qualified campaign expenses and that the candidate will maintain and furnish the Commission any other information or records it may request, Committee to Elect Lyndon LaRouche v. Federal Election Commission, , 613 F.2d 834 (D.C. Cir. 1979), cert. denied 100 S. Ct. 1019 (1980).

CFL, a political committee, although responding in part, has refused full compliance with the demand that it produce certain documents and respond to various questions. The respondents assert that the subpoena is fatally defective in that it was issued illegally in part, is overbroad and violates the attorney-client privilege, and is burdensome and issued for the purpose of

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[1] 26 U.S.C. § 9037(a) (1976).

documents and answer written questions. On June 27, 1980, the Commission's representatives were informed that certain documents would not be produced. On July 7, 1980, the Commission's Office of the General Counsel received CFL's answers to 16 of the 18 interrogatories earlier propounded. CFL refused to respond to two interrogatories (A and B) on the grounds of irrelevancy and inquiry into possible privileged matter. Interrogatory A requests identification of one Susan Pennington and her association with CFL; Interrogatory B seeks identification of the individual who processed the receipt by CFL of $40.00 charged to a specific VISA account on February 15, 1979.

According to CFL the above unanswered interrogatories, as well as document requests 9 and 10, each relate to the matter of one L. Pruett Pemberton and have "nothing to do with the subject of this MUR" (1186) (relating to the contribution of one Harold Harper). See respondent's Memorandum of Law filed August 27, 1980. The Commission claims that the material related to the Pemberton transaction is evidence raising questions about the validity of contributions submitted to the Commission by CFL for verification to receive matching funds in connection with the 1980 Presidential election. Therefore, the Commission contends that those related inquiries are relevant and within the scope of its subpoena power.

An examination of the Notification of Reason to Believe Finding which accompanied MUR 1186 reveals the factual background for the Commission's suspicion that CFL had violated 26 U.S.C. § 9042. The Notification details a concern over 12 money orders

fulfill its mandate to proceed expeditiously in enforcing campaign finance laws, 2 U.S.C. § 432g(a)(3)(A), it also bears responsibility to grant the full measure of due process notification to the respondent for an inquiry that suggests that there may have been additional violations of the law.

The seminal case of United States v. Morton Salt Co., 338 U.S. 632 (1950), and its progeny, remind governmental agencies that in their investigative and accusatory process, they may be so over-zealous in using broad subpoena powers so as to deny due process. Morton Salt laid down the guidelines for determining whether a subpoena exceeds the bounds of due process. The Court declared, "[I]t is sufficient if the inquiry is within the authority of the agency, the demand is not too indefinite, and the information sought is reasonably relevant." Id. at 652.

Based on its review of the record as submitted, this Court is of the view that the subpoena is enforceable. It is readily apparent that the inquiry into the Pemberton transaction is within the broad authority of the Commission as set out in 2 U.S.C. § 437g(a)(2), which provides

> The Commission upon receiving any complaint under paragraph (1) [of this section], and if it has reason to believe that any person has committed a violation of this Act or of chapter 95 or of chapter 96 of the Internal Revenue Code of 1954, or, if the Commission, on the basis of information ascertained in the normal course of carrying out its responsibilities, has reason to believe that such a violation has occurred, shall notify the person involved of such alleged violation and shall make an investigation of such alleged violation in accordance with the provisions of this section.

Id. The Commission in the course of its investigation into the

Commission the power to conduct field interviews despite the lack of an express grant in the statute to do so. The same statutory analysis supports a finding that the subpoena of the Pemberton materials falls within the scope of the agency's authority.

The subpoena describes with sufficient specificity the materials sought, and CFL has not made the requisite showing that compliance would be unduly burdensome. See Federal Trade Commission v. Texaco, Inc., 555 F.2d 862 (D.C. Cir.) (en banc), cert. denied 431 U.S. 974 (1977).

It appears also from the materials submitted by the Commission that the inquiry into the Pemberton transaction is reasonably relevant to the MUR 1186, as that investigation, although focused on transactions from Oregon, was aimed at discovering the practices of CFL to determine whether it violated the Act. The subpoena for the Pemberton matter also is aimed at determining whether CFL has violated the Act. Both the Harper and Pemberton transactions come under the broad scope of the inclusive investigation into whether CFL submitted false information to the Commission.

CFL's other objections to the subpoena are groundless. The claims on the demand for documents (numbers 6, 7, and 8--concerning the Harper matter) of a blanket attorney-client privilege are rejected because CFL refused to follow the procedures set out in 11 C.F.R. 111.15 for objections to subpoenas on the ground of privilege. As to the request for the original document signed and dated by Harold M. Harper, CFL has represented to this Court that it believes, but has no records to back up this belief, that it turned over the original to the Commission. The

time does not excuse its failure to comply with the subpoena ultimately. Should the original document be found, it must promptly be turned over to the Commission pursuant to demand 5 of the request for documents.

The subpoena and the request for production of documents directed to CFL are legitimate, within the authority of the Commission, not unduly burdensome, and reasonably relevant to the investigation, mandating the enforcement of the subpoena.

It is therefore, this 30th day of September, 1980,

ORDERED that the respondent, Citizens for Larouche, shall comply by October 14, 1980 in all respects to the June 9, 1980, subpoena and order of the Federal Election Commission.

The matter is dismissed.

Joyce Hens Green
JOYCE HENS GREEN
United States District Judge

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[2] It should also be noted that CFL is no stranger to the courts, and thus, presumably, to the strict demands for documents and materials necessitated by administrative and legal proceedings. CFL or related organizations have been parties to a variety of suits over the past few years. See, e.g., Committee to Elect Lyndon Larouche v. Federal Election Commission, 613 F.2d 834 (D.C. Cir. 1979), cert. denied 100 S.Ct. 1019 (1980); Federal Election Commission v. Committee to Elect Lyndon Larouche, 613 F.2d 849 (D.C. Cir. 1979), cert. denied 100 S.Ct. 1019 (1980); Jones v. Unknown Agents of the Federal Election Commission; 613 F.2d 864 (D.C. Cir. 1979). For the future, it is expected that CFL will "straighten up its shoeboxes" to provide accurate records of its transaction.

AND THAT THERE IS NO CONSTITUTIONAL BAR TO THE COMMISSION PROCEEDING IN NORMAL SUBPOENA ENFORCEMENT ACTION TO TRY OBTAIN INFORMATION TO CARRY OUT ITS STATUTORY DUTY.

SO AGAIN, WE WOULD ASK THAT THE SUBPOENA BE ENFORCED AND THAT MOTION FOR PRELIMINARY INJUNCTION BE DENIED AND THE COUNTERCLAIM BE DISMISSED.

THANK YOU, YOUR HONOR.

THE COURT: WELL, WE ARE PREPARED TO RULE.

THE COURT'S FINDINGS OF FACT AND CONCLUSIONS OF LAW

AS PROBABLY IS APPARENT FROM SOME OF THE QUESTIONS THAT WERE ASKED OF MR. SILARD, WE'RE GOING TO GRANT THE COMMISSION'S PETITION TO ENFORCE THE SUBPOENA AND BY WAY OF EXPLANATION, I'D LIKE TO SAY THE FOLLOWING.

THE CHIEF ISSUES RAISED BY THE RESPONDENT IN THIS CASE ARE FIRST OF ALL, THE NATURE OF THE SUBPOENA AND WHETHER IT FALLS WITHIN THE GUIDELINESOF ENFORCEABILITY, AND SECOND THAT THE COMMISSION LACKS JURISDICTION OVER THE SUBJECT MATTER WHICH RAISES THE COLLATERAL QUESTION AS TO WHETHER OR NOT SUCH A DEFENSE CAN BE RAISED AT THE SUBPOENA ENFORCEMENT STAGE OF THE PROCEEDING, I.E., WHETHER THIS LACK OF STATUTORY JURISDICTION CAN BE RAISED BY THE RESPONDENT AT THIS TIME. IN ADDITION, THEY ASK FOR A DECLARATORY JUDGMENT AND PRELIMINARY INJUNCTION. AS I INDICATED EARLIER, IT SEEMED TO ME THAT THOSE ISSUES WOULD BE MOOTED OUT IF WE GRANTED THE GOVERNMENT THE RELIEF THEY SEEK. BUT EVEN IF THIS WERE AN ORIGINAL SUIT BY THE MACHINISTS AGAINST

FEC FOR AN INJUNCTION, PRELIMINARY INJUNCTION, I THINK WE WOULD BE REQUIRED TO HOLD THAT THEY WOULD NOT HAVE DEMONSTRATED A SUBSTANTIAL LIKELIHOOD OF SUCCESS ON THE MERITS, AND THEREFORE, WE WOULD HAVE DENIED A MOTION FOR PRELIMINARY INJUNCTION ON THAT GROUND, ALONE.

BUT GETTING BACK TO THE MATTER OF THE GUIDELINES OF ENFORCEABILITY -- AND THIS HAS NOTHING TO DO WITH THE MERITS OF THE CASE -- AND THESE GUIDELINES HAVE BEEN SET FORTH IN A NUMBER OF CASES AND ONE OF THEM, OF COURSE, BEING MORTON SALT, THE REQUIREMENTS TO BE MET ARE FIRST THAT THE INQUIRY MUST BE MADE WITHIN THE AUTHORITY OF THE AGENCY. I DON'T THINK THERE IS ANY QUESTION BUT WHAT THIS INQUIRY IS WITHIN THE AUTHORITY OF THE FEDERAL ELECTIONS COMMISSION . IT WAS JUST THIS TYPE OF MATTER THAT CAUSED CONGRESS TO SET THE WHOLE MACHINERY IN MOTION WHEN IT ENACTED THE STATUTE. SECOND IS THAT THE DEMAND MUST NOT BE TOO INDEFINITE AND THIS, OF COURSE, IS A SWEEPING SUBPOENA, BUT BECAUSE OF THE VERY NATURE OF THE SUBJECT MATTER, I THINK IT IS ABOUT AS SPECIFIC AS COULD BE EXPECTED. AND THIRD IS THAT THE INFORMATION SOUGHT MUST BE REASONABLY RELEVANT. IT SEEMS TO ME WITHOUT ANY QUESTION THIS INFORMATION IS REASONABLY RELEVANT IF THE COMMISSION IS GOING TO ATTEMPT TO CARRY OUT ITS STATUTORY DUTIES AS SET FORTH IN THE ACT. SO MUCH FOR THE MATTER OF THE VALIDITY OF THE SUBPOENA, ITSELF.

WITH RESPECT TO THE MATTER OF LACK OF JURISDICTION,

IT SEEMS TO ME THAT IT HAS BEEN WELL ESTABLISHED THAT THIS TYPE OF MATTER, LACK OF JURISDICTION, IS SOMETHING THAT HAS TO BE ADDRESSED AT THE FIRST INSTANCE TO THE COMMISSION, ITSELF, WHEN THE ENFORCEMENT PROCEEDING, IF ANY, TAKES PLACE. IT IS PERFECTLY TRUE THAT THEY DIDN'T RULE ON THE QUESTION WHEN THE RESPONDENT FILED ITS MOTION TO QUASH BEFORE THE COMMISSION, BUT THE COMMISSION WAS NOT REQUIRED TO RULE ON EVERY SINGLE ONE OF THE OBJECTIONS THAT WERE RAISED THROUGH THE MATTER OF THE SUBPOENA. BUT GETTING BACK TO THE MATTER OF LACK OF JURISDICTION -- AND WE DON'T GET INTO THE MERITS IN OUR DISCUSSION AT ALL, BUT THE CASES SEEM TO HOLD THAT A SUBPOENA ENFORCEMENT PROCEEDING IS NOT TO SAY IN WHICH THE ONE SUBPOENA IS RAISED AS A DEFENSE THAT THE AGENCY IS EXCEEDING THE SCOPE OF ITS STATUTORY AUTHORITY AND I WOULD LIKE TO GIVE FOR THE RECORD THE FOLLOWING QUOTE IN SEC AGAINST WALL STREET TRANSCRIPT CORPORATION, APPEARING AT 422 FED. 2ND, 1371 AND 1375, IN WHICH IT WAS STATED:

> " IT HAS LONG BEEN ESTABLISHED THAT THE QUESTION OF THE INCLUSION OF A PARTICULAR PERSON OR ENTITY WITHIN THE COVERAGE OF A REGULATORY STATUTE IS GENERALLY FOR INITIAL DETERMINATION BY AN AGENCY, SUBJECT TO REVIEW ON DIRECT APPEAL, RATHER THAN FOR A DISTRICT COURT WHOSE JURISDICTION IS INVOKED TO ENFORCE AN ADMINISTRATIVE SUBPOENA. SO LONG AS AN AGENCY

"ESTABLISHES THAT AN INVESTIGATION WILL BE CONDUCTED PURSUANT TO A LEGITIMATE PURPOSE, THAT THE INQUIRY MAY BE RELEVANT TO THE PURPOSE, THAT THE INFORMATION SOUGHT IS NOT ALREADY WITHIN ITS POSSESSION, AND THAT THE ADMINISTRATIVE STEPS REQUIRED HAVE BEEN FOLLOWED,' NO SHOWING OF PROBABLE CAUSE MAY BE MADE TO THE DISTRICT COURT UNLESS A STATUTE INDICATES OTHERWISE."

AND IN ACCORD WITH THAT, OF COURSE, IS THE ENDICOTT JOHNSON CASE, 317 U.S. 501, ET CETERA.

NOW FOR ALL OF THESE REASONS, WE ARE GOING TO GRANT THE GOVERNMENT'S PETITION TO ENFORCE THE SUBPOENA AND THE OPINION WE'VE JUST GIVEN WILL BE THE STATEMENT OF REASONS WHICH ACCOMPANIES THE GOVERNMENT'S SUBMISSION FOR A PROPOSED ORDER.

YES, MR. SILARD?

MR. SILARD: I'VE DISCUSSED WITH MR. NOBLE, YOUR HONOR, THE APPEAL, WE BOTH LIKE TO EXPEDITE THAT, BUT I HAVE AN ORDER, I THINK, I NEED FROM YOUR HONOR IN THE APPELLATE COURT. I DON'T HAVE A PROBLEM WITH THE SEALING SITUATION WHERE ON THE TRANSCRIPT YOUR HONOR HAS AGREED THAT THE DOCUMENTS I'VE FILED WILL BE KEPT UNDER SEAL, BUT THERE IS NO ACTUAL ORDER TO THAT EFFECT AND I DON'T WANT TO HAVE A FUSS WITH THE CLERK OF THE COURT OF APPEALS ABOUT HOW HE HANDLES THE RECORD. COULD

EXHIBIT 4

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

ORDER TO PRODUCE DOCUMENTS AND MATERIALS

AND TO ANSWER WRITTEN QUESTIONS

TO: Howard F. Dow
Secretary-Treasurer
Machinists Non-Partisan
Political League
1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1038

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a), the Machinists Non-Partisan Political League ("MNPL") is hereby ordered to produce for inspection and copying all documents listed below that are in the possession or control of MNPL or its officers, agents, staff members or employees. Production is to be made at Room 706, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., on November 14, 1979, at 10:00 a.m. Where originals are not available, please supply photocopies or duplicates, if available. Samples of mass mailings, distributions or publications may be provided.

1. All documents and materials (including but not limited to letters, memoranda (internal or otherwise), minutes, notes, telephone bills, and records of telephone conversations)

relating to meetings, discussions, correspondence, or other communications between any official, employee, staff member, volunteer, or agent of MNPL and any of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents:

a. Florida for Kennedy Committee
200 Southest First Street
12th Floor
Miami, Florida 33131

b. Committee for Alternatives
to Democratic Presidential Candidate
840 Fifth Avenue
Des Moines, Iowa 50309

c. New Hampshire Democrats for Change
P.O. Box 4268
Manchester, New Hampshire 03108

d. Minnesotans for a Democratic Alternative
208 McCall Building
366 Jackson Place
St. Paul, Minnesota 55107

e. Illinois Citizens for Kennedy
127 N. Dearborn
Room 238
Chicago, Illinois 60602

f. D.C. Committee for a Democratic Alternative
P.O. Box 1500
Washington, D.C. 20013

g. Democrats for Change-1980
P.O. Box 6707
Los Angeles, California 90067

h. Citizens for Democratic Alternatives in 1980
P.O. Box 2485
Washington, D.C. 20013

i. National Call for Kennedy
1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

j. Mark A. Siegel

2. All documents and materials (including but not limited to letters, memoranda (internal or otherwise), minutes, notes, records of telephone conversations, newsletters, and publications) concerning the formation, organizational structure, and staff assignments of any of the organizations listed in 1 a-i above.

3. All documents and materials (including but not limited to letters, memoranda, minutes, notes, and records of telephone conversations) concerning requests for monetary or in-kind contributions, support, or assistance made to MNPL or any of its officials, employees, staff members, volunteers, or agents by any of the organizations listed in 1 a-i above or their officials, employees, staff members, volunteers, organizers, or agents, and all documents and materials indicating the disposition of such requests.

4. All documentation of monetary or in-kind contributions, support, or assistance provided by MNPL or any of its officials, employees, staff members, volunteers, or agents to any of the organizations listed in 1 a-i above or their officials, employees, staff members, volunteers, organizers, or agents.

5. All documents and materials (including but not limited to airplaine, bus, or train ticket receipts, automobile rental and gas receipts, bills for lodging and accomodations, travel authorization requests, and vouchers) relating to travel by officials, employees, staff members, volunteers, or agents of MNPL to meet with officials, employees, staff members, volunteers, organizers, or agents of any of the organizations named in 1 a-i above.

6. All documents and materials (including but not limited to minutes, notes, memoranda, or records of telephone conversations) relating to meetings, discussions, correspondence, or other internal communications whereby the MNPL or any of its committees

or sub-units determined to support or oppose any individual in any way for nomination or election to the office of President in 1980.

In addition, MNPL is hereby ordered to reply to the following information request:

Please list the telephone numbers of MNPL and of every official, employee, staff member, volunteer, or agent of MNPL. For each number listed please indicate the listed or known name of the person to whom each number belongs.

Please submit a response to the foregoing information requst along with any additional information or response MNPL may wish to provide within ten (10) days of your receipt of this letter.

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 5th day of November, 1979.

Max L. Friedersdorf

Max L. Friedersdorf Vice Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8304042[illegible]6

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,	)	
	)	
PETITIONER,	)	
	)	
v.	)	MISCELLANEOUS ACTION
	)	NO. 81-0019
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE,	)	
	)	
RESPONDENT.	)	

CERTIFICATE OF SERVICE

This is to certify that I caused to be served by first-class mail, postage prepaid, on February 23, 1981, a copy of Petitioner Federal Election Commission's Reply to Respondent's Opposition to Enforcement of Administrative Subpoena to the following counsel:

Robert R. Sparks, Jr.
J. Curtis Herge
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Counsel for National Conservative
POlitical Action Committee

Anne A. Weissenborn

Anne A. Weissenborn

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GCL#3781

1 FEB 13 P4:56

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION, Petitioner, v. NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE, Respondent.	)	Miscellaneous Action No. 81-0019

MEMORANDUM IN OPPOSITION TO PETITION TO SHOW CAUSE WHY SUBPOENA SHOULD NOT BE ENFORCED

This memorandum is submitted in opposition to the petition of the Federal Election Commission ("the Commission") for an order to compel respondent National Conservative Political Action Committee ("NCPAC") to produce documents and answer interrogatories propounded by the Commission.

On July 2, 1980, the Carter-Mondale Reelection Committee ("Carter-Mondale") filed with the Commission a complaint alleging that NCPAC and other named respondents had committed various violations of the Federal Election Campaign Act of 1971 ("the Act"), and other statutes cognizable by the Commission. The Carter-Mondale complaint alleged that independent expenditure efforts by NCPAC and the other named respondents were unlawfully coordinated with Mr. Reagan or his official campaign. According to Carter-Mondale, this coordination was achieved in various ways. It was alleged that by reading newspaper accounts of Mr. Reagan's presidential campaign, respondents could conduct a parallel campaign on Mr. Reagan's behalf, designed to aid his election campaign. To make matters worse, Carter-Mondale complained, many of the organizers and members of the respondent committees

were life-long, politically active Republicans - some were even friends of Mr. Reagan - who, Carter-Mondale feared, ardently wished for Mr. Reagan's election.

The Carter-Mondale complaint was filed in the heat of the national political conventions, when it was apparent that Mr. Reagan was to be the Republican nominee for President. Carter-Mondale sought to prevail on the Commission to withhold its certification of Mr. Reagan's eligibility to receive approximately $29.4 million in public funding of his presidential campaign under the Presidential Election Campaign Fund Act. When the Commission declined to withhold that certification, Carter-Mondale and others then sought unsuccessfully to have the Court of Appeals of this Circuit enjoin that certification, and withhold disbursement of presidential matching funds. In Re: Carter-Mondale Reelection Committee, Inc., and Democratic National Committee; Carter-Mondale Reelection Committee, Inc., and Democratic National Committee; Federal v. Federal Election Commission, Ronald Reagan, and Reagan For President General Election Committee; U.S. Court of Appeals for the District of Columbia Circuit, Nos. 80-1841 and 80-1842, September 12, 1980.

The complaint was based in large part on newspaper predictions of respondents' activities, surmise, and conjecture. In effect, it complained that active Republicans were working together for Mr. Reagan's election. Because some of these Republicans were acquaintances of Mr. Reagan or members of his authorized committees, their conduct was, in Carter-Mondale's view, suspect and subject to investigation by the Commission. The Commission reviewed the complaint and its voluminous attachments and, on September 25, 1980, notified NCPAC that it had found reason to believe that NCPAC had

violated provisions of the Act and 26 U.S.C. §9012(f), in certain particulars recited therein. (A copy of the Commission's letter is attached to the Commission's memorandum, along with its discovery requests.)

Before setting out the particulars in support of its finding of reason to believe, the Commission expressly noted: "The evidence contained in the complaint that is put forth below represents only that evidence which the General Counsel's office has found relevant to believe that the expenditures by NCPAC are not 'independent' expenditures, but rather in-kind contributions to Mr. Reagan." Notification 3. The Commission then listed certain transactions and associations between NCPAC and common vendors and with the Reagan for President Committee.[1/] The Commission noted that "in light of the foregoing evidence," it found reason to believe that NCPAC had made or was making excessive in-kind contributions and expenditures on behalf of the 1980 authorized committees of Ronald Reagan, in violation of 2 U.S.C. §441a(a) and 26 U.S.C. §9012(f). Section 9012(f) prohibits independent committees from knowingly and willfully incurring "qualified campaign expenses"[2/] in excess of $1,000 to further the election of a Presidential or Vice Presidential candidate who has received public funding of his election campaign.

The Commission also made a separate finding as to 26 U.S.C. §9012(f), based on the evidence recited above, and

---

1/ Specifically, the Commission questioned expenditures made by NCPAC to certain named vendors also used by the Reagan campaign; a polling expense incurred by NCPAC to a consultant also used by the Reagan campaign; and the apparent sale by NCPAC of "office equipment" to the Reagan for President Committee. Commission Notification at 3-4.

2/ "Qualified campaign expenses" are those campaign-related expenses incurred by the candidates, their authorized committees, or by any person authorized by the candidates or by any of their authorized committees. 26 U.S.C. §9012(11).

alleged a violation of 2 U.S.C. §432(e)(4) in the use of Mr. Reagan's name in the title of NCPAC's independent expenditure project, the "Ronald Reagan Victory Fund."

On September 29, 1980, the Commission propounded to NCPAC a series of written interrogatories and issued an order to produce documents and materials. NCPAC timely responded to the Commission's interrogatories and document requests which addressed the evidence found by the Commission to support its finding of reason to believe that violations of the law had occurred. NCPAC has, however, declined to furnish documents or to respond to those interrogatories which seek information concerning possible conduct or associations beyond the evidence listed by the Commission in its notification.

ARGUMENT

The Commission's statutory authority to conduct investigations of possible violations of the Act or Chapters 95 or 96 of Title 26 is contained in 2 U.S.C. §437g(a)(2). That section, as amended, now provides:

> If the Commission...determines, by an affirmative vote of four of its members, that it has reason to believe that a person has committed...a violation of this Act or chapter 95 or chapter 96 of title 26, the Commission shall, through its chairman or vice chairman, notify the person of the alleged violation. Such notification shall set forth the factual basis for such alleged violations. The Commission shall make an investigation of such alleged violation, which may include a field investigation or audit, in accordance with the provisions of this section (emphasis added).

The Commission's regulations similarly require that a notification set forth "the sections of the statute or regulations alleged to have been violated and the alleged factual basis supporting the finding." 11 C.F.R. §111.9(a). Congress amended section 437g(a)(2) in 1979 to require an affirmative vote of four commissioners before the Commission may find reason to

believe that a violation has been committed, and to require that notification of the alleged violation set forth the factual basis of the alleged violation. Pub.L. 96-187, section 108, 93 Stat.1354, 1358 (1980).

Section 437g(a)(2) contains strict procedural safeguards intended to protect respondents to a Commission enforcement action. Those protections are vitiated if, as here, the Commission is able to simply pay lip service to the specificity requirement of that section in the initial reason to believe process, and then ignore the specificity safeguards in its subsequent investigation. That is what has happened here. Carter-Mondale's allegations were based on the rankest form of conjecture and paranoia, and were apparently dismissed as such by the Commission in its reason to believe notification. There is not a shred of evidence of conscious coordination or parallelism between NCPAC and the Reagan camp.

The Commission, in its notification, raised questions based on tangible evidence before it in the form of apparently inconsistent filings by the Reagan campaign committees and NCPAC. Those filings suggested an apparent use by NCPAC and Reagan of common vendors or consultants. The Commission properly inquired into those transactions and NCPAC promptly and completely responded to those inquiries. The Commission also questioned a sale of "office equipment" by NCPAC to the Reagan campaign, and NCPAC explained that transaction to the Commission. But there is no evidence cited by the Commission (and nothing more than fears cited by Carter-Mondale) that any of the staff of NCPAC or the Ronald Reagan Victory Fund had any improper contact with any of the laundry list of individuals or organizations listed by the Commission in its discovery requests.

NCPAC contends that section 437g(a)(2) requires that the scope of the Commission's inquiry be circumscribed by the factual bases on which a finding of reason to believe is founded. If the Commission's inquiry is not so limited, then there is no point to the requirement of a factual foundation.

This court has already held that the legislative history of the 1979 amendments to 2 U.S.C. §437g(a)(2) evince a Congressional intent that the Commission conduct its investigations within the boundaries of strict procedural safeguards. Felice M. Gelman, et al v. Federal Election Commission, No. 80-2471, October 24, 1980, Fed.Elec.Camp.Fin.Guide (CCH), ¶9139. If the Commission is permitted to allege certain violations of the law, based on accompanying factual allegations, and then to inquire into all manner of other unrelated matters, then the intention of Congress, the wording of section 437g(a)(2), and the decision of this court will be flouted.

If the Commission has reason to believe that NCPAC has had contact or association with the entities or individuals listed in its discovery requests, it should say so, cite evidence in support of that allegation, and conduct discovery with respect to that evidence. It has not done so because it has been unable to find such evidence.

Accordingly, we ask that this court refuse NCPAC's petition for an order to show cause.

Respectfully submitted,

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

Attorneys for National Conservative Political Action Committee

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Memorandum In Opposition To Petition To Show Cause Why Subpoena Should Not Be Enforced, was hand-delivered to Charles N. Steele, General Counsel, Federal Election Commission, this 13th day of February, 1981.

Robert R. Sparks, Jr.

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETU

INSTRUCTIONS: See "INSTRUCTIONS FOR SERVICE OF PROCESS BY THE U.S. MARSHAL" on the reverse of the last (No.5) copy of this form. Please type or print legibly, insuring readability of all copies. Do not detach any copies.

PLAINTIFF	COURT CASE NUMBER
FEDERAL ELECTION COMMISSION	
DEFENDANT	**TYPE OF PROCESS**
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE	

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
National Conservative Political Action Committee

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
1500 Wilson Boulevard, Suite 513, Arlington, Virginia 22209

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

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

Number of process to be served with this Form-285	
Number of parties to be served in this case	
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service):

Fold Fold

Defendant's telephone number - (703) 522-2800

Plaintiff is a government agency. Please do not bill.

Signature of Attorney or other Originator requesting service on behalf of:		TELEPHONE NUMBER	DATE
	☒ PLAINTIFF ☐ DEFENDANT	523-5071	1/30/81

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
	[redacted] No.		No.		

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above. (See remarks below)

Name and title of individual served (if not shown above)

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode.

Address (complete only if different than shown above)

Date of Service | Time | am / pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal or	Amount of Refund (Check enclosed)

REMARKS

PRIOR EDITIONS MAY BE USED

5. ACKNOWLEDGMENT OF RECEIPT

FORM USM-285 (Rev. 11/11/77)

3040421

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

Petitioner,

v.

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

MISCELLANEOUS ACTION NO.
81-0019

FILED

JAN 23 1981

JAMES F. DAVEY, Clerk

ORDER

The Federal Election Commission has petitioned this court for an order requiring respondent National Conservative Political Action Committee to show cause why the Commission's subpoena and order requirng the respondent to produce written documents and materials, and to answer written questions should not be enforced. The subpoena and order was served upon the respondent on October 2, 1980, pursuant to the Commission's authority under 2 U.S.C. § 437d(a)(1) and (3). The respondent failed to comply fully with the Commission's subpoena and order and the Commission, therefore, applied hereto.

It appearing to this court that the Federal Election Commission has shown good cause for the entry of this order, it is hereby:

ORDERED that respondent appear before the Honorable John H. Pratt with the documents and materials and answers to written questions specified in the Commission subpoena, on the 26th day of February at 9:30 a.m., 1981, or as soon thereafter as feasible. Counsel can be heard, and show cause, if there be any, why an order should

not be entered by this court directing the respondent to comply with the Commission subpoena and order.

IT IS FURTHER ORDERED, that if respondent intends to file pleadings, affidavits, exhibits, motions or other papers in opposition to said petition or the Order requested, such papers shall be filed and served no later than the 13th day of February , 1981. The Commission shall have the opportunity to file a reply brief to any such papers in opposition no later than the 23rd day of February , 1981.

Done this 23rd day of January , 1981.

Gabriel W. Gould

UNITED STATES DISTRICT JUDGE

8 3 0 4 0 4 2

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

Petitioner,

v.

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209
(703) 522-2800

Respondent.

MISCELLANEOUS ACTION NO.

81-0019

RECEIVED

JAN 23 1981

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

PETITION FOR ORDER TO SHOW CAUSE WHY
SUBPOENA SHOULD NOT BE ENFORCED

Petitioner, the Federal Election Commission (hereinafter "Commission") hereby applies to the court for enforcement of its subpoena and order and represents the following to the court:

1. This is an action for enforcement of a subpoena and order issued by the Commission pursuant to 2 U.S.C. § 437d(a)(1) and (3).

2. Jurisdiction is conferred upon this court by 2 U.S.C. § 437d(b).

3. Petitioner is the agency of the United States Government charged with the administration and enforcement of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq., and of Chapters 95 and 96 of Title 26, United States Code. The Commission is empowered to investigate possible violations of the Federal Election Campaign Act of 1971, as amended, and of Chapters 95 and 96 of Title 26, United States Code.

4. Respondent National Conservative Political Action Committee (NCPAC) is a respondent in a Commission enforcement action currently under investigation. Said investigation involves possible violations by NCPAC of 2 U.S.C. §§ 441a(a) and 434(e)(4) and of 26 U.S.C. § 9012(f).

5. In connection with this investigation the Commission on September 29, 1980, issued to respondent NCPAC a subpoena and order requiring it to produce documents and materials and requiring it to answer written questions.

6. Respondent NCPAC, having complied only in part with the Commission's subpoena and order, has failed and refused to comply in all regards to the Commission's subpoena and order.

7. WHEREFORE, the Federal Election Commission prays:

(a) That this court issue an order directing respondents to appear before this court on a day certain, to be fixed by said order, and to show cause, if there be any, why an order should not be issued directing respondent NCPAC fully to comply with the subpoena and order;

(b) That, upon return of said order to show cause, an order be issued directing the respondents to comply with the subpoena and order; and

(c) That the Federal Election Commission be granted such further relief as may be necessary and appropriate.

8. No prior applications have been made for the relief sought herein.

Respectfully submitted,

Charles N. Steele
General Counsel

Thomas J. Whitehead
Assistant General Counsel

Anne A. Weissenborn
Attorney

Vincent J. Convery, Jr.
Attorney

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

8304021

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

Petitioner,

v.

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209
(703) 522-2800

Respondent.

MISCELLANEOUS ACTION NO.

MEMORANDUM IN SUPPORT OF PETITION TO SHOW CAUSE WHY SUBPOENA SHOULD NOT BE ENFORCED

STATEMENT OF THE CASE

This action is before the court on petition of the Federal Election Commission ("Commission" or "FEC") for an order to show cause why a Commission subpoena to produce documents and order to answer written questions should not be enforced. Jurisdiction is conferred upon this court by 2 U.S.C. § 437d(b). 1/

On July 2, 1980, the Carter-Mondale Re-election Committee, Inc. ("C-M") filed a signed, sworn complaint with the FEC, asking that the Commission invoke its enforcement authority with regard to alleged violations of the Federal Election Campaign Act of 1971, 2/

1/ The Federal Election Campaign Act of 1971, Pub. L. No. 92-225, 86 Stat. 3 (1972) was amended as follows: Federal Election Campaign Act Amendments of 1974, Pub. L. No. 93-443, 88 Stat. 1263 (1974); Federal Election Campaign Act Amendments of 1976, Pub. L. No. 94-283, 90 Stat. 475 (1976); Federal Election Cmapaign Act Amendments of 1977, Pub. L. No. 95-216, 91 Stat. 1655 (1977); Federal Election Campaign Act Amendments of 1979, Pub. L. No. 96-187, 93 Stat. 1339 (1980). The provisions of the Act are codified in Chapter 14 of Title 2, United States Code. The Federal Election Commission, which was created by § 208(a) of the Federal Election Campaign Act of 1971, has enforcement authority over the Act and over Chapters 95 and 96 of Title 26, United States Code.

2/ On September 29, 1980, a complaint was filed with the Commission by Common Cause alleging the same violations as those alleged by C-M. The matter under review arising from the Common Cause complaint has been merged with that arising from the C-M complaint.

as amended, (hereinafter "the Act" or "Federal Election Campaign Act"). Complainant alleged that the National Conservative Political Action Committee ("NCPAC") and other named committees had exceeded their contribution limitations in violation of 2 U.S.C. § 441a(a), had failed to report contributions and expenditures properly in violation of 2 U.S.C. § 434, and had knowingly and willfully incurred expenditures in excess of $1,000 to further the election of Ronald Reagan to the office of President of the United States in violation of 26 U.S.C. § 9012(f). In addition the complaint alleged that NCPAC had violated 2 U.S.C. § 432(e)(4) in that its project, the "Ronald Reagan Victory Fund," a discrete, unauthorized political committee, unlawfully included the name of "Ronald Reagan" in its name.

Pursuant to 2 U.S.C. § 437g(a)(2), the Commission found there was reason to believe that violations of the Act and of Commission regulations had been committed by NCPAC and by certain other named respondents. The Commission notified NCPAC, providing the respondent committee with a copy of the complaint and with a general description of the legal basis for the Commission's preliminary finding. (A copy of the notification letter is appended as Exhibit 1.) The Commission commenced an investigation of the alleged violations.

Pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), and in connection with the aforesaid investigation, the Commission, on September 29, 1980, issued an order and subpoena which directed NCPAC to produce documents and materials and to provide written answers to Commission

questions. (A copy of the subpoena and order is appended as Exhibit 2.) NCPAC filed a motion to quash the subpoena on October 14, 1980. However, on October 20, 1980, NCPAC complied in part by submitting the documents requested at Specifications 4, 5 and 11 of the Commission's subpoena and by providing written answers to Interrogatories A and C. On December 16, 1980, the Commission voted to deny the NCPAC motion to quash and notified respondent by a letter dated December 19, 1980. That letter set January 9, 1981, as the date for the production of documents and materials not already produced. It also required submission of answers not yet provided within ten (10) days of receipt of the letter. (See Exhibit 3). The Commission's letter was received by counsel for respondents on December 30, 1980. By letter dated January 9, 1981, NCPAC notified the Commission that it would "not voluntarily comply with the Commission's order directing NCPAC to submit to the requested discovery." (See Exhibit 4).

ARGUMENT

2 U.S.C. § 437d(b) provides the authority for the Commission to seek a compliance order from any United States District Court "within the jurisdiction of which an inquiry is being conducted" if there has been a refusal to obey a Commission subpoena. It is settled law that subpoena enforcement proceedings of the kind that are before this court are summary in nature. Where the rights of the parties are protected and an adversary hearing is made available, if requested, the court need not require the filing of a complaint followed by an answer and discovery under the Federal Rules of Civil Procedure. Donaldson v. United States, 400 U.S. 517, 528, 529 (1971).

The standard for determining whether an administrative agency's subpoena be enforced was set forth in United States v. Morton Salt Co.,

338 U.S. 632, 652 (1950). There the Court held that a subpoena or an order is entitled to enforcement so long as the inquiry is within the authority of the agency, the demand is not too indefinite, and the information sought is reasonably relevant. Id. The Commission's subpoena meets these standards and this court should order NCPAC to comply with the Commission's subpoena.

A. The Inquiry Is Within the FEC's Authority

The FEC has broad authority to administer the Federal Election Campaign Act and Chapters 95 and 96 of Title 26, United States Code. The Commission has express statutory power to formulate general policy with respect to the administration of the cited laws, 2 U.S.C. § 437c(b)(1); to make rules for their implementation, 2 U.S.C. § 437d(a)(8); to render advisory opinions concerning them, 2 U.S.C. § 437d(a)(7); and to initiate civil actions to enforce them, 2 U.S.C. 437d(a)(6).

The Commission has exclusive primary jurisdiction with respect to civil enforcement of the Act and of Chapters 95 and 96 of Title 26, 2 U.S.C. §§ 437c(b)(1), 437d(e), and 437g, and to that end is granted the statutory authority to conduct investigations to determine whether there is cause to believe that violations of the Act or Chapters 95 and 96 of Title 26 have been or will be committed. 2 U.S.C. § 437g(a). Section 437g(a)(2) of the Act provides that:

> If the Commission upon receiving a complaint . . . or on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, determines, by an affirmative vote of 4 of its members, that it has reason to believe that a person has committed, or is about to commit, a violation of this Act or chapter 95 or chapter 96 of title 26, the Commission shall, through its chairman, notify the person of the alleged violation. Such notification shall set forth the factual basis for such alleged violation. The Commission shall make an investigation of such alleged violation, which may include a field investigation or audit, in accordance with the provisions of this section. (Emphasis added.)

Thus the Commission has a statutory duty to conduct an investigation where as here, a signed, sworn complaint alleging violations of the Act has been filed, and where it has found reason to believe a violation has occurred. In carrying out that duty the Act specifically grants the Commission the power "to require, by special or general orders, any person to submit under oath, such written reports and answers to questions as the Commission may prescribe" and "to require by subpoena, signed by the chairman or vice chairman ... the production of all documentary evidence relating to the execution of its duties." 2 U.S.C. § 437d(a)(1) and (3). In short, the Commission has ample statutory authority to investigate the allegations made in the C-M complaint and to issue subpoenas and orders in pursuance of that investigation.

B. The Demand Is Not Too Indefinite

The subpoena and order issued by the Commission describes with sufficient specificity the information sought by the Commission. The request for information in the Commission's subpoena and order is is drawn as narrowly as possible, and compliance would not be unduly burdensome. Even assuming arguendo that there is some burden in complying with the subpoena, it has been recognized in this judicial circuit that some burden on subpoenaed parties is to be expected and may be necessary to the conduct of the agency's inquiry. Federal Trade Commission v. Texaco, 555 F.2d 862, 882 (D.C. Cir., 1977) en banc, cert. denied 431 U.S. 974 (1977). The burden of showing that the request for information is unreasonable is upon the subpoenaed party. Id.

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C. The Information Sought Is Reasonably Relevant

There are two issues which the Commission is investigating in this matter. The first is whether expenditures made by NCPAC on behalf of the candidacy of Ronald Reagan were made with the cooperation or prior consent of, in consultation with or concert with, or at the request or suggestion of Mr. Reagan, his authorized committee, or his agents. If the expenditures were so made, they would, by law, be "non-independent" and, thus, contributions to the candidate. See 2 U.S.C. § 441a(a)(7)(B)(i) and 11 C.F.R. § 109.1(c). The subpoena seeks information which is necessary to determine whether such cooperation, consultation, prior consent, requests or suggestions did in fact take place. The second issue involves the nature of the Ronald Reagan Victory Fund and its relationships to NCPAC. Therefore, the information sought in the subpoena is relevant to the Commission's investigation of the C-M complaint.

The complaint against NCPAC and others makes numerous factual allegations to support its legal contention that the Act has been violated. Under such circumstances, "a wide range of investigation is necessary and appropriate." Federal Trade Commission v. Texaco, 555 F.2d 862, 877 (D.C. Cir. 1977). Thus, the information sought by the subpoena cannot be characterized as "plainly incompetent or irrelevant to any lawful purpose." Endicott Johnson Corp. v. Perkins, 317 U.S. 501, 509 (1943), and therefore the subpoena should be enforced. Id.

CONCLUSION

The Federal Election Commission is proceeding within its congressionally mandated authority to investigate the Carter-Mondale Re-election Committee, Inc., complaint. The subpoena is clearly

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authorized and seeks, within well-established bounds, to compel the production of evidence in support of the investigation. The court has jurisdiction to enforce the subpoena and may issu an order to show cause why the subpoena should not be enforced.

For the reasons expressed herein, it is submitted that the Commission's petition for an order to show cause should be granted, and such order should be issued by the court.

Respectfully submitted,

Charles N. Steele
General Counsel

Thomas J. Whitehead
Assistant General Counsel

Anne A. Weissenborn
Attorney

Vincent J. Convery, Jr.
Attorney

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

8304042116

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463
(202) 523-5071

Petitioner,

v.

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209

MISCELLANEOUS ACTION NO.

ORDER

The Federal Election Commission has petitioned this court for an order requiring respondent National Conservative Political Action Committee to show cause why the Commission's subpoena and order requirng the respondent to produce written documents and materials, and to answer written questions should not be enforced. The subpoena and order was served upon the respondent on October 2, 1980, pursuant to the Commission's authority under 2 U.S.C. § 437d(a)(1) and (3). The respondent failed to comply fully with the Commission's subpoena and order and the Commission, therefore, applied hereto.

It appearing to this court that the Federal Election Commission has shown good cause for the entry of this order, it is hereby:

ORDERED that respondent appear before the Honorable

with the documents and materials and answers to written questions specified in the Commission subpoena, on the

day of , 1981, or as soon thereafter as feasible. Counsel can be heard, and show cause, if there be any, why an order should

not be entered by this court directing the respondent to comply with the Commission subpoena and order.

IT IS FURTHER ORDERED, that if respondent intends to file pleadings, affidavits, exhibits, motions or other papers in opposition to said petition or the Order requested, such papers shall be filed and served no later than the day of , 1981. The Commission shall have the opportunity to file a reply brief to any such papers in opposition no later than the day of , 1981.

Done this day of , 1981.

UNITED STATES DISTRICT JUDGE

U.S. MARSHALS SERVICE
PROCESS RECEIPT and RETU

INSTRUCTIONS: See "INSTRUCTIONS [illegible] SERVICE OF PROCESS BY THE U.S. MARSHAL" on [illegible] reverse of the last (No. 5) copy of this form. Please type or [illegible] legibly, insuring readability of all copies. Do not detach [illegible] copies.

PLAINTIFF: **Federal Election Commission**

COURT CASE NUMBER: CA 81-0019

DEFENDANT: **National Conservative Political Action Committee**

TYPE OF PROCESS: Order to Show Cause

SERVE AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN
Robert R. Sparks, Jr., Esquire, Sedam and Herge

ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)
7600 Old Springhouse Road, McLean, Virginia 22102

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW:

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

Number of process to be served with this Form-285	1
Number of parties to be served in this case	1
Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (*Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available For Service*).

Fold

Counsel for National Conservative Political Action Committee
Telephone - (703) 821-1000

The Federal Election Commission is a government agency. Please do not bill.

Fold

Signature of Attorney or other Originator requesting service on behalf of	☒ PLAINTIFF ☐ DEFENDANT	TELEPHONE NUMBER	DATE
		523-5071	1/16/81

SPACE BELOW FOR USE OF U.S. MARSHAL ONLY — DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated (Sign only first USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
	[redacted]	No	No		

I hereby certify and return that I ☒ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below)

Name and title of individual served (if not shown above)

☐ A person of suitable age and discretion then residing in the defendant's usual place of abode.

Address (complete only if different than shown above)

Date of Service: 1-26-81 Time: 2:40 ☒ am ☐ pm

Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges (including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal	or	Amount of Refund (Check enclosed)
0.00	2.04		12.04				

REMARKS

NOTE

PRIOR EDITIONS MAY BE USED

3. NOTICE OF SERVICE

GCC
3707

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7800 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
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

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

TWX/TELEX: 710-831-0698

CABLE: SEDAMHERGE

January 9, 1981

BY HAND

81 JAN 9 AM 11:07

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

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

Re: MUR 1252

Dear Mr. Steele:

By letter of December 19, 1980, you informed the undersigned that, after review and consideration by the Federal Election Commission ("the Commission") of the objections of National Conservative Political Action Committee (NCPAC) to certain written interrogatories propounded to NCPAC by the Commission, and the Motion by NCPAC to Quash or Modify the Commission's subpoena in this matter, the Commission had voted to deny the motion and to require answers to all written interrogatories.

This is to inform you that NCPAC will not voluntarily comply with the Commission's orders directing NCPAC to submit to the requested discovery. NCPAC has already answered certain of the interrogatories of the Commission and has produced certain of the documents requested by the Commission's subpoena.

It is NCPAC's position that the permissible scope of the Commission's discovery in this matter is limited by that conduct determined by the Commission and listed in its September 25, 1980 Notification Of Reason To Believe Finding to be potentially violative of statutes cognizable by the Commission. Having raised questions with regard to that conduct enumerated in support of its finding of reason to

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believe, the Commission may not properly inquire into other areas absent a determination that the questioned conduct exists, and that it may violate a statute or regulation cognizable by the Commission.

Section 437g(a)(2) of the Federal Election Campaign Act of 1971 provides:

> If the Commission...determines, by an affirmative vote of four of its members, that it has reason to believe that a person has committed...a violation of this Act, or Chapter 95 or Chapter 96 of title 26, the Commission shall, through its chairman or vice-chairman, notify the person of the alleged violation. Such notification shall set forth the factual basis for such alleged violation. The Commission shall make an investigation of such alleged violation, which may include a field investigation or audit, in accordance with the provisions of this section (emphasis added).

Thus, the Commission is limited in the permissible scope of its inquiry to the specific allegations contained in its Notification Of Reason To Believe Finding.

The Commission's Notification set out three findings of potential statutory violations. The first alleged excessive in-kind contributions and expenditures on behalf of Ronald Reagan. In support of that finding, the Commission set forth several transactions and associations between NCPAC and Mr. Reagan or his authorized committees. In so doing, the Commission set forth "only that evidence which the General Counsel's office has found relevant to a determination of whether there is reason to believe that the expenditures by NCPAC are not 'independent' expenditures, but rather in-kind contributions to Mr. Reagan." Notification, at 2. NCPAC has answered each interrogatory and has produced every document requested by the Commission concerning the evidence recited in its Notification in support of its first finding.

The Commission's second finding alleges a potential violation of 26 U.S.C. §9012(f). That Section purports to prohibit certain conduct by political committees irrespective of their independence from a candidate or his committees. Thus, Section 9012(f) cannot serve as a justification for inquiry into any contacts between NCPAC and the Reagan Committees.

Moreover, NCPAC asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause, et al. v Schmidt, et al., (80-1609 and 80-1754 (consolidated), September 30, 1980), to which the Commission was a party, bars any attempt by the Commission to enforce Section 9012(f) as it is written, or to inquire into expenditures by NCPAC on behalf of Ronald Reagan irrespective of the independence of NCPAC from Reagan or his authorized committees. Absent any reasonably supported finding by the Commission of reason to believe that NCPAC is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

Accordingly, for the reasons stated above, NCPAC will not voluntarily comply with the Commission's original discovery request of September 29, 1980, or its Orders of December 16 and 19, 1980, directing compliance therewith.

Please feel free to contact me if you have any questions or comments concerning this matter.

Sincerely,

Robert R. Sparks, Jr.

3304211

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1252

Dear Mr. Sparks and Mr. Herge:

The Commission has received the Motion to Quash or Modify Subpoena filed by you on behalf of the National Conservative Political Action Committee ("NCPAC") and also sworn written answers by Mr. Kenneth F. Boehm to certain interrogatories, together with objections to other particular questions. The Commission has reviewed and considered the motion and the answers and objections to the written interrogatories, and on December 16, 1980, voted to deny NCPAC's motion and to require answers to all written questions submitted.

Accordingly, NCPAC is requested to produce for inspection and copying the documents previously described in the Commission's October 1, 1980, subpoena, and not yet produced, at Room 706, 1325 K Street, N.W., Washington, D.C., on January 9, 1981, and all subsequent business days thereafter required to complete inspection. Answers not yet provided to all written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

With respect to compliance with the Commission's previously issued subpoena and order, we direct your attention to the specific directions for proper compliance set out in the paragraph preceeding the document requests on page three of the subpoena sent to NCPAC.

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If you have any questions or problems, please contact Ms. Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Commission Orders

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The National Conservative Political Action Committee is required to answer all written questions submitted by the Commission on October 1, 1980. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

December 16, 1980
Date

JOHN WARREN McGARRY
Vice Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The motion of the National Conservative Political Action Committee to quash or modify the Commission order to produce documents and materials and to answer questions is denied. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

12/19/80
Date

JOHN WARREN McGARRY
Vice Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

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

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

HAND DELIVERY

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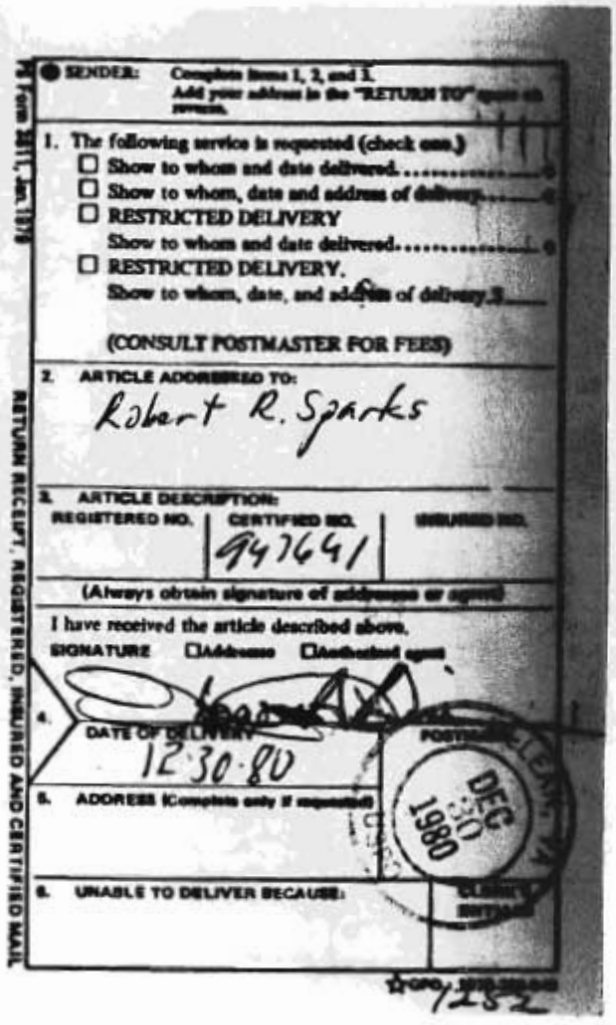

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2. ARTICLE ADDRESSED TO:
Robert R. Sparks

3. ARTICLE DESCRIPTION:

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	947641	

(Always obtain signature of addressee or agent)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 19, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1252

Dear Mr. Sparks and Mr. Herge:

The Commission has received the Motion to Quash or Modify Subpoena filed by you on behalf of the Fund for a Conservative Majority ("FCM") and also sworn written answers by Mr. John T. Dolan to certain interrogatories, together with objections to other particular questions. The Commission has reviewed and considered the motion and the answers and objections to the written interrogatories, and on December 16, 1980, voted to deny FCM's motion and to require answers to all written questions submitted.

Accordingly, FCM is requested to produce for inspection and copying the documents previously described in the Commission's October 1, 1980, subpoena, and not yet produced, at Room 706, 1325 K Street, N.W., Washington, D.C., on January 7, 1981, and all subsequent business days thereafter required to complete inspection. Answers not yet provided to all written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

With respect to compliance with the Commission's previously issued subpoena and order, we direct your attention to the specific directions for proper compliance set out in the paragraph preceeding the document requests on page three of the subpoena sent to FCM.

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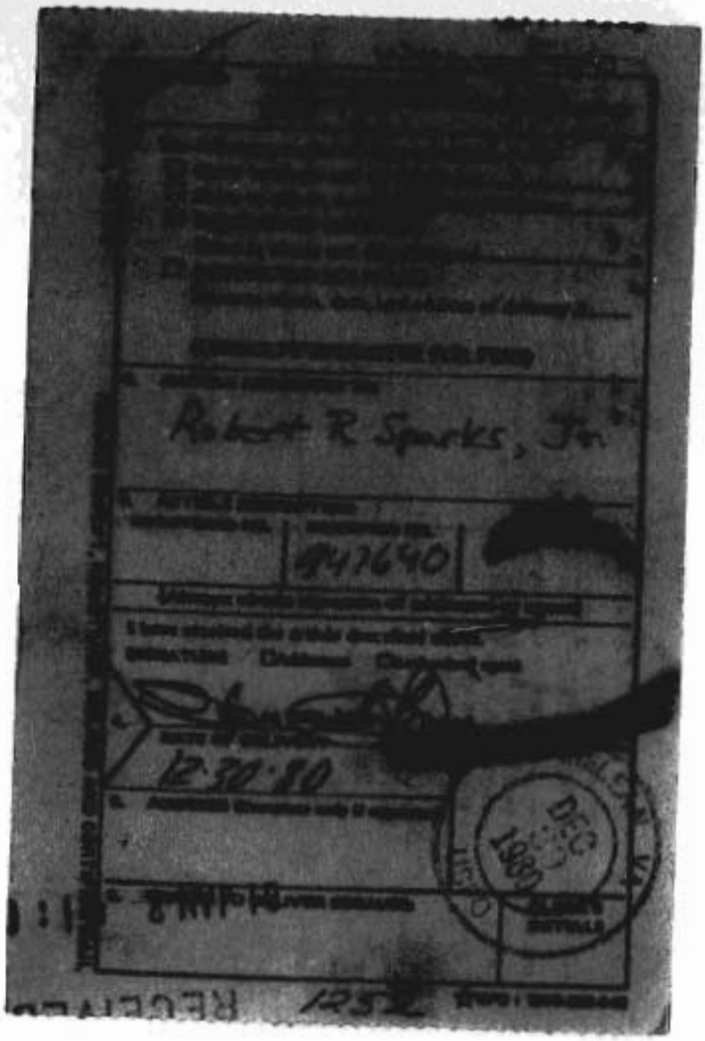
If you have any questions or problems, please contact Ms. Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Commission Orders

8304040211 39



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The motion of the Fund for a Conservative Majority to quash or modify the Commission order to produce documents and materials and to answer questions is denied. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

December 16, 1980
Date

JOHN WARREN McGARRY
Vice Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 12, 1980

Mr. Curtis Herge, Esquire
SEDAM & HERGE
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Herge:

The Commission has received the Motions to Rescind the Commission's decision to merge Matters Under Review (MURs) 1252 and 1299 filed by you on behalf of your clients, Fund for a Conservative Majority ("FCM") and the National Conservative Political Action Committee ("NCPAC"). The Commission reviewed and considered the papers submitted on October 27, and 28, 1980 and on December 9, 1980, voted to deny FCM's and NCPAC's motions.

For the record, two points should be noted; 1) the Commission merger of these two matters was initially suggested by counsel for FCM and NCPAC, Robert Sparks, at a meeting in early October with Commission staff, and 2) as you were notified by letter dated September 25, 1980, the Commission found reason to believe, based on a complaint filed by the Carter-Mondale Reelection Committee, Inc., that your clients FCM and NCPAC had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and Chapter 95, Title 26 U.S. Code ("the Fund Act").

As your associate, Mr. Robert Sparks, has been told in the course of numerous conversations with the staff assigned to this case, the Commission did not make any additional finding of reason to believe with respect to your clients in connection with the complaint filed subsequently by Common Cause. A finding of reason to believe is a triggering mechanism for the initiation of an investigation of alleged violations of the law by the Federal Election Commission, a non-adjudicatory, investigatory agency. As Mr. Sparks was also informed, insofar as the complaint filed by Common Cause alleged the same violations of the Act, and Fund Act contribution and expenditure limitations by virtue of expenditures made by the same named respondents and relied upon virtually the same allegations of fact and pointed to the same evidence in support of their identical claims, the two matters were merged into one investigative endeavor, thus avoiding duplicative efforts on the part of both the Commission and the respondents.

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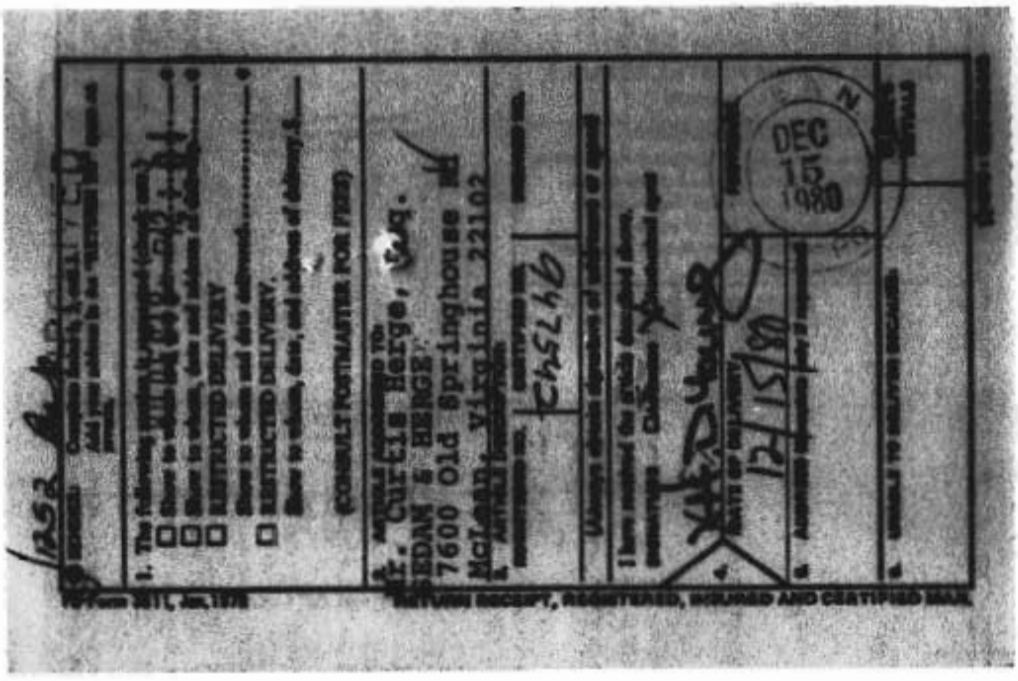
As you are aware, FCM and NCPAC were provided an opportunity to demonstrate that no action should have been taken by the Commission prior to the Commission's finding of reason to believe. Moreover, you are of course free at anytime to bring forth whatever information you may deem relevant to the Commission's investigation of the alleged violations of the statute by your clients. In addition, should the General Counsel ultimately recommend to the Commission that it proceed to a consideration of a finding of probable cause to believe FCM and/or NCPAC violated the law, you will of course receive a copy of the General Counsel's brief and be able, pursuant to 2 U.S.C. § 437g(a)(3), to submit a brief stating the position of your client(s) on the legal and factual issues of the case and reply to the brief of the General Counsel.

I hope that this eliminates any questions you might have had regarding the Commission's merger of these two matters. However, should you have any additional questions or problems, please contact Ms. Marsha Gentner, the attorney assigned to this case at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel



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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans for Change,) MUR 1252
et al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 12, 1980, the Commission decided by a vote of 4-1 to take the following actions in the above-captioned matter:

1. Deny in all respects the motion to quash and the motion to modify the Commission subpoenas made by respondent National Conservative Political Action Committee.

2. Require respondent to answer all written questions submitted.

3. Authorize the Office of General Counsel to advise NCPAC of the above actions and redirect the respondent to appear in compliance with the subpoena and to file the written answers not yet provided.

Commissioners Harris, McGarry, Reiche, and Tiernan voted affirmatively for the decision; Commissioner Friedersdorf dissented. Commissioner Aikens abstained on the vote.

Attest:

12-15-80
Date

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS, COMMISSION SECRETARY MWE

DATE: DECEMBER 10, 1980

SUBJECT: OBJECTION FILED TO GENERAL COUNSEL'S December 8, 1980 Report on MUR 1252 circulated at 4:00 p.m. December 8, 1980 on a 48-hour tally basis by OCS.

The above-named report was objected to by Commissioner Friedersdorf at 2:31 p.m. on December 10, 1980.

This matter has been placed on the agenda for the Executive Session of Tuesday, December 16, 1980.

8304042114

December 8, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Jane Colgrove

SUBJECT: MUR12252

Please have the attached General Counsel's Report on MUR11252 distributed to the Commission on a 48 hour tally basis.

Thank you.

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 DEC 8 P2:25

December 8, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Jane Colgrove

SUBJECT: MUR 1252

Please have the attached General Counsel's Report on MUR 1252 distributed to the Commission on a 48 hour tally basis.

Thank you.

8304042116

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans for Change,) MUR 1252
et al.)

80 DEC 8 P2: 25

GENERAL COUNSEL'S REPORT IN OPPOSITION TO MOTION OF THE NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE TO QUASH AND MODIFY SUBPOENAS AND IN RESPONSE TO OBJECTIONS TO CERTAIN WRITTEN QUESTIONS

I. Summary of Proceedings

On October 1, 1980, the Federal Election Commission mailed a subpoena to produce documents and materials and an order to answer written questions to counsel for the National Conservative Political Action Committee ("NCPAC"). The subpoena and order seek to ascertain facts concerning the relationship between NCPAC and Ronald Reagan and his authorized committees for purposes of determining whether NCPAC's expenditures on behalf of Mr. Reagan's candidacy for the office of President are independent of the candidate and his authorized committees. In addition, the subpoena and order seek information concerning the relationship between NCPAC and "The Ronald Reagan Victory Fund" in order to ascertain whether the latter is an unauthorized committee using the name of the candidate in its name.

On October 14, 1980, NCPAC moved to quash or modify the subpoena and objected to certain of the written questions to which answers had been ordered.[1/] (See Attachments I and II). NCPAC's motion to quash or modify the subpoena and its objections to certain questions are based upon several arguments. First, NCPAC states that the subpoena and interrogatories are overbroad and inconsistent with the terms of the Commission's notification of reason to believe.

1/ NCPAC has submitted written answers to sections A and C of the interrogatories and has produced documents in response to sections 4, 5 and 11 of the Commission subpoena.

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It is asserted that pursuant to the requirements of 11 C.F.R. § 111.9(a) the Commission is required to notify the respondent of the section of the statute or regulations allegedly violated and of the factual basis allegedly supporting the finding, and that any inquiry pursued as a result of such finding is limited to the associations and activities constituting the facts which supported the Commission's determination. Respondent asserts that "the Commission may not inquire into others absent a finding of reason to believe that those activities or associations exist and that they violate statutes or regulations within the Commission's purview." (Motion to Quash, p. 3). NCPAC in keeping with this position has agreed to furnish documents which relate to the specific activities and associations set forth in the notification, but moves to quash or modify the remaining requests because "they are unsupported by any articulated finding of reason to believe that the questioned relationships or activities exist or, it they do exist, that they constitute a violation of any statute or regulation over which the Commission has jurisdiction". (Motion to Quash, p. 3).

Secondly, NCPAC argues that, even if some or all of the other relationships or activities included in the subpoena exist, the scope of questions is unreasonable. This alleged unreasonableness is based upon the claim that the document search required would be unduly burdensome because "NCPAC would be compelled to review all of its records in order to produce those requested," and upon the determination that the time period granted by the Commission is unreasonable. Burdensomeness is also cited as a reason for objecting to certain interrogatories.

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Thirdly, NCPAC argues that the Commission is barred by the decision in Common Cause, et al. v. Schmitt, et al, 80-1609 and 80-1754 (consolidated)(D.D.C. September 30, 1980), from enforcing the provisions of 26 U.S.C. § 9012(f)).

For the reasons set forth below the Office of General Counsel believes that the above arguments are without merit and recommends that NCPAC's motion to quash or to modify the subpoena be denied and that the respondent be required to answer all interrogatories.

II. Analysis

1. The Commission's Subpoena and Order are Consistent with the Notification of Reason to Believe, Are Reasonably Related to Its Investigation, and Are Not Unduly Burdensome.

NCPAC's assertion that the subpoena and order are overbroad and inconsistent with the Commission's notification of reason to believe demonstrates a misunderstanding of the relationship between the facts presented as the basis for a finding of reason to believe a violation has occurred and that finding itself. The Commission finds reason to believe that a violation has taken place, not that particular facts exist. Allegations of fact are required as bases for a finding of reason to believe and the opening of an investigation, but those facts do not define the parameters of the investigation. They serve as a starting point, not as the sole focus. Therefore, no future reason to believe findings are necessary as new facts are revealed which are relevant to a previous finding with regard to a particular portion of the statute or regulations. The statement in the notification sent to NCPAC to the effect that the Office of General Counsel had limited the basis of its recommendation of a finding of reason to believe to those facts deemed relevant was meant to convey that this

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Office had not used all of the information supplied by the complainant. The statement was not intended to preclude future additions to the information initially used which support the finding of an apparent violation.[2/]

NCPAC also argues that the subpoena and order are unreasonable because they are "unduly burdensome". According to counsel, the subpoena would require NCPAC to review all of its records before it could produce the records requested. However, in FTC v. Texaco, 555 F.2d 862, 882 (D.C. Cir., 1977), the court stated that "[s]ome burden on subpoenaed parties is to be expected and is necessary in furtherance of the agency's legitimate inquiry and public interest." The subpoenaed party must show that the request is unreasonable. Otherwise, it is the duty of a subpoenaed party to undertake whatever search is necessary to produce documents required.

In the present instance the Commission has the authority to determine the independence or non-independence of political committees. The subpoena is designed to help the Commission obtain facts which would reveal the relationship between NCPAC and Ronald Reagan and his authorized committees, if any, as well as provide a foundation for examination of witnesses upon oral deposition. As such, the contents of the subpoena and order are reasonably relevant to the objective of the investigation and therefore should not be quashed. See United States v. Morton Salt Co., 338 U.S. 632 (1950); Federal Trade Commission v. Texaco, 555 F.2d 862, 877 (D.C. Cir., 1977)(wide range of investigation is necessary and appropriate where numerous factual allegations in support of legal contention have been made);

2/ This explanation was given to NCPAC counsel at the meeting cited in counsel's letter; however, the misunderstanding apparently persists.

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FEC v. Machinists Non-Partisan Political League, Misc. Action No. 79-0291, (D.D.C., January 28, 1980)(findings of fact and conclusions of law); FEC v. Wisconsin Democrats for Change in 1980, No. 80-C-124, Opinion and Order at 5 (W.D. Wisc., April 24, 1980).

NCPAC's allegation that the time period granted by the Commission for production of documents is unreasonable is not supported by any statements explaining why NCPAC found itself unable to assemble the necessary documents within the stated period. NCPAC is an established committee with a professional staff and therefore, absent any showing to the contrary, should be able to gather the materials without undue effort.

NCPAC also asserts that the Commission is barred from enforcing 26 U.S.C. § 9012(f) by the recent decision of the three-judge District Court panel in Common Cause, et al. v. Schmitt, et al., that the provision is unconstitutional. The Commission is appealing the court's decision and therefore should not rescind or revoke its finding of reason to believe that § 9012(f) has been violated, but rather should take no further action regarding this violation at this time.

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III Recommendation

Both the motion to quash and the motion to modify the Commission subpoena made by respondent National Conservative Political Action Committee should be denied in all respects. In addition, respondent should be required to answer all written questions submitted. Staff would so advise NCPAC and redirect the respondent to appear in compliance with the subpoena and to file the written answers not yet provided.

Should NCPAC fail to comply fully with the subpoena and the order to submit written answers, we recommend authorization to institute a civil action pursuant to 2 U.S.C. § 437d(b).

8 December 1980
Date

Charles N. Steele
General Counsel

Attachments

1. Motion to Quash or Modify Subpoenas
2. Letter from NCPAC counsel re: written interrogatories
3. Answers and Objections to Interrogatories
4. Commission Orders (2)
5. Denial of Motion to Quash or Modify the Commission's Subpoena and Order
6. Requirement to Answer Written Interrogatories
7. Letter to NCPAC counsel

8304042113 2

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BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

ATTACHMENT I

October 14, 1980

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

Re: MUR 1252/Motion To Quash or Modify Subpoena

Dear Sir:

Pursuant to Federal Election Commission Regulations, 11 C.F.R. §111.15(a), National Conservative Political Action Committee (NCPAC), by counsel, hereby moves to quash or modify the subpoena duces tecum issued by the Federal Election Commission ("the Commission") in this matter on September 29, 1980, on the ground that such subpoena is overbroad and inconsistent with the terms of the Commission's Notification and Reason To Believe Finding that NCPAC has violated certain provisions of the Federal Election Campaign Act (2 U.S.C. §431, et seq.) and the Presidential Election Campaign Fund Act (26 U.S.C. §9001, et seq.) ("the Acts").

By Notification dated September 25, 1980, the Commission informed NCPAC that it had found reason to believe that NCPAC had violated certain provisions of the Acts having to do with limitations on contributions and expenditures on behalf of Ronald Reagan, and with respect to the use of Mr. Reagan's name in the title of its project, "The Ronald Reagan Victory Fund." The Commission's Regulations, 11 C.F.R. §111.9(a), require that in the event the Commission determines that there is reason to believe that a respondent has violated a statute or regulation over which the Commission has jurisdiction, it shall:

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> ...notify such respondent of the Commission's finding by letter, setting forth the sections of the statute or regulations alleged to have been violated and the alleged factual basis supporting the finding. (emphasis added).

Pursuant to that requirement, the Commission set forth in its Notification:

> ...only that evidence which the General Counsel's Office has found relevant to a determination of whether there is reason to believe that the expenditures by NCPAC are not "independent" expenditures, but rather in-kind contributions to Mr. Reagan. [Notification, at 3.]

The Commission then questioned certain specific activities with respect to expenditures made by NCPAC to certain vendors and others deemed to be "agents" of Ronald Reagan by virtue of their earlier use or employment by the Reagan Committee. The Commission also questioned a discrepancy between filings with the Commission by NCPAC and by the Reagan For President Committee with regard to a debt of $2,200.00 apparently owed by the Reagan for President Committee to NCPAC for "office equipment." Id. In addition, the Commission noted that NCPAC may have violated 2 U.S.C. §432(e)(4) by using the name of a candidate in the title of its project, "Ronald Reagan Victory Fund." Notification at 4-5.

The Commission therefore found reason to believe that:

1. NCPAC had violated 2 U.S.C. §441a(a) and 26 U.S.C. §9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan.

2. That NCPAC had violated 26 U.S.C. §9012(f) by making excessive independent expenditures on behalf of Ronald Reagan.

3. That NCPAC had violated 2 U.S.C. §432(e)(4).

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As to the Commission's first finding, it is the position of NCPAC that the scope of the Commission's inquiry is limited by those activities and associations referred in Part A of the Notification. Having raised questions with regard to those activities and associations in support of its "reason to believe finding," the Commission may not inquire into others absent a finding of reason to believe that those activities or associations exist, and that they may violate statutes or regulations within the Commission's purview. In short, it is NCPAC's position that the Commission's regulation, which requires the Commission to particularize its findings and the factual basis in support of those findings, thereby necessarily limits the scope of its inquiry as to those findings.

Accordingly, in response to the Commission's subpoena, NCPAC will produce on or before the date specified therein those documents referred to in the requests numbered 4, 5, and 11. NCPAC hereby moves to quash or modify the subpoena as to the remaining requests on the ground that they are unsupported by any articulated finding of reason to believe that the questioned relationships or activities exist or, if they do exist, that they consititute a violation of any statute or regulation over which the Commission has jurisdiction.

Even if the Commission determines from evidence before it that there exist some or all of the other questioned relationships or activities, it is the position of NCPAC that even then the scope of questions relating thereto must be reasonable. As the document requests are now framed, they are unduly burdensome since, to comply with the Commission's requests, NCPAC would be compelled to review all of its records in order to produce those requested. Moreover, the short time period granted by the Commission in which to produce the volume and nature of the documents requested makes the Commission's request unreasonable.

As to the Commission's second finding, NCPAC asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause, et al. v. Schmidt, et al., (80-1609 and 80-1754 (consolidated),

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September 30, 1980), to which the Commission was a party, bars any attempt by the Commission to enforce 26 U.S.C. §9012(f) as it is written, or to inquire into expenditures by NCPAC on behalf of Ronald Reagan irrespective of the independence of NCPAC from Reagan or his authorized committees. Absent any finding by the Commission of reason to believe that NCPAC is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

At a meeting conducted at the offices of Lawrence M. Noble, Assistant General Counsel to the Commission, Mr. Noble informed the undersigned counsel that after a review of the Carter-Mondale/Democratic National Committee complaint which generated this action, only those items set out in the Notification were deemed worthy of consideration by the Commission. Thus, any future "reason to believe finding" by the Commission must be supported either by another, different complaint, or must be based upon an internally-generated recommendation.

Wherefore, NCPAC moves the Commission to quash or modify its subpoena as to the requests numbered 1-3, and 6-10 therein.

Sincerely,

Robert R. Sparks, Jr.

J. Curtis Herge

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BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

ATTACHMENT 2

October 14, 1980

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

Re: MUR 1252

Dear Mr. Steele:

Submitted herewith are the sworn written answers of Mr. John T. Dolan, Chairman of National Conservative Political Action Committee (NCPAC) to written Interrogatories propounded by the Commission to NCPAC on September 29, 1980, transmitted by the Commission to counsel for NCPAC on October 1, 1980, and received by counsel on October 2, 1980. Included therein are objections to certain of the Commission's questions, together with reasons in support of those objections.

Also enclosed is NCPAC's motion to quash or modify the subpoena duces tecum issued by the Commission, transmitted, and received with the Commission's Interrogatories. Reference is made to the letter of October 9, 1980, from Lawrence M. Noble, Assistant General Counsel, to counsel for NCPAC with respect to the timeliness of the filing of the motion to quash.

It is understood that this motion to quash or modify the Commission's subpoena will be submitted to the Commission for its determination and that counsel for NCPAC will be notified of the Commission's decision. Counsel has been informed that where the Commission denies an application to quash or modify a subpoena the office of general counsel customarily affords a respondent further opportunity to comply before seeking any enforcement remedies.

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I look forward to notification of the Commission's decision in this matter.

Sincerely,

Robert R. Sparks, Jr.

enclosures

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ATTACHMENT 3

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al., Complainants, -against- RONALD REAGAN, et al., Defendants.	MUR 1252

ANSWERS TO INTERROGATORIES

COMES NOW, National Conservative Political Action Committee (NCPAC); by its Chairman, John T. Dolan, and in response to the written Interrogatories from the Federal Election Commission to NCPAC in this matter, answers as follows:

A. NCPAC is a multi-candidate political committee one of whose objects is to further the election of Ronald Reagan to the office of President of the United States. NCPAC pursues this object through the "Ronald Reagan Victory Fund, a project of National Conservative Political Action Committee." The Ronald Reagan Victory Fund is not a separate entity, but is a project of NCPAC.

With regard to the specific questions raised by the Commission concerning the relationship of NCPAC to the Ronald Reagan Victory Fund ("the Fund"):

1.) The Fund does not maintain a bank account separate and apart from NCPAC, although NCPAC does maintain a separate internal ledger accounting for receipts and expenditures on behalf of the Fund.

2.) The Fund does not employ a staff separate and apart from that of NCPAC.

3.) Most of the solicitations or requests for contributions to the Fund ask that checks be made payable to the Fund. Some solicitations have requested that contributions be made to NCPAC.

4.) Monies received from checks received by NCPAC which were made payable to NCPAC have been used by the Fund. All contributions to NCPAC or to the Fund are reported to the Commission by NCPAC as having been received by NCPAC.

5.) The account into which funds contributed to or for the Fund are deposited is in the name of NCPAC and all such funds are commingled with the funds of NCPAC.

B. NCPAC objects to this question as being unreasonable and overbroad in that it requests information beyond the scope of the Commission's findings of reason to believe that NCPAC has violated statutes or regulations over which the Commission has jurisdiction. Moreover, to supply the information requested would require that NCPAC conduct a systematic search of all of its records, and to do so within the time period afforded by the Commission would unduly burden NCPAC and its personnel.

C. NCPAC has not transferred any items of the type listed in this Interrogatory to the Reagan General Election Committee since January, 1980. In September, 1979, NCPAC transferred certain typewriters to that Committee in consideration of the payment by that Committee of $2,200.00, which amount was paid in full by the Committee to NCPAC on or about July 15, 1980.

D. See response to Interrogatory B.

E. See response to Interrogatory B.

F. See response to Interrogatory B.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

JOHN T. DOLAN

SUBSCRIBED and sworn to before me this 14th day of October, 1980.

Notary Public

My commission expires: 2/6/84

ATTACHMENT 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The motion of the National Conservative Political Action Committee to quash or modify the Commission order to produce documents and materials and to answer questions is denied. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

Date

Max Friedersdorf, Chairman
Federal Election Commission

Attest:

Marge W. Emmons
Secretary to the Commission

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ATTACHMENT 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DENIAL OF MOTION TO QUASH
OR MODIFY THE COMMISSION'S
SUBPOENA AND ORDER

The Federal Election Commission hereby denies the Motion of the National Conservative Political Action Committee to Quash or Modify the Commission's Order to Produce Documents and Materials and to Answer Questions.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

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ATTACHMENT 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

REQUIREMENT TO ANSWER
WRITTEN INTERROGATORIES

The Federal Election Commission hereby requires the National Conservative Political Action Committee to answer all written interrogatories.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

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ATTACHMENT 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1252

Dear Mr. Sparks and Mr. Herge:

The Commission has received the Motion to Quash or Modify Subpoena filed by you on behalf of the National Conservative Political Action committee ("NCPAC") and also sworn written answers by Mr. John T. Dolan to certain interrogatories, together with objections to other particular questions. The Commission reviewed and considered the motion and the answers and objections to the written interrogatories, and on November , 1980, voted to deny NCPAC's motion and to require answers to all written questions submitted.

Accordingly, NCPAC is requested to produce for inspection and copying the documents previously described in the Commission's October 1, 1980, subpoena, and not yet produced, at Room 706, 1325 K Street, N.W., Washington, D.C., on November , 1980, and all subsequent business days thereafter required to complete inspection. Answers not yet provided to all written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

With respect to compliance with the Commission's previously issued subpoena and order, we direct your attention to the specific directions for proper compliance set out in the paragraph preceeding the document requests on page three of the subpoena sent to NCPAC.

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If you have any questions or problems, please contact Ms. Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Commission Orders

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WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-831-0696
CABLE: SEDANHERGE

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October 28, 1980

Honorable Max L. Friedersdorf
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

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FEDERAL ELECTION COMMISSION
CENTRAL INVESTIGATIVE FILE

Re: MUR 1252 and MUR 1299

Dear Mr. Friedersdorf:

On September 25, 1980, the Federal Election Commission ("the Commission") notified the undersigned counsel for National Conservative Political Action Committee ("NCPAC") that with respect to that certain complaint filed with the Commission on July 2, 1980 by the Carter-Mondale Reelection Committee, Inc. (MUR 1252), the Commission had found reason to believe that NCPAC had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Chapter 95, Title 26, U.S. Code.

By letter dated October 2, 1980, Mr. Charles N. Steele, General Counsel to the Commission, notified NCPAC that Common Cause had also filed a complaint with the Commission, denominated MUR 1299 by the Commission, alleging that NCPAC, together with other named respondents, may have violated certain provisions of the Act, and Chapters 95 and 96 of Title 26, U.S. Code. On October 20, 1980, counsel for NCPAC filed with the Commission, pursuant to 2 U.S.C. §437g(a)(1) and 11 C.F.R. 111.6, NCPAC's response to the Common Cause complaint. In its response, NCPAC asserted that no action should be taken against NCPAC on the basis of the complaint, and that the complaint should be dismissed as to NCPAC, on the ground that the complaint failed to meet the technical requirements of 11 C.F.R. 111.4, in that it did not contain a clear and concise recitation of facts which describe a violation of a statute or regulation over which the Commission has jurisdiction.

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NCPAC has not been notified of any action by the Commission with respect to NCPAC's response to the Common Cause complaint. However, counsel for NCPAC has been notified by Mr. Steele, by letter dated October 23, 1980, that on October 15, 1980, the Commission voted to merge the complaint filed by Common Cause (MUR 1299) with the complaint of the Carter-Mondale Reelection Committee (MUR 1252), and to treat both as a single investigatory matter. From that decision NCPAC appeals, moves the Commission to reconsider its action and rescind its decision merging both complaints, and to consider each complaint on its own merits.

When it voted to merge MUR 1252 and MUR 1299, the Commission acted without having considered NCPAC's response to the Common Cause complaint and, in point of fact, before NCPAC had even responded to that complaint. The Commission's purported merger of the complaints is not only untimely and prejudicial to NCPAC, but is also beyond the scope of its authority. Further, it is NCPAC's position that the effect of the merger is to accelerate the investigatory process as to MUR 1299 to the same stage as MUR 1252. In short, by failing to consider NCPAC's response to the Common Cause complaint, and by merging the complaints, the Commission has omitted a step in the investigatory scheme set by Congress, and has instead taken a step unauthorized and unrecognized by either Congressional statute or Commission regulation.

Section 437g(a)(1) of the Act provides in part:

> Before the Commission conducts <u>any</u> vote on the complaint, other than a vote to dismiss, any person so notified [of the filing of a complaint] shall have the opportunity to demonstrate, in writing, to the Commission within 15 days after notification that no action should be taken against such person on the basis of the complaint. [Emphasis supplied.]

The Commission's regulations provide:

> The Commission <u>shall not take any action</u>, or make any finding, against a respondent other than action dismissing the complaint, unless it has

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considered such response or unless no such response has been served upon the Commission within the fifteen (15) day period specified in 11 C.F.R. 111.6(a). [11 C.F.R. 111.6(b), Emphasis supplied.]

The Commission could not take the action which it did in MUR 1299, because, on October 15, 1980, when it purported to merge MUR 1252 and MUR 1299, NCPAC had not yet been afforded the opportunity granted it by statute and regulation to respond to the Common Cause complaint. The Commission acted before the period within which NCPAC was required to respond, and before it had in fact responded to the complaint. The Commission was therefore absolutely barred by statute and its own regulation from taking <u>any action</u> when it did, other than action dismissing the complaint.

The Commission's purported merger of MUR 1299 with MUR 1252 is tantamount to a determination by the Commission of reason to believe that as to the Common Cause complaint (MUR 1299), NCPAC has violated a statute or regulation cognizable by the Commission. The merger has effectively accelerated the investigatory process as to MUR 1299, for the Commission has already found reason to believe as to MUR 1252. Therefore, the Commission's action in merging the complaints is to the detriment of respondent NCPAC; it is "action taken against a respondent," 11 C.F.R. 111.6(b), and is expressly prohibited by regulation. Even if the Commission does not agree that it has accelerated the investigatory process to the detriment of NCPAC, it has clearly violated the plain wording of §437g(a)(1) of the Act, which prohibits <u>any</u> vote on a complaint, other than a vote to dismiss, during the pendency of the period of response to that complaint.

Not only is the Commission's action untimely, but the action itself is unsanctioned, either by statute or regulation. There is no authorization for the Commission to merge one complaint with another, particularly in the absence of a request for such a merger from the complainant or any of the respondents. The procedure to be followed by the Commission in reviewing and investigating complaints, voting to take action thereon, dismissing complaints, making

findings thereon, or seeking judicial relief with respect to any violation of any statute or regulation cognizable by the Commission, is expressly set out in the regulations of the Commission. The Commission's authority is a creature of statute and regulation and it cannot be expanded by custom, practice, or expediency. There is no statutory or regulatory provision which permits the Commission to merge one complaint with another, and its purported merger is therefore beyond its authority and without effect.

For the reasons advanced above, NCPAC contends that the Commission's purported merger of MUR 1252 and MUR 1299 is not permitted by law and operates to the detriment of respondent NCPAC. Accordingly, NCPAC requests the Commission to rescind its "merger" of the complaints, to consider each on its own merits, and to dismiss MUR 1299 as to NCPAC for the reasons stated in NCPAC's response thereto, filed with the Commission on October 20, 1980.

Please feel free to contact me if you have any questions on this matter.

Sincerely,

J. Curtis Herge
Counsel for National
Conservative Political
Action Committee

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SEDAM & HERGE
ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

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Honorable Max L. Friedersdorf
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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RAD 80L-159

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE October 24, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Marsha Gentner

TEAM CHIEF Bobby Werfel BW

COMPLIANCE REVIEW B

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1252

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

Entries on reports of National Conservative Political Action Committee and Fund For A Conservative Majority showing the use of the same legal services as the Reagan-Bush Compliance Fund. Attachment #1

Entries on reports of National Conservative Political Action Committee showing the use of the same vendor as the Reagan-Bush Complinace Fund. #2

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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ATTACHMENT #1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Exempt Fundraising, Legal and Accounting, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 8 of ____
LINE NUMBER 24

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

Name of Candidate or Committee in Full

REAGAN BUSH COMPLIANCE FUND

A. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Rent-All Center 8412 Richmond Highway Alexandria, VA 22304	Equipment Rental	8/29/80	149.76
B. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Gaug, Tyre, & Brown 6400 Sunset Building Los Angeles, CA 90028	Legal Services	8/29/80	7,500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Sedam & Berge 7600 Old Springhouse Road McLean, VA 22102	Legal Services	8/29/80	2,661.56
D. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Air & Cruise Administration 1426 H. Street, N.W. Washington, D.C. 20005	Air Travel	8/29/80	419.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Metro-Printing & Mailing Services, Inc. 1200 S. Sterling Blvd. Sterling, VA 22170	Printing	8/29/80	677.82
F. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Betty Gillian 2701 S. Walter Reed Arlington, VA 22206	Rent	8/29/80	1,500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ted Wroblicky 1324 La Sierra Drive Sacramento, CA 95825	Check Voided	8/31/80	(2,009.84)
H. Full Name, Mailing Address and ZIP Code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of Expenditures This Page (optional)	$ 10,898.30
TOTAL This Period (last page this line number only)	$

Approved by G.A.O. B-187430 (R0371), Expires 83-2-28

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 11 of 16 for Line Number 21b
Use separate schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
Natioanl Conservative Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Virginia Employment Commission P.O. Box 1358 Richmond, VA 23211	Late Filing Penalty Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/8/80	32.58
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sedam & Herge 7600 Old Springhouse Road McLean, Virginia 22102	Legal Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/8/80	1,820.87
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Acro Van Lines	Wharehousing Charges Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/8/80	63.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lisa Stoltenburg 51 D Street, S.E. Washington, D.C. 20003	Reimbursement of Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/11/80	18.71
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
John T. Dolan 3129 S. 14th Street Arlington, VA 22204	Payroll Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/11/80	304.98
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Candace M. Taw 5520 N. Morgan Street #201 Alexandria, VA 22312	Payroll Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/11/80	247.16
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Susan S. Hannegan	Payroll Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/11/80	419.84
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lisa Stoltenburg	Payroll Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/11/80	468.26
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Eleanor Hannegan 9717 Donneybrook Court #201 Annendale, VA 22003	Payroll Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/12/80	320.77
SUBTOTAL of Disbursements This Page (optional)			$3,693.17
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 5 of 12 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)

The Fund for a Conservative Majority

	Purpose of Disbursement / Disbursement for: ☐Primary ☐General ☐Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Cash	Adv. on exp. for Board meeting.	9/5/80	100.00
B. Full Name, Mailing Address and ZIP Code Cash	To reimburse petty cash	9/5/80	67.56
C. Full Name, Mailing Address and ZIP Code Sedam & Berge 7600 Old Springhouse Rd. McLean, VA 22102	August retainer/fees	9/5/80	3000.00
D. Full Name, Mailing Address and ZIP Code Cash	Adv. on exp. for Board meeting.	9/5/80	50.00
E. Full Name, Mailing Address and ZIP Code Jorge Sanchez	Cleaning Services	9/8/80	33.25
F. Full Name, Mailing Address and ZIP Code Thompson & Assoc. Inc. 7015 Old Keene Mill Rd. Springfield, VA 22150	Postage for Direct Mail	9/9/80	400.00
G. Full Name, Mailing Address and ZIP Code Petty Cash	To reimburse petty Cash	9/8/80	78.81
H. Full Name, Mailing Address and ZIP Code Cash	Reimbursement petty cash office supplies.	9/9/80	111.31
I. Full Name, Mailing Address and ZIP Code Central Fidelity Bank	For FICA/FED deposit	9/9/80.	3232.88
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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ATTACHMENT #2

8304042111 76

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Exempt Fundraising, Legal and Accounting, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 8 of ____
Last Number 24

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

Name of Candidate or Committee in Full

REAGAN BUSH COMPLIANCE FUND

	Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
A.	Rent-All Center 8412 Richmond Highway Alexandria, VA 22306	Equipment Rental	8/29/80	149.76
B.	Gaug, Tyre, & Brown 6400 Sunset Building Los Angeles, CA 90028	Legal Services	8/29/80	7,500.00
C.	Sedam & Berge 7600 Old Springhouse Road McLean, VA 22102	Legal Services	8/29/80	2,661.56
D.	Air & Cruise Administration 1426 H. Street, N.W. Washington, D.C. 20005	Air Travel	8/29/80	419.00
E.	Metro-Printing & Mailing Services, Inc. 1200 S. Sterling Blvd. Sterling, VA 22170	Printing	8/29/80	677.82
F.	Betty Gilliam 2701 S. Walter Reed Arlington, VA 22206	Rent	8/29/80	1,500.00
G.	Ted Wroblicky 1324 La Sierra Drive Sacramento, CA 95825	Check Voided	8/31/80	(2,009.84)
H.	Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period

SUBTOTAL of Expenditures This Page (optional)	$ 10,898.30
TOTAL This Period (last page this line number only)	$

Approved by G.A.O. B-181639 (R0571), Expires 82-2-28

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SCHEDULE B P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Exempt Fundraising, Legal and Accounting, Transfers Out, Contributions In-Kind, Loans, Loan Repayments and Refunds Made)

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 5 of ____
LINE NUMBER 24

Use separate sched(s) for each numbered line

NOTE: *Any information reported herein may not be copied for sale or use by any person for purpose of soliciting contributions or for any commercial purpose.*

Name of Candidate or Committee in Full

REAGAN BUSH COMPLIANCE FUND

A. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Benchmark Systems 2000 N. 16th St. Arlington, VA 22201	Calculators & Paper	8/15/80	634.08
B. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Metro 1200 S. Sterling Blvd. Sterling VA 22170	Printing of Forms	8/15/80	677.82
C. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Potomac Mini Storage 7150 Fullerton Rd. Springfield, VA 22151	Storage	8/16/80	142.00
D. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Metro Printing Services 1200 South Sterling Blvd. Sterling, VA 22031	Printing	8/18/80	160.01
E. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Neal Peden 5923 Minuteman Rd. Springfield, VA 22152	Reimbursement for Travel Expense	8/18/80	111.50
F. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Vichers B. Bryan 901 S. Highland St. Arlington, VA 22204	Reimbursement for Travel	8/18/80	19.50
G. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
U.S. Postmaster 3118 Washington Blvd. Arlington, VA 22210	Zip Code Books	8/18/80	15.00
H. Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Steve Nedberg 1404 Mount Royal Ave. Baltimore, MD 21214	Reimbursement for Office Supplies	8/19/80	10.91
SUBTOTAL of Expenditures This Page (optional)			$ 1,770.82
TOTAL This Period (last page this line number only)			$

Approved by GAO, B-181630 (R0579), Expires 82-2-28

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FEC FORM 5

ITEMIZED INDEPENDENT EXPENDITURES

Page 6 of 32 Pages

Name of Committee (In Full)
National Conservative Political Action Committee

I.D. No.
C00024687

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (Month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
U.S. Postmaster	Postage	8/5/80	45,000.00	Reagan President ☒ Support ☐ Oppose
Metro Printing & Mailing P. O. Box 2626 Sterling, VA	Envelopes Purchase	8/5/80	7,833.70	Reagan President ☒ Support ☐ Oppose
U. S. Postmaster	Postage	8/5/80	9,000.00	Reagan President ☒ Support ☐ Oppose
Metro Printing & Mailing	Printing	8/8/80	2,100.00	Reagan President ☒ Support ☐ Oppose
Tri-State Envelope	Printing	8/8/80	1,569.40	Reagan President ☒ Support ☐ Oppose
D. C. Lithorgraphers	Printing	8/8/80	3,800.00	Reagan President ☒ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$69,303.10	
(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 targeting of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate his campaign committee or their agent.

Signature _____ Date _____

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 11 of 52 Pages

Name of Committee (In Full)	I.D. No.
National Conservative Political Action Committee	C00024687

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Mid America Communications Box 25 Sioux Falls, SD 57111	Production Cost	8/12/80	118.46	McGovern U.S. Senate SD ☐ Support ☒ Oppose
U. S. Postmaster	Postage	8/15/80	36,000.00	Reagan President ☒ Support ☐ Oppose
Metro Printing	Printing	8/20/80	2,167.06	Reagan President ☒ Support ☐ Oppose
American Mail List	Mail List Rental	8/22/80	1,070.00	Reagan President ☒ Support ☐ Oppose
Diversified Mail Services	Mail Services	8/22/80	6,596.78	Reagan President ☒ Support ☐ Oppose
Richard A. Viguerie Co.	Mail Fees & Mail List Rental Computer Svc	8/22/80	4,481.41	Reagan President ☒ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$ 50,433.71	
(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.

Signature _____ Date _____

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC _____

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INDIVIDUALS

ITEMIZED INDEPENDENT EXPENDITURES

(Use Reverse Side for Instructions)

Page 32 of 99 Pages

Name of Committee (In Full)	I.D. No.
National Conservative Political Action Committee	C00024687

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (Month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Mt. Vernon Publishing Co.	Printing	7/14/80	46.80	Bayh U. S. Senate IN ☐ Support ☒ Oppose
Mt. Vernon Publishing Co.	Printing	7/14/80	46.80	Church U. S. Senate ID ☐ Support ☒ Oppose
Mt. Vernon Publishing Co.	Printing	7/14/80	46.80	Culver U. S. Senate IO ☐ Support ☒ Oppose
Mt. Vernon Publishing Co.	Printing	7/14/80	46.80	Cranston U. S. Senate CA ☐ Support ☒ Oppose
Metro Printing & Mailing	Printing	7/14/80	388.74	Reagan President ☒ Support ☐ Oppose
Diversified Mail Service	Mail Services	7/14/80	73.22	Culver U. S. Senate IO ☐ Support ☒ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 649.10

(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.

_____ _____

Signature Date

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

_____

NOTARY PUBLIC

FEC FORM 5

ITEMIZED INDEPENDENT EXPENDITURES

Page 35 of 99 Pages

(See Reverse Side for Instructions)

Name of Committee (In Full)	I.D. No.
National Conservative Political Action Committee	C00024687

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (Month, day, year)	Amount	Name of Person or Candidate supported or opposed by the expenditure & office sought
Metro Printing & Mailing Services	Printing	7/25/80	552.52	Reagan President ☒ Support ☐ Oppose
Diversified Direct Inc.	Printing	7/25/80	1,839.15	Reagan President ☒ Support ☐ Oppose
DC Lithographers, Inc. 7942 L Angus Ct Springfield, VA 22153	Printing	7/25/80	1,400.00	Reagan President ☒ Support ☐ Oppose
Diversified Mailing Svc	Mail Services	7/25/80	5,000.00	Reagan President ☒ Support ☐ Oppose
Composition Systems Inc.	Typesetting	7/25/80	54.86	Reagan President ☒ Support ☐ Oppose
Berlin & Jones Co., Inc.	Printing	7/25/80	2,000.00	Reagan President ☒ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ 10,846.53

(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 funding of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

_____ _____
Signature Date

Subscribed and sworn to before me this _____ day of _____, 19____.

My Commission expires _____

_____
NOTARY PUBLIC

83040211387

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

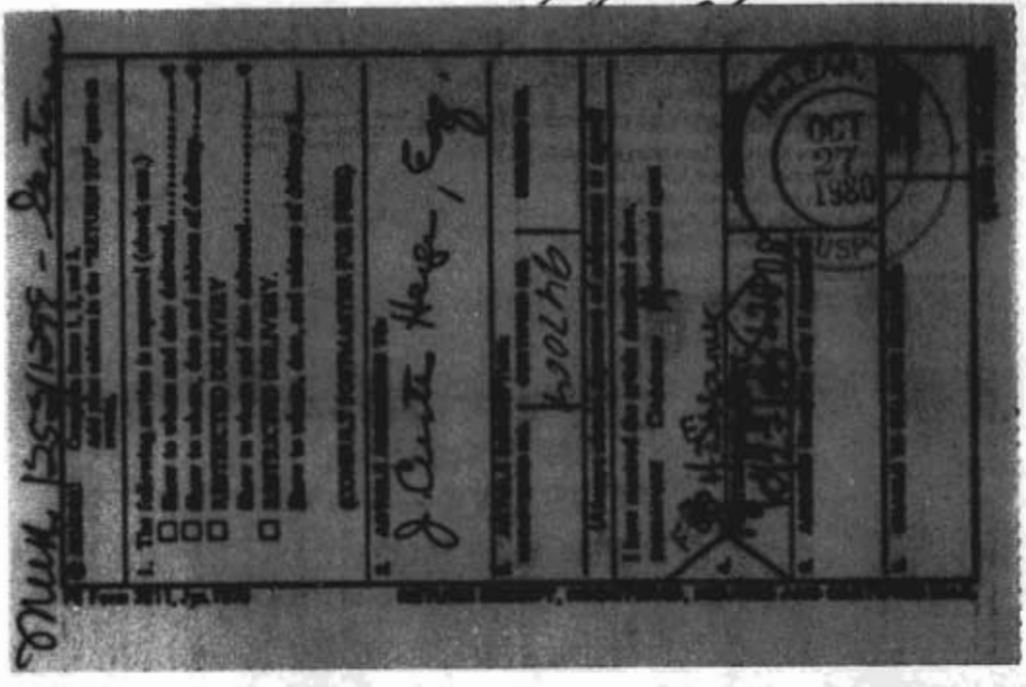
Re: MUR 1252 and MUR 1299

Dear Mr. Herge:

On September 25, 1980 you were notified of the Commission's findings concerning your client, National Conservative Political Action Committee (NCPAC), with respect to the complaint filed by the Carter-Mondale Reelection Committee and captioned MUR 1252. On September 29, 1980 the Commission received a complaint filed by Common Cause against your client, and a copy of that complaint was mailed to NCPAC. This letter is to further notify you that on October 15, 1980, the Commission voted to merge the complaint in MUR 1299 with MUR 1252, and to treat it as a single investigatory matter.

If you have any questions with respect to this or any other Commission action, please call Marsha G. Gentner, Anne A. Weissenborn, or Patricia F. Bak at (202) 523-5071.

Sincerely,



8304042118

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252 and MUR 1299

Dear Mr. Herge:

On September 25, 1980 you were notified of the Commission's findings concerning your client, National Conservative Political Action Committee (NCPAC), with respect to the complaint filed by the Carter-Mondale Reelection Committee and captioned MUR 1252. On September 29, 1980 the Commission received a complaint filed by Common Cause against your client, and a copy of that complaint was mailed to NCPAC. This letter is to further notify you that on October 15, 1980, the Commission voted to merge the complaint in MUR 1299 with MUR 1252, and to treat it as a single investigatory matter.

If you have any questions with respect to this or any other Commission action, please call Marsha G. Gentner, Anne A. Weissenborn, or Patricia F. Bak at (202) 523-5071.

Sincerely,

8304042118

MUR
10/20/80

GC
3034

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
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

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

October 20, 1980

Ms. Marsha G. Gentner
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252

Dear Ms. Gentner:

In accordance with your instructions to me by telephone this date, as counsel for National Conservative Political Action Committee (NCPAC), I deliver herewith those documents, or their equivalent, and explanations thereof, requested at numbers 4, 5 and 11 of the Commission's subpoena duces tecum issued in this matter on September 29, 1980. This will also confirm your assurance to me that delivery in this manner by close of business, October 20, 1980, will constitute compliance with the Commission's subpoena, except as to those requests as to which NCPAC has already filed a motion to quash or modify the subpoena.

There is enclosed the following:

1. Copies of NCPAC checks, printing company invoices, materials printed thereby, and NCPAC purchase orders describing the services to be performed, as to each of the expenditures by NCPAC to Diversified Direct, Inc. questioned in the Commission's "reason to believe finding," dated September 25, 1980. As to a purported expenditure on June 2, 1980 to Diversified, I enclose a letter from Candace Taw, NCPAC's office manager, reflecting that a review of NCPAC's filings with the Commission and of its own files has revealed no payment on June 2, 1980 to Diversified, as alleged by the Commission in its September 25 notification of finding.

8304042119

2. Similar documentation as to an expenditure by NCPAC to Tri-State Envelope Corp.

Please note that as to both of the above groups of expenditures, NCPAC's purchase orders reflect that NCPAC provided camera-ready art to the printer. This art was produced for NCPAC by vendors other than those as to which the Commission has raised a question concerning their use by Mr. Reagan or his authorized committees.

3. Copies of NCPAC's check dated June 5, 1980, to Arthur Finkelstein & Associates, Finkelstein's statement for and explanation of services rendered, and Finkelstein's further explanations of the "polling services" rendered to NCPAC, indicating that neither the poll nor its results inured to the benefit of Mr. Reagan, and were not "accepted" by him. The poll itself and the results thereof are withheld on the ground that their production would unduly burden NCPAC, as the poll itself runs to several hundred pages and would involve undue time and expense to produce herewith.

4. Copy of a letter from NCPAC's office manager explaining the circumstances surrounding the sale of a "memory typewriter" by NCPAC to a Reagan committee. No documentation of this transaction exists other than a copy of the Committee's cancelled check which must be obtained from NCPAC's bank. A copy of that check can be produced on request of the Commission.

I trust you will find the documents produced by NCPAC herewith responsive to the Commission's needs. Please feel free to contact me if you have any questions on this matter.

Sincerely,

Robert R. Sparks, Jr.

Enclosures

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FEDERAL ELECTION COMMISSION

Account Numbers

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	X	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne R. Weissenborn

Date 6/9/83

FEC 9-21-77

8304042137

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 618, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

1613

May 23, 1980

PAY N.C.P.A.C. 1513.80 DOLLARS $ 1513.80

TO THE ORDER OF
Diversified Direct, Inc.
c/o U.V.B. Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVC-3 V-3

DATE	DESCRIPTION	AMOUNT
4/15/80	For payment of invoice #A 1919	$1513.80
	#524C IE Reagan	

B 3040427

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1919

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 / NCPAC 7269	4/10/80	1692 / 10563	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
348 M	RE: PRINTING SERVICES, POSTCARDS. Postcards, with 2 color face and 1 color back.	4.35/M	1,513.80
	TOTAL INVOICE:		$1,513.80

71,000 308.85 87D

-71,000 308.85 87W1

-206,000 896.10 20D

524 C IE Reagan

C33156

8330421 8

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C788

P.O. NO. NCPAC-7269

DATE April 3, 1980

DATE REQUIRED April 10-11, 1980

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

SHIP TO Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/HouseProspect/Bufkin-Taylor/Mail Codes 87M, M1, 20C

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
348,000		ITEM: Postcard coded PW7 Size: 3 1/2" x 5 1/2" Stock: ~~[illegible]~~ 75lb. Ei-bulk white Ink: PMS 185 Red and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$4.35M	TOTAL: $1513.80

ACCOUNT REP

Chris Bufkin

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

L. Titlow

PURCHASING AGENT

FOR OFFICE USE ONLY	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ADDITIONAL INFORMATION

Smith- no bid does not have enough stock, Prep$4.

Place
Stamp
Here

Governor Ronald Reagan
9841 Airport Blvd., #1430
Los Angeles, CA 90045

FIRST CLASS

8304042111911

Dear Governor Reagan:

I understand Federal Election Law prohibits your campaign from spending the funds you need in remaining crucial primary states.

I wanted to let you know that I am making a personal contribution today to an independent campaign on your behalf sponsored by the National Conservative Political Action Committee.

Please accept my best wishes in your campaign for the President. I am behind you 100%.

Sincerely,

PWT

NATIONAL CONSERVATIVE
SUITE 615, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

[illegible] Bank
Enterprise, Virginia

1686

June 13, 80

PAY N.C.P.A.C. 7528 24/100 DOLLARS $ 7528.24

TO THE ORDER OF
Diversified Direct
c/o UVB Box 179
Alexandria, VA 22314

Candice M. Tow
Sr. Acct. NOT NEGOTIABLE

[illegible]

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT
4/15/80	For payment of invoice #1942 and partial payment of invoice #1913 #524C IE Reagan	$7528.24

[illegible]

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1913

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd,
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7271	4/15/80	1691 / 10567	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, ADS.		
348 M	Reagan ads, with 1 color face on 1 side only.	8.97/M	3,121.56
	TOTAL INVOICE:		$3,121.56
	87W - 87W1 - 20D		Partial 1,600.00
	#524 C IE Reagan		62.43

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

☐ SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO C788

P.O. NO. NCPAC- 7271

DATE April 3, 1980

DATE REQUIRED April 4, 1980 approved

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

SHIP TO Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/House-Prospect/Bufkin-Taylor/Mail Codes 87W, W1, 20D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
348,000		ITEM: Reagan Ad coded FW7 Size: 8" x 10" Stock: ~~White offset~~ 50lb white offset Ink: Black Prints: 1/0 (1 20% screen black) Fold into equal thirds, head out Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$8.97M	
			TOTAL	$3121.56M

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

PURCHASING AGENT L. Titlow

FOR OFFICE USE ONLY	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO(S)	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ADDITIONAL INFORMATION

SMith$9.53, M, Prep$ 10.20M

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1942

DATE April 15, 1980

TO:

National Political Action Committee.
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7270	4/10/80	1681 10562	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER LETTERS.		
205 M	Comp. letters with 1 color face and 1 color back. Coded: L 20 D.	16.38/M	3,357.90
143 M	Comp letters same specs. Coded: LW7	16.38/M	2,342.34
			5,700.24
	4% Va. tax:		228.00
	TOTAL INVOICE:		$5,928.24

8304019 3

8700 87401

87W - 87W1 - 524-C - Lt. Reagan

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Urgentgram

From:	Response Requested by
To:	

[redacted]

URG

8304211961

Authorized and paid for by the National Conservative Political Action Committee

8304042I197

Urgentgram

URGENT REPLY REQUESTED NO LATER THAN

IN POPULARITY. REAGAN WILL LOSE VALUABLE MOMENTUM IF HE CANNOT MAINTAIN HIS CAMPAIGN ADVERTISING PROGRAM IN HIGH GEAR IN THE MAY-JUNE PRIMARIES. CARTER CAN PULL AHEAD BECAUSE OF THE FREE ADVERTISING HE GETS AS A SITTING PRESIDENT.

NCPAC HAS AND WILL RUN "INDEPENDENT" PRO-REAGAN ADS TO MAKE SURE THIS DOES NOT HAPPEN.

I AM CONVINCED RONALD REAGAN IS A DEDICATED CONSERVATIVE WHO WILL HELP TURN THIS COUNTRY AROUND IF ELECTED.

BUT, ASIDE FROM THIS, I AM DETERMINED TO HELP GOVERNOR REAGAN NOW FOR TWO REASONS:

1. WHEN NCPAC WAS FOUNDED IN 1976 RONALD REAGAN SIGNED A LETTER PERSONALLY ASKING HIS SUPPORTERS AND OTHER CONSERVATIVES ALL OVER THE COUNTRY TO HELP US. IN FACT NCPAC WAS THE ONLY ORGANIZATION RONALD REAGAN HELPED IN 1976.

   MANY THOUSANDS OF CONSERVATIVES RESPONDED TO HIS CALL. HE IS ONE OF THE MAIN REASONS NCPAC IS HERE TODAY WITH A 71% WIN RECORD AGAINST THE LIBERALS.

2. AN OVERWHELMING MAJORITY OF NCPAC SUPPORTERS--PERHAPS YOU WERE ONE--WHO WERE CONTACTED WITH OUR "1980 PRESIDENTIAL SURVEY" SAID REAGAN WAS THEIR NUMBER ONE CHOICE FOR PRESIDENT.

NOW GOVERNOR REAGAN NEEDS OUR HELP.

THE ADS WE PRODUCE WILL BE TOUGH, HARD-HITTING ADS THAT WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS PROMOTE REAGAN.

THESE ADS WILL BE PRODUCED BY TOP NOTCH PROFESSIONALS. THEY TALK ABOUT CARTER'S WEAK HANDLING OF IRAN, INFLATION ETC. AND HOW REAGAN WOULD BE A MUCH BETTER PRESIDENT.

WE WILL RUN THESE ADS IN MAJOR CITIES AND PLACES WHERE MANY VOTERS WILL BE MAKING UP THEIR MINDS BETWEEN CARTER AND REAGAN IN THE NEXT TWO MONTHS.

IF YOU CAN SEND A CONTRIBUTION TO NCPAC TO HELP US HELP GOVERNOR REAGAN, I AM ALSO ASKING YOU TO SEND HIM THE ENCLOSED POSTCARD TELLING HIM OF YOUR SUPPORT.

THE POSTCARDS YOU AND OTHER CONSERVATIVES SEND IN WILL GO TO GOVERNOR REAGAN'S CAMPAIGN HEADQUARTERS. HIS STAFF WILL SEE THE DEEP LEVEL OF SUPPORT GOVERNOR REAGAN HAS WITH CONSERVATIVES LIKE YOU.

WILL YOU PLEASE SEND YOUR LARGEST POSSIBLE CONTRIBU-

8304+21-23

DATE REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C788

P.O. NO. NCPAC- 7270

DATE April 3, 1980

DATE REQUIRED ~~April 8, 1980~~ April 9, 1980

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER

Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

SHIP TO The Viguerie Company
Computer Division

ACCOUNT NCPAC/House-Prospect/Bufkin-Taylor/Mail Codes 87W, W1, 20D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
2		ITEM: Computer Letter/Reply coded L-W7 and L-200 *		
2		Size: 11" x 14 7/8" (FOR 3800 LASER)		
348,000		Ink: PMS 293 Blue and Black	$16.38M	
8 3 0 4 0		Prints: 1/1 (blue over black, bleed left and right)		
		Blueline required		
		Stock: 50 lb white offset		
		Please return camera ready art and provide 10 samples to production upon completion of job.		
		2 Versions		
		* I - L-200 -- 205,000		
		* II - L-W7 -- 143,000		
			TOTAL:	$5700.24

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

L. Titlow
PURCHASING AGENT

FOR OFFICE USE ONLY:	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER [illegible] NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ADDITIONAL INFORMATION

Colorgraphics $37.75M, metro $32.50 - 4/10 del.

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 513, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

Culpeper, Virginia

1710

June 20, 1980

PAY N.C.P.A.C. 5454.36 DOLLARS $ 5454.36

TO THE ORDER OF

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
5/12-5/19	Pär payment of invoices: #A2025,A2024, A2035, A2034, A2059	$5454.36
	#524C IE McGovern $543.70 #524C IE Bayh $543.70 #588C IE Church $543.70 #524C IE Culver $543.70 #524C IE Cranston $543.69 #524C IE Reagan $1125.77 #524D $1610.10	

8304202030

Diversified Direct, Inc.

INVOICE A2025

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B[redacted]

DATE May 8, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO. C832D NCPAC 7779, 7780	DATE SHIPPED/MAILED. 5/6/80	DDI JOB NO. / DDI P.O. NO. 1501 / DIVISIONAL JOB NO. 10675	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, 10.5 M & 5.5M COMPUTER FORMS.		
10.5 M	Computer forms, with 2 color face and black back, coded: L20G2. PO NCPAC 7779.	54.22/M	569.31
5.5 M	Computer forms, same specs. Coded: LC81. PO NCPAC 7780.	54.22/M	298.21
			867.52
	4% Va. tax:		34.70
	TOTAL INVOICE:		$902.22

8304212001

McGovern
543.70
543.70
543.70
543.70
543.69
180.44
180.43
x8

#524C
7/80

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

NCPAC

National Conservative Political Action Committee

1500 wilson blvd. • arlington, va. • 22209

8304042120

LC81

Authorized and paid for by the National Conservative Political Action Committee

liberal Americans for Democratic Action (of which McGovern is chairman) gives him 75.

The union boss COPE political committee gives him a 100% rating. In fact, McGovern got over $63,000 in union boss funds in his 1974 election campaign.

The National Taxpayers Union gives him a miserable 22% rating for his big spending record.

The pro-strong defense American Security Council gives him a failing 20%.

But that's not all.

McGovern has called concerned, dedicated conservatives like you, who support NCPAC, "Kooks" on national TV.

He thinks it's "unfair" that he should be singled out for attack.

Well, I think it's very fair.

Our country just can't afford too many more years of the kind of downright socialism George McGovern stands for.

Just about the time most American voters are waking up to its false promises, McGovern is still preaching the welfare state ideas.

And just as Americans are beginning to fully realize the very real dangers of Communist aggression in Afghanistan, the Middle East, and the Caribbean, McGovern is still criticizing our national defense.

He even favors U.S. recognition of Castro's marxist dictatorship in Cuba.

Isn't it time we retire George McGovern from the U.S. Senate?

As I've said, McGovern is already part of our project to defeat the 5 most liberal men in the U.S. Senate.

But I'm writing this letter to you today to make absolutely sure NCPAC has the money we need to do the very best job we can to defeat McGovern this year.

Because even if the other 4 liberals win re-election (which is doubtful) McGovern's defeat will more than anything else symbolize the end of the liberal era.

It will send a clear message to remaining liberals in the Congress that the American people no longer

8304212.03

8304042120

☐ SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO: C832D

P.O. NO: NCPAC- 7780

DATE: May 1, 1980

DATE REQUIRED: May 9, 1980

BILL TO: National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER: DDI
2936 Prosperity Ave.
Merrifield, Va

SHIP TO: The Viguerie Company
Computer Division

ACCOUNT: NCPAC/House/Bufkin-Taylor/Mail Code 88C1

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL	
2		ITEM: COMPUTER LETTER coded LC81 (FOR 3800 LASER)			
2		Size: 14 7/8" x 11"	$54.22		
5,500		Stock: 50 lb white offset			
		Ink: PMS 287 Blue and Black			
		Prints: 2/1			
		Blueline required			
		Please return camera ready art and provide 10 samples to production dept. upon completion of job.			
			TOTAL	$298.21	

ACCOUNT REP

8304 01

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sperger
PURCHASING AGENT

FOR OFFICE USE ONLY	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-64.72

ADDITIONAL INFORMATION

☐ SALE REMAINING MATERIAL

PURCHASE ORDER

JOB NO C833D

P.O. NO NCPAC-7779

DATE May 1, 1980

DATE REQUIRED May 9, 1980

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
DDI
2936 Prosperity Av.e
Merrifield, Va

SHIP TO
The Viguerie Company
Computer Division

ACCOUNT NCPAC/Prospect/Bufkin-Taylor/Hall Code 20G2

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office [illegible] or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
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8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
18,500		ITEM: Computer Forms coded L2062 (FOR 3800 LASER) Size: 14 7/8" x 11" Stock: 50 lb white offset Ink: PMS 287 Blue and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$54.22	
			TOTAL	$569.31

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sparger
PURCHASING AGENT

FOR OFFICE USE ONLY:	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-64.72

ADDITIONAL INFORMATION

Diversified Direct, Inc.

INVOICE A2024

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4606

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 8, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, VA. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
NCPAC 7781 C832A	5/6/80	1502 / 10674	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
25 M	Computer forms, with 2 color face and black back. Coded: L-A8.	42.27/M	1056.75
	4% Va. tax:		42.27
	TOTAL INVOICE:		$1099.02

8304212007

#524 C
L 180
219.81 2
219.80 3

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE A2035

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INV. NO. [redacted]

DATE May 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C832A NCPAC 8163	5/12/80	1533 / 10690	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
8304212 6	RE: PRINTING SERVICES, COMP. FORMS.		
9 M	Computer forms, with 2 color face and black back, Coded: L-A8.	76.63/M	689.67
	4% Va. tax:		27.58
	TOTAL INVOICE:		$717.25

#524 C
T 180
14345

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Targeted for defeat in 1980

NCPAC

National Conservative Political Action Committee

1500 Wilson Boulevard
Arlington, VA 22209

C 83040421209

Authorized and paid for by the National Conservative Political Action Committee
A copy of our report is on file with and available for purchase from the Federal Election Commission, Washington, D.C.

their weak points with the voters.

In each state our surveys showed these 5 liberals were way out of step with the voters back home.

If NCPAC can effectively broadcast the ultra-left wing voting records of these 5 men (who portray themselves as moderates back home), there's a very good chance the voters will vote them out.

2. Phase II of "Target '80" developed just the right kind of professional ads--radio, TV, and newspaper--to expose these 5 Senators as radicals.

Some experts have said these are some of the best political ads they have ever seen.

(Since you helped pay for them, I've enclosed some sample ads for you to see.)

I especially like the one that shows a housewife shopping for bologna and complaining about the "bologna" she's been getting from her Senator in Washington.

But Phase III's the most exciting part of "Target '80."

3. Phase III is NCPAC's all out effort to run the ads we've developed and turn public opinion against these radical Senators.

That's where we are right now.

These commercials have already appeared in every one of our targeted states.

At one point a few weeks ago, we were running 150 ads a day against Frank Church in Idaho.

During this period our survey's showed Church's popularity rating fell an incredible 15%!

George McGovern's popularity rating fell 22% during a similar advertising blitz.

Because of Target '80 our surveys now show both Church and McGovern are behind their conservative challengers.

You can see "Target '80" is working.

But we're going to run a lot more ads--to make "Target '80" a complete success.

We've already spent over $340,000.

But we're going to have to spend over $400,000 in

MAY 12 1980

8304042120

the next 3 months on advertising to defeat McGovern, Church, and the rest next November.

I know it's a lot of money. But think of what's at stake.

The 5 Senators we've targeted have done more than anyone to push our country toward a socialist welfare state and to critically weaken our National Defense.

** Frank Church - the radical Chairman of the Senate Foreign Relations Committee who single-handedly had presided over the destruction of the FBI and the CIA, and lead the fight to cut back our military strength by voting against new weapon systems and defense spending.

** George McGovern - the radical Senator from South Dakota who favors recognition of communist Cuba.

** John Culver - the freshman Democrat from Iowa who while largely unknown, has the most radical left wing voting record in the entire U.S. Senate.

** Birch Bayh - the Democrat from Indiana who is a key liberal leader of the Equal Rights Amendment extension and abortion on demand forces in the U.S. Senate.

** Alan Cranston - one of Big Labor's staunchest allies in the U.S. Senate.

The "Target '80" advertising campaign exposes the records and true beliefs of these 5 Senators to the voters back home.

"Target '80" may be the most important political project ever undertaken by conservatives.

Even the national media has recognized this.

Articles or stories on "Target '80" have appeared in the New York Times, the Washington Post, the Los Angeles Times, and CBS and NBC news.

But "Target '80" won't be a complete success unless we put Phase III into effect.

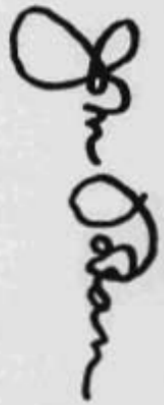
I've set a goal of $400,000 for that campaign. That's a large amount of money for people like you and me.

But if you and the other past NCPAC supporters would match your most generous contribution, we sincerely believe we can reach our goal.

And whether you consider the millions of dollars Big

8304042111

8304042121 2



☐ SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C832A

P.O. NO. NCPAC-8163 CONFIRMING

DATE May 8, 1980

DATE REQUIRED May 12, 1980

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER DDI
2936 Prosperity Ave.
Merrifield, Va

SHIP TO The Viguerie Company
Computer Division

ACCOUNT NCPAC/House/Bufkin-Taylor/Mail Code SSA (adds)

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
9,000		ITEM: Computer Letters coded L-A3 (FOR 3800 LASER) Size: 14"7/8" x 11" Stock: 50 lb white offset Ink: PMS 185 Red and Black Prints: 2/1 (5 halftones) Blueline waived Please return camera ready art and provide 10 samples to production dept. upon completion of job. EXACT RERUN OF NCPAC-7781	$76.63	
			TOTAL	$689.67

ACCOUNT REP

8304012

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sparger
PURCHASING AGENT

FOR OFFICE USE ONLY	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-80.00

ADDITIONAL INFORMATION

Diversified Direct, Inc.

INVOICE A2034

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va.

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C832C, NCPAC 8096	5/12/80	1507 / 10683	JM	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
61 M	Computer forms, with 2 color face and black back. Coded: LC8.	25.38/M	1548.18
	4% Va. tax:		61.92
	TOTAL INVOICE:		$1610.10

8304042121

#524D

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

CAPITOL WIRE SERVICE

P.O. Box 877,
Ben Franklin Sta.
Washington, D.C. 20044

Repeat Message ☒ Yes ☐ No	Operator I.D. # 64105	Request confirming copy to sender via U.S. Mail ☒ Yes ☐ No
Line Count: 62	Payment: ☒ Cash ☐ Charge ☐ Collect	

CLASSIFICATION
☐ Standard Wiregram
☐ Night Letter
☒ Emergency Wire

Send the following message to the individual above.

PLEASE CONTACT ME IMMEDIATELY.

I WAS JUST NOTIFIED YOUR NAME APPEARS ON LIST OF THOSE WHO HAVE NOT SENT 1980 CONTRIBUTION TO NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE.

I AM DISAPPOINTED TO SEE YOUR NAME NOT ON INACTIVE LIST. I KNOW PERSONALLY YOU HAVE BEEN GENEROUS CONTRIBUTOR TO NCPAC IN THE PAST.

IT IS ESPECIALLY DISAPPOINTING TO ME ALSO BECAUSE THE 1980 ELECTIONS MAY BE THE MOST CRUCIAL IN RECENT HISTORY.

RIGHT NOW, THESE VITAL NCPAC PROJECTS NEED YOUR HELP:

1) <u>TARGET '80</u>-THIS IS OUR PLAN TO DEFEAT THE FIVE MOST LIBERAL MEN IN THE U.S. SENATE: GEORGE MCGOVERN, ALAN CRANSTON, BIRCH BAYH, JOHN CULVER, AND FRANK CHURCH.

   OUR POLLS SHOW EACH OF THESE LIBERALS IS NOW BEATABLE BUT WE MUST KEEP UP THE PRESSURE TO HAVE A REAL CHANCE TO DEFEAT THEM IN NOVEMBER.

   <u>REMEMBER</u>, WE ONLY NEED TO DEFEAT 10 LIBERAL

LC8

Paid for by NCPAC; not authorized by any candidate or candidate's committee.

8304212

DEMOCRATS IN ALL FOR THE REPUBLICANS TO ACTUALLY TAKE OVER THE SENATE.

BUDGET $400,000

2) PRO-REAGAN ADS-REAGAN HELPED NCPAC GET STARTED IN 1975. I AM DETERMINED TO HELP HIM NOW. WE MUST SEIZE THIS OPPORTUNITY TO ELECT A REAL CONSERVATIVE PRESIDENT. UNFORTUNATELY THE REAGAN CAMPAIGN IS ALMOST OUT OF MONEY. BUT NCPAC CAN BUY AND RUN ADS INDEPENDENT OF HIS CAMPAIGN. THESE ADS WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS HELP REAGAN.

BUDGET $559,000

3) CONGRESSIONAL PROJECT-DOZENS OF GOOD CONSERVATIVES ARE RUNNING FOR CONGRESS ACROSS THE COUNTRY WHO NEED OUR HELP. IF THEY CAN GET THE SUPPORT THEY NEED FROM NCPAC WE COULD ELECT A MAJORITY OF CONSERVATIVE DEMOCRATS AND REPUBLICANS TO CONGRESS THIS YEAR.

BUDGET $403,000

RECEIVED MAY 21 1980

YOU CAN SEE WHY 1980 IS SO IMPORTANT. AND WHY I AM SO DISAPPOINTED WE HAVE NOT HEARD FROM YOU.

IMPORTANT YOU KNOW WHOLE SITUATION: AS OF APRIL 1ST NCPAC IS NEARLY 50% BELOW BUDGET. I FEAR MANY CONTRIBUTORS, LIKE YOU, WAITING TO SEND MONEY CLOSER TO ELECTIONS. BUT FUNDS SPENT RIGHT NOW MOST EFFECTIVE IN SWAYING PUBLIC OPINION TO CONSERVATIVES. MONEY SPENT THIS FALL WILL BE MUCH LESS IMPORTANT.

FAILURE TO RENEW YOUR FINANCIAL SUPPORT NOW MEANS MAJOR SETBACK FOR CONSERVATIVE ELECTION VICTORY IN 1980.

MY GREATEST CONCERN RIGHT NOW IS RAPID DETERIORATION OF U.S. ECONOMY AND DEFENSE STRENGTH. CARTER ADMINISTRATION AND LIBERAL DOMINATED CONGRESS TOGETHER HAVE FAILED TO COUNTER GROWING SOVIET MILITARY AND POLITICAL EXPANSIONISM AROUND THE WORLD.

NCPAC MUST DIRECT ALL EFFORTS, ALL RESOURCES TO ELECT A CONSERVATIVE PRESIDENT, SENATE AND HOUSE.

STOPPING U.S. SOCIALISTIC TREND DEPENDS ON THESE 1980 ELECTIONS.

MY ONLY HOPE IS FOR YOU TO RESPOND NOW TO MY EMERGENCY WIRE AND SEND BACK YOUR GENEROUS CONTRIBUTION IMMEDIATELY. YOUR RENEWAL CONTRIBUTION ESSENTIAL TO CONSERVATIVE SUCCESS. UNLESS FORMER NCPAC SUPPORTERS LIKE YOU CONTRIBUTE VITAL

8304042116

SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO C832C.6

P.O. NO NCPAC-8096

DATE May 1, 1980

DATE REQUIRED May 9, 1980

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
DDI
2936 Prosperity Ave
Merrifield, VA

SHIP TO The Viguerie Company
Computer Division

ACCOUNT NCPAC/House/Bufkin-Taylor/Mail Codes 88C, D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
61,000		ITEM: Computer Letters coded L-CS Size: 17" x 11" Stock: 50 lb ~~White~~ Canary offset Ink: PMS 185 Red and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$25.38	
			TOTAL	$1,548.18

8304021

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sparger
PURCHASING AGENT

FOR OFFICE USE ONLY	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-48.92

ADDITIONAL INFORMATION

NATIONAL CONSERVATIVE
SUITE 513, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

The [illegible]
Culpeper, Virginia

1729

June 27, 1980

PAY N.C.P.A.C. 3200 00 DOLLARS $ 3,200.00

TO THE ORDER OF
Diversified Direct, Inc.
2936 Prosperity Avenue
Fairfax, VA 22031

Ronald Reagan
NOT NEGOTIABLE

⑈014020714⑈ 0100133086⑈01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DETACH BEFORE DEPOSITING V-8

DATE	DESCRIPTION	AMOUNT
5/19/80	Partial Payment on Invoice #A2061	
	#524C IE Reagan	$3,200.00

8304021 3

Diversified Direct, Inc.

INVOICE A2061

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C833e,f NCPAC 8103	5/14/80	1518 / 10687	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMP. FORMS.		
444 M	Computer forms, with 1 color face and back. Code: L20H.	17.02/M	7556.88
	4% Va. tax:		302.27
	TOTAL INVOICE:		$7859.15
	6/27 Partial ←		-3200.00
	#524C		
	IE Reagan	7/3 partial	-2220.00
		7/11	-600.00

330402121

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Urgentgram

URG

From:

To:

8304042120

L20H

Authorized and paid for by the National Conservative Political Action Committee

ADVANTAGE AS A SITTING PRESIDENT.

CARTER CAN GET INSTANT PUBLICITY AND ADVERTISING WHENEVER HE WANTS IT JUST BY CALLING A PRESS CONFERENCE.

ALSO, CARTER CAN "BUY VOTES" BY PROMISING FEDERAL MONEY, DAMS, ETC. TO DIFFERENT COMMUNITIES BEFORE THE ELECTION.

ON TOP OF THIS, HE WILL HAVE AN ARMY OF GOVERNMENT PAID BUREAUCRATS WORKING FOR HIS RE-ELECTION.

FINALLY, YOU CAN BET BIG LABOR WILL BE DOING EVERYTHING IN ITS POWER TO HELP CARTER AND STOP REAGAN (THEY SPENT OVER $11 MILLION TO HELP CARTER IN 1976).

NONE OF THESE ADVANTAGES WILL BE COUNTED AGAINST THE SPENDING LIMIT ON CARTER'S CAMPAIGN.

BUT NCPAC WITH YOUR HELP WILL RUN "INDEPENDENT" PRO--REAGAN ADS TO HELP OFFSET CARTER'S HUGE ADVANTAGES. THIS KIND OF HELP COULD MAKE THE DIFFERENCE IN THE NOVEMBER ELECTION. BUT WE MUST MOVE QUICKLY.

I AM CONVINCED RONALD REAGAN IS A DEDICATED CONSERVATIVE WHO WILL HELP TURN THIS COUNTRY AROUND IF ELECTED. BUT, ASIDE FROM THIS, I AM DETERMINED TO HELP GOVERNOR REAGAN NOW FOR TWO REASONS:

1. WHEN NCPAC WAS FOUNDED IN 1976 RONALD REAGAN SIGNED A LETTER PERSONALLY ASKING HIS SUPPORTERS AND OTHER CONSERVATIVES ALL OVER THE COUNTRY TO HELP US. IN FACT NCPAC WAS THE ONLY ORGANIZATION RONALD REAGAN HELPED IN 1976.

   MANY THOUSANDS OF CONSERVATIVES RESPONDED TO HIS CALL. HE IS ONE OF THE MAIN REASONS NCPAC IS HERE TODAY WITH A 71% WIN RECORD AGAINST THE LIBERALS.

2. AN OVERWHELMING MAJORITY OF CONSERVATIVES -- PERHAPS YOU WERE ONE--WHO WERE CONTACTED WITH OUR "1980 PRESIDENTIAL SURVEY" SAID REAGAN WAS THEIR NUMBER ONE CHOICE FOR PRESIDENT.

NOW GOVERNOR REAGAN NEEDS OUR HELP.

THE ADS WE PRODUCE WILL BE TOUGH, HARD-HITTING ADS THAT WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS PROMOTE REAGAN. I HAVE ENCLOSED TWO OF THEM FOR YOU TO SEE.

THESE ADS WERE WRITTEN BY TOP NOTCH PROFESSIONALS. THEY TALK ABOUT CARTER'S WEAK HANDLING OF IRAN, INFLATION, ETC. AND HOW REAGAN WOULD BE A MUCH BETTER PRESIDENT.

WE WILL RUN THESE ADS IN MAJOR CITIES AND PLACES WHERE

8304042122

MANY VOTERS WILL BE MAKING UP THEIR MINDS BETWEEN CARTER AND REAGAN IN THE NEXT FEW WEEKS.

IF YOU CAN SEND A CONTRIBUTION TO NCPAC TO HELP US HELP GOVERNOR REAGAN BY PUTTING THESE ADS ON THE AIR, I AM ALSO ASKING YOU TO SEND HIM THE ENCLOSED POSTCARD TELLING HIM OF YOUR SUPPORT.

THE POSTCARDS YOU AND OTHER CONSERVATIVES SEND IN WILL GO TO GOVERNOR REAGAN'S CAMPAIGN HEADQUARTERS. HIS STAFF WILL SEE THE DEEP LEVEL OF SUPPORT GOVERNOR REAGAN HAS WITH CONSERVATIVES LIKE YOU.

REMEMBER, YOU WILL NOT BE ABLE TO CONTRIBUTE DIRECTLY TO GOVERNOR REAGAN'S CAMPAIGN AFTER THE CONVENTION. BUT YOU CAN HELP GOVERNOR REAGAN GET ELECTED PRESIDENT BY SENDING YOUR CONTRIBUTION TO NCPAC'S "HELP REAGAN" PROJECT.

BUT WE MUST GET STARTED IMMEDIATELY.

ALL EXPERTS ARE SAYING THE CARTER-REAGAN RACE WILL BE EXTREMELY CLOSE. WE MUST GIVE GOVERNOR REAGAN ALL THE HELP WE CAN NOW.

PLEASE SEND NCPAC $15.00, $25.00 OR MORE IF YOU CAN.

WHATEVER YOU CAN SEND I KNOW GOVERNOR REAGAN WOULD DEEPLY APPRECIATE IT.

AWAITING YOUR REPLY.

SIGNED: JOHN T. DOLAN, CHAIRMAN, NCPAC

OVER, PLEASE

8304212

Urgentgram

URGENT REPLY REQUESTED

9304042122 3

Paid for by NCPAC; not authorized by any candidate or candidate's committee.

☐ SAVE REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C833e,f

P.O. NO NCPAC-8103

DATE May 7, 1980
12

DATE REQUIRED May 8, 1980

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
DDI
2936 Prosperity Ave.
Merrifield, Va

SHIP TO The Viguerie Company
Computer Division

ACCOUNT NCPAC/Prospect/Bufkin-Taylor/Mail Codes 20H, H1, H2, H4, 20H+

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
464,000		ITEM: Computer Letter/Replys coded L20H (FOR 3300 LASER) Size: 14 7/8" x 11" Stock: 50 lb canary offset Ink: Black Prints: 1/1 Bleeds left and right Blueline required Please return camera ready art and provide 10 samples upon completion of job.	$17.02/M	
			TOTAL	$7,556.88

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE SEE SPECIAL INSTRUCTIONS ABOVE.

Sand sperger SSperger
PURCHASING AGENT

FOR OFFICE USE ONLY:	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorTraphics – 2237

ADDITIONAL INFORMATION

☐ DESTROY REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C833L

P.O. NO. NCPAC-8105

DATE May 5, 1980

DATE REQUIRED May 14, 1980

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
DDI
2936 Prosperity Ave.
Merrifield, Va

SHIP TO
The Viguerie Company
Computer Division

ACCOUNT NCPAC/Prospect/Bufkin-Taylor/Mail Codes 20H3, 21A, 20B

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
28,000		ITEM: Computer Letters, 1-up FW, coded L-21A Size: 17" x 11" (for 3211 printer) Stock: ~~Xerox Bond~~ 50 lb white offset Ink: PMS 287 Blue and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$44.50/M	$1,246.00
			TOTAL	$1,246.00

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sparger — PURCHASING AGENT

FOR OFFICE USE ONLY	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-52.29

ADDITIONAL INFORMATION

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 512, 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

1714

Arlington, Virginia

June 20, 1980

PAY N.C.P.A.C. 28000000 DOLLARS 2800.00

TO THE ORDER OF

Tri- State Envelope Corp.
6900 Faigle Road
Beltsville, MD. 20705

NOT NEGOTIABLE

:0314020718: 0100123086#01

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

DELUXE - FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT
5/16/80	For partial payment of invoice #10932 #524C IE Reagan	$2800.00

8 3 0 4 0 2 2 0 6

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 10932

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
5-16-80	5-1017-80M	NCPAC 8097 C-833 C,D	x		DMS MD

SOLD TO
National Conservative Political Committee
1500 Wilson Blvd. #513
Arlington VA 22209

1=PREPAID 2=COLLECT: 1
1=COMPLETE 2=PARTIAL: 1
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT: 1
X=CUT CHARGES TO FOLLOW:
X=FREIGHT CHARGES TO FOLLOW:

QUANTITY	DESCRIPTION	PRICE	AMOUNT
420,000	#10 24 BK OS DS Std Sty Wdw	13.75M	5775.00
	plates		18.10
			5793.10
	MD 5%		289.66
	Total		6082.76
		6/20/80	-2,800.00
			3282.76
BL# 13279 Dave		6/27/80	-1600.00
			1.682.76

#534C
IE Reagan

B/L NO.	SLSM	CUT CHG.	PRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

☐ DESTROY REMAINING MATERIAL

PURCHASE ORDER

JOB NO. C833C.D4

P.O. NO. NCPAC- 8097

DATE May 8, 1980
13

DATE REQUIRED May 16, 1980
1-1/70

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, VA 22209

SUPPLIER
TriState
6900 Faigle Rd.
Beltsville, MD

SHIP TO
Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/Prospect/Bufkin-Tayler/Mail Codes 20H-H3-H2-20HA-20M-P-Q-R-S-T-U-W

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
8304		ITEM: Standard Window Carriers coded C20H Size: #10 Stock: 24 ~~lbs~~ Brown Kraft Ink: PMS Reflex Blue and black Prints: 2/0 Please return camera ready art and provide 10 samples to production dept. upon completion of job. ACCOUNT REP	$13.75	
420,000			TOTAL	$5,775.00

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE SEE SPECIAL INSTRUCTIONS ABOVE.

PURCHASING AGENT

FOR OFFICE ONLY	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

B&J-13.92 Metro-16.13

ADDITIONAL INFORMATION

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE II
1500 WILSON BLVD., SUITE 615
ARLINGTON, VA. 22209

1st AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA 22102

2070

June 5, 19 80

PAY N.C.P.A.C. 2416 DOLLARS 69 CTS

DOLLARS $ 2,416.69

TO THE ORDER OF

Arthur J. Finkelstein & Assoc.
117 Smith Avenue
Mount Kisco, N.Y. 10549

NOT NEGOTIABLE

⑈0000 2000⑈ ⑆056004241⑆ 06188133⑈

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE II

DELUXE - FORM WVD-3 V-8

DATE	DESCRIPTION	AMOUNT
3/80	South Carolina 6C.D. 1,000.00	
2/80	Reimbursement of Expenses 1,416.69	
		$2,416.69

18 30 04 21 2

National Conservative
Political Action Committee
1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

October 17, 1980

Mr. Curt Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Curt:

I've researched the sale of the equipment to the Reagan Campaign and have found the following.

Back in September of 1979 NCPAC's Office Manager Lisa Stoltenberg decided to update some of our office equipment. Because of space problems we needed to sell the old equipment, before we could take delivery of the new. The equipment sold was an IBM Memory typewriter and the equipment purchased was an Olivetti word processor model TES 501. Ms. Pieden of the Reagan Campaign negotiated the sale price of $2,200, with Lisa Stoltenberg and took possession of the equipment. On 7/15/80 we received payment in full and on 7/16/80 we deposited the payment.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

Candace M. Taw
Office Manager

CMT:nkm

8304042130

FEC # 3038

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

(703) 821-1000

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

GLENN J. SEDAM, JR.
J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

October 20, 1980

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

Attention: Marsha Gentner, Esq.

Re: MUR 1299

Dear Mr. Steele:

This letter is written in reply to your letter to National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209, dated October 2, 1980, in which you reported that Common Cause had filed a complaint with the Federal Election Commission (hereinafter referred to as "the Commission"), alleging that National Conservative Political Action Committee, together with certain other named Respondents, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act") and Chapters 95 and 96 of Title 26 of the United States Code. The Commission has numbered this matter MUR 1299.

National Conservative Political Action Committee (hereinafter referred to as "NCPAC") appreciates this opportunity, pursuant to 2 U.S.C. 437g(a)(1) and 11 CFR 111.6, to demonstrate that no action should be taken against NCPAC on the basis of the complaint and that the complaint should be dismissed as to NCPAC. In fact, we assert that the complaint fails to meet the technical requirements of 11 CFR 111.4, in that it fails to contain a clear and concise recitation of facts, or other evidence, which describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction. See, 11 CFR 111.4(d)(3).

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As part of its activities, NCPAC makes independent expenditures expressly advocating the election of Governor Reagan to the office of President of the United States. As reported in paragraph 13 of the complaint, NCPAC's program in this regard is conducted under the name "The Ronald Reagan Victory Fund, a project of National Conservative Political Action Committee." This program is conducted pursuant to, and in accordance with, the provisions of Section 431(17) of the Act and Part 109 of 11 CFR. The complaint filed by Common Cause fails to provide a modicum of creditable evidence to support a finding to the contrary.

In that portion of the complaint entitled "Respondents' Violations", Common Cause fails to provide the Commission with any facts, or other evidence, which would substantiate a finding of reason to believe that NCPAC may have violated a statute or regulation over which the Commission has jurisdiction. This failure is evident from a paragraph by paragraph analyses of the complainant's alleged violations.

Paragraph 14. Common Cause alleges that NCPAC is now violating 26 U.S.C. 9012(f)(1), whether or not NCPAC is independent of the official Reagan campaign. The allegation is a statement of a legal conclusion which, in fact, is inaccurate and misleading.

NCPAC asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause et al. v. Schmidt, et al., (80-1609 and 80-1754 (consolidated), September 30, 1980), to which the Commission was a party, bars any attempt by the Commission to enforce 26 U.S.C. 9012(f) as it is written, or to inquire into expenditures by NCPAC on behalf of Ronald Reagan, irrespective of the independence of NCPAC from Reagan or his authorized committees. Absent any finding by the Commission of reason to believe that NCPAC is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

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Paragraph 15. This paragraph fails to allege facts, or other evidence, which describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction. To the contrary, the paragraph is a statement of a legal conclusion and NCPAC denies that it is not independent of the official Reagan campaign.

Paragraph 16. This paragraph fails to allege facts, or other evidence, which describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction. To the contrary, the paragraph is a statement of a legal conclusion.

Paragraph 17. This paragraph is argumentative and it is not based on facts, or other evidence, placed before the Commission.

Paragraph 18. This paragraph is argumentative and a statement of legal conclusions.

Subparagraph (a) of paragraph 18 makes no reference to NCPAC, its current personnel, or activities.

Subparagraph (b) of paragraph 18 makes no reference to NCPAC, its current personnel, or activities.

Subparagraph (c) of paragraph 18 makes no reference to NCPAC, its current personnel, or activities.

Subparagraph (d) of paragraph 18 makes no reference to NCPAC, its current personnel, or activities, except in footnote 31. 1/

---

[1] NCPAC admits that it announced it will buy television time in Alabama, Louisiana, Mississippi and Florida to broadcast anti-Carter commercials, but it denies that announcement or activity violated the provisions of Section 431(17) of the Act or Part 109 of 11 CFR.

The allegation in subparagraph (e) of paragraph 18, as it relates to NCPAC, is that Arthur J. Finkelstein and Associates "assisted" NCPAC and the official Reagan campaign. Attached is a copy of a letter from Arthur J. Finkelstein & Associates, which explains the nature of the services rendered by that firm to NCPAC. The engagement by NCPAC of Arthur J. Finkelstein & Associates under the circumstances does not constitute a violation of the Act. (See, Answer 3 in AO 1979-80.)

The allegation in subparagraph (f) of paragraph 18, as it relates to NCPAC, fails to allege a violation of applicable law. Neither 2 U.S.C. 431(17) or 11 CFR 109 prohibits persons who are making independent expenditures from "coordinating" their efforts with each other. It is coordination with the candidate, his committee or his agents which is proscribed. In any event, but for the coincidence of time, which does not create a presumption of coordination, the complainant fails to allege facts which describe a violation of law. Furthermore, NCPAC denies it has coordinated its activities with other respondents or with the Reagan campaign.

The allegation in subparagraph (g) of paragraph 18 is without merit. It fails to allege that the conduct of NCPAC violates applicable law. Instead, it suggests that Gov. Reagan or his staff have some duty, which does not exist in the law, to direct NCPAC not to use Gov. Reagan's name in its independent expenditure activities. If such a direction had been given and followed, such conduct would undoubtedly have been determined to have been improper coordination of activities.

The allegation in subparagraph (h) of paragraph 18 makes no reference to NCPAC, or its activities.

Paragraph 19. This paragraph is argumentative, it makes no reference to NCPAC, its personnel, or activities, and it is not based on facts, or other evidence, placed before the Commission.

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Paragraph 20. This paragraph is argumentative, it makes no reference to NCPAC, its personnel, or activities, and it is not based on facts, or other evidence, placed before the Commission.

Paragraph 21. This paragraph is not applicable to NCPAC.

Paragraph 22. This paragraph is not applicable to NCPAC.

Paragraph 23. This paragraph is not applicable to NCPAC.

Paragraph 24. This paragraph is not applicable to NCPAC.

Paragraph 25. This paragraph is not applicable to NCPAC.

Paragraph 26. This paragraph is not applicable to NCPAC.

Paragraph 27. This paragraph is not applicable to NCPAC.

Paragraph 28. This paragraph is not applicable to NCPAC.

Paragraph 29. This paragraph is not applicable to NCPAC.

Paragraph 30. This paragraph is not applicable to NCPAC.

Paragraph 31. This paragraph is not applicable to NCPAC.

Paragraph 32. This paragraph is not applicable to NCPAC.

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Paragraph 33. This paragraph is not applicable to NCPAC.

Paragraph 34. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that NCPAC may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 35. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that NCPAC may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 36. This paragraph fails to allege facts, or other evidence, which would substantiate a finging of reason to believe that NCPAC may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 37. This paragraph is argumentative and NCPAC denies that the allegations "provide ample reason to believe that [NCPAC is] not independent of the official Reagan campaign ..." Subparagraphs a., b., c. and d. of paragraph 37 simply allege violations which are not supportable in fact.

Thus, with the possible exception of the allegation contained in subparagraph (e) of paragraph 18, an allegation which has been adequately addressed in this letter, the complaint fails to contain a clear and concise recitation of facts, or other evidence, which describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction. Argumentative assertions and legal conclusions do not provide a foundation upon which the

9304042136

Commission may find reason to believe that a statute or regulation over which it has jurisdiction has been violated. Accordingly, it is submitted that the complaint should be dismissed as to NCPAC.

Sincerely,

J. Curtis Herge
Counsel to National Conservative
Political Action Committee

Attachment

8304042137

Arthur J. Finkelstein & Associates
117 Smith Avenue
Mount Kisco, N. Y. 10549
(914) 666-2750

October 16, 1980

Mr. Curtis Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Curt:

In the past, Arthur J. Finkelstein & Associates has done survey work for the National Conservative Political Action Committee only for Senate, Congressional, and State elections. In every instance, no statements advocating either the election or the defeat of any candidate existed.

NCPAC paid for and saw only its surveys.

Arthur J. Finkelstein was a member of the National Republican Advisory Committee. His participation with this Committee was at best non-existent. He never went to meetings or got actively involved with other Advisory members concerning the Committee's business.

I hope this will answer all questions that you may have. If additional information is needed, please feel free to call.

Sincerely,

Ronald W. Finkelstein

RWF:dhd

RECEIVED
OCT 17 1980
SEDAM & HERGE

8304042136

Stephen J. Pinkelstein & Associates
111 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

May 1, 1980

Mr. Terry Dolan
1500 Wilson Boulevard
Suite # 513
Arlington, VA 22209

Dear Terry:

The following list of monies are due A.J.F. & Associates) NCPAC/NCEEF/NCSEF and expenses:

Colorado - 1st C.D.	4/80	(NCPAC)	$3,000.00	Pd 2,000 5/12
Missouri - Statewide	4/80	(NCPAC)	7,500.00	Pd 7000 5/12
		(NCSEF)	7,500.00	
Washington - Statewide	4/80	(NCPAC)	500.00	
		(NCSEF)	500.00	
South Carolina - 6th C.D.	2/80	(NCPAC)	1,000.00	
Missouri - 5th C.D.	4/80	(NCPAC)	3,750.00	Pd 2,000 5/12
Expenses (1-way)			170.00	
Illinois - 10th C.D.	4/80	(NCEEF)	6,400.00	
Expenses (attached)			1,416.69	
Complete Total			~~$31,736.69~~ 21,736.69	

Your attention to this matter would be appreciated.

Sincerely,

Ronald V. Pinkelstein

Expenses (Letter dated 3/7/80)

Washington	2/13/80	Plane	122.00
		Trans.	16.00
Los Angeles	2/27/80	Plane	618.00
		Hotel	24.00
		Misc.	6.00
Washington	3/11/80	Plane	141.00
		Hotel	78.70
		Hotel	91.51
		Trans.	16.00
		Total	$1,093.21

WFAC Expenses

Washington	4/9 - 4/10/80	Hotel	70.00
		Plane	125.00
		Hotel	77.48
		Trans.	26.00
		Food	25.00
		Total	$323.48

Complete total - $1,416.69

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SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22012

To:

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

FIRST CLASS MAIL

8304042|242

SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA [redacted] 22102

To:

Ms. Marsha G. Gentner
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FIRST CLASS MAIL

Code 3006

910585

National Conservative Political Action Committee

OCT 17 P2:48

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

October 14, 1980

Mr. Charles N. Steel
General Counsel
Federal Election Commission
1325 "K" Street
Washington, D.C. 20463

Re: MUR 1299

Dear Mr. Steel:

This letter is to inform you Mr. J. Curtis Herge is authorized to represent the National Conservative Political Action Committee in the referenced case. All correspondence should be directed to him at the address listed below.

Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102
(703) 821-1000

Sincerely yours,

Candace M. Taw

Candace M. Taw
Office Manager

CMT:nkm

cc: J. Curtis Herge

3304042124

National Conservative
Political Action Committee
1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2600

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Mr. Charles N. Steel
General Counsel
Federal Election Commission
1325 "K" St.
Washington, D.C. 20463

All 2956

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

(703) 821-1000

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

GLENN J. SEDAM, JR.
J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

October 14, 1980

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

Re: MUR 1252/Motion To Quash or Modify Subpoena

Dear Sir:

Pursuant to Federal Election Commission Regulations, 11 C.F.R. §111.15(a), National Conservative Political Action Committee (NCPAC), by counsel, hereby moves to quash or modify the subpoena duces tecum issued by the Federal Election Commission ("the Commission") in this matter on September 29, 1980, on the ground that such subpoena is overbroad and inconsistent with the terms of the Commission's Notification and Reason To Believe Finding that NCPAC has violated certain provisions of the Federal Election Campaign Act (2 U.S.C. §431, et seq.) and the Presidential Election Campaign Fund Act (26 U.S.C. §9001, et seq.) ("the Acts").

By Notification dated September 25, 1980, the Commission informed NCPAC that it had found reason to believe that NCPAC had violated certain provisions of the Acts having to do with limitations on contributions and expenditures on behalf of Ronald Reagan, and with respect to the use of Mr. Reagan's name in the title of its project, "The Ronald Reagan Victory Fund." The Commission's Regulations, 11 C.F.R. §111.9(a), require that in the event the Commission determines that there is reason to believe that a respondent has violated a statute or regulation over which the Commission has jurisdiction, it shall:

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> ...notify such respondent of the Commission's finding by letter, setting forth the sections of the statute or regulations alleged to have been violated and the alleged factual basis supporting the finding. (emphasis added).

Pursuant to that requirement, the Commission set forth in its Notification:

> ...only that evidence which the General Counsel's Office has found relevant to a determination of whether there is reason to believe that the expenditures by NCPAC are not "independent" expenditures, but rather in-kind contributions to Mr. Reagan. [Notification, at 3.]

The Commission then questioned certain specific activities with respect to expenditures made by NCPAC to certain vendors and others deemed to be "agents" of Ronald Reagan by virtue of their earlier use or employment by the Reagan Committee. The Commission also questioned a discrepancy between filings with the Commission by NCPAC and by the Reagan For President Committee with regard to a debt of $2,200.00 apparently owed by the Reagan for President Committee to NCPAC for "office equipment." Id. In addition, the Commission noted that NCPAC may have violated 2 U.S.C. §432(e)(4) by using the name of a candidate in the title of its project, "Ronald Reagan Victory Fund." Notification at 4-5.

The Commission therefore found reason to believe that:

1. NCPAC had violated 2 U.S.C. §441a(a) and 26 U.S.C. §9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan.

2. That NCPAC had violated 26 U.S.C. §9012(f) by making excessive independent expenditures on behalf of Ronald Reagan.

3. That NCPAC had violated 2 U.S.C. §432(e)(4).

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As to the Commission's first finding, it is the position of NCPAC that the scope of the Commission's inquiry is limited by those activities and associations referred in Part A of the Notification. Having raised questions with regard to those activities and associations in support of its "reason to believe finding," the Commission may not inquire into others absent a finding of reason to believe that those activities or associations exist, and that they may violate statutes or regulations within the Commission's purview. In short, it is NCPAC's position that the Commission's regulation, which requires the Commission to particularize its findings and the factual basis in support of those findings, thereby necessarily limits the scope of its inquiry as to those findings.

Accordingly, in response to the Commission's subpoena, NCPAC will produce on or before the date specified therein those documents referred to in the requests numbered 4, 5, and 11. NCPAC hereby moves to quash or modify the subpoena as to the remaining requests on the ground that they are unsupported by any articulated finding of reason to believe that the questioned relationships or activities exist or, if they do exist, that they consititute a violation of any statute or regulation over which the Commission has jurisdiction.

Even if the Commission determines from evidence before it that there exist some or all of the other questioned relationships or activities, it is the position of NCPAC that even then the scope of questions relating thereto must be reasonable. As the document requests are now framed, they are unduly burdensome since, to comply with the Commission's requests, NCPAC would be compelled to review all of its records in order to produce those requested. Moreover, the short time period granted by the Commission in which to produce the volume and nature of the documents requested makes the Commission's request unreasonable.

As to the Commission's second finding, NCPAC asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause, et al. v. Schmidt, et al., (80-1609 and 80-1754 (consolidated),

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September 30, 1980), to which the Commission was a party, bars any attempt by the Commission to enforce 26 U.S.C. §9012(f) as it is written, or to inquire into expenditures by NCPAC on behalf of Ronald Reagan irrespective of the independence of NCPAC from Reagan or his authorized committees. Absent any finding by the Commission of reason to believe that NCPAC is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

At a meeting conducted at the offices of Lawrence M. Noble, Assistant General Counsel to the Commission, Mr. Noble informed the undersigned counsel that after a review of the Carter-Mondale/Democratic National Committee complaint which generated this action, only those items set out in the Notification were deemed worthy of consideration by the Commission. Thus, any future "reason to believe finding" by the Commission must be supported either by another, different complaint, or must be based upon an internally-generated recommendation.

Wherefore, NCPAC moves the Commission to quash or modify its subpoena as to the requests numbered 1-3, and 6-10 therein.

Sincerely,

Robert R. Sparks, Jr.

J. Curtis Herge

8304042162

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

(703) 821-1000

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

GLENN J. SEDAM, JR.
J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

October 14, 1980

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

Re: MUR 1252

Dear Mr. Steele:

Submitted herewith are the sworn written answers of Mr. John T. Dolan, Chairman of National Conservative Political Action Committee (NCPAC) to written Interrogatories propounded by the Commission to NCPAC on September 29, 1980, transmitted by the Commission to counsel for NCPAC on October 1, 1980, and received by counsel on October 2, 1980. Included therein are objections to certain of the Commission's questions, together with reasons in support of those objections.

Also enclosed is NCPAC's motion to quash or modify the subpoena duces tecum issued by the Commission, transmitted, and received with the Commission's Interrogatories. Reference is made to the letter of October 9, 1980, from Lawrence M. Noble, Assistant General Counsel, to counsel for NCPAC with respect to the timeliness of the filing of the motion to quash.

It is understood that this motion to quash or modify the Commission's subpoena will be submitted to the Commission for its determination and that counsel for NCPAC will be notified of the Commission's decision. Counsel has been informed that where the Commission denies an application to quash or modify a subpoena the office of general counsel customarily affords a respondent further opportunity to comply before seeking any enforcement remedies.

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I look forward to notification of the Commission's decision in this matter.

Sincerely,

Robert R. Sparks, Jr.

enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al., Complainants, -against- RONALD REAGAN, et al., Defendants.	MUR 1252

ANSWERS TO INTERROGATORIES

COMES NOW, National Conservative Political Action Committee (NCPAC); by its Chairman, John T. Dolan, and in response to the written Interrogatories from the Federal Election Commission to NCPAC in this matter, answers as follows:

A. NCPAC is a multi-candidate political committee one of whose objects is to further the election of Ronald Reagan to the office of President of the United States. NCPAC pursues this object through the "Ronald Reagan Victory Fund, a project of National Conservative Political Action Committee." The Ronald Reagan Victory Fund is not a separate entity, but is a project of NCPAC.

With regard to the specific questions raised by the Commission concerning the relationship of NCPAC to the Ronald Reagan Victory Fund ("the Fund"):

1.) The Fund does not maintain a bank account separate and apart from NCPAC, although NCPAC does maintain a separate internal ledger accounting for receipts and expenditures on behalf of the Fund.

2.) The Fund does not employ a staff separate and apart from that of NCPAC.

3.) Most of the solicitations or requests for contributions to the Fund ask that checks be made payable to the Fund. Some solicitations have requested that contributions be made to NCPAC.

4.) Monies received from checks received by NCPAC which were made payable to NCPAC have been used by the Fund. All contributions to NCPAC or to the Fund are reported to the Commission by NCPAC as having been received by NCPAC.

5.) The account into which funds contributed to or for the Fund are deposited is in the name of NCPAC and all such funds are commingled with the funds of NCPAC.

B. NCPAC objects to this question as being unreasonable and overbroad in that it requests information beyond the scope of the Commission's findings of reason to believe that NCPAC has violated statutes or regulations over which the Commission has jurisdiction. Moreover, to supply the information requested would require that NCPAC conduct a systematic search of all of its records, and to do so within the time period afforded by the Commission would unduly burden NCPAC and its personnel.

C. NCPAC has not transferred any items of the type listed in this Interrogatory to the Reagan General Election Committee since January, 1980. In September, 1979, NCPAC transferred certain typewriters to that Committee in consideration of the payment by that Committee of $2,200.00, which amount was paid in full by the Committee to NCPAC on or about July 15, 1980.

D. See response to Interrogatory B.

E. See response to Interrogatory B.

F. See response to Interrogatory B.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

JOHN T. DOLAN

SUBSCRIBED and sworn to before me this 14th day of October, 1980.

Notary Public

My commission expires: 2/6/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 9, 1980

HAND DELIVERED

Robert O. Sparks, Esq.
Sedam & Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Sparks:

Pursuant to your meeting with Office of General Counsel staff, this is to notify you that, as the subpoenas to your clients, Fund for a Conservative Majority and the National Conservative Political Action Committee, were received on October 2, 1980, any motions to quash filed with the Commission on their behalf shoud be received by the Commission on October 14, 1980. This accounts for the five day period set forth in 11 C.F.R. § 111.15, computed according to the methods delineated by 11 C.F.R. § 111.2.

Sincerely,

Charles N. Steele
General Counsel

by Lawrence M. Noble
Assistant General Counsel

8304042135

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 1, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
SEDAM & HERGE
7600 Old Springhouse Road
McLean, Virginia 22102

Re: Matter Under Review (MUR) 1252(80)

Dear Mr. Herge:

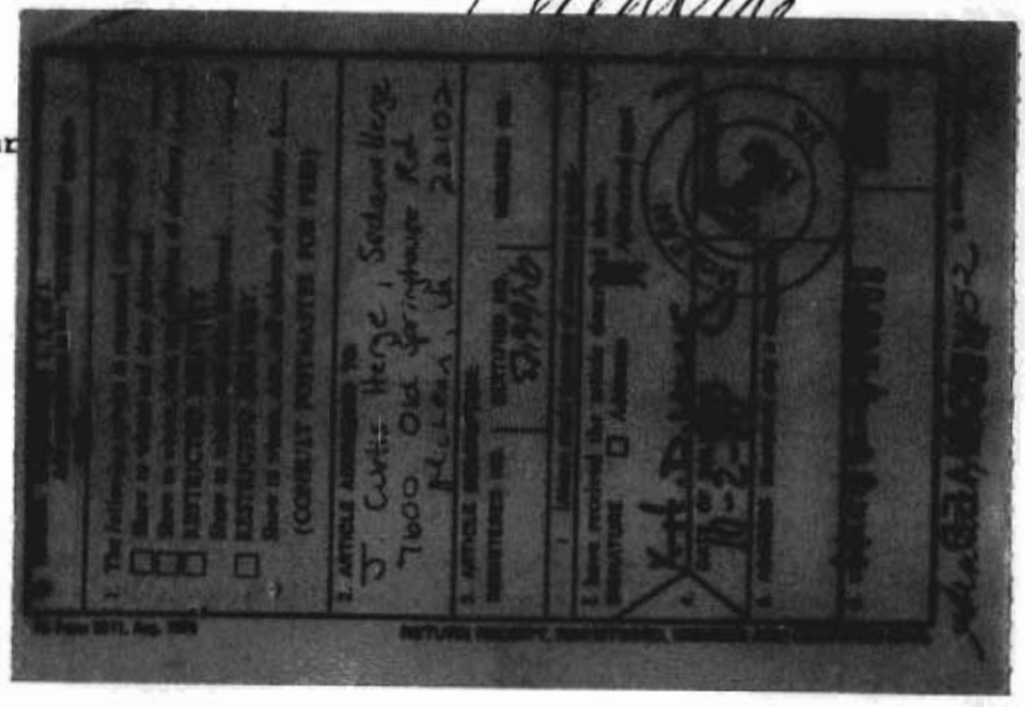
Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission") to your client, National Conservative Political Action Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071 or Ms. Patricia P. Bak at (202) 523-4060.

Sincerely,

Enclosur



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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

National Conservative Political Action Committee
1500 Wilson Boulevard, # 573
Arlington, Virginia 22209

RE: MUR 1252

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), the National Conservative Political Action Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the National Conservative Political Action Committee or of its officers, agents, staff members, volunteers or employees. Production is to be made at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W. Washington, D.C. on October 20, 1980, at 10:00 a.m. In addition, the National Conservative Political Action Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

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As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the National Conservative Political Action Committee and the Ronald Reagan Victory Fund. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the entity in question, and the dates of such service.

3. "National Conservative Political Action Committee" or "NCPAC" shall mean its predecessors, affiliates, committees, subcommittees; divisions, branches, projects, as well as any other bodies which conduct business on behalf of NCPAC, and NCPAC's officers, agents, employees, staff, and volunteers.

4. "Ronald Reagan Victory Fund" shall mean what NCPAC has described as a "project" of NCPAC.

5. Reagan General Election Committee shall mean the principal campaign committee (see 2 U.S.C. § 431(5)) of Ronald Reagan, the 1980 Republican nominee for the office of President, the committee's predecessors (including, but not limited to the Reagan for President Committee), affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on its behalf, and its officers, agents, employees, staff and volunteers.

6. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.

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7. "FEC Disclosure Reports" shall mean any reports filed by NCPAC with the FEC pursuant to the requirements of 2 U.S.C. §§ 431-455.

8. "Agent" shall mean any person who has actual, oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate; or any person who has been placed in a position within the campaign organization where it could reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. See 11 C.F.R. § 109.1(b)(5).

9. "Organizer" with reference to a project or group, shall mean any person who has directly or indirectly participated in the formation, planning, structure or organization of the project or group in question, including, but not limited to, attendance at or participation in any meetings, discussions or communications concerning the project or group from the period from January 1980 to the group or project's formal inception.

10. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relating in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between NCPAC and/or the Ronald Reagan Victory Fund and any of the or the following persons

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or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of either NCPAC and/or the Ronald Reagan Victory Fund or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Republican National Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
North Carolina Congressional Club
Americans for Reagan
Fund for a Conservative Majority
Citizens for Reagan in '80
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

2. All documents and materials concerning or relating to the formation, organization, planning, or undertaking of the Ronald Reagan Victory Fund.

3. All documents and materials concerning or reflecting any NCPAC or Ronald Reagan Victory Fund decisions to expend funds which would in any way further the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

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4. All documents and materials concerning the following expenditures reported by NCPAC in FEC disclosure reports:

Payee	Date	Reported Purpose
Diversified Direct, Inc.	May 23, June 13, June 20, and June 27, 1980	Printing; Ronald Reagan U.S. President
Tri State Envelope Corp.	June 20, 1980	Printing; Ronald Reagan U.S. President

a. Please provide a copy of each item printed for use by NCPAC as consideration for the above listed payments.

5. All documents and materials concerning the NCPAC expenditure on June 5, 1980, to Arthur Finkelstein and Associates, the purpose of which was described in NCPAC's response of July 22, 1980, to FEC MUR 1252 as a "polling expense".

a. A copy of any survey results, poll, memoranda, or report which was transferred to NCPAC by Arthur Finkelstein and Associates, its agents, or employees in connection with the above expenditure.

6. All documents and materials relating to the contractual or professional relationship or any other association from January 1980, to present, between NCPAC and/or the Ronald Reagan Victory Fund and the following entities, their agents, officers or employees undertaken in connection with efforts on the part of NCPAC and/or

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the Ronald Reagan Victory Fund which would relate in any way to furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or Ronald Reagan's general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate:

Diversified Direct, Inc.
Tri State Envelope Corp.
Arthur Finkelstein and Associates

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7. All documents and materials relating to any NCPAC and/or Ronald Reagan Victory Fund expenditure of funds for the financing of the dissemination, distribution, or republication, in whole or in part, of any broadcast or any written, graphic or other form of campaign materials prepared by Ronald Reagan, the Reagan for President Committee, the Reagan General Election Committee, the Reagan Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

8. All documents and materials disseminated, distributed or republished by NCPAC and/or the Ronald Reagan Victory Fund which contain, in whole or in part, any broadcast or any written, graphic or other form of campaign materials prepared or used by Ronald Reagan, the

Reagan for President Committee, the Reagan General Election Committee, the Reagan-Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

9. All documents and materials concerning any solicitation of or request for funds for the Ronald Reagan Victory Fund or by NCPAC which relate in any way to the furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or the general election of Ronald Reagan as President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

10. All telephone bills and/or other records of telephone calls made or received by NCPAC and the Ronald Reagan Victory Fund from January, 1980 to the present.

11. All documents and materials concerning a debt of $2,200 listed in Reagan for President Committee FEC disclosure reports as owed to NCPAC since February 22, 1980, for "office equipment" and all documents and materials concerning the receipt of $2,200 listed in the NCPAC FEC disclosure reports as coming from Reagan for President Committee on July 15, 1980, for a "memory typewriter".

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Please answer the following interrogatories:

A. Describe the relationship between the Ronald Reagan Victory Fund and NCPAC, noting specifically:

(1) whether the Ronald Reagan Victory Fund maintains bank accounts or an accounting of receipts and expenditures separate and apart from NCPAC;

(2) whether the Ronald Reagan Victory Fund employs a staff separate and apart from that of NCPAC;

(3) whether solicitations or requests for contributions to the Ronald Reagan Victory Fund request that checks be made payable to NCPAC or to the Ronald Reagan Victory Fund or to either NCPAC or the Ronald Reagan Victory Fund;

(4) whether monies received from checks from NCPAC which were made payable to NCPAC have been used by the the Ronald Reagan Victory Fund, and

(5) in whose name the account is held into which funds contributed to or for the Ronald Reagan Victory Fund are deposited.

B. Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants or other agents of NCPAC and the Ronald Reagan Victory Fund from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor.[1/]

1/ In lieu of identifying the supervisor of each individual identified in response to interrrogatory B, NCPAC and the Ronald Reagan Victory Fund may each provide the Commission with organizational charts.

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(1) Please identify which of the above individuals and any other individuals who have, participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any NCPAC or Ronald Reagan Victory Fund expenditures which relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other Presidential candidate in 1980.

(2) Please identify which of the above individuals and and other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials produced by either NCPAC or the Ronald Reagan Victory Fund which relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other 1980 presidential candidate.

(3) Please identify which of the above individuals and any other individuals have participated in any way, directly or indirectly in the planning, organization, and formation of the Ronald Reagan Victory Fund.

C. Please provide a list of all items (including, but not limited to, office equipment, machinery, furniture, and office supplies) transferred by NCPAC to the Reagan General Election Committee

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since January 1980, along with an item by item breakdown containing the original cost of each item paid by NCPAC, and the amount paid, if any, by the Reagan General Election Committee for each item.

D. List the phone numbers and extensions used by NCPAC and the Ronald Reagan Victory Fund since January 1980, noting the extensions assigned to or used by each person identified in response to interrogatory B.

E. List by date and location all fundraisers held by NCPAC and/or the Ronald Reagan Victory Fund since January, 1980 which related in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980, or which in any way aided in the defeat of any other 1980 Presidential candidate.

F. With respect to each individual identified in response to interogatory B, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership, with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated with the particular group, organization, project, or company and the position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic

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Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Committment 80

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at the offices of the Commission at 1325 K Street, N.W., Washington, D.C., this 29th day of September 1980.

John W. McGarry
Vice Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Herge:

On July 7, 1980, the Federal Election Commission notified your client, the National Conservative Political Action Committee ("NCPAC"), of a complaint alleging that NCPAC has violated certain sections of the Federal Election Campaign Act of 1971, as amended, ("the Act") and of Chapter 95 of Title 26, U.S. Code. A copy of the complaint was forwarded to NCPAC at that time.

Upon further review of allegations contained in the complaint and of information which you have supplied in response, the Commission has determined that there is reason to believe that NCPAC has violated 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan; 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan; and 2 U.S.C. § 432(e)(4). A report on the Commission's finding is attached. You may submit any factual or legal materials which you believe relevant to the Commission's analysis of this matter.

We acknowledge receipt of your response to this matter which was dated July 22, 1980. In the absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against NCPAC, the Commission may find probable cause to believe that violations have 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.

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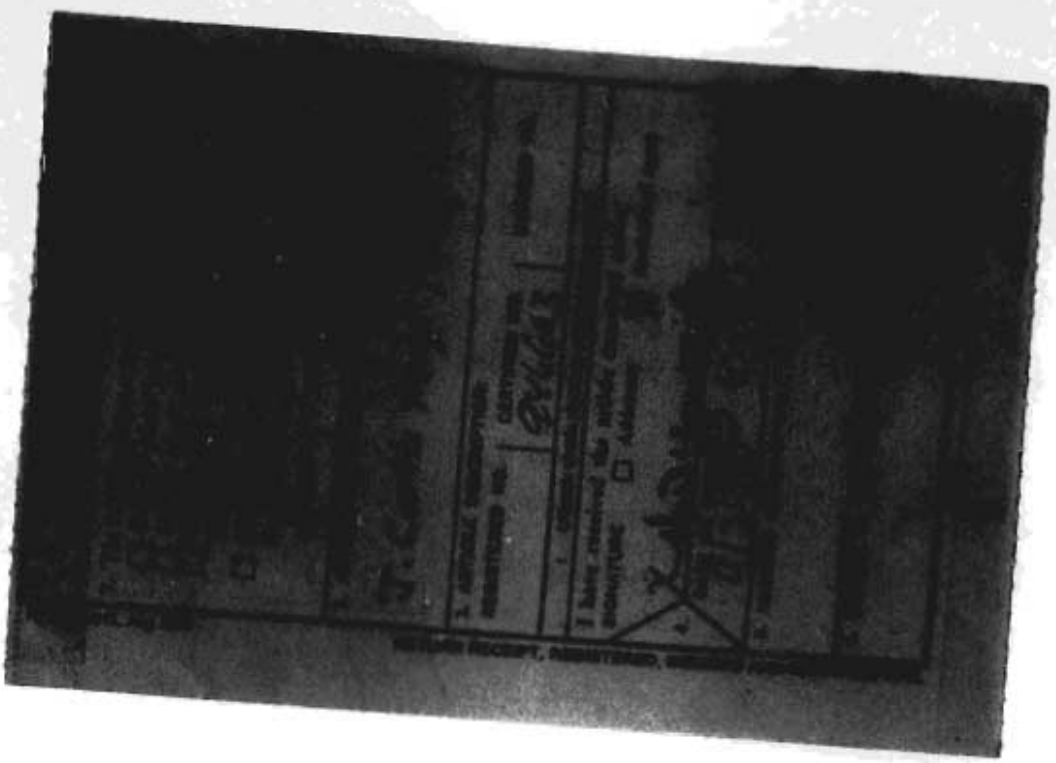
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Marsha G. Gentner or Anne Weissenborn, the attorneys assigned to this matter, at (202) 523-5071.

Sincerely,

JOHN WARREN McGARRY
Vice-Chairman

Enclosure



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

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Upon further review of allegations contained in the complaint and of information which you have supplied in response, the Commission has determined that there is reason to believe that NCPAC has violated 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan; 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan; and 2 U.S.C. § 432(e)(4). A report on the Commission's finding is attached. You may submit any factual or legal materials which you believe relevant to the Commission's analysis of this matter.

We acknowledge receipt of your response to this matter which was dated July 22, 1980. In the absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against NCPAC, the Commission may find probable cause to believe that violations have 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.

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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 Marsha G. Gentner or Anne Weissenborn, the attorneys assigned to this matter, at (202) 523-5071.

Sincerely,

Enclosure

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FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE SEP 25 1980

MUR NO. 1252
STAFF MEMBER(S) & TEL. NO.
Marsha G. Gentner

RESPONDENT The National Conservative Political Action Committee

Anne A. Weissenborn
(202) 523-5071

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On July 2, 1980, the Carter-Mondale Reelection Committee, Inc., and the Democratic National Committee (hereinafter "Complainants") submitted a complaint which contained the following allegations:

1. That one or more of the respondent committees have violated or will violate 2 U.S.C. § 441a(a) by exceeding their contribution limitations with regard to Mr. Reagan;

2. That Ronald Reagan and one or more of the respondent committees have violated or will violate 2 U.S.C. § 434 by failing to report properly contributions and expenditures;

3. That one or more of the respondent committees have violated or will violate 26 U.S.C. § 9012(f) by knowingly and willfully incurring expenditures in excess of $1,000 to further the election of Mr. Reagan which would constitute qualified campaign expenses if incurred by an authorized committee;

4. That the National Conservative Political Committee (hereinafter "NCPAC") has violated 2 U.S.C. § 432(e)(4) in that its project the "Ronald Reagan Victory Fund" is a discrete, unauthorized political committee which has included "Reagan" in its name

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PRELIMINARY
FACTUAL BASIS AND LEGAL ANALYSIS

A. Allegation of Violations of 26 U.S.C. § 9012(f) and 2 U.S.C. § 441a(a).

Complainants allege that expenditures to be made by the respondent committees on behalf of Mr. Reagan will be made with the cooperation or prior consent of, in consultation with or concert with, or at the request or suggestion of Mr. Reagan, his authorized committee, or his agents and therefore would be considered non-independent expenditures and thus contributions to the candidate pursuant to 2 U.S.C. § 441a(a)(7) (B)(i) and 11 C.F.R. § 109.1(c). By virtue of these circumstances, the respondent committees have or will violate 26 U.S.C. § 9012(f) which prohibits unauthorized committees from knowingly and willfully incurring expenditures in excess of $1,000 to further the election of candidates of a political party for President and Vice-President who are eligible to receive public funds, when such expenditures would constitute qualified campaign expenses if incurred by an authorized committee of such a candidate. In addition, a violation of 2 U.S.C. § 441a(a) by respondent committees would likewise result from their excessive contributions, if the expenditures in question are found to be non-independent, in-kind contributions.

Complainants cite several factors in support of their argument that the expenditures which have been or will be made by respondent committees on behalf of Ronald Reagan are not "independent" and thus constitute contributions to that candidate in violation of 26 U.S.C.. § 9012(f) and 2 U.S.C. § 441a(a). These include the present and prior affiliation with Mr. Reagan of certain individuals now allegedly involved with the respondent committees and the use of common vendors.

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The evidence contained in the complaint that is put forth below represents only that evidence which the General Counsel's office has found relevant to a determination of whether there is reason to believe that the expenditures by NCPAC are not "independent" expenditures, but rather in-kind contributions to Mr. Reagan.. 11 C.F.R. § 109.1(c).

The complaint contains no allegations of NCPAC officer overlap with the official 1980 Reagan committees. 1/ However, the complaint and NCPAC reports filed with the Commission reveal that purported "independent" expenditures in support of Mr. Reagan by NCPAC were made through the same vendors as those used by the authorized Reagan committee shortly before that time 2/, thus indicating that NCPAC expenditures with respect to Mr. Reagan were made through agents of his (as defined by 11 C.F.R. § 109.1(b)(5)) resulting in in-kind contributions by NCPAC. See 11 C.F.R. § 109.1 (b)(4)(i)(B) and § 109.1 (c), and AO 1979-80.

Reports also show that NCPAC made an expenditure to Arthur Finkelstein and Associates on June 5, 1980. The response of NCPAC refers to this as a "polling expense." An expenditure by the Reagan Committee to Arthur Finkelstein and Associates for consulting services was reported as being made on June 5, 1980. As previously noted, this raises questions as to whether the polling results were "accepted" by the authorized Reagan

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1/ In a footnote, complainant makes reference to two ex-officers of NCPAC presently indirectly associated with the authorized Reagan committees. However, these two individuals had resigned from their NCPAC offices by March 18, 1978 (the date of the NCPAC amendment to its Statement of Organization).

2/ These expenditures were:

Vendor	Date by NCPAC and Reported Purpose	Date by Authorized Reagan Committee and Purpose
Diversified Direct, Inc.	5/23, 6/2, 6/13, 6/20 and 6/27/80 "printing" Reagan for President	4/22, 5/14, 6/18/80 "Direct Mail
Tri State Envelope Corp.	6/20/80 "printing" Reagan for President	4/22/80 "Stationary" "Direct Mail

NCPAC, in its response to the compliant states that the expenditure to Diversified Direct, Inc., was for mechanical mailing services only. However, the entry on the report filed by NCPAC that the expenditure was for "printing" contradicts this assertion. NCPAC in its response also states that its expenditure to Tri-State was for NCPAC printed envelope stock and thus an operating expenditure. This directly contradicts the NCPAC report which designated the expenditure as "printing" for "Reagan, President".

Committee or its agent, resulting in an in-kind contribution by NCPAC to that committee. 3/ See 11 C.F.R. § 106.4(b).

Moreover, the Reagan for President Committee continues to report a debt of $2,200 owed since February 22, 1980, to NCPAC for "office equipment". This contradicts the asserted complete independence from authorized Reagan committees that NCPAC puts forth. Rather, it would seem that such a transaction indicates that an avenue for coordination with respect to the needs of the Reagan Committee may already have been established.

The Office of General Counsel has recommended that in light of the foregoing evidence the Commission find reason to believe NCPAC violated 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions and expenditures on behalf of the 1980 authorized committees of Ronald Reagan.

B. Allegation of Violation of 26 U.S.C. § 9012(f) by Respondent Committees

26 U.S.C. § 9012(f) prohibits unauthorized committees from knowingly and willfully incurring expenditures in excess of $1000 to further the election of candidates of a political party for President and Vice-President who are eligible to receive public funds when such expenditures would constitute qualified campaign expenses if incurred by an authorized committee of such candidates. As discussed in "Part A" above, complainants allege that respondent committees have violated or will violate this provision.

Part A deals with whether or not the respondent committees are independent of the Reagan authorized committees. However, even if these committees are in fact found to be independent, they would still be in violation of § 9012(f) if they expend more than $1000 on behalf of Mr. Reagan's candidacy, as Section 9012(f) applies to all political committee expenditures, whether or not "independent".

As the complaint and supplements demonstrate, NCPAC has publicly announced its intention and has begun to solicit funds to spend in excess of $1,000 in support of Ronald Reagan's candidacy. Therefore, the Office of General Counsel has recommended that that the Commission find reason to believe that NCPAC has violated or is about to violate 26 U.S.C. § 9012(f).

C. Alleged Violation of 2 U.S.C. § 432(e)(4)

2 U.S.C. § 432(e)(4) provides that unauthorized committees may not include the name of any candidate in their names. Complainants

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3/ Newspaper articles submitted by complainants refer to assertions by NCPAC officials that their expenditures in support of Mr. Reagan will "depend on the Reagan strategy" and on "market testing by a professional pollster". See Baltimore Sun, July 16, 1980, p. A7, attached to July 21, 1980, supplement to complaint.

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alleged in their initial complaint that the "Ronald Reagan Victory Fund", a project of NCPAC, is a discreet, unauthorized political committee which has the name "Reagan" in its name in violation of Section 432(e)(4).

The Office of General Counsel has recommended that the Commission find reason to believe that NCPAC has violated 2 U.S.C. § 432(e)(4).

COMMISSION DETERMINATION

Based on the foregoing analysis, the Federal Election Commission has found:

1. That the National Conservative Political Action Committee, has violated 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan.

2. That the National Conservative Political Action Committee, has violated 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan.

3. That the National Conservative Political Action Committee, has violated 2 U.S.C. § 432(e)(4).

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RAD 80-159

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE SEPTEMBER 25, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Anne Weissenborn

TEAM CHIEF Bobby Werfel

COMPLIANCE REVIEW

THROUGH: STAFF DIRECTOR

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

MUR No. 1252

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE --- September Monthly Report (8-1-80 to 8-31-80) entry to Dave Keene 8-29-80 $500 "Consultant Fee". ATTACHMENT #1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

National Conservative Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Federal Express Corp. P.O. Box 727, Dept. A Memphis, TN 38194	Freight Charges Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	22.64
B. Ramsey Enterprises 2635 South Garland Avenue Garland, TX 75041	Office Supplies Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	80.16
C. Olivetti Corp.	Office Supplies Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	1,828.57
D. All State Courier 1200 North Hudson Street Arlington, VA 22201	Courier Service Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	257.37
E. MediAmerica, Inc.	Typing & Mailing Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	1,642.50
F. Dave Keene 10874 Hampton Road Fairfax Station, VA	Consultant Fee Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	500.00
G. University Book Store 711 State Street Madison, Wisconsin 53703	COD charge for reference material Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/29/80	3.75
H. Susan S. Hannegan 8506 Inyo Court Alexandria, VA 22309	Salary Advance Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/5/80	150.00
I. H.G. Smithy Property Co.	Rent Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	8/5/80	2,810.25
SUBTOTAL of Disbursements This Page (optional)			$7,295.24
TOTAL This Period (last page this line number only)			

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RAD 80L-157

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: OGC

DATE Sept. 2, 1980

ANALYST Mark Kleinman MK

TO: Office of General Counsel
ATTENTION: Anne Weissenborn

TEAM CHIEF Bobby Werfel BW

COMPLIANCE REVIEW PS

THROUGH: STAFF DIRECTOR BL

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS DH

MUR No. 1252

DATE OF ORIGINAL REFERRAL N/A

**PURPOSE:

INFORMATION:

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE:

August Monthly (7-1-80 to 7-31-80) showing receipt from Reagan For President Committee of $2,200 7-15-80, for "Sale of Memory Typewriter". Attachment #1

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for LINE NUMBER 15
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
National Conservative Political Action Committee

A. Full Name, Mailing Address and ZIP Code Sundance Broadcasting, Inc. Boise, ID Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Refund - Broad-casting cancelation Occupation Aggregate Year-to-Date—$	Date (month, day, year) 7/23/80	Amount of Each Receipt this Period 4.80
B. Full Name, Mailing Address and ZIP Code Working Names Inc. 1629 K Street NE Washington, DC Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Mail list rental Mail canceled Occupation Aggregate Year-to-Date—$	Date (month, day, year) 7/23/80	Amount of Each Receipt This Period 69.81
C. Full Name, Mailing Address and ZIP Code Reagan for President Committee 809 Cameron Street Alexandria, VA 22314 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Sale of Memory Typewriter Occupation Aggregate Year-to-Date—$	Date (month, day, year) 7/15/80	Amount of Each Receipt This Period 2,200.00
D. Full Name, Mailing Address and ZIP Code Westpark Travel 2600 Wespark Drive McLean, VA Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Refund of travel Expense Occupation Aggregate Year-to-Date—$	Date (month, day, year) 7/15/80	Amount of Each Receipt This Period 125.00
E. Full Name, Mailing Address and ZIP Code Western Union P. O. Box 26208 Richmond, CA 23260 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Refund on Mailgram Occupation Aggregate Year-to-Date—$	Date (month, day, year) 7/23/80	Amount of Each Receipt This Period 70.00
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			2,469.61
TOTAL This Period (last page this line number only)			2,469.61

FEC 3:80 MAR 24 11 20 76

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ACKNOWLEDGEMENT OF RECEIPT

This is to acknowledge receipt of a letter from the Federal Election Commission addressed to:

John T. Dolan, Chairman
National Conserbative Political Action Committee
1500 Wilson Blvd., Suite 513
Arlington, Virginia

7/9/80
Date of receipt

Signature of recipient

On behalf of:
John T. Dolan

83040421279

909221
GCC*
2023

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
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.
—
THOMAS M. DAVIS III
OF COUNSEL

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 821-1000
TELEX 89-8388 (AEMPOWER WHEN)
TWX 710-828-0533 (TELEREP 800)

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RECEIVED
OFFICE OF THE
GENERAL COUNSEL

July 22, 1980

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

Attention: Marsha Gentner, Esq.

Re: MUR 1252

Dear Mr. Steele:

This letter is written in reply to your letter to National Conservative Political Action Committee, 1500 Wilson Boulevard, Arlington, Virginia 22209, dated July 7, 1980, in which you reported that the Carter-Mondale Reelection Committee, Inc. (hereinafter referred to as "C-M") and the Democratic National Committee (hereinafter referred to as "the DNC") had filed a complaint with the Federal Election Commission (hereinafter referred to as "the Commission"), alleging that National Conservative Political Action Committee, together with certain other named Respondents, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act") and Chapter 95 of Title 26 of the United States Code. The Commission has numbered this matter MUR 1252.

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National Conservative Political Action Committee (hereinafter referred to as "NCPAC") appreciates this opportunity, pursuant to 2 U.S.C. 437g(a)(1) and 11 CFR 111.6, to demonstrate that no action should be taken against NCPAC on the basis of the complaint and that the compliant should be dismissed as to NCPAC. In fact, we assert that the complaint fails to meet the technical requirements of 11 CFR 111.4, in that it fails to contain a clear and concise recitation of facts which describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction. See, 11 CFR 111.4(d)(3).

I. The Complaint Fails to Recite Facts Which Describe a Violation by NCPAC of a Statute or Regulation Over Which the Commission has Jurisdiction

An analysis of that portion of the complaint which relates to NCPAC fails to reveal a single statement of fact which describes, or supports an allegation of, a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction.

Under that portion of the complaint entitled, "The Facts," the first reference to NCPAC appears on page 15, as follows:

"Congressional Quarterly reported that National Conservative Political Action Committee (NCPAC) spent more than $600,000 'independently' in 1979 and early 1980, and plans to spend significant amounts on Mr. Reagan's behalf during the general election. (6/14/80, p.1636)"

Thereafter, the complaint contains the following passage:

"In April 1980, NCPAC sent an 'Urgentgram' to potential contributors. Pointing out that 'Reagan has almost reached his spending limit set by Federal election law,' NCPAC warned that 'Reagan will lose valuable momentum if he cannot maintain his campaign advertising program in high gear in the May-June primaries.' The 'Urgentgram' continued:

'When NCPAC was founded in 1976 Ronald Reagan signed a letter personally asking his supporters and other conservatives all over the country to help us. In fact NCPAC was the only organization Ronald Reagan helped in 1976.

'Many thousands of conservatives responded to his call. He is one of the main reasons NCPAC is here today with a 71% win record against the liberals....

'Now Governor Reagan needs our help.

'The ads we produce will be tough hard-hitting ads that will expose Carter's weaknesses as well as promote Reagan.

'These ads will be produced by top notch professionals...

'We will run these ads in major cities and places where many voters will be making up their minds between Carter and Reagan in the next two months." 1/

1/ A reproduction of the "Urgentgram" appears at tab 81 of the exhibits filed with the complaint. It will be noted that the "Urgentgram" contains the statements required at 2 U.S.C. 441d(a)(3) and 11 CFR 110.11(a)(1)(iv).

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In the second supplement to the complaint, C-M and the DNC provided the Commission with a copy of an article which appeared in the July 15, 1980 issue of The New York Times. Presumably submitted as a supplement to the recitation of facts, that article contained the following passage relevant to NCPAC:

> "The National Conservative Political Action Committee previewed a series of 10 television commercials that are to be shown in selected markets beginning on Friday. Terry Dolan, chairman, said that the group would spend from $1 million to $5 million."

It is submitted that the foregoing passages demonstrate nothing more than that C-M and the DNC are maintaining a sensitive awareness of the activities of NCPAC. These passages consist simply of factual statements regarding that portion of NCPAC's activities which relate to the making of independent expenditures in support of the nomination and election of Governor Reagan to the office of President of the United States. These expenditures have been and will be made in accordance with 2 U.S.C. 431(17) and 11 CFR 109.1, in that they are made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and are not made in concert with, or at the

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request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

C-M and the DNC also attempt, in page 5 of the complaint as supplemented by the appendix, to allege that, in making independent expenditures in support of the nomination and election of Gov. Reagan, NCPAC has utilized agents of Reagan for President. See, 11 CFR 109.1 and AO 1979-80. As to those vendors of NCPAC which are listed in the appendix, NCPAC notes the following:

> Appendix (1). Arthur J. Finkelstein & Associates conducted polls for NCPAC (not, in any event, related to the independent expenditure activity under review), which did not include any communication expressly advocating the election or defeat of a clearly identified candidate. The cost of such polls thus constituted an operating expense and not an independent expenditure. See AO 1979-80.
>
> Appendix (4). There is no allegation that Richard A. Viguerie Co., Inc. or American Mailing Lists Corp. is an agent of Reagan for President. (The fact that Richard A. Viguerie Co., Inc. and American Mailing Lists Corp. may have provided services to the 1976 Reagan campaign, which NCPAC can neither confirm nor deny, is irrelevant by reason of the fact that that was a separate election.)
>
> There is no allegation that Diversified Printing Services, Inc. and Metro Mailing and Printing are agents of Reagan for President.

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Diversified Mailing Services, upon information and belief, is presently known as Diversified Mail Marketing. NCPAC can neither confirm nor deny that Diversified Mail Marketing is or was a vendor to Reagan for President, but, in any event, the services provided by that firm to NCPAC consist of mechanically folding letters, inserting letters in envelopes, applying postage to the envelopes and bundling envelopes for mailing. Such activities are operating expenses and not independent expenditures. See, AO 1979-80.

Appendix (5). NCPAC has no record of having engaged "Human Events" to provide list rental and computer services. Such services are, in any event, operating expenses and not independent expenditures.

Appendix (6). There is no allegation that Input Data Assoc. is an agent of Reagan for President.

Appendix (7). NCPAC has not engaged the services of Ed Nichols Assoc. Wiland & Assoc., Inc. provides computer services to NCPAC designed to aggregate contributions to NCPAC for use in preparing and submitting its periodic reports to the Commission. Such activities are operating expenses and not independent expenditures. AO 1979-80.

Appendix (8). There is no allegation that Lone Star Press and Mail Room, Inc. are agents of Reagan for President.

Appendix (9). There is no allegation that Smarr Mailing, Thompson & Assoc. or the Name Exchange are agents of Reagan for President.

Appendix (11). Tri-State Envelope Corp. have been engaged by NCPAC to supply it with printed envelope stock based upon design, copy and layout supplied by NCPAC. Such activities are operating expenses and not independent expenditures. AO 1979-80.

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Appendix (13). There is no allegation that Frank Gunpert Printing, Maryland Litho, McCollum Press and Smith Lithograph are agents of Reagan for President.

Appendix (14). NCPAC has no record of having engaged Decision Making Information. Polling services are, in any event, operating expenses and not independent expenditures. AO 1979-80.

The final reference to NCPAC in that portion of the complaint captioned, "The Facts," appears on page 31. There it is noted that Charles Black was NCPAC's original chairman and that Roger Stone was NCPAC's original Treasurer. Both these observations are irrelevant to the matter under review, as Mr. Black resigned from NCPAC on or about April 25, 1977 and Mr. Stone resigned from NCPAC on or about October 31, 1977. Neither individual has any present relationship with NCPAC.

NCPAC is a multicandidate political committee, as defined in 2 U.S.C. 441a(a)(4) and 11 CFR 100.5(e)(3), which is incorporated, as permitted by 11 CFR 114.12(a), under the Non-Profit Corporation Law of the District of Columbia and which is qualified to transact business in the State of Virginia. The Board of Directors of NCPAC consists of John T. Dolan, Robert L. Shortley and Rhonda K. Stahlman. Mr. Dolan serves as its Chairman and Mrs. Susan S. Hannegan serves as its Treasurer.

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In its complaint, C-M and the DNC attempt, improperly, to persuade the Members of the Commission, through the use of hyperbolic propaganda, that the recitation of "facts" applicable to NCPAC somehow constitutes a violation of law. For example, C-M and the DNC assert that they "show [in the complaint], at least five interrelated groups of professional politicians, including active Republican office holders and former office holders and other long-term active members of Mr. Reagan's campaign and political staffers, are planning to contribute tens of millions of dollars -- perhaps as much as $50,000,000 -- to the Republican nominees' campaign in fundamental violation of the Fund Act and the Federal Election Act." Notwithstanding this bold assertion, C-M and the DNC fail to allege a single fact to support a funding that NCPAC is "interrelated"[2/] with the other named Respondents; that NCPAC consists of active members of Mr. Reagan's campaign; or, that NCPAC plans "to contribute" to Governor Reagan's general election campaign. Thus, it is requested that the Commission review only the factual assertions, stripped of

---

[2/] It appears that what C-M and the DNC are attempting to allege by the use of the word "interrelated" is that two or more of the Respondents may be affiliated committees. See, 11 CFR 100.5(g). There is no showing, however, that NCPAC is affiliated with any of the other Respondents.

the irrelevant, inflammatory rhetoric and unsupported conclusions, in determining whether the complaint is sufficient on its face to describe a violation by NCPAC of a statute or regulation over which the Commission has jurisdiction.

II. The Alleged Violations of Law in the Complaint are Not Supported by Fact

With reference to the section in the complaint captioned, "Violations of the Law," C-M and the DNC assert that the law has been violated by "a facade of independence" and that "formalistic sham and technicality will not obscure reality." These artistic and creative phrases are not supported by fact and fail to support a finding of reason to believe that NCPAC has committed, or is about to commit, a violation of a statute or regulation over which the Commission has jurisdiction.

For the benefit of the record, however, NCPAC asserts the following with respect to the specific allegations:

> Paragraph I(a)(1) is denied in that it fails to state a violation supported by the facts or by the law. See, AO 1979-80 and AO 1980-46;
>
> Paragraph I(a)(2) is denied in that it is not applicable to NCPAC, which is a multi-candidate political committee;

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Paragraph (I)(a)(3) is denied in that it fails to state a violation supported by the facts or by the law;

Paragraph (I)(b) is denied in that it fails to state a violation supported by facts before the Commission;

Paragraph II(a) is denied in that it fails to state a violation supported by facts before the Commission;

Paragraph II(b) is denied in that it fails to state a violation supported by facts before the Commission;

Paragraph III is denied for the reasons described above;

Paragraph IV is denied for the reasons described above;

Paragraph V is denied for the reasons described above;

Paragraph VI is denied for the reasons described above;

Paragraph VII is denied for the reasons described above;

Paragraph VIII is denied (The Commission has failed to interpret the application of 26 U.S.C. 9012(f) and the issue is before the courts.);

Paragraph IX is not applicable to NCPAC; and,

Paragraph X is denied in that NCPAC is not an authorized committee and, therefore, its name does not include the name of any candidate in its name. The fact that under its name it conducts a project known as "The Ronald Reagan Victory Fund," does not constitute a violation of 2 U.S.C. 432(e)(4) and it is a communication protected by the First Amendment to the Constitution. All statements required by 2 U.S.C. 441d include the full name of the committee. For example, see tab 81 of the exhibits to the complaint.

III. Conclusion

Contrary to their ambitious assertions in page 2 of the complaint, C-M and the DNC have failed to show through a recitation of facts that NCPAC has committed, or is about to commit, a violation of a statute or a regulation over which the Commission has jurisdiction. Furthermore, the Commission is without authority to conclude that there is reason to believe that 2 U.S.C. 431(17) and 11 CFR 109.1 have been, or may be, violated because of a fear by C-M and the DNC that independent expenditures may determine the identity of the next President of the United States and may determine whether public financing of presidential election campaigns can survive.[3/] See, Buckley v. Valeo, 424 U.S. 1, 14 (1976); Speiser v. Randall, 357 U.S. 513, 520-21, 525-26 (1958); and, First National Bank of Boston v. Bellotti, 435 U.S. 765, 785 n.21 (1978).

As a consequence, the relief sought by C-M and the DNC against NCPAC should be denied and no action should be taken against NCPAC on the basis of the complaint.

Respectfully submitted,

Sincerely yours,

J. Curtis Herge
Counsel to National Conservative
Political Action Committee

3/ Page 3 of the complaint.

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FIRST CLASS

SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

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

FIRST CLASS MAIL

FIRST CLASS

ACC* 1959

National Conservative Political Action Committee

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

July 15, 1980

Charles N. Steel
General Counsel
Federal Election
Commission
1325 "K" Street
Washington, DC
20463

Re: MUR1252, Complaint of Carter Mondale Presidential Committee, Inc. v. Ronald Reagan, et. al. (filed July 2, 1980)

Dear Mr. Steel:

This letter is to inform you Mr. J. Curtis Herge is authorized to represent the National Conservative Political Action Committee is the above referenced case. All correspondence should be directed to him at the address listed below.

Sedan & Herge
7600 Old Springhouse Road
McLean, Virginia 22102
(702) 821-1000

Sincerely,

Candace M. Taw

Candace M. Taw
Office Manager

cc: J. Curtis Herge

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FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
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National Conservative
Political Action Committee
1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

Charles N. Steel
General Counsel
Federal Election Commission
1325 "K" Street
Washington, DC
20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1980

HAND DELIVERED

John T. Dolan
Chairman
National Conservative Political Action
Committee
1500 Wilson Blvd.
Suite 513
Arlington, Virginia 22209

Dear Mr. Dolan:

Enclosed is a copy of the letter the Federal Election Commission today directed be sent to counsel for the Carter-Mondale Presidential Committee, Inc.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John T. Dolan
Chairman
National Conservative Political Action
Committee
1500 Wilson Blvd.
Suite 513
Arlington, Virginia 22209

Re: MUR 1252

Dear Mr. Dolan:

This letter is to notify you that on July 2, 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") and Chapter 95 of Title 26, U.S. Code. We have numbered this matter MUR 1252. Please refer to this number in all future correspondence.

A copy of the complaint is enclosed. We understand that complainant hand delivered a copy of the complaint including exhibits to you on July 2, 1980. Therefore, we have not enclosed a copy of these extensive exhibits to the complaint. However, if you would like another copy of the exhibits, we would, of course, provide it upon request.

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.

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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.

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

Enclosures

1. Complaint
2. Procedures

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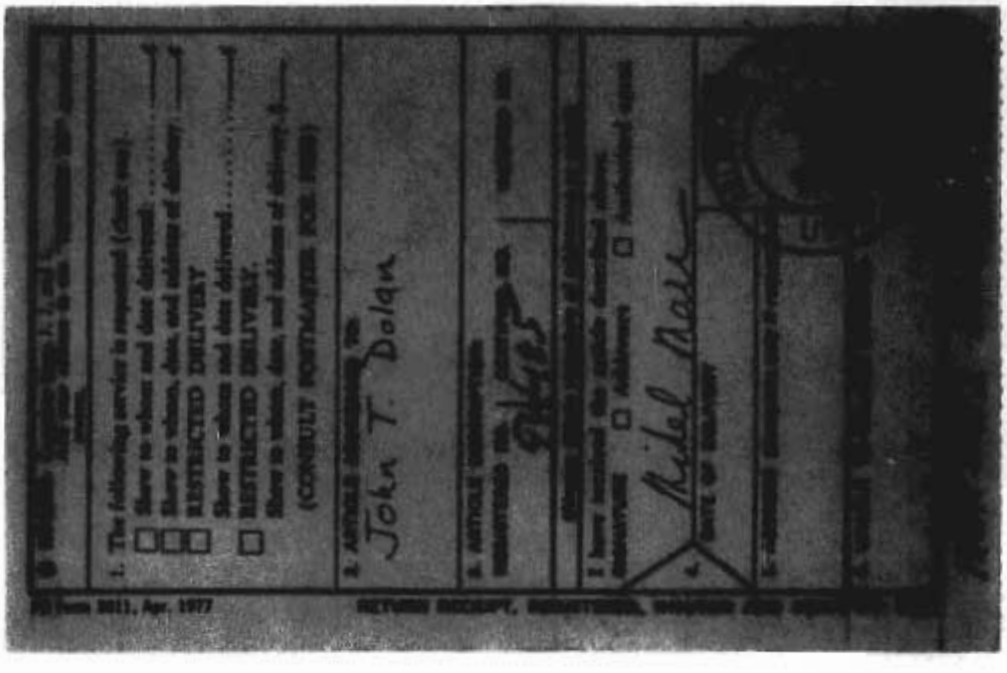

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FEDERAL ELECTION COMMISSION

FCM telephone bills

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	X	(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 Lynne A. Weissenborn

Date 6/20/83

FEC 9-21-77

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Robert R. Sparks, Jr.
Counsel, Fund for a Conservative
Majority
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the Fund for a Conservative Majority ("FCM"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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SUITE 820
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WASHINGTON, D.C. 20006
(703) 821-1000
TELEX: 710-831-0898
CABLE: SEDANHERGE

April 19, 1983

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

Re: MUR 1252/1299

Dear Ms. Emmons:

This letter is written on behalf of our client, Fund for a Conservative Majority ("FCM"), in response to the General Counsel's Brief to the Commission in this matter, dated March 25, 1983.

In that brief, the General Counsel has recommended that the Commission find no probable cause to believe as to the purported violation of 2 U.S.C. §432(e)(4). We have no dispute with that recommendation. We do, however, dispute the recommendation that the Commission take no further action with respect to the alleged violation of 2 U.S.C. §441a(a), and that a finding of probable cause to believe be entered, but that no further action be taken, as to the alleged violation of 26 U.S.C. §9012(f).

The Recommendation as to 2 U.S.C. §441a(a).

The General Counsel's investigation of the complaints filed by the Carter/Mondale Committee and Common Cause in this matter has spanned some two and one-half years, with no discernible result other than the expenditure of an extraordinary amount of time and taxpayers' money. There is no evidence whatsoever of prohibited coordination of expenditures between FCM and its agents, on the one hand, and any authorized Reagan Committee or its agents, on the other. The General Counsel's Brief does claim that an "opportunity" or potential for coordination existed

because of the use by the Reagan campaign and FCM of certain common vendors; but no actual evidence of prohibited coordination was found.

If the General Counsel has found no evidence of a violation of 2 U.S.C. §441a(a) - and he admits in his Brief that he has found none; he relies solely on "presumptions of coordination" (p.55) - then the Commission should find no probable cause to believe that a violation of that law has occurred, and close the file. FCM and those representatives of the official Reagan campaign contacted by the office of General Counsel have all steadfastly denied any forbidden coordination; so, too, have the common vendors deposed in this matter. The General Counsel has found no more than the potential or an opportunity for coordination; and that based only on supposition and conjecture.

No evidence of unlawful coordination has been found because there is none. To recommend, as the General Counsel does, simply that no further action be taken, without a recommendation as to probable cause, does not do justice to FCM. In addition, such a recommendation, if adopted by the Commission, does not appear to be authorized by 2 U.S.C. §437g. That statute suggests that the only findings available to the Commission are "probable cause" or "no probable cause."

Moreover, there is an even more compelling reason why the Commission should not accept the recommendation of the General Counsel. The Commission is the agency charged by Congress with enforcement and, through its advisory opinion powers, interpretation of the Federal Election Campaign Act of 1971, as amended. As such, the public in general, and respondents in particular, look to it for intelligible guidance as to what is and is not permitted under the Act. The General Counsel's recommendation disserves the Commission's purpose, for it provides no guidance, either to FCM or to the public at large, as to what types of activities or relationships (social or commercial) are permitted under the Act. From the General Counsel's recommendation, no lessons can be gleaned as to what constitutes actionable or prohibited coordination under the Act.

So that respondent FCM, and the public at large, will know what is unlawful coordination and what is not, the Commission should find no probable cause to believe that FCM has violated the law on these facts. Such a finding is the only

logical finding consistent with the General Counsel's determination that no actual evidence of prohibited coordination has been found.

The Recommendation as to 26 U.S.C. §9012(f).

In a lawsuit brought by the Commission against FCM, 26 U.S.C. §9012(f) was declared unconstitutional by a three-judge district court of the District of Columbia. That decision was affirmed by a 4-4 vote by the Supreme Court.

The Commission has lost the lawsuit it brought against FCM. Now, however, aware that it cannot successfully bring another action against FCM for its 1980 presidential election activities, the General Counsel nevertheless recommends that the Commission find that FCM violated the law, but recommends that nothing be done about it. The General Counsel should not be permitted to have it both ways. The enforceability of 26 U.S.C. §9012(f) has been decided against the Commission - at the very least for the 1980 election cycle, although we contend it has been decided for all elections thereafter, as well.

The Commission, if it adopts the General Counsel's recommendation, will leave FCM in the position of having had entered against it a finding that it has violated a law that has been declared unconstitutional by a federal court. The Commission should decline to enter a finding that FCM has violated the law, just as a three-judge district court (undisturbed by the Supreme Court) has already done with respect to FCM.

Moreover, the General Counsel's thinly-veiled threat that future independent expenditures by FCM in support of a publicly-financed candidate would be answered by Commission enforcement proceedings is even more insidious than his inconsistent recommendation that the Commission find that FCM violated the law but that the Commission should take no action. The General Counsel's threat is apparently intended to frighten FCM and others and discourage them from exercising their right to express their support of future presidential candidates through expenditures.

Whether or not the Supreme Court's affirmance has precedential effect, as a matter of judicial economy and sensitivity to the most effective means of spending what tax

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dollars are allocated to the Commission, no further Commission action with respect to enforcement of 26 U.S.C. §9012(f) should be taken. The constitutionality - and, hence, the enforceability - of that provision has been litigated and decided against the Commission. The Commission should enforce those provisions of the law that have not been determined to be unconstitutional, and should not indulge in a quixotic campaign to litigate again an issue already decided.

As a matter of equity, if for no other reason, the Commission should find no probable cause to believe that FCM has violated 26 U.S.C. §9012(f). A court has, and would again, so find in favor of FCM; this Commission should do so, as well.

Sincerely,

Robert R. Sparks, Jr.

cc: Ann Weissenborn

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Docket 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

Robert R. Sparks, Jr.
Counsel, Fund for a Conservative Majority
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

SENSITIVE

RE: MUR 1252/1299

Dear Mr. Sparks:

Based on a complaint filed with the Commission on July 2, 1980, the Commission determined on September 3, 1980, that there was reason to believe that your client, the Fund for a Conservative Majority, had violated 26 U.S.C. § 9012(f), 2 U.S.C. § 441a(a) and 2 U.S.C. § 432(e)(4). On September 26, 1980, a second complaint was filed also alleging violations of 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by your client. An investigation of this matter ensued.

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 of 26 U.S.C. § 9012(f) occurred, but that no further action be taken; that no further action be taken with regard to the alleged violation of 2 U.S.C. § 441a(a), and that no probable cause to believe be found with regard to the alleged violation of 2 U.S.C. § 432(e)(4). The Commission may or may not approve the General Counsel's recommendations.

Submitted for your review is a brief stating the positions 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 positions 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 the General Counsel,

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again if possible. The General Counsel's brief and any brief you may submit will be considered by the Commission before proceeding to a vote.

Should you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1252/1299
Fund for a Conservative Majority	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The issues involved in this matter were brought to the attention of the Commission as a result of complaints filed on July 2, 1980, and on September 26, 1980, by the Carter/Mondale Reelection Committee and the Democratic National Committee, and by Common Cause alleging violations of provisions of the Federal Election Campaign Act of 1971, as amended, and of 26 U.S.C. § 9012(f) by the Fund for a Conservative Majority ("FCM"). 1/ On September 3, 1980, the Commission found reason to believe that FCM had or was about to violate 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan, 2 U.S.C. § 441a(a) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan, and 2 U.S.C. § 432(e)(4) by using the name "Ronald Reagan" in the name of its self-designated "project", "Citizens for Reagan in '80."

Notification of the Commission determinations were sent to FCM on September 25, 1980, followed, on October 1, 1980, by a subpoena for production of documents and an order for answers to written questions. (Attached as Exhibit A). FCM submitted

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1/ On October 15, 1980, the two complaints were merged to form MUR 1252/1299.

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answers to the interrogatories on October 14, 1980 (attached as Exhibit B-1 and B-2). On that same date, FCM filed a motion to quash or modify the Commission's subpoena, which motion was denied by the Commission on December 16, 1981. FCM began document production on October 22, 1980; the last submission was made in December, 1981. Depositions have been taken of the chairman and the treasurer of the committee, as well as of the former treasurer and the former deputy director for communication of the Reagan/Bush Committee.

II. Legal Analysis

A. Alleged Violation of 26 U.S.C. § 9012(f)

In 1971, Congress established a system for the public financing of presidential elections. Enacted as the Presidential Election Campaign Fund Act, Pub. L. No. 92-178, 85 Stat. 573 (1971) ("the Fund Act"), this system permits individual taxpayers to participate voluntarily in the funding of presidential election campaigns by means of a $1.00 tax return check-off. Major party candidates who satisfy the eligibility requirements of 26 U.S.C. § 9003 are entitled to equal payments from the fund to defray qualified campaign expenses. Once such a candidate has chosen to accept public funds, he or she may accept private contributions only if they are necessary to make up a deficiency in the Presidential Election Campaign Fund. 26 U.S.C. §§ 9003(b)(2), 9012(b). Such candidates must also pledge not to make qualified campaign expenditures in excess of his or her

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allotment pursuant to 26 U.S.C. § 9004. 26 U.S.C. § 9001(b)(1). In 1980, this allotment totaled $29.4 million per major party candidate.

Congress was also concerned that the stated legislative purposes of the public financing of presidential campaigns could be undermined by the infusion of private funds into the political process in the form of independent expenditures by unauthorized committees on behalf of the presidential candidates receiving public funds. 2/ Congress recognized the potential danger to its goals of controlling the amounts spent in presidential elections and of limiting the influence of private monies in these elections if political committee leaders could raise large numbers of contributions and use this aggregated wealth to defray expenses which would otherwise be qualified campaign expenses subject to the candidate's statutory expenditure limitation.

In order to prevent the undermining of the candidate's expenditure limitation and to assure that the receipt of public funds would be a substitute for private funds, not just a

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2/ The stated purposes of public financing were to free the candidates from the rigors of fundraising; promote public discussion of issues; restore public confidence in government; "make a major change that would be a tremendous improvement toward lifting the office of the Presidency above the power of private money to control it," 117 Cong. Rec. 41,947 (1970) (remarks by Senator Long); "take the whole presidential electoral process out of the arena of big astronomical money," 117 Cong. Rec. 42,377 (1971) (remarks of Senator Pastore); and thus "end the most flagrent single abuse of our democracy, the unconscionable power of money." 117 Cong. Rec. 41,778 (1971) (remarks of Senator Kennedy).

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supplement to those funds, Congress also included in the Fund Act a limitation of $1,000 on the amount of independent expenditures an unauthorized political committee may incur to further the election of a candidate for the office of President who is eligible to receive public funds pursuant to 26 U.S.C. § 9003. The addition of what is now Section 9012(f) was designed "to prevent any political committees from being formed as a subterfuge so that they can go beyond the authorization of the committees and make expenditures that were not within the limitations of the expenditures which are in the bill." 117 Cong. Rec. 42,397 (1971) (remarks of Senator Taft).

Any knowing and willful expenditures totaling in excess of $1,000 by unauthorized political committees for goods or services which would constitute qualified campaign expenses if incurred by the committee of the candidate being supported are in violation of Section 9012(f). 26 U.S.C. § 9002(1) defines "qualified campaign expense" as (A) an expense incurred by a candidate of a political party for the office of President or Vice President or by an authorized committee of such candidates "to further" their election to such offices; (B) an expense incurred within the expenditure report period of such candidates (i.e., in the present instance between the date of nomination and thirty days after the presidential election; and (C) an expense the incurring of which is not in violation of law.

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On July 24, 1980, the Commission determined that Ronald Reagan, the nominee of the Republican Party for the office of President, was eligible to receive public funds pursuant to 26 U.S.C. § 9003 and certified payment to him of $29.4 million.

In 1980, FCM was a multicandidate political committee not authorized by Ronald Reagan to make expenditures on behalf of his candidacy. 3/ This committee was and still is funded primarily by means of direct mail solicitations. (Deposition of Robert C. Heckman, Chairman of FCM, page 7).

During 1979 and 1980, FCM reported making $1,772,835 in independent expenditures in support of Ronald Reagan's primary and general election campaigns for the office of President. Fifty-five percent of this amount, or $986,059, was spent during Ronald Reagan's general election expenditure report period, i.e., between July 16, 1980 and December 4, 1980. These latter expenditures purchased services from political consultants, in particular Michael Thompson and Associates which carried out FCM's direct mail solicitation efforts; paid for phone banks and for printing, postage and mailing services related to direct mail solicitations; covered certain staff salaries and travel costs; and purchased at least $219,000 in media advertisement production and placement services through the firms of Edmonds Associates,

3/ Prior to October 13, 1976, FCM was registered with, and reported to, the Commission as the Young Americans Campaign Committee.

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Inc.; HML, Inc.; and Thompson and Associates. These expenditures, which were carried out as part of FCM's "Citizens for Reagan in '80" project, indicate that FCM's 1980 activities in support of the Reagan candidacy covered the full range of campaign activities which any presidential candidate's committee would undertake if not bound by the prohibition against receipt of private contributions and the limitation on expenditures imposed upon recipients of funds from the Presidential Election Campaign Fund. FCM solicited contributions on a nation-wide basis and used monies received to make expenditures for media advertising and other means of promoting the candidacy of Ronald Reagan. These expenditures in effect permitted the Reagan campaign to benefit from private contributions which it could not itself receive; they also added $986,059 to the $29.4 million expenditure limitation of the Reagan candidacy itself. 4/

Such receipt of private contributions and supplementation of the candidate's expenditure limitations were exactly what FCM intended to achieve by its expenditures. When asked the purpose of FCM's project, "Citizens for Reagan in '80", Robert Heckman, Chairman of FCM, stated, "The primary purpose was to give our donors an outlet for participating in the presidential election. We would buy and run media advertisements,...and we did massive

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4/ Although a considerable portion of this amount represented direct mail solicitation expenses, it should be noted that the direct mail pieces served as means for expressing political views in support of Ronald Reagan as well as for requesting contributions. (See Exhibits C, D, G and J for examples).

direct mail mailing on (Reagan's) behalf." (Deposition of Robert Heckman, pages 15-16).

In its direct mail solicitation letters, FCM explained the general election expenditure limitation upon the candidates of the major parties and the inability of Ronald Reagan to accept private contributions. This information was used to underline the fact that FCM saw itself as being under no expenditure limitation, to stress the importance of FCM's planned expenditures in support of Ronald Reagan, and to urge those being solicited to contribute to FCM as a means of contributing to the Reagan campaign effort. For example, in a solicitation entitled, "Reagan/Vice-Presidential Survey Package", which was apparently mailed during the late primary period, Mr. Heckman directed the attention of the reader to the general election period by stating

> Once Reagan is nominated at the Republican convention, we will not stop our campaign - no indeed. "Citizens for Reagan" will continue to campaign right up to election day.
>
> As an independent campaign, "Citizens for Reagan in '80" is not bound by the federal law to disband after Ronald Reagan's nomination. However, the only money Ronald Reagan will have after his nomination will be that which the Federal Election Commission gives him.
>
> As an independent effort "Citizens for Reagan in '80" has no limit on expenditures before or after the nomination.
>
> Ronald Reagan can win in 1980. But to win he needs your help today. (Emphasis in original.) (Attached hereto as Exhibit C).

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In another solicitation letter, apparently also mailed late in the primary election campaign period, Mr. Heckman wrote:

> But FCM knows that Ronald Reagan will be running against more than just Jimmy Carter this fall.
>
> Of course, both men will receive their limited campaign budgets from the federal government. But as the incumbent President, Carter will use the White House and federal spending to the maximum to try to buy the election.
>
> . . .
>
> Only you can help offset these built-in disadvantages faced by Ronald Reagan. And you can help defeat Jimmy Carter. (Emphasis in original.)
>
> Your support of FCM's "Citizens for Reagan in '80" campaign will directly help elect Ronald Reagan our next President.
>
> Because of the way the federal campaign law is written, this independent effort for Ronald Reagan can spend as much money as can be raised from people like you.
>
> . . .
>
> Remember, you will not be able to contribute to the official Reagan for President organization after Ronald Reagan is nominated. Federal law prohibits it. (Emphasis in original.)
>
> But you can help elect Ronald Reagan by sending your contribution today to the Fund for a Conservative Majority. (Attached hereto as Exhibit D).

Such solicitation of contributions and making of expenditures by an unauthorized political committee in support of a presidential candidate receiving public funds was exactly what Congress intended to limit by the promulgation of

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Section 9012(f). In addition, because FCM's $986,059 in general election-related expenditures were incurred within Ronald Reagan's general election report period and would have constituted qualified campaign expenses if incurred by his authorized committees, the FCM expenditures come squarely within the language as well as the intent of Section 9012(f), and consequently within the limitations imposed thereby.

On July 15, 1980, the Commission filed a complaint in the United States District Court for the District of Columbia pursuant to 26 U.S.C. §§ 9010(c) and 9011(b) seeking to implement and construe 26 U.S.C. § 9012(f) as applicable to three political committees, including FCM. On September 30, 1980, the three-judge court rendered its judgment and opinion, finding that "(t)he plain language of section 9012(f) proscribes categorically the defendants' planned expenditures," but also declaring 26 U.S.C. § 9012(f) to be unconstitutional. FEC v. Americans for Change, 512 F. Supp. 489, 492, 500-501 (D.D.C. 1980).

On January 19, 1982, the Supreme Court affirmed by an equally divided Court the finding of the three-judge District Court that 26 U.S.C. § 9012(f) is unconstitutional. Common Cause, et al. v. Harrison Schmitt, et al., No. 80-846, United States Supreme Court, consolidated with Federal Election Commission v. Americans for Change, et al., No. 80-1067, United States Supreme Court. While the Court's decision effectively closed the civil litigation in FEC v. AFC, the equally divided

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nature of the Court's opinion left the issue of the constitutionality of Section 9012(f) still unresolved and thus open. A judgment entered by an equally divided Court is not "entitled to precedential weight". Trans World Airways v. Hardison, 432 U.S. 63, 73 n.8 (1977). See also, Neil v. Biggers, 409 U.S. 188 (1972); Inman v. Baltimore and Ohio Railroad Co., 361 U.S. 138 (1959); and Ohio ex rel Eaton v. Price, 364 U.S. 263 (1960).

Given the law regarding the non-precedential nature of equally divided Supreme Court opinions, the Commission would not be barred from relitigating the issue of the enforceability of 26 U.S.C. § 9012(f). The remaining question is therefore whether or not to pursue enforcement against FCM for its clear violation of this provision in 1980.

As regards this particular committee, the prospect of eventual litigation arising out of a 1980-related enforcement action by the Commission necessitates consideration of the potential effects of res judicata and collateral estoppel. Although judicial interpretation of these doctrines is not settled, there appears to be general agreement that parties to a particular suit are barred from re-litigating in a second action the same issues of fact involving the same parties which have been before a court in an earlier action, either again before the same court in which the initial suit was brought or before other courts of like or lesser jurisdiction. American Medical

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International, Inc. v. Secretary of Health, Education and Welfare, No. 79-1460 (D.C. Cir., Aug. 14, 1981); Walsh v. International Longshoreman's Association, AFL-CIO, 630 F.2d 864 (1st Cir. 1980); U.S. v. Anaconda Co., 445 F. Supp. 486 (D.C.D.C. 1977). Therefore, it is likely that, because FCM was a party in FEC v. Americans for Change, supra, the Commission would be deemed estopped from attempting again to enforce Section 9012(f) as regards the 1980 campaign activities of this committee.

Beyond the question of whether the Commission would succeed in any further enforcement effort, it is the General Counsel's view that the Commission should consider that it made a strong attempt to enforce the provisions of the statute in the 1980 election. Further attempts could be made by pursuing this and other cases. In the unique circumstances, however, of a deadlocked Supreme Court on the issues as raised in the 1980 election, avoidance of further litigation over the same issue with regard to the election past seems to the General Counsel to be a valid exercise of the Commission's judgment in pursuing cases.

It must be emphasized, however, that future expenditures by FCM in furtherance of the election of a publicly financed presidential candidate would create a new factual situation to which considerations of estoppel and prior Commission efforts need not apply. Section 9012(f) has not been declared unconstitutional by the United States Supreme Court. FCM is thus

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on notice that any project or program involving more than $1,000 in expenditures on behalf of a presidential candidate receiving funds pursuant to 26 U.S.C. § 9001, et seq., in 1984 or beyond would be undertaken in the knowledge that 26 U.S.C. § 9012(f) as enacted by Congress remains in effect.

This Office recommends that the Commission find probable cause to believe that FCM violated 26 U.S.C. § 9012(f) in 1980 but take no further action with regard to this particular violation.

B. Alleged Violation of 2 U.S.C. § 441a(a)(2)(A)

2 U.S.C. § 441a(a)(2)(A) limits to $5,000 the amount of contributions which a multicandidate political committee can make to any candidate and his authorized committees with respect to any election for Federal office. 2 U.S.C. § 431(8)(A)(i) and 11 C.F.R. § 100.7(a)(1) define "contribution" as including "anything of value made by any person for the purpose of influencing any election for Federal office." 11 C.F.R. § 100.7(a)(1)(iii)(A) states that "anything of value" includes all in-kind contributions, which are in turn defined as the provision of goods and services without charge or at less than the normal and usual charge. Expenditures made by a political committee which "expressly advocate the election or defeat of a clearly identified candidate, but which are not made with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any

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agent or authorized committee of such candidate" are deemed independent expenditures and not in-kind contributions. 2 U.S.C. § 431(17) and 11 C.F.R. § 109.1(a). Therefore, in the present instance, a finding of probable cause to believe that FCM violated 2 U.S.C. § 441a(a)(2)(A) would require evidence of cooperation or consultation by FCM representatives with an authorized Reagan committee related to the making of FCM's expenditures in support of the Reagan candidacy.

1) Organization and Expenditure Authorizations

During 1979-80, FCM was governed by a Board of Directors composed of Robert C. Heckman, who also served as Chairman, Kenneth F. Boehm, who also served as Treasurer, and Jeffrey Kane. (Heckman Deposition, page 8). The Board formulated policy and authorized expenditures. Expenditures could also be authorized by Mr. Heckman. Mr. Boehm could authorize expenditures if they were in line with Board policy. Mr. Heckman has asserted that he "exercised the authority to oversee all facets of the operation, including expenditures." (Heckman Deposition, page 10).

Final decisions with regard to fundraising and media time buys were usually made by the Chairman "in conjunction with" Mr. Boehm. (Heckman Deposition, page 10. See also Deposition of Kenneth Boehm, Treasurer of FCM, page 11).

Ralph Galliano served as Executive Director of FCM during 1979-80. His role was to direct the staff in carrying out policy established by the Board or the Chairman. (Heckman Deposition, page 8). He did not serve on the Board of Directors.

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Mr. Heckman stated that certain fundraising and media time buying consultants could also authorize expenditures on behalf of FCM when "working on projects previously authorized by FCM's Treasurer or Executive Director". (Exhibit B-1, page 2). These consultants were Michael Thompson of Thompson and Associates, FCM's direct mail fundraiser; Thomas Edmonds of Edmonds Associates, Inc., which provided television commercials; and H.M.L., Inc., a California TV production and time buying company. (Exhibit B-1, page 2 and Heckman Deposition, pages 11-12).

2) Committee Policy Regarding Independent Expenditures

The Office of General Counsel has attempted to ascertain the knowledge available to FCM as to the statutory and regulatory requirements pertaining to the making of independent expenditures on behalf of a candidate, the policy formulated to meet these requirements, and the steps taken to disseminate this information and to enforce the maintenance of independence.

In response to the Commission's subpoena for production of documents, FCM produced a letter from J. Curtis Herge, counsel for FCM, to Ralph Galliano dated September 7, 1979, together with an accompanying memorandum, the subject of which reads "Guidelines on Independent Expenditures". (Attached hereto as Exhibit E). The memorandum sets out the statutory definition of "independent expenditure" and also provides counsel's interpretation of this definition. According to the first paragraph of the memorandum, this information was designed

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especially as a guide for field personnel. Mr. Heckman has testified that the memorandum was widely distributed and available, and that consultants were informed about their responsibilities regarding independent expenditures. (Heckman Deposition, pages 17-18).

Mr. Boehm stated that a session was held with field representatives when they were first hired, and that

> they were told, if they got to a campus and there was official Reagan activity, that they should avoid it if it was well organized and move on to the next campus, just to avoid any possibility of mingling. (Boehm Deposition, page 19).

He also noted that discussions took place in the office "to make sure that the people we had who were temporary employees ... knew that they had to work with us and us alone." (Boehm Deposition, page 20).

3. Application of 11 C.F.R. § 109.1(b)(4)(ii)(B); Non-Presumptive Evidence of Contacts

Pursuant to 11 C.F.R. § 109.1(b)(4)(i)(B), expenditures are to be presumed to have been made by "arrangement, coordination or direction" of a candidate or the candidate's agent or authorized committee if they are

> Made by or through any person who is, or has been, authorized to issue or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent ....

Based on this regulation, evidence that personnel of any unauthorized committee, authorized to make expenditures on its

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own behalf, had once been, or later became, officers of, or compensated by an authorized committee of the candidate being supported, or that an unauthorized committee had employed the same vendors or consultants as those employed by an authorized committee, gives rise to the presumption that the unauthorized committee has consulted with, or coordinated its activities with, the candidate or his/her authorized committee. Once a presumption is raised, it then becomes necessary to examine the facts surrounding an individual or a vendor's relationship to the activities of the respective committees involved in order to determine whether or not the alleged independence of the unauthorized committee's expenditures has apparently been compromised.

In situations where a presumption of coordination would not arise pursuant to Section 109.1(b)(4)(i)(B), evidence should still be sought of contacts through the individual or vendor involved which could point to actual or possible coordination of activities.

A. Involvement of Individuals

Mr. Heckman has testified that he was neither employed by nor a volunteer for an authorized committee of Ronald Reagan during the 1979-80 election cycle. (Heckman Deposition, page 5). He stated that he could not remember whether he had volunteered for the Reagan campaign in 1976. (Heckman Deposition, pages 5-6). 5/

5/ The Commission has not found that employment or association prior to candidacy is presumptive of non-independence. (See AO 1979-80, at 5).

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Kenneth Boehm has testified that he had no relationship with an authorized Reagan committee during the 1980 campaign period. In 1976, he was an elected delegate from Pennsylvania to the Republican National Convention where he supported Mr. Reagan, and he also worked as a volunteer for Youth for Reagan in Pennsylvania. (Boehm Deposition, page 6).

FCM has provided a list of all persons employed by FCM between September, 1979, and January, 1981. (Exhibit B-1). Mr. Heckman has stated that "(t)here is no way for FCM to know whether each of the individuals identified in Interrogatory B [list of employees] has any relationship (past or present) with the groups and associations listed in Interrogatory E [including authorized Reagan committees and other respondent committees]. Such information is not requested or required upon their employment with FCM, and such records are not kept by FCM...." (Exhibit B-1, pages 2-3. See also Exhibit A, page 10). The only exceptions given were the involvement of all FCM employees in FCM's "Citizens for Reagan in '80" project, Mr. Ralph Galliano's prior associations with Arthur J. Finkelstein on behalf of FCM, and his prior employment with the National Conservative Political Action Committee, and the fact that "many of the employees of FCM are registered Republicans". (Exhibit B-1, page 3). Mr. Heckman has asserted that as far as is known to him, "no individual identified in Interrogatory B had any association with the Reagan for President Committee". (Exhibit B-1, page 3).

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The Office of General Counsel has not found evidence of prior associations other than those cited above, and in particular no evidence that persons authorized by FCM in 1979-80 to make expenditures had served as officers of an authorized Reagan committee or received any form of compensation or reimbursements from such committees during this same period.

B. Use of Common Vendors

The principal bases for the findings of reason to believe that FCM violated 2 U.S.C. § 441a(a) were its use of four vendors in common with the Reagan for President Committee. During the course of its investigation, the Office of General Counsel found several additional vendors and consultants who had received compensation from both FCM and the Reagan for President Committee or the Reagan/Bush Committee. This Office has taken the depositions of representatives of those vendors whose employment served as the basis for the finding of reason to believe and questioned both Reagan campaign and FCM representatives about the nature and content of the services performed by common vendors.

a. Differentiation by Nature of Services

The investigation of the vendors common to FCM and the Reagan committees has revealed that certain ones were hired to perform only ministerial functions, while two played more active consultative roles with at least one of the vendee committees involved. The first group apparently had no input into the planning of the ultimate product or in the selection of the

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components of a particular service, but, rather, were provided with all components by the client and merely performed as instructed. Included in this group are Diversified Direct, Inc., Wiland and Associates, Telecommunications Industries, Inc., Tri-State Envelopes, and Metro Printing and Mailing Services.

i) Diversified Direct, Inc.

As noted above, both Mr. Boehm and Mr. Heckman testified that direct mail activity undertaken by FCM in 1979-80 was handled by Michael Thompson and Associates of Springfield, Virginia. (Boehm Deposition, page 20; Heckman Deposition, page 23). Mr. Heckman stated that FCM maintained "very heavy control" over Thompson's work.

> "We met with Thompson . . . on a consistent basis to review work they were doing, and we could have cut it off at any time. We made all decisions that were of any substance whatsoever . . . . I would have seen the initial draft (of any fundraising letter), may have made changes on every other draft between the beginning and the end." (Heckman Deposition, page 22).

Thompson and Associates was given the authority to hire sub-vendors, although FCM could overrule these selections. (Heckman Deposition, page 22). According to invoices made available by FCM, Thompson selected Diversified Direct, Inc. as such a sub-vendor, this being one of three of the vendors whose earlier activities on behalf of the Reagan campaign formed the basis for the Commission's finding of reason to believe that FCM had violated the Act.

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According to testimony provided by Mr. George P. McDonnell, co-founder and former chief executive officer of Diversified Direct, Inc., this company was a printing and mailing company, the assets of which had been purchased by Mr. McDonnell from Diversified Mail Marketing, Inc., a printing company owned by Richard A. Viguerie. At the time of his deposition, Mr. McDonnell was employed by the Richard A. Viguerie Company as a creative vice president. (McDonnell Deposition, pages 3-5, 8).

Mr. McDonnell described the activities performed by Diversified Direct, Inc. for clients as follows:

> Directly we performed printing, and we acted as a broker for mailing services, which would be stuffing of envelopes, putting labels on an envelope, putting a stamp on, taking the mail to the Post Office. (McDonnell Deposition, pages 7-8).

Mailing lists were provided by the client, not maintained by Diversified Direct itself. (McDonnell Deposition, page 9).

According to reports submitted to the Commission by the Reagan for President Committee, expenditures were made by that committee to Diversified Direct on March 24, 1980 ($4,097.29), April 22, 1980 ($1,961.27), May 14, 1980 ($11,614.25) and June 18, 1980 ($17,527.16). (Exhibits A, B and C to McDonnell Deposition; invoices and solicitation letters attached hereto as Exhibit F). Mr. McDonnell confirmed that Diversified performed services for the Reagan for President Committee and stated that these services were performed through the agency of Black, Manafort and Stone. (McDonnell Deposition, page 10. See also

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Deposition of Angela M. Buchanan, former treasurer of the Reagan for President Committee, page 77). When asked if Diversified Direct's work for Black, Manafort and Stone ever involved discussions of the Reagan campaign, Mr. McDonnell answered "No". He also denied any discussion or suggestions made by Diversified personnel as to how the Reagan campaign should be run. (McDonnell Deposition, page 12).

Mr. McDonnell identified the Diversified Direct invoices sent to the Reagan for President Committee which showed that Diversified Direct had undertaken printing and mailing services for Reagan for President. Identification of sample direct mail pieces and the matching of those pieces to particular invoices proved to be more difficult, partly because Mr. McDonnell did not necessarily see all items printed or otherwise handled by his company and also because the actual services performed by the company varied. For example, an invoice could show that Diversified performed printing services involving computer forms, with the actual work involved having been the printing of only the heading, not body copy; or, in other cases, the printing of both the heading and the body copy could have been performed. In still other instances, an offset letter was produced. (McDonnell Deposition, pages 20-21). However, when asked who would have supplied the copy for a solicitation letter printed by Diversified, Mr. McDonnell stated that it was "always the client or his agency." (McDonnell Deposition, page 19). Diversified

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Direct had no input as to the content of the letters printed. When asked who would have supplied the mailing list, Mr. McDonnell replied, "Always the client." (McDonnell Deposition, page 19).

Reports submitted by FCM indicate that this committee also made expenditures to Diversified Direct, Inc. during the 1979-80 election cycle which were reported as independent expenditures in support of Ronald Reagan. These expenditures were made on May 27, 1980 ($2,012.14), June 24, 1980 ($2,989.53), and July 28, 1980 ($3,078.60), and, according to invoices provided to the Commission by FCM, involved printing services provided in April and May, 1980, apparently for solicitation packages and a follow-up letter regarding telephone solicitations. (See Exhibits D, E and F attached to McDonnell Deposition and Exhibits D, E and F attached to Boehm Deposition; invoices and solicitation packages attached hereto as Exhibits G and C). Again, Mr. McDonnell identified the Diversified Direct invoices but was unable to identify the solicitation packages also submitted by FCM; he stated that another employee of Diversified Direct had dealt with this particular client. When asked who would have supplied the text for the solicitation materials involved, Mr. McDonnell stated, "I would guess Thompson, Associates." (McDonnell Deposition, page 36). When asked about the source of copy for these same solicitation packages, Mr. Heckman of FCM, stated that Thompson and Associates would have supplied the copy. In answer

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to the question, "Would Diversified Direct make any suggestions about that?", Mr. Heckman replied, "Absolutely not." (Heckman Deposition, pages 26-27). Mr. Heckman stated that he would have approved the text of the letters. (Heckman Deposition, page 28). According to both Mr. Boehm and Mr. Heckman, Thompson and Associates would have supplied the mailing lists for these FCM solicitations; the lists were either FCM's in-house lists, lists brokered through Thompson, or others brokered through other houses. (Boehm Deposition, page 34; Heckman Deposition, pages 27-28).

The Office of General Counsel has uncovered no evidence contradicting the testimony of Mr. McDonnell, Mr. Boehm and Mr. Heckman as to the role played by Diversified Direct in the activities of the Reagan for President Committee and of FCM. Based upon that testimony, it is apparent that Diversified Direct played a passive role in its work as a printing and mailing service. It had no creative input with regard to the content of the material printed for either committee, nor did it take the initiative with regard to the selection of mailing lists used. In addition, Mr. Boehm and Mr. Heckman have testified that they were not aware, at the time of FCM's employment of Diversified Direct, that the Reagan for President Committee had also employed that firm as early as April 22, 1980. (Boehm Deposition, page 32; Heckman Deposition, page 25). FCM coordinated its business with Diversified Direct through Thompson and Associates,

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while the Reagan for President Committee dealt either directly with Diversified Direct or through Black, Manafort and Stone. Thus, there was no common intermediary.

Given the passive, almost mechanical nature of Diversified Direct's involvement in the activities of both FCM and the Reagan for President Committee, it appears that the use of this vendor by both committees did not undermine the alleged independence of FCM's expenditures in support of Ronald Reagan.

ii) Wiland and Associates

A second vendor selected for FCM by Thompson and Associates and also cited as the basis for the Commission's finding of reason to believe was Wiland and Associates, Inc., a data processing service bureau formerly located in Culpepper, Virginia, and now located in Fredericksburg, Virginia. According to testimony provided by E. Michael Lawrence, Regional Vice President, Wiland and Associates specializes entirely in direct mail marketing. It maintains mailing lists, merges and purges mailing lists, prints computer letters, and analyzes response mailings. Wiland owns no mailing lists, but maintains lists for some of its customers. (Lawrence Deposition, page 5). The printing undertaken by Wiland can involve the computer printing of names and addresses on a letter format or on labels, but not the printing of the text of a letter itself; however, in the case of laser printing, Wiland could print the entire text of a letter. (Lawrence Deposition, pages 9 and 18-19). Wiland is not involved in the writing of copy. (Lawrence Deposition, page 7).

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Although a subsidiary company of Wiland and Associates, namely, Wiland Market Analysis and List Brokerage Company, used to be in the business of brokering mailing lists between owners and users, Mr. Lawrence testified that this subsidiary has "been dormant for several years". (Lawrence Deposition, page 9). As regards Wiland and Associates, Mr. Lawrence stated that it was possible that suggestions could be made to one client that it might like to rent a list owned by another client, but that that "wasn't any significant part of the business activity." (Lawrence Deposition, page 10). He also stated that "it would be standard not to" discuss a proposed activity of one client with another. "Whatever we are doing for one client, it's with regard to that client's business only. It's not really a proper matter to discuss that with another client." (Lawrence Deposition, pages 10-11).

Reports filed by the Reagan for President Committee show that payments were made to Wiland and Associates on February 22, 1980 ($3,925), March 12, 1980 ($1,400), and April 22, 1980 ($5,710.13). According to these reports, the payments were for mailing services and printing. (See Exhibits 1(a), 1(g) and 1(h) attached to Lawrence Deposition). Mr. Lawrence was unable to identify definitely the solicitation materials supplied to the Commission by the Reagan for President Committee as related to expenditures made to Wiland. A memorandum and Diversified Direct invoice supplied by the Reagan for President Committee seem to show that the first of these payments was for the laser printing

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by Wiland in February, 1980 of letters on computer forms supplied by Diversified Direct. (See attached Exhibit H). The third payment apparently involved at least the laser printing of names and addresses on a response device included in an April mailing, while the second may have involved the printing of cards to be used in relationship to a phone bank. (Lawrence Deposition, pages 18-21 and 25-31 and Exhibit 1; see attached Exhibit I). As regards the content of letters printed, Mr. Lawrence stated that "(w)e don't really have anything to do with the content. It's more a mechanical or production function." (Lawrence Deposition,page 18). According to Mr. Lawrence, it was the Reagan for President Committee which provided the content of the letters and the mailing lists; and it was also the Reagan for President Committee which arranged for any shipments of computer forms from Diversified Direct to Wiland. (Lawrence Deposition, pages 18-22). According to the testimony of the former treasurer of the Reagan for President Committee, Roger Stone was the person with the Reagan campaign who would have contacted Wiland. (Buchanan Deposition, page 78).

FCM also reported expenditures made to Wiland and Associates on January 4, 1980 ($1,900.63), March 3, 1980 ($1,201), March 21, 1980 ($459.17), May 27, 1980 ($1,299), June 24, 1980 ($1,259.11), July 25, 1980 ($13,728.50), September 2, 1980 ($1,835.81 and $1,728.32), August 8, 1980 ($97.10), September 9, 1980 ($3,664.66), October 1, 1980 ($700.51), October 10, 1980 ($47.73) and October 20, 1980 ($47.73). The expenditures were reported as independent expenditures in support of Ronald Reagan and as being

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for mailing expenses and computer services. According to invoices provided by FCM, these expenditures were payments for services rendered between November, 1979 and July, 1980. (Exhibit 2 attached to Lawrence Deposition; Exhibit 4 attached to Boehm Deposition; invoices and solicitation packages attached hereto as Exhibit J). Mr. Heckman testified that Wiland and Associates maintains the FCM mailing list and computerizes information pertaining to contributions made to the committee. (Heckman Deposition, page 33).

As noted above, the services performed by Wiland and Associates for FCM in 1980 were undertaken pursuant to arrangements made through Thompson and Associates. When asked if he remembered talking with Mr. Thompson about work which Wiland had been doing for the Reagan for President Committee, Mr. Lawrence indicated that he did not remember such a conversation. He then went on to state:

> ...as part of the business you do not talk to one client about what another client is doing. It wouldn't happen. You wouldn't talk about what someone else is doing. It would be bad business. (Lawrence Deposition, pages 33-34).

With regard to particular expenditures made to Wiland by FCM, and to the services or products related to those expenditures, Mr. Lawrence identified all Wiland invoices submitted to Thompson and Associates but, with one exception, found it impossible to relate particular solicitation packages to particular invoices. The exception involved a payment made on

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January 4, 1980, which Mr. Lawrence "suspect(ed)" involved a laser letter produced by Wiland. (Lawrence Deposition, pages 35-36 and Exhibit 2(a)-(d); attached hereto as Exhibit J-1 and J-2). Mr. Lawrence assumed that Thompson and Associates prepared the copy, and he imagined that Thompson and his client (i.e., FCM) would have decided upon the mailing list. He stated that the list used was not one of Wiland's because of the entry on the invoice "to convert foreign files." (Lawrence Deposition, page 37,Exhibit 2-c). Mr. Heckman confirmed that Thompson and Associates would have supplied the copy and mailing list for this mailing. (Heckman Deposition, page 29). Mr. Lawrence stated that he talked to no one at the Reagan for President Committee about this mailing. (Lawrence Deposition, page 38).

With regard to the expenditures made to Wiland by FCM on March 3, 1980, March 21, 1980, and May 27, 1980, with which this Office has been unable to match particular solicitation packages, Mr. Lawrence was able to identify the apparently corresponding invoices, but could not say which mailings were involved. The services performed by Wiland included the merging of mailing lists, the identification of duplicate names, the converting of foreign lists to the Wiland computer format, and the printing of mailing labels.

The FCM expenditure made on June 24, 1980, apparently was related to a solicitation entitled "Texas Package". (See Exhibit J-5). According to Mr. Lawrence, Wiland's input involved

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production of mailing labels from tapes supplied by Thompson and Associates; Wiland was not involved in the printing of copy. (Lawrence Deposition, pages 44-45). To Mr. Lawrence's knowledge, the Reagan for President Committee was not aware of the mailing of the Texas package. (Lawrence Deposition, page 45).

The FCM expenditure to Wiland and Associates dated July 25, 1980, apparently involved services with regard to two solicitation letters, the "Vice Presidential Survey" Package and the "Final Drive" Package. (Lawrence Deposition, Exhibit 2(q) to 2(y); attached as Exhibits C and G-4). Again, Mr. Lawrence could identify the Wiland invoices involved, but stated that he didn't recognize the solicitation letters and accompanying materials. Judging by the non-personalization of the copy of the first letter supplied, and the fact that it is not a laser computer letter, 6/ he surmised that all Wiland would have seen were the mailing labels. The second letter is a laser letter which may have been printed by Wiland. Mr. Lawrence stated that Mike Thompson probably provided the copy and the mailing list. (Lawrence Deposition, page 50). Mr. Heckman again confirmed that Thompson and Associates would have supplied the copy and the mailing lists involved. (Heckman Deposition, pages 26-27). The copy would have been approved by Mr. Heckman. (Heckman Deposition, page 31).

6/ The Wiland invoice related to the July 25, 1980 expenditure by FCM lists Vice President Laser Letters, but no letter of this type was supplied by the respondent.

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The two September 2, 1980 expenditures made by FCM to Wiland and Associates apparently involved, at least in part, services performed in June of that year related to a solicitation package designated "Anti-Carter Letter A and B". (Attached as Exhibit J-12). Again, Mr. Lawrence could identify the invoices, but found only an enclosure showing a sample certificate of appreciation to have been potentially of a personalized nature and thus the type of printing which could have been undertaken by Wiland.

The FCM expenditure on September 9, 1980, apparently was made in payment for services rendered in July, 1980 with regard to a letter designated "On the White House". No particular solicitation package could be linked to this payment. (See Exhibit H-13). Mr. Lawrence identified the invoice but could not identify the specific mailing except to agree that Wiland was involved only in the merging and purging of the mailing lists involved and in the preparation of mailing labels. The October 1, 1980 payment by FCM apparently involved only the July, 1980 processing of mailing lists and printing of mailing labels for a solicitation package entitled "Election #1". (Attached as Exhibit J-15). Because this package was not computerized, Mr. Lawrence stated that Wiland and Associates would not have seen its contents. (Lawrence Deposition, page 57). Mr. Heckman agreed that Wiland's involvement consisted of merging/purging a number of lists. (Heckman Deposition, page 36).

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It appears that there is an insufficient basis to conclude that Wiland and Associates played a role in the activities of either the Reagan for President Committee or FCM which would have resulted in opportunities for the kinds of arrangement, coordination or direction of FCM activities by an agent of the Reagan for President Committee that would compromise the independence of FCM expenditures. According to the testimony of Mr. Lawrence and Mr. Heckman, Wiland and Associates either handled the computerization of mailing lists and the printing of mailing labels related to particular direct mail solicitations, or the laser printing of solicitation letters. In the former instances, Wiland personnel would have seen only the computer tapes and printed labels, not the content of the mailings; and in the latter cases, Wiland would have been responsible for printing copy supplied by Thompson and Associates for FCM or by the Reagan for President Committee or its agent, Black, Manafort and Stone. Tapes rented outside Wiland by FCM were supplied by Thompson and Associates. It appears that the involvement of Wiland and Associates did not include strategy planning, copy writing, selection of target populations or any other activity indicating an active role in the campaigns of either client.

iii) Telecommunications Industries (Telepost)

A third vendor selected for FCM by Thompson and Associates was Telecommunications Industries (Telepost). The common employment of this company by both FCM and the Reagan for

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President Committee also formed a basis for the Commission's finding of reason to believe in this matter. Thomas Mitchell, Director of Marketing for this company, has testified that Telecommunications Industries markets a registered trademark/service mark product called Telepost which is a high impact letter. (Mitchell Deposition, page 5).

> Basically we have what we call a Telepost letter, and it consists of an envelope and piece of paper that has Telepost written on it. What we do is computer work from that point on to generate Telepost letters. They give us the text and names and addresses, and we simply print the letters that go out, normally as a Telepost letter. That's 95 percent of our business activity. We are not involved in copy writing or any creative work at all.
>
> .....
>
> Very infrequently we might suggest something that we have seen that's worked in the past for other people and make a suggestion, or something in terms of keeping copies shorter or making them a little more terse. But beyond that (no input). I mean very, very minimal. (Mitchell Deposition, pages 7 and 8).

In response to a question as to whether Telecommunications ever undertakes coordination of efforts of different clients, Mr. Mitchell replied, "No". (Mitchell Deposition, page 8).

According to reports filed by the Reagan for President Committee, expenditures were made to Telepost on March 31, 1980 ($10,000), April 17, 1980 ($20,000) and May 2, 1980 ($7,021.17). These payments were apparently made for a Telepost letter mailed February 15, 1980, and for a laser letter printed on Reagan for

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President letterhead which was also produced in February, 1980. (Exhibit 1 attached to Mitchell Deposition; and invoices and letters attached hereto as Exhibit K). The Reagan/Bush Committee did not report expenditures to this vendor, and Mr. Mitchell confirmed that no work was done for the Reagan general election committee. (Mitchell Deposition, page 9).

Mr. Mitchell testified that initially he dealt directly with the Reagan staff and later with Black, Manafort and Stone. The texts of the letters and the mailing lists were provided to Telecommunications by Black, Manafort and Stone, or by the Reagan for President Committee. No discussion of strategy or of the content of the letters took place with this firm. (Mitchell Deposition, pages 11-12). Mr. Mitchell also stated that a later mailing was done for the Reagan for President Committee in March, 1980, and that the copy and the mailing list would have come from Black, Manafort and Stone. (Mitchell Deposition, pages 21-22).

Reports filed by FCM also show expenditures made to Telecommunications Industries (Telepost) on April 15, 1980 ($602.64), June 24, 1980 ($1,100) and October 6, 1980 ($480). These payments were reported as independent expenditures in support of Ronald Reagan and apparently were for three Telepost letters mailed February 27, 1980, April 16, 1980 and October 17, 1980. (Exhibit 2 attached to Mitchell Deposition; invoices and letters all attached hereto as Exhibit L). According to the Telecommunications Industries invoices, the production of letters

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printed by this company was arranged through Thompson and Associates. Mr. Mitchell testified that his company has dealt with Thompson and Associates for three or four years and that this relationship was "totally independent of anything that came prior to or subsequently to us dealing with the Reagan for President Campaign Committee." (Mitchell Deposition, page 26). Regarding the first two FCM mailings here at issue, Mr. Mitchell testified that it was presumably Thompson and Associates which provided the copy and the mailing list. "They would simply provide that to us and we would simply do the production." (Mitchell Deposition, page 28). Mr. Mitchell stated that to the best of his knowledge, the Reagan for President letters were not discussed with FCM, nor was the Reagan Committee aware of the FCM letters. (Mitchell Deposition, pages 29 and 32).

Mr. Heckman of FCM confirmed that the copy for letters produced by Telecommunications Industries and the mailing lists involved would have been supplied by Thompson and Associates. (Heckman Deposition, page 45) He also stated that he was not aware, at the time FCM made the earlier expenditures to this company, that it had been performing services for the Reagan for President Committee. (Heckman Deposition, page 46).

Again, the nature of the services performed by Telecommunications Industries, Inc. make it apparent that there was no coordination through that company of the activities of FCM and the Reagan for President Committee. These services involved

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only the printing and mailing of computer letters for which the copy and mailing list were supplied by the clients. Therefore, it appears that the evidence could not sustain a finding of coordination between the two committees through this vendor.

iv) Tri-State Envelopes

Tri-State Envelopes is a vendor of envelopes and printing services located in Beltsville, Maryland. Reagan for President Committee reports show payments made to Tri-State Envelope Corporation on March 24, 1980 ($3,460.80 and $410.80), April 22, 1980 ($6,921.71), May 14, 1980 ($4,863.19), and June 18, 1980 ($4,698.07). According to Ms. Buchanan, this company supplied envelopes for direct mail, a statement apparently confirmed by notations on Tri-State invoices. (See Exhibit M for examples).

FCM also purchased envelopes from Tri-State on July 30, 1980 ($460.54) and November 18, 1980 ($1,381.80). These expenditures, which were not reported as independent expenditures in support of Ronald Reagan, involved printing services and envelopes for direct mail. Mr. Heckman testified that he did not know at the time of FCM's transactions that Tri-State had been employed earlier by the Reagan for President Committee.

It appears that solely the purchase of envelopes, printed or not, could not give rise to the type of coordination necessary to undermine the independence of expenditures made by the second of two purchasers.

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v) Metro Printing and Mailing Services

Metro Printing and Mailing Services is located in Sterling, Virginia. The Reagan/Bush Compliance Fund made expenditures to Metro Printing on August 15, 1980 ($677.82), August 18, 1980 ($160.01), and August 29, 1980 ($677.82) for printing. Reports submitted by the Reagan/Bush Committee also show an expenditure made to this company on October 22, 1980, in the amount of $10,800 for postage. Information more recently supplied by the Reagan/Bush Committee regarding its $10,800 payment indicates that this expenditure was made for printing and mailing services as well as for postage, and that the mailing involved was directed apparently toward a particular voter group, namely, veterans. On November 3, 1980, $780.77 was refunded by the vendor. (Documentation attached hereto as Exhibit N).

FCM also utilized the services of this firm, with expenditures having been reported as made on January 3, 1980 ($1,446.07), January 31, 1980 ($1,000), June 30, 1980 ($500), June 2, 1980 ($500), July 7, 1980 ($500), July 15, 1980 ($500), August 1, 1980 ($1,200) and September 2, 1980 ($1,300). The FCM payments were reported as operating costs for "printing services" and "printing and mailing services", not as independent expenditures in support of Ronald Reagan. When asked if Metro Printing had done any work in connection with FCM's support of the Reagan candidacy, the chairman of FCM stated, "if we didn't list them as independent expenditures, then it is my impression

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they never did such work." The chairman also responded in the negative when asked if he knew that this company was being used by the Reagan/Bush Committee at the time FCM made its expenditures. (Heckman Deposition, pages 54-55).

No evidence has been found of coordination by FCM and the Reagan campaign through Metro Printing and Mailing Services, or that the services provided by this vendor involved any creative input.

Arthur J. Finkelstein and Associates and Thompson and Associates made up the second group of vendors, which played, in varying degrees, more active roles in the activities of either FCM or an authorized Reagan committee, or both. Given the nature and timing of their roles, the possibility of coordination through these particular common vendors appears greater than through the first group discussed above.

vi) Arthur J. Finkelstein and Associates

Arthur J. Finkelstein and Associates is a consulting firm located in Mount Kisco, New York. Reports submitted by the Reagan for President Committee show expenditures made to Arthur J. Finkelstein and Associates on November 28, 1979 ($6,000), January 24, 1980 ($318.95), February 7, 1980 ($12,000), February 6, 1980 ($396.12), March 24, 1980 ($6,000), April 9, 1980 ($3,000), April 30, 1980 ($206.02), and June 5, 1980 ($3,044). According to these reports and to invoices submitted by this firm, the payments totaling $18,000 which were made on

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February 7 and March 24, 1980 were for telephone polls conducted in Iowa in November and December, 1979; the payments totaling $12,044 made on November 28, 1979 and on April 9 and June 9, 1980, were for political consulting performed in 1979 and January and February, 1980, by Arthur J. Finkelstein; and the remainder involved reimbursements for travel expenses. (Exhibit J attached to Buchanan Deposition; invoices attached hereto as Exhibit O).

In his July 1, 1982 response to written questions posed by this Office, Mr. Finkelstein stated that the "total scope" of services performed by his company for the Reagan for President Committee encompassed a review of Ronald Reagan's announcement speech, the poll in Iowa noted above, and "occasional phone conversations concerning strategy -- plus perhaps three or so days of work: one in New Hampshire, one in California and a one hour speech in Wisconsin." (Exhibits P-1 and P-2).

In his response of July 28, 1982, to follow-up questions posed by this Office, Mr. Finkelstein elaborated somewhat upon his earlier answers regarding the Reagan campaign by stating that he could not recall the telephone conversations cited, but that they were "by and large from people with the Committee who knew me from previous campaigns...." Three were from Frank Donatelli, the Committee's Mid-West Coordinator, who asked that Mr. Finkelstein speak in Wisconsin, from Elizabeth Doyle in New York State, and from the New Hampshire State Chairman Senator Gordon Humphrey. According to Mr. Finkelstein, his day in

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California involved a review of Ronald Reagan's announcement speech, with his Committee contact there being John Sears; during his stay in New Hampshire, he looked at the Committee's campaign plan and suggested buying television time for older voters, and in Wisconsin, he gave a speech before a rally of Reagan volunteers. (Exhibits P-3 and P-4).

The Reagan for President Committee has refused to produce the results of the Iowa poll as requested in the Commission's subpoena for production of documents. (Buchanan Deposition, pages 63-64).

Reports submitted to the Commission by FCM show an expenditure made to Arthur J. Finkelstein on March 25, 1980, in the amount of $5,000 for a survey undertaken in Wisconsin. This expenditure was reported as an independent expenditure in support of Ronald Reagan. (Boehm Deposition, Exhibit 9).

In a letter from Ronald W. Finkelstein to Curtis Herge, counsel for FCM, dated October 16, 1980, (attached hereto as Exhibit Q), Mr. Finkelstein stated that the Wisconsin survey for FCM was conducted on March 15 and 16, 1980, and that it was paid for and seen only by FCM. In his initial response to the written questions posed by this Office, Mr. Finkelstein stated that the survey involved 600 interviews and that his company had written the first draft of the questions posed and submitted them to FCM in that form. (Exhibit P-2).

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From the above facts it appears that Arthur J. Finkelstein and Associates did play an active role in the activities of the Reagan for President Committee and a lesser but still active role in FCM's pro-Reagan activity shortly thereafter. This company conducted polls and provided political advice to the Reagan campaign between November, 1979 and the end of February, 1980, and drafted and conducted a poll for FCM in March, 1980, which was reported as an independent expenditure in support of Ronald Reagan. These facts constitute evidence that FCM's $5,000 expenditure to Finkelstein was not independent.

Both Arthur J. Finkelstein and representatives of FCM have denied such coordination. Mr. Finkelstein has stated that neither he nor anyone else at his firm suggested that FCM pay for a survey in Wisconsin, and that he never "informed representatives of FCM of information concerning the Reagan for President Committee's strategy or any other matter. No such information was used in the formulation of questions to be used in the March, 1980, survey in Wisconsin." (Exhibit P-2, page 2). Mr. Finkelstein has also stated that neither he nor anyone else in his firm played a role in FCM's utilization of information derived from the survey in Wisconsin. (Exhibit P-2, page 2). Mr. Finkelstein also asserted that all services for the Reagan for President Committee were terminated on February 28, 1980, and, in response to the question of whether he maintained contacts with this committee after completion of his final

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assignment and through the remainder of 1980, he stated that neither he nor anyone else at Arthur J. Finkelstein, Inc., had had any further contact with the representatives of the Reagan committee. (See Exhibits P-1 and 2).

Mr. Heckman has testified that at the time FCM contracted with Arthur J. Finkelstein and Associates, he and others at that committee were not aware that that firm had previously performed services for the Reagan for President Committee. He also stated that he never saw the results of any surveys done by Finkelstein for the Reagan for President Committee and that to his knowledge no one else at FCM would have seen such results. (Heckman Deposition, page 50). In response to the Commission's subpoena for production of documents, FCM produced a copy of the questions and results involved in the Wisconsin survey undertaken by Finkelstein for that committee. It appears that there is nothing in the questions posed in this survey which would indicate special knowledge of the Reagan campaign's own strategy or concerns that had been derived from Mr. Finkelstein's earlier involvement with the Reagan campaign, in Wisconsin or elsewhere. Rather, the questions which were related to reactions to and preferences for individual candidates were either quite broad or related to issues being addressed by all candidates. The totally issue-oriented questions were again not out of the ordinary. (Questions attached as Exhibit R).

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The fact of the common employment of Arthur J. Finkelstein by the Reagan for President Committee and by FCM, the fact that FCM's employment of this firm took place simultaneously with, or only shortly after, that of the Reagan committee and involved an expenditure made in support of the Reagan candidacy, and the fact that Finkelstein was actively involved with the two clients create a situation clearly addressed by 11 C.F.R. § 109.1(b)(4)(i)(B) and would support a finding of probable cause to believe that FCM violated 2 U.S.C. § 441a(a)(2)(A). Representatives of FCM and Arthur Finkelstein have denied that FCM saw a copy of the earlier Reagan poll in Iowa or otherwise benefited from Mr. Finkelstein's knowledge of Reagan strategy; however, flat denials would not outweigh completely evidence of active involvement. On the other hand, neither the Wisconsin poll nor information provided directly by Mr. Finkelstein prove that special knowledge was made available to FCM as a result of his employment by the Reagan committee.

vii) Thompson and Associates

As stated above, during 1979-80 Thompson and Associates served as the direct mail consultant for FCM, and in that capacity was responsible for hiring such vendors as Telepost, Diversified Direct and Wiland and Associates, and for selecting mailing lists, etc. This firm also rented at least one mailing list to the RNC during the 1980 campaign, the RNC being an authorized Reagan Committee. (See Exhibit J-14). The issue here

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becomes, therefore, whether the rental of a mailing list to the RNC at the same time this firm was acting as direct mail coordinator for FCM compromised the independence of FCM's expenditures made through Thompson and Associates.

The renting of mailing lists is common in the direct mail solicitation business. In order to show that the rental by Thompson and Associates of a list to the RNC destroyed FCM's independence, it would be necessary to show that FCM benefitted from knowledge about the Reagan campaign obtained by Thompson and Associates by virtue of the latter's rental of a mailing list to the RNC. No direct evidence to this effect has been found; however, the channel of communication afforded FCM by Thompson's involvement with the RNC leaves room for doubt as to the independence of FCM's activities.

b. Circumstances of Timing and Utilization of Product

In certain instances the employment of a particular vendor by both FCM and an authorized Reagan committee appears not to have been conducive to cooperation or coordination between the committees because of the timing of the expenditures involved or because the finished product was not used by the purchaser.

i) Pyramid Video Tapes

Pyramid Video Tapes is located in Washington, D.C, and specializes in copying video tapes for re-distribution. The Reagan/Bush Committee reported an expenditure of $317.28 to this firm on September 23, 1980; earlier, FCM had reported a $62.40

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independent expenditure in support of Ronald Reagan to the same company on January 4, 1980. Given the fact that FCM's expenditure was made fully eight months prior to that made by the Reagan/Bush Committee, the common use of this vendor apparently would not give rise to facts which could support a Commission finding that FCM's expenditure was not independent. 7/

ii) Ed Nichols Associates

Ed Nichols Associates is a firm located in Bethesda, Maryland. According to reports filed by the Reagan for President Committee, expenditures were made to that firm on November 21, 1979 ($10,000), November 27, 1979 ($15,100.00), December 12, 1979 ($23,001.05), December 19, 1979 ($6,000 and $579.61), February 6, 1980 (($14,464.03), April 9, 1980 ($1,500), April 17, 1980 ($19,985.90), May 14, 1980 ($21,799.45), June 10, 1980 ($1,001) and July 30, 1980 ($8,800.35) for direct mail expenses, consulting fees, reimbursement of travel expenses, truck rental and telephone banks.

According to Ms. Buchanan, Ed Nichols and Associates was hired by Charles Black of the Reagan for President Committee to do political direct mail solicitations. Ed Nichols also acted as

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7/ On July 1, 1982, in MUR 1225, the Commission voted to take no further action with regard to a violation by FCM of 2 U.S.C. § 441a(a)(7)(B)(ii) related to this January 4, 1980 expenditure which involved the use of a recorded speech by Ronald Reagan in radio advertisements paid for by FCM and of a reprint of another Reagan speech in an advertisement in a periodical.

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a consultant with regard to the "advisability of doing direct mail pieces, certain places, certain ways, basically a consultant to us." (Buchanan Deposition, pages 70-71). All copy would have been approved by individuals directly involved in the campaign. (Buchanan Deposition, page 71).

FCM also reported an expenditure to Ed Nichols on January 27, 1981 ($3,974.80) for data processing. (Boehm Deposition, Exhibit 10). This expenditure was not reported as an independent expenditure in support of Ronald Reagan, and, according to Mr. Boehm, involved payment for data processing of voter registration tapes which arrived too late for use. Mr. Boehm did not believe that this expenditure involved FCM's campaign for Ronald Reagan. (Boehm Deposition, pages 53-54).

Given the failure of FCM to use the product purchased from Ed Nichols for campaign purposes, this use of a common vendor does not apparently create a set of facts which could support a Commission finding of lack of independence on the part of FCM.

4. Conscious Parallelism and Indirect Communication

In its complaint, Common Cause cited as evidence of coordination the respondents' "plans to complement and supplement each other's activities. . . . Each Respondent is consciously attempting to conduct a parallel shadow campaign." This accusation of conscious parallelism was apparently directed toward the selection of geographic areas of concentration by the respondents with regard to media advertising, provision of

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volunteers, etc. Such selection was deemed by the complainant to be sufficient to show actual agreement between the Reagan committees and the unauthorized committees, including FCM."

Common Cause and the Carter/Mondale Committee also argued that the respondents, including FCM, were indirectly communicating with each other through the press, with coordination the result. In the latter regard, Common Cause cited the language of 11 C.F.R. § 109.1(b)(4)(i)(A) as restated in AO 1979-80. According to this provision of the Commission's regulations, expenditures will be presumed not to be independent if they are

> Based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate or by the candidate's agents, with a view toward having an expenditure made.

The concept of conscious parallelism is derived primarily from anti-trust law. The principal cases on this subject are Theatre Enterprises v. Paramount Film Distributing, 346 U.S. 537 (1954); and Delaware Valley Marine Supply v. American Tobacco, 297 F.2d 199 (3d Cir. 1961), cert. denied, 369 U.S. 839 (1962). In Theatre Enterprises, the Supreme Court determined that a finding that competitors consciously acted in a parallel fashion does not in itself establish a conspiracy for purposes of the Sherman Act. According to the court in Delaware Valley, conscious parallelism "is circumstantial evidence, the probative

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value of which necessarily varies with the kind of parallelism and the factual setting where it is found." at 203.

Delaware Valley cites several factors which, together with conscious parallelism, can lead logically to an inference of conspiracy, namely

1) the unlikelihood of numerous parties reaching one of several possible conclusions; and,

2) action in apparent contradiction of a party's self-interest. (at 205-206)

Other such factors which have been present in cases in which conspiracy has been found are:

1) a radical departure from past practices (See e.g., Interstate Circuit, Inc. v. U.S., 306 U.S. 208 (1939);

2) express or implied request for agreements (Interstate Circuit, supra);

3) opportunity to agree;

4) earlier finding of conspiracy (Theatre Enterprises, supra).

Generally, two or more of these so-called "plus factors" have been present in cases where a conspiracy has been found. (James R. McCall, Sum and Substance of Antitrust, Center for Creative Educational Services, pp. 134-136).

Not all of these anti-trust-related plus factors would be applicable in the context of election campaigns. The unlikelihood of two committees making the same decision as to the substance of solicitations, the targeting of media campaigns,

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etc., would appear to be a relevant factor, as would express or implied requests for agreements, opportunities to agree and earlier findings of cooperation or consultation between two committees. Contradictions of self-interest do not appear relevant, nor do radical departures from past practice in light of the shifting natures of campaign issues and of the responses of political committees thereto.

Application of plus factors to the selection by FCM of certain target areas does not provide support for a finding of cooperation or consultation. No evidence has been found that this committee ever received an express or implied request from the Reagan committees for a division or sharing of geographical responsibility, selected targets unusually similar to those of the Reagan campaign in a situation where many targets were possible (see below), or was represented at a meeting where an opportunity to agree was present. Nor has FCM previously been found to have cooperated in a way similar to the activity here alleged. Therefore, the fact, for example, that FCM chose to emphasize pre-primary activity in New Hampshire at a time when Reagan committee funds were low or when Reagan committee expenditures had reached their state limit would not be sufficient alone to sustain a finding of cooperation.

Common Cause in its complaint interpreted Section 109.1(b)(4)(i)(A) as including within the definition of "information . . . provided to the expending person . . . with a

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view toward having an expenditure made", information which is supplied by one committee to the press, published, and then used as a basis for action by another committee. In the view of the complainant, the Reagan committee released such information "with a view toward having expenditures made by Respondents", a "mutual understanding exist(ed) to that effect", and "Respondents have acted on the basis of that understanding." Common Cause complaint, pp. 16-17.

As evidence supporting its allegation of indirect communications, the Common Cause complaint cites an article which appeared in the Wall Street Journal on July 14, 1980, and one which appeared in Newsweek on July 28, 1980. Both authors discussed the strategy being planned for the Reagan/Bush campaign as it has been set forth by Richard Wirthlin, and cited, among other elements, that Michigan, Illinois, Ohio, New York and Pennsylvania had been chosen as states to be emphasized. The Newsweek article also included a map of the United States with the individual states shaded to show in part "Reagan's Key Targets" and "Long Shots for Reagan".

In response to the Commission subpoena for documents, FCM produced a memorandum written by Ken Boehm to the FCM Directors outlining FCM's strategy for its independent expenditure program in support of Ronald Reagan. (Exhibit 12-d of Boehm Deposition and attached hereto as Exhibit S). On page 2 of this memorandum, the states of New York, Pennsylvania, Connecticut, and Florida are listed as the four target states for the FCM project and it

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is stated that "the principal reason for their selection was that all four are states in which a concentrated effort by an independent campaign could effect the outcome." On page 3 of the same memorandum is a listing of six sources used in selecting these target states, one of which is headed "Reagan Strategists" with the date of July 28, 1980 below and the use of the phrases "Reagan Key Target" or "Long Shot for Reagan" below each target state. A comparison of dates and language would indicate that the Newsweek article cited by the complainant was apparently a source used by Mr. Boehm in the preparation of his memorandum.

When asked during his deposition about the sources of information listed in the chart in his memorandum, Mr. Boehm testified that "most came from publications." Further investigation has revealed that all of the sources cited were apparently publications. 8/ When asked if he had had any direct contact with the "Reagan Strategists", he responded, "Not outside of reading things in the newspaper and I wouldn't construe that as direct." (Boehm Deposition, page 58).

Absent a showing of an actual agreement to use the media for purposes of coordinating activity, it would be very difficult to sustain a finding of cooperation and coordination based upon

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8/ "Governor's Prediction" appears to be a reference to an article entitled "With Governors, It's Reagan by a Landslide", which appeared in U.S. News and World Report, August 18, 1980, page 28, while the information cited in "Carter Strategists" was seemingly taken from an article entitled "Going Straight for the Jugular, Time, August 25, 1980, page 27. The remaining citations are provided in the memorandum.

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press releases and subsequent use of the information contained therein. The statutory definition of "independent expenditure" cites possible relationships ranging from "in cooperation with" to "at the suggestion of" with the latter seeming to be the weakest link deemed sufficient to undermine the independence of an expenditure. The Report of the Committee on House Administration which accompanied the 1976 House bill amending the Federal Election Campaign Act contained the following explanation:

> In the definition of "independent expenditures", the phrase "at the . . . suggestion of . . ." is intended to include direct suggestions made by a candidate or his agent . . . or any other person responsible for reporting contributions and expenditures . . . . It is not the Committee's intent to hold a candidate responsible for suggestions by persons over whom he does not exercise control. Further, for example, if a candidate or some other person suggests in a speech to a group of persons that everything possible should be done to defeat the opponent of the candidate, it is not the intent of the Committee that such a reference in a speech be viewed as a "suggestion" for purposes of the definition. H. Rep. No. 917, 94th Cong., 2d Sess., 5 (1976). (Emphasis added.)

The Conference Report which accompanied S. 3065, the bill containing the amendments finally approved, contained the statement "that advocacy of the election or defeat of a candidate or a general request for assistance in a speech to a group of persons by itself should not be considered a 'suggestion' that such persons make an expenditure to further such election or

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defeat." The Report also stated that it was the Conference Committee's intent to define "independent expenditures" in a manner consistent with the discussion of such expenditures contained in Buckley v. Valeo, 424 U.S. 1 (1976). H. Conf. Rep. No. 1057, 94th Cong., 2d Sess., 38 (1976). The Court in Buckley emphasized the absence of "prearrangement" and "coordination" in distinguishing between independent expenditures and contributions. Buckley v. Valeo, 424 U.S. at 47.

It appears that Congress intended to require direct communications between a candidate and his or her authorized committee or agent on the one hand and an unauthorized committee on the other before the independence of the latter's expenditures in support of the candidate could be jeopardized. Indirect and uncoordinated communications through the press would not come within the definition of even "suggestion", let alone "in concert with" or "at the request of", etc.

4. Other Direct Contacts

Examination of telephone bills submitted by FCM pursuant to subpoena did reveal two telephone calls made from FCM headquarters to Reagan for President headquarters in Inglewood, California, one on October 31, 1979, at 8:50 p.m. which lasted one minute, and one on November 14, 1979, which lasted nine minutes; another call was made from FCM headquarters to the Reagan/Bush headquarters in Little Falls, New Jersey, on November 2, 1980, at 5:53 p.m. and lasted twelve minutes.

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Neither the chairman nor the treasurer of FCM could identify the makers or the recipients of these calls.

Correspondence produced in response to the Commission's subpoena included a 1979 telegram from Ronald Reagan to FCM asking that the Committee's expenditure program in support of his candidacy be halted. (Attached as Exhibit T). The Committee's chairman has testified that this request was discussed by the Board of Directors but that no response was sent. (Heckman Deposition, page 55). Mr. Heckman indicated that there were no further communications between Mr. Reagan and FCM concerning FCM's planned expenditures. (Heckman Deposition, pages 55-56).

During his deposition, Mr. Boehm was asked about his use of the term "official Reagan strategy" in his August 31, 1980 memorandum on FCM strategy. He testified that "(t)hat was what I culled from public sources...." (Boehm Deposition, page 59). When asked if he had had access to official Reagan strategy documents, he responded, "No, none whatsoever." (Boehm Deposition, page 59).

5. Summary and Conclusion

To summarize, this Office's investigation of possible violation by FCM of 2 U.S.C. § 441a(a)(2)(A) has sought evidence of cooperation or coordination with a Reagan authorized committee by examining FCM's organization and policy, the use of common vendors, prior involvement of FCM personnel, or agents other than vendors, with an authorized Reagan committee, direct contacts

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with a Reagan committee and conscious parallelism and indirect communication through the press. The only concrete evidence of direct contacts are the telegram from Ronald Reagan asking FCM to cease its independent expenditure program on his behalf, and three long distance telephone calls, the makers and recipients of which have not been identified. No prior involvement by FCM personnel with the 1979-80 Reagan authorized campaign committees has been uncovered, nor have any "plus factors" to support a finding of conscious parallelism in campaign targets and techniques. FCM did use information gleaned from the press in formulating its independent expenditure campaign, but no evidence of an actual agreement to use the media for communication has been found.

Cooperation resulting from the use of certain common vendors does not appear likely given the nature, contents, timing or non-utilization of the products or services obtained. In two instances, however, those involving the common employment of Arthur J. Finkelstein and Associates and of Thompson and Associates, the situation is different. FCM's employment of Finkelstein took place immediately following that firm's employment by the Reagan for President Committee, the FCM expenditure to Finkelstein did involve that committee's support of the Reagan campaign, and the work undertaken by Finkelstein for both campaigns included active involvement by the vendor in the activities of its clients. As stated above, this Office

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finds that these facts clearly point to the type of potential for cooperation and coordination addressed by 11 C.F.R. § 109.1(b)(4)(i)(B). Both Arthur J. Finkelstein and Robert Heckman have denied any cooperation between FCM and the Reagan campaign. Again, this Office does not believe that the denials of Mr. Heckman and Mr. Finkelstein completely outweigh the evidence of the latter's involvement in both campaigns.

The employment of Thompson and Associates by FCM at the same time that this firm was engaged in a list rental to the RNC poses other questions as to possible coordination, although the circumstances appear more extenuated than those surrounding the Arthur J. Finkelstein involvement. There also remain the three unidentified telephone calls made to Reagan field offices from FCM headquarters.

All told, several issues involving vendors and telephone calls are still open as a result of this Office's extensive investigation of the relationship between FCM and the authorized Reagan committees during the 1980 primary and general election campaigns. It is highly doubtful that further investigation would be fruitful, either as regards the particular issues cited above or with regard to new lines of evidence. Representatives of the Reagan campaign and of FCM have addressed the presumptions of coordination raised by the use of common vendors by consistently and flatly denying that any coordination took place. They have also argued that there were committee policies designed

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to avoid either the reality or the appearance of such cooperative endeavors. Despite such stated policies, opportunities for consultation and cooperation were certainly present, either through common vendors or otherwise. Whether or not they were in fact utilized remains in doubt.

Therefore, the Office of General Counsel recommends that the Commission take no further action with regard to the alleged violation by FCM of 2 U.S.C. § 441a(a).

C. Alleged Violation of 2 U.S.C. § 432(e)(4)

2 U.S.C. § 432(e)(4) states in part, "In the case of any political committee which is not an authorized committee, such political committee shall not include the name of any candidate in its name." The complainants in this matter alleged that the Committee had violated Section 432(e)(4) in that its "project", "Citizens for Reagan in '80", is a "discrete, unauthorized political committee which (has) included the name Reagan in (its) name."

This Office has determined that because the language of both 2 U.S.C. § 432(e)(4) and the Commission's implementing regulation, 11 C.F.R. § 102.14(a), refers only to the names of political committees, it would be difficult to sustain the inference that it also applies to the use by such committees of a candidate's name in other contexts. Therefore, in order to find that 2 U.S.C. § 432(e)(4) was violated, it would be necessary to determine that "Citizens for Reagan in '80" met the definition of a "political committee" at the time this name was used.

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The investigation has revealed that this "project" was not a political committee as that term is defined. It did not maintain either a separate bank account, or a bookkeeping system, separate personnel or the like. In his answers to the Commission's interrogatories on this issue, FCM's treasurer asserted that "Citizens for Reagan in '80" ("CFR") did not "maintain a bank account or an accounting of receipts and expenditures separate and apart from FCM", that "CFR does not employ a staff separate and apart from that of FCM", that "(s)olicitations or requests for contributions" asked that checks be made payable to FCM, that funds derived from checks made payable to FCM were used for CFR, and that funds contributed to CFR went into the FCM account. (Exhibit B-2).

The FCM chairman has testified that the project, "Citizens for Reagan in '80" was directed by the FCM chairman and treasurer, with the latter the person who actually ran it. (Heckman Deposition, pages 16-17). According to the treasurer, a "Project" "was a broad program that we had undertaken, a dramatic program to channel resources.... It was a method of organization." (Boehm Deposition, page 11). "In terms of how (a project) was organized within the office, it was just one of a number of things we were doing. We weren't super rigid in terms of dividing one thing from another thing." (Boehm Deposition, page 14). Other projects included "Senate Control" and "Students for Reagan". The same people often worked on both "Citizens for Reagan" and "Senate Control". (Boehm Deposition, pages 15-16).

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Solicitation letters bearing the heading "Citizens for Reagan in '80" also bore the sub-heading "A project of FUND FOR A CONSERVATIVE MAJORITY". All contained the statement that FCM had paid for the communication and all enclosures.

In the case of FCM, it appears that there has existed no group of persons involved with the activities here at issue which can be designated "Citizens for Reagan in '80". Only FCM staff, bank accounts and other records have allegedly been involved in the receipt and expenditure of funds undertaken under the name "Citizens for Reagan in '80". Communications bearing the project name identified FCM as the parent committee. Contributions to the project were reported as receipts by FCM. Therefore, it seems that the Committee did not present itself to the public under more than one name, but explicitly made FCM the principal entity. Given these facts, "Citizens for Reagan in '80" does not meet the definition of "political committee" set forth at 2 U.S.C. § 431(4)(A), and therefore the provisions of 2 U.S.C. § 432(e)(4) are not applicable to those terms. Therefore, this Office recommends that the Commission find no probable cause to believe that FCM has violated 2 U.S.C. § 432(e)(4).

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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe and take no further action with regard to the violation by the Fund for a Conservative Majority of 26 U.S.C. §9012(f).

2. Take no further action with regard to the alleged violation by the Fund for a Conservative Majority of 2 U.S.C. § 441a(a).

3. Find no probable cause to believe that the Fund for a Conservative Majority violated 2 U.S.C. § 432(a)(4).

25 March 1983
Date

Charles N. Steele
General Counsel

Attachments - 20

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Exhibit A

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

Fund for a Conservative Majority
1022 Wilson Boulevard
Arlington, Virginia 22209

RE: MUR 1252

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), the Fund for a Conservative Majority is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Fund for a Conservative Majority or of its officers, agents, staff members, volunteers or employees. Production is to be made at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W., Washington, D.C. on October 22, 1980, at 10:00 a.m. In addition, the Fund for a Conservative Majority is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

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As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the Fund for a Conservative Majority and/or Citizens for Reagan in '80. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the entity in question , and the dates of such service.

3. "Fund for a Conservative Majority" or " FCM" shall mean its predecessors, affiliates, committees, subcommittees; divisions, branches, projects, as well as any other bodies which conduct business on behalf of FCM, and its officers, agents, employees, staff, and volunteers.

4. "Citizens for Reagan in 80" shall mean what FCM has described as a "project" of the FCM.

5. Reagan General Election Committee shall mean the principal campaign committee (see 2 U.S.C. § 431(5)) of Ronald Reagan, the 1980 Republican nominee for the office of President, the committee's predecessors (including, but not limited to the Reagan for President Committee), affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on its behalf, and its officers, agents, employees, staff and volunteers.

6. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.

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7. "FEC Disclosure Reports" shall mean any reports filed by FCM with the FEC pursuant to the requirements of 2 U.S.C. §§ 431-455.

8. "Agent" shall mean any person who has actual, oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate; or any person who has been placed in a position within the campaign organization where it could reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. See 11 C.F.R. § 109.1(b)(5).

9. "Organizer" with reference to a project or group, shall mean any person who has directly or indirectly participated in the formation, planning, structure or organization of the project or group in question, including, but not limited to, attendance or participation in any meetings, discussions or communications concerning the project or group from the period from January 1980 to the group or project's inception.

10. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relating in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between FCM and for Citizens for Reagan in '80 and any of the following persons or organizations or

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their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of either FCM and/or Citizens for Reagan in '80 or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980.

Reagan-Bush Committee
Republican National Committee
Reagan for President Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Ruth Jones, Ltd.
Reagan for President Compliance Fund
Bailey, Deardourff & Associates, Inc.
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

2. All documents and materials concerning or relating to the formation, organization, planning, or undertaking of Citizens for Reagan in '80.

3. All documents and materials concerning or reflecting any FCM or Citizens for Reagan in '80 decisions to expend funds which would in any way further the election of Ronald Reagan as the Presidential nominee of the Republican Party or his general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

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4. All documents and materials concerning the following expenditures reported by FCM in FEC disclosure reports:

Payee	Date	Reported Purpose
Diversified Direct, Inc.	May 27 and June 24, 1980	Printing; Reagan U.S. President
Wiland and Associates	May 27, 1980	Printing; Reagan U.S. President
Telepost	June 24, 1980	Direct mail; Reagan U.S. President

a. Please provide a copy of each item printed for use by FCM as consideration for the above listed payments.

5. All documents and materials concerning the FCM expenditure on March 26, 1980, to Arthur Finkelstein and Associates, the purpose of which was listed on FCM disclosure reports to the FEC as for a survey for Ronald Reagan, U.S. President.

a. A copy of any survey results, poll, memoranda, or report which was transferred to FCM by Arthur Finkelstein and Associates, its agents, or employees in connection with the above expenditure.

6. All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to the present, between FCM and/or Citizens for Reagan in '80

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and the following entities, their agents, officers or employees undertaken in connection with any efforts on the part of FCM and/or Citizens for Reagan in '80 which would relate in any way to the furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or Ronald Reagan's general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate:

Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates

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7. All documents and materials relating to the financing by FCM and/or Citizens for Reagan in '80 of the dissemination, distribution, or republication, in whole or in part, of any broadcast or any written, graphic or other form of campaign materials prepared by or for Ronald Reagan, the Reagan for President Committee, the Reagan General Election Committee, the Reagan-Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

8. All documents and materials disseminated, distributed or republished by FCM and/or Citizens for Reagan in '80 which contain, in whole or in part, any broadcast or any written, graphic or other form of campaign materials prepared or used by Ronald Reagan, the Reagan for President Committee, the Reagan General Election Committee, the Reagan-Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

9. All documents and materials concerning any solicitation or request for funds for Citizens for Reagan in '80 or by FCM which relate in any way to the furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or the general election of Ronald Reagan as President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

10. All telephone bills and/or other records of telephone calls made or received by FCM and Citizens for Reagan in '80 since January 1980.

Please answer the following interrogatories:

A. Describe the relationship between Citizens for Reagan in '80 and FCM, noting specifically:

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(1) whether the Citizens for Reagan in '80 maintains bank accounts or an accounting of receipts and expenditures separate and apart from FCM;

(2) whether Citizens for Reagan in '80 employs a staff separate and apart from that of FCM;

(3) whether solicitations or requests for contributions to Citizens for Reagan in '80 request that checks be made payable to FCM or to Citizens for Reagan in '80 or to either FCM or Citizens for Reagan in '80;

(4) whether monies received from checks received by FCM which were made payable to FCM have been used by Citizens for Reagan in '80,

(5) and in whose name the account is held into which funds contributed to or received for Citizens for Reagan in '80 are deposited.

B. Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants or other agents of FCM and Citizens for Reagan in '80 from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor. 1/

(1) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any FCM and/or Citizens for Reagan in '80 expenditures which may each provide the

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1/ In lieu of identifying the supervisor of each individual identified in interrogatory B, FCM and Citizens for Reagan in '80 may provide the Commission with organizational charts.

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relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

(2) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials produced by either FCM or Citizens for Reagan in '80 which relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of other 1980 Presidential candidate.

(3) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the planning, organization, and formation of Citizens for Reagan in 80.

C. List the phone numbers and extensions used by FCM and Citizens for Reagan in '80 since January, 1980, noting the extensions assigned to or used by each person identified in response to interrogatory B.

D. List by date and location all fundraisers held by FCM and/or Citizens for Reagan in '80 since January, 1980 which related in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, his general election for President in 1980 or which related in any way to the defeat of any other 1980 Presidential candidate.

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E. With respect to each individual identified in response to interrogatory B, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated with the particular organization, project, or company and the position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic
Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Committment 80

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WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at the offices of the Commission at 1325 K Street, N.W., Washington, D.C., this 29th day of September, 1980.

John W. McGarry
Vice Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

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Exhibit B-1

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al., Complainants, -against- FUND FOR A CONSERVATIVE MAJORITY, et al. Defendants.	MUR 1252

ANSWERS TO INTERROGATORIES

COMES NOW, Fund For A Conservative Majority ("FCM"), by its Chairman, Robert C. Heckman, and in response to the written Interrogatories of the Federal Election Commission to FCM in this matter, answers as follows, in paragraphs lettered to correspond to the lettered paragraphs of the Interrogatories:

B. The Chairman of FCM is Mr. Robert C. Heckman; and, the Treasurer of FCM is Mr. Kenneth F. Boehm. The members of the Board of Directors of FCM are Mr. Robert C. Heckman, Mr. Kenneth F. Boehm and Mr. Jeffrey D. Kane. The Executive Director of FCM from September, 1979 to January 5, 1981 was Mr. Ralph J. Galliano. The current Executive Director of FCM is Mr. Paul G. Dietrich. All staff members of FCM work under the direction of the Executive Director.

Attached hereto is a list of, to the best of your affiant's knowledge, all the people who served on the staff of FCM as an employee, consultant or other agent from September, 1979, to the present.

The following three firms were authorized to make media time buys in behalf of FCM: Thompson and Associates; Edmunds and Associates; and, H.M.L., Inc.

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A variety of volunteers worked in or with FCM's "Citizens for Reagan in '80" project. FCM maintained no record of the names of those volunteers.

(1) Expenditures by FCM could only be authorized by a vote of the FCM Board of Directors or by the express direction of the FCM Treasurer and, with his authority, the FCM Executive Director. Fund raising and time buying consultants such as Mr. Mike Thompson, Mr. Tom Edmunds, H.M.L. Inc., and others, were also authorized to approve expenditures when they were working on projects previously authorized by FCM's Treasurer or Executive Director.

(2) Upon information and belief, the following individuals participated in the production of documents and materials by FCM which related to FCM's "Citizens for Reagan in '80" project: Mr. Ralph Galliano, Mr. Frank Cannon, Mr. Ken Boehm, Mr. John Gizzi, Mr. Robert Heckman, J. Curtis Herge, esq., and Mr. Mike Thompson.

(3) The following individuals participated in the planning, organization and formation of FCM's "Citizens for Reagan in '80" project: Mr. Robert Heckman, Mr. Kenneth Boehm, Mr. Jeffrey Kane, Mr. Ralph Galliano, J. Curtis Herge, Esq., and Mr. Mike Thompson.

C. The current telephone number for FCM is (703) 524-4400. No extension numbers were assigned to any individual person listed in response to Interrogatory B. According to the records of FCM, the following additional phone numbers were used by FCM: (703) 524-4400, (703) 525-1304, and (615) 521-6216.

D. Between January, 1980 and the present, neither FCM nor FCM's "Citizens for Reagan in '80" project held any fundraisers or fundraising events.

E. There is no way for FCM to know whether each of the individuals identified in Interrogatory B has any

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8-E. FCM objects to these questions as being overbroad and unreasonable in that they request information beyond the scope of the Commission's findings of reason to believe that FCM has violated statutes or regulations over which the Commission has jurisdiction. Moreover, to supply the information requested would require that FCM conduct a systematic search of all of its records, and to do so within the time period afforded by the Commission would place an undue burden on FCM and its personnel. In addition, certain of the Commission's requests cannot be answered as they relate to contacts between FCM and agents or employees of various entities, which parties are unknown to FCM.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

Kenneth F. Boehm
KENNETH F. BOEHM

SUBSCRIBED and sworn to before me this 14th day of October, 1980.

Winifred Petty
Notary Public

My commission expires: 2/6/84

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Exhibit B-2

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al., Complainants, -against- FUND FOR A CONSERVATIVE MAJORITY, et al. Defendants.	MUR 1252

ANSWERS TO INTERROGATORIES

COMES NOW, Fund for a Conservative Majority ("FCM"), by its Treasurer, Kenneth F. Boehm, and in response to the written Interrogatories from the Federal Election Commission to FCM in this matter, answers as follows:

FCM

A. FCM is a multi-candidate political committee, a project of which is "Citizens for Reagan in '80." The purpose of that project is to aid in the election of Ronald Reagan to the office of President of the United States.

With regard to the specific questions raised by the Commission concerning the relationship between FCM and "Citizens for Reagan in '80" (CFR):

1) CFR does not maintain a bank account or an accounting of receipts and expenditures separate and apart from FCM.

2) CFR does not employ a staff separate and apart from that of FCM.

3) Solicitations or requests for contributions to CFR ask that checks be made payable to FCM.

4) Monies received from checks received by FCM which were made payable to FCM have been used by CFR.

5) The account into which funds contributed to or received for CFR are deposited in in the name of FCM.

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Mottola, Chris
Mullenhoff, Mark F.
Mullins, Kathy M.
Nagurney, Dave M.
O'Brien, William C.
O'Callaghan, James J.
Pair, Leona
Pana Gakos, Estelle
Parlier, Michele W.
Patton, Charles O.
Pelott, Robert O.
Pena, Costanza
Pencarski, Ed
Peterson, Brad
Phares, Tim
Pittman, Virginia Faye
Renfrow, Jeanne Marie
Richardson, Robert C.
Riley, Deborah A.
Riley, Sandy
Ringhausen, Kathryn Y.
Rodway, Allan C.
Roldan, Carlos E.
Roldan, Hernando J.
Sacharanski, John
Salman, Christopher M.
Sanders, David
Sexton, Lea Ann
Shearer, Danny L.
Siemon, Mark A.
Silverfield, Martin B.
Simon, Ken B.
Simonsen, William
Smathers, John
Smutko, Joan S.
Stoskus, Paul J.
Streeter, Linda D.
Strolhrek, John Stanley
Supka, Kevin P.
Switky, William R.
Switky, Ralph
Taylor, Emerson
Tocco, Brian
Tuggle, Linda J.
Tyson, David
Valls, Mary
Van Buskirk, Robert C.
Van Gales, Symarion
Vignare, Christopher
Vignare, Kim
Ward, Robert A.
Wibert, Alta M.
Wolf, Robin
Wood, William
Woodbury, Deborah S.
Zeavin, Jill R.

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Fitzgerald, Daniel W.
Fitzgerald, Kevin
Fitzgerald, Megan A.
Gaaserud, Karin
Galliano, Ralph J.
Gavin, Roberta S.
Ghanipour, Maryann
Giampietro, Martha T.
Gizzi, John
Graine, Robin L.
Grasso, Kenneth L.
Haines, Lisa Alice
Hansen, Doris P.
Hansen, Marta
Hansen, Willard
Harding, Mark
Harmon, Arthur
Heckman, Robert C.
Heise, Eric
Henderson, Cheryl
Higgins, Vera Clay
Hightower, Carol
Hines, Susan
Holcomb, Shannon W.
Horness, Jacqueline
Horowityz. Daryl
Howell, David V.
Hughes, Aleighta L.
Hyatt, Susan
Jakaitis, John A.
Jones, Jean P.
Kampolla, Karen M.
Kaplan, William E.
Karlson, Courtney
Keating, Bill
Kelly, Ida
Kelly, John B.
Kelly, Peter B.
Key, Beatrice
Key, Mary A.
Kleiman, Gil
Knight, Willard O.
Kupersmith, Charles D.
Laniguera, Daniel W.
Lambert, Wayne A.
Lamountain, Rick
Lampe, Scott A.
Linderman, Phillip
Lodergan, Hope
Londino, Joe
Longyard, William H.
Lopaz, James A.
Marishi, Sachie
Mann, Michael
Manzelli, Peter
McKee, Eileen
Meder, Cecil
Mills, Kim
Miri, Giso

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ABERNETHY, JOHN J.
ACEVEDO, LISA ANN
Allen, Edward E.
Amburgey, Clavin T.
Ammdson, Steve Bruce
Anderson, David P.
Anglari, Maroverite M.
Athanson, Deborah J.
Bake, Maroaret L.
Ballentine, Brian T.
Barnes, Mindy
Barnett, Florence A.
Baxter, Bruce B.
Beaty, Kyle B.
Beeler, Richard
Bennett, Thomas D.
Boehm, Ken
Boynton, Robert A.
Brewer, Gregory J.
Brill, Wallace J. Jr.
Bruce, Jodell
Burgess, James E.
Burlingame, Becki C.
Canfield, Mark C.
Cannon, Francis P.
Carlson, Juan M.
Carpey, Daniel M.
Carter, Helen C.
Cerna, Olga J.
Chambers, Bill
Champagne, Bernard J.
Clay, M.E.
Cliff, Dianne
Coker, David
Courman, Mary Ann
Cox, Earl G. Jr.
Crenshaw, Judy
Cross, Carol L.
Curtis, Carla J.
Daugherty, Lloyd
Dawson, Hazel J.
Delaney, Serena A.
Dickinson, Diana L.
Dickson, Diana L.
Dikeman, Carroll H.
Dolan, Bob
Dudley, Michael R.
Dunlop, James R.
Eggers, Mary
Eidlin, Richard J.
Elmore, Patricia
Evans, Catherine D.
Falkenberg, Elaine K.
Field, Mel H.

relationship (past or present) with the groups and associations listed in Interrogatory E. Such information is not requested or required upon their employment with FCM, and such records are not kept by FCM, subject, however, to the following:

(1) All employees of FCM had the opportunity to participate in FCM's "Citizens for Reagan in '80" project. By reason of the fact that "Citizens for Reagan in '80" was a project of FCM and was administered as such, "Citizens for Reagan in '80" had no separate legal identity. Therefore, the officers, directors and employees of FCM were the operational and administrative authorities of "Citizens for Reagan in '80."

(2) So far as known to the undersigned affiant, from September, 1979 to November 4, 1980, no individual identified in Interrogatory B had any association with the Reagan for President Committee.

(3) Arthur J. Finkelstein and Associates was commissioned in the past to do work for FCM under the direction of Mr. Ralph J. Galliano.

(4) Mr. Ralph J. Galliano is a former employee of the National Conservative Political Action Committee.

(5) Many of the employees of FCM are registered Republicans.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

Robert C. Heckman
ROBERT HECKMAN

SUBSCRIBED and sworn to before me this 5th day of January, 1981.

Cynthia D. Wheeler
Notary Public

My commission expires: December 5, 1982

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Citizens for Reagan
in 80!

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REAGAN/VICE-PRESIDENTIAL SURVEY PACKAGE

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Thursday

Dear Friend:

Reagan as President and a Conservative Majority in the Senate is within our grasp!

National columnist Jack Anderson has referred to this possibility when he recently wrote:

> **"... if a conservative Republican should win the presidency next year, his allies in the Senate could help him change the political direction of the country dramatically."**

With your help we can nominate and elect Ronald Reagan as President! And we can control the Senate as well!

"Citizens for Reagan in 80" is a special project of the prominent multi-candidate political action committee -- Fund for a Conservative Majority. FCM is one of the oldest PAC's in the country and it's efforts have helped elect many of today's conservative leaders.

FCM is working to elect conservative candidates to federal office who will actively work to limit the size, price and control of government.

"Citizens for Reagan in '80" can be the deciding factor in nominating Ronald Reagan as President of the United States.

Please join "Citizens for Reagan in '80" today.

Tens of thousands of dollars in "independent money" must be raised if Reagan's campaign for President is to succeed.

The Eastern Establishment Liberals within the Republican Party are pouring hundreds of thousands of dollars into a "STOP Reagan Campaign."

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

We must not allow them to succeed!

"Citizens for Reagan in '80" is an independent campaign working to nominate and elect Ronald Reagan President of the United States.

Citizens for Reagan will encourage our fellow citizens to vote for Ronald Reagan in 1980.

Citizens for Reagan is campaigning in all the important primary and convention states. However, the extent to which we campaign depends directly upon the amount of support received from patriotic Americans like you.

Citizens for Reagan budgeted a great deal of money for the important New Hampshire primary on February 26, and has now focussed its efforts on the later primaries in the South, in the Midwest and in Texas.

Radio and newspaper advertising, voter mailings, polling and literature distribution will be carried out by "Citizens for Reagan in '80".

The goal is simple: to nominate and elect Ronald Reagan President of the United States.

Ronald Reagan is a strong, articulate and experienced leader. He proved he was an effective executive while serving as Governor of California.

As a matter of fact, Reagan was the first major spokesman calling for a national "taxpayers revolt" by urging the citizens to join him in bringing government under control.

And Ronald Reagan has clearly understood the Soviet threat and has always called for a superior U.S. military force.

Once Reagan is nominated at the Republican convention, we will not stop our campaign -- no indeed. "Citizens for Reagan in '80" will continue to campaign right up to election day.

As an independent campaign, "Citizens for Reagan in '80" is not bound by the federal law to disband after Ronald Reagan's nomination. However, the only money Ronald Reagan will have after his nomination will be that which the Federal Election Commission gives him.

As an independent effort "Citizens for Reagan in '80" has no limit on expenditures before or after the nomination.

Ronald Reagan can win in 1980. But to win he needs your help today.

Many Republican candidates have entered the Presidential sweepstakes -- Bush, Baker, Connally, etc.

Why? Because Jimmy Carter can be defeated in 1980.

But the best man to challenge Jimmy Carter is Ronald Reagan. You and I both know this.

For instance, just imagine the Presidential Debates in the fall of 1980 between Reagan and Carter! Or against Ted Kennedy if he should take the nomination from President Carter. Ronald Reagan will so out-class and out-debate Carter or Kennedy that the American people will simply have to vote for our man!

Send your maximum contribution today to the Fund for a Conservative Majority and join "Citizens for Reagan in '80". Already the campaigns are gearing up and we need operational money to help nominate and elect Conservatives to the United States Senate and Ronald Reagan as President of the United States.

And with your participation we can also help decide who Reagan's Vice President will be.

Please join in the national "Reagan's Running Mate Survey" which is enclosed.

Who should Reagan ask to run with him? You can help make this decision by sending us the enclosed survey as soon as you complete it.

The results of this survey will be periodically released to the news media right up to the Republican National Convention.

Please take these three important steps to help insure Ronald Reagan's nomination and election as President of the United States:

(1) Be sure you and your Reagan friends are registered to vote.

(2) Fill out the enclosed "Reagan's Running Mate Survey" and send it to us today.

(3) Please enclose a maximum contribution with your survey. Make your check payable to Fund for a Conservative Majority.

Don't let the liberal news media and the Eastern Establishment Republicans keep us from nominating and electing Ronald Reagan!

Join "Citizens for Reagan in '80" today. Send your maximum contribution just as soon as possible to the Fund for a Conservative Majority.

On November 4, 1980 Ronald Reagan can be elected President of the United States.

On January 20, 1981 Ronald Reagan can be sworn in as the 40th President of the United States!

On January 21, 1981 President Reagan will begin to bring government under control; he will take action to decrease the rate of inflation; and he will begin to build an effective military defense for our country and our allies.

All this can actually happen! But to make sure it does you must first join "Citizens for Reagan in '80" today.

I am anxiously awaiting your reply.

Sincerely,

Bob Heckman

Robert Heckman, Chairman
Fund for a Conservative Majority

P.S. Tens of thousands of dollars must be raised quickly to allow "Citizens for Reagan in '80" to continue to organize in the key primary states and to promote Ronald Reagan at State Republican conventions around the country.

Please join "Citizens for Reagan in '80" today!
Send your completed survey and your contribution to the Fund for a Conservative Majority.

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Paid Political Advertisement

AMERICA NEEDS LEADERSHIP!

America needs Ronald Reagan as President of the United States. At a time when government seems too big and too powerful, we need a man to bring control of government back to the people.

Government deficit spending continues —

Costly regulations add $100 billion each year to the price of goods and services —

Soviet military strength is increasing while America's defense capability is declining —

America cries for a strong, national leader. *Ronald Reagan is the leader America needs in 1980!*

JOIN "CITIZENS FOR REAGAN IN '80"!

An independent expenditure campaign by Fund for a Conservative Majority, one of the oldest political action committees in the country.

PLEDGE YOUR SUPPORT!

Send your contribution today!

"Citizens for Reagan in '80"

Count me on the Reagan Team for 1980! I am most happy to join "Citizens for Reagan in '80" and to work to nominate and elect Ronald Reagan President of the United States.

___ $15 ___ $25 ___ $50 ___ $100
___ $500 ___ $1,000 ___ $5,000 ___ Other

(Make Check to: Fund for a Conservative Majority or FCM)

A project of Fund for a Conservative Majority, 927 Fifteenth Street, N.W., Washington, D.C. 20005

Name _____
Address _____
City _____
State _____ Zip _____
Occupation _____
Self-employed? _____
Place of Business _____

This communication and all expenditures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

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THE FUND FOR A CONSERVATIVE MAJORITY

The Fund for a Conservative Majority (FCM) is one of the oldest conservative political action committees in the country. It was established under the original name Young Americans Campaign Committee several years before the Federal Election Commission came into existence.

Over the years FCM has supported most of the country's conservative leaders. Men like Governor Ronald Reagan; Senators John Tower, Jesse Helms and Orrin Hatch; and Congressmen Jack Kemp, Robert Dornan and Dan Marriott have all been assisted in their elections by this important political action committee.

The Board of Directors of the Fund for a Conservative Majority includes Robert Heckman who also serves as Director of State and Regional Activities for Young Americans for Freedom; Kenneth Boehm, former Prosecuting Attorney and award winning radio personality; and Jeff Kane, a successful businessman in the state of Maine. FCM's Executive Director is Ralph Galliano formerly with the National Conservative Political Action Committee.

The Fund for a Conservative Majority is dedicated to the goal of creating a conservative majority in the Congress and of electing a conservative President.

FCM believes a conservative majority in the Senate and a Conservative President can be elected in 1980.

Activities for the 1980 Election

"Senate Control in '80" is one of FCM's two current major political campaigns.

Conservatives can win control of the U.S. Senate in 1980. Many of the ultra-Liberals who must face the voters next year are very vulnerable to defeat: Liberal Senators like George McGovern of South Dakota, Gary Hart of Colorado, John Culver of Iowa, Birch Bayh of Indiana, John Durkin of New Hampshire and *at least ten others.*

FCM plans to be very active in this campaign to gain "Senate Control in '80."

• • • • • • • • • • •

"Citizens for Reagan in '80" is a special independent campaign effort to help secure the nomination and election of Ronald Reagan as President of the United States.

"Citizens for Reagan in '80" will be working in key primary states such as New Hampshire, Florida, North Carolina and Texas, and at the important state conventions of Virginia, South Carolina and Missouri. Mailings, newspaper and radio ads, billboards and other political campaign activities will be sponsored by the independent campaign.

927 Fifteenth Street, N.W. Washington, D.C. 20005

Reagan's Running Mate Survey

distributed by Citizens for Reagan in '80

(A project of Fund for a Conservative Majority)

Please show your 1st and 2nd choices for the Vice Presidential candidate to run on Ronald Reagan's Ticket.

John CONNALLY ____

Cong. Phil CRANE ____

Cong. Jack KEMP ____

Sen. Jesse HELMS ____

George BUSH ____

Sen. Bob DOLE ____

Sen. John TOWER ____

other ____

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YES, I want to join Citizens For Reagan In '80!

Enclosed is my contribution in the amount of:

____ $15	____ $25	____ $60	____ $100	____ $250
____ $500	____ $1,000	____ $2,500	____ $5,000	____ Other

(Make Check to: Fund for a Conservative Majority or FCM)

The Federal law requires that we ask the following questions:

Occupation _____ Self employed? _____

Place of Business _____

Corporate contributions can be accepted. They should be issued to the order of The Fund for a Conservative Majority — State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

CITIZENS FOR REAGAN IN '80
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

Paid for and distributed by Fund for a Conservative Majority
Not authorized by any candidate

THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

Paid for by Fund for a Conservative Majority and not authorized by any candidate

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Exhibit D

BUSINESS LETTER PACKAGE

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Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Thursday

Dear Business Executive:

With your help, and that of tens of thousands of other concerned and patriotic Americans, Ronald Reagan can be elected President of the United States!

To "top off" our victory on election night, as many as ten or twelve Big Spending Liberal Democratic Senators can be replaced with responsible conservative Republicans! Many powerful Democratic Congressmen can also be defeated.

The national opinion polls show this can be done! But the campaign has just started.

Ronald Reagan must be elected. President Carter simply has not been the strong, creative and effective leader our country and the Free World so desperately needs in these difficult times.

Jimmy Carter has failed as President.

His domestic policies have produced economic chaos for our people.

Carter's foreign policy failures have shaken the Free World.

Carter must be defeated.

As a businessman, I have to meet payroll every two weeks, pay increasing social security taxes, try to manage under government-created inflation, and then I try to make a reasonable profit!

But thanks to Jimmy Carter my job has become much more difficult.

Today's inflation rate of 12% is frightening. During the first three months of this year inflation was soaring ahead at 18%! This is over three times the inflation rate as when Carter was elected in 1976.

Government spending is projected to be over $615 billion in the next federal budget! This is almost three times the budget of 1972 and over $200 billion more than President Ford's budget in his last year as President.

You and I worked until mid-May this year just to pay our taxes! And taxes take about 40% of the nation's overall earnings.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

This year the average American family will pay over $7,000 in federal taxes!

Most of us pay more in taxes than for our combined costs for food, clothing and shelter.

And in our international dealings with friends and enemies, Carter has also been a terrible failure.

Our military has severely deteriorated under the guidance of Jimmy Carter.

The Russians have brazenly invaded Afghanistan and supported Cuban backed revolutions throughout Central America and Africa. Carter's appointments have supported these communist forces as "stabilizing influences"!

President Carter has managed to destroy our political alliance with Iran and today our American compatriots remain hostages to fanatic terrorists in Iran.

Communist China finally got from Jimmy Carter what no other American President would even seriously consider giving it -- the de-recognition of a loyal ally (The Republic of China on Taiwan) and the help of the U.S. in building up the economic and military strength of this communist giant.

And our Free World allies shake their heads in disbelief as they watch America -- only a few short years ago the strong leader of the non-communist world -- quickly becoming a second rate world influence behind the Soviet Union.

But right now you can join with tens of thousands of your fellow Americans to change the direction of our country -- to rebuild our military strength; to begin to dismantle the over-sized federal government; to give each of us and our businesses a large tax cut; and to bring proven, responsible and strong leadership to the Presidency of the United States.

You can join with "Citizens for Reagan in '80" and help elect Ronald Reagan as our next President.

"Citizens for Reagan in '80" is an independent campaign effort sponsored by the highly respected and nationally recognized Fund for a Conservative Majority. It has been working for over a year to elect Ronald Reagan our next President. FCM is well-known as a cost-efficient and professionally run organization.

"Citizens for Reagan in '80" was a key factor in the Governor's primary victories earlier this year.

FCM is also using its expertise and resources to help elect a conservative majority in the Senate. Its "Conservative Senate Control" campaign has already had a significant impact this year and the Liberal Democrats are scared.

But FCM knows that Ronald Reagan will be running against more than just Jimmy Carter this fall.

Of course, both men will receive their limited campaign budgets from the federal government.

But as the incumbent President, Carter will use the White House and federal spending to the maximum to try to buy the election.

Just watch as Carter stages important news events close to the election. Large federal programs will be announced... new appointments will be made from "swing states"... Carter will desperately try to force some sort of international "success"... Presidential press conferences and urgent national messages requiring full network coverage will suddenly become more frequent.

The Big Union Bosses will "pull out all the stops" to defeat Ronald Reagan. Since the Democratic Congress has given the unions special election advantages, you can expect these powerful men to spend millions of dollars in 1980 to stop Ronald Reagan from becoming President.

And the various left-wing, consumer, anti-defense and pro-abortion groups will be supporting Carter and attacking Reagan. Millions of dollars will be spent by these left-wing organizations to secure the jobs of their government friends and to continue the discredited policies of the Carter Administration.

Finally there is the news media. The men and women who "report" the news will try to destroy Governor Reagan. The reports will show Reagan in the worst possible light. Tens of millions of dollars in "news time" will be spent by the media to stop Ronald Reagan from becoming President.

Only you can help offset these built-in disadvantages faced by Ronald Reagan. And you can help defeat Jimmy Carter.

Your support of FCM's "Citizens for Reagan in '80" campaign will directly help elect Ronald Reagan our next President.

Because of the way the federal campaign law is written, this independent effort for Ronald Reagan can spend as much money as can be raised from people like you.

"Citizens for Reagan in '80" hopes to spend at least $3,000,000 this fall -- maybe as much as $10,000,000 -- to help elect Ronald Reagan our next President. This critically important money must be raised from citizens like you.

To help meet this goal, "Citizens for Reagan in '80" has established a special Honorary Business Advisory Council and plans to enlist the support of at least 10,000 business leaders. I am honored to serve on this Honorary Business Advisory Council.

For as little as $25 (the maximum allowed contribution is $5,000) you can join this very important campaign committee. "Citizens for

Reagan in '80" hopes to raise between $1,000,000 and $3,000,000 from the American business community to help elect Ronald Reagan our next President.

The campaign plans are simple: to carefully and professionally spend as much money as can be raised to reach the American people with good, strong and effective television advertising, with creative radio and newspaper ads and by sending voter mailings to as many voters as possible in key states.

The money you give to "Citizens for Reagan in '80" will be spent effectively and professionally to help elect Ronald Reagan.

Send your maximum contribution today and join with tens of thousands of other Americans in support of "Citizens for Reagan in '80".

Your contribution can range up to $5,000.

Remember, you will not be able to contribute to the official Reagan for President organization after Ronald Reagan is nominated. Federal law prohibits it.

But you can help elect Ronald Reagan President by sending your contribution today to the Fund for a Conservative Majority.

After receiving your contributon of at least $25 you will be sent a beautifully designed and individually personalized Membership Certificate. You will be proud to hang this document on your wall.

You will also be sent timely updates on the election and asked for help and advice as Election Day draws near.

Please send your contribution today. Help elect Ronald Reagan President of the United States.

I am counting on you. Reagan's election as President could well be determined by the support you give today.

Sincerely,

Jeffrey Kane

Jeffrey Kane
Director
Honorary Business Advisory Council

P.S. Jimmy Carter has simply failed as President. Our economy is in turmoil and our military strength is dangerously weak.

Help turn our country around! Join "Citizens for Reagan in '80" today. With your help Ronald Reagan can be elected our next President.

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THE WALL STREET JOURNAL

Business Leaders Rate Reagan Most Capable

By Roger B. May
Staff Reporter of THE WALL STREET JOURNAL

Chief executives of U.S. business overwhelmingly believe Ronald Reagan is better able to handle the economy than President Carter or John Anderson. Even so, they mostly have only a fair amount of confidence in his ability as opposed to a great amount.

The executives expect Mr. Reagan to get the chance to test his talents. Sixty-six percent of chief executive officers at large and medium-sized companies think Mr. Reagan will win the presidential election next fall. Slightly over 20% pick Mr. Carter. Among small-company executives, 58% expect a Reagan victory; 23% think Mr. Carter will be reelected. At present, it is almost impossible to find any corporate chief executive who believes Mr. Anderson will be the next President.

A WSJ/Gallup Survey

According to the Wall Street Journal/Gallup survey of business opinion, conducted jointly by the Journal and the Gallup Organization, better than eight in 10 chief executives of large companies believe Mr. Reagan is better able to deal with the economy than is either Mr. Carter or Mr. Anderson. Though a somewhat smaller proportion of medium-sized and small-company chief executives thinks so, their sentiment in favor of Mr. Reagan is still substantial—70% of medium-sized company executives and 61% of small-company executives say he is the best man of the three for the job.

Carter Does Poorly

Only 5% of large-company chief executives and 7% of medium-sized company chief executives think Mr. Carter is the best choice to deal with the economy. His support comes mostly from small-company executives. Still, only 14% of them put the President ahead of Mr. Reagan or Mr. Anderson.

For Mr. Anderson, 4% of large-company executives, 9% of those at medium-sized companies and 10% of small-company executives think he would handle the economy best.

How chief executives rate the three candidates among each other closely follows the amount of confidence they have in each man's ability to deal with the economy. Eighteen percent of large-company executives place a great deal of confidence in Mr. Reagan's ability; 61% express a fair amount of confidence. Among medium-sized and small-company executives, the feeling is roughly similar.

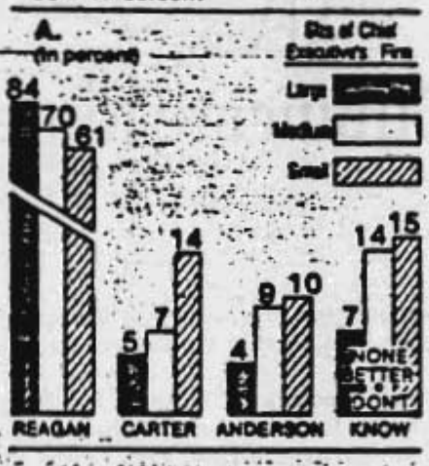
Few chief executives are comfortable with Mr. Carter's abilities. More than 80% of large and medium-sized company executives and more than 70% of small-company executives say they have little or no confidence in his capability to cope with the economy. Only 13% of large-company officials, 17% of those at medium-sized companies and 29% of small-company executives say they have a fair amount or great deal of confidence in him.

Anderson an Enigma

Executives feel much the same way about Mr. Anderson. His problem is partly that many chief executives don't know that much about him. Among large-company executives, 73% have little or no confidence in Mr. Anderson's ability to handle the economy; 13% don't have an opinion. Forty-five percent of small-company executives have little or no confidence in him; 24% can't say.

Chief executives think it is important to the economy who wins the election in November. Seventy-three percent of those at large companies say it will make a difference.

Q. *Who do you feel would do the best job of handling the economy: Ronald Reagan, Jimmy Carter or John Anderson?*



Sixty-nine percent of medium-sized company executives say it matters who wins as do 58% of small-company executives. In general, the greater the dissatisfaction with the economy or the President's handling of it, the more likely a chief executive thinks the election outcome will make a difference.

For this survey, the Gallup Organization interviewed 341 chief executive officers of companies drawn from Fortune magazine's listings of 1,000 large companies during the period from June 5 to July 16. Also interviewed were 311 chief executives from medium-sized companies and 306 from small companies drawn from a commercial listing of about 1.5 million companies. The margin of sampling error is plus or minus 5% percentage points for responses from large and medium-sized companies, plus or minus seven percentage points for small companies.

Join the Honorary Business Advisory Council of the nationally recognized "Citizens for Reagan in '80." You help Reagan win & today will help elect Ronald our next President!

Help Elect Ronald Reagan!

Dear Mr. Kane:

I am most happy to join you in support of Ronald Reagan for President in 1980. I am firmly committed to the defeat of Jimmy Carter this year.

Ronald Reagan is the best man to be President!

Enclosed is my contribution. I understand that an official "Citizens for Reagan in '80" Honorary Advisory Board Certificate will be sent to everyone who sends in at least $25.

__$25 __$50 __$100 __$250 __$500

__$1,000 __$2,500 __$5,000 $___Other

(Make check payable to Fund for a Conservative Majority or FCM)

Corporate contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority – State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/City/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

8304213795

Honorary Business Advisory Board

Presented to

SAMPLE

for active participation in the national campaign to elect Ronald Reagan President of the United States in 1980.

The Officers and Directors of "Citizens for Reagan in '80" thank you for your generous support of Ronald Reagan during the 1980 presidential campaign. "Citizens for Reagan in '80" is an independent campaign sponsored by the nationally-recognized political action committee, Fund for a Conservative Majority.

Robert C. Heckman, Chairman

8 3 0 4 9 4 F 1 3 9 9

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

Exhibit E

September 7, 1979

Mr. Ralph Galliamo
Fund for a Conservative Majority
1022 Wilson Boulevard
Arlington, Virginia 22209

Dear Ralph:

Enclosed is a memorandum which is designed to be reproduced and distributed to your field people. Please call me after you read it and let me know if it is what you and Bob had in mind.

Sincerely,

J. Curtis Herge

enclosure

JCH:tmg

8304042140

8304042140I

September 7, 1979

MEMORANDUM

TO: The Board of Directors of Fund for a Conservative Majority

FROM: J. Curtis Herge

SUBJECT: Guidelines on Independent Expenditures

This memorandum is written in response to your request for a brief summary of the relevant provisions of the law on "independent expenditures" which could serve as a guideline for your critical field personnel who are working on the Citizens for Reagan in '80 project.

Of course, the most critical thing is to provide you with the definition of an independent expenditure, which appears in the Federal Election Campaign Act of 1971, as amended.

> An independent expenditure is an expenditure for communications made expressly to advocate the election or defeat of a clearly identified candidate which is not made with the cooperation or consent of, or in consultation with or at the request or suggestion of, any candidate or any of his or her agents or authorized committees.

This definition is the keystone for the entire project. It is suggested that all personnel be made familiar with it and understand it. The important features of the definition are:

1) The expenditures are being made independent of Gov. Reagan, his agents and his campaign committee. They are being made by Fund for a Conservative Majority, a multi-candidate political committee. (Citizens for Reagan in '80 is a project of Fund for a Conservative Majority.)

2) The expenditures are those for communications "expressly to advocate" the nomination and election of Gov. Reagan. This means any communication containing a message which advocates his nomination or election. Included, for example, are expressions such as "vote for," "elect," "support," "cast your ballot for" and "Reagan for President."

3) To be independent, the expenditures must be made without the cooperation of Gov. Reagan, his agents and his campaign committee. All personnel must be admonished not to have any communication whatsoever with Gov. Reagan, his agents or his campaign committee. (Agent means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize campaign expenditures.) These prohibited communications are to be avoided. The Federal Election Commission will assume that any contacts, between FCM personnel and members of the proscribed class of persons, involved a discussion of the expenditures and/or the plans of the Reagan Campaign. The burden will then be on FCM to

8304042140

demonstrate that such discussions did not take place. Any accidental or inadvertant contacts with members of the proscribed class of persons should be promptly terminated, be documented (as to time, place, people involved and matters discussed) and be reported immediately to the Executive Director of FCM.

In order to be independent, an expenditure cannot be made through any person who is or has been authorized to raise or expend funds for Gov. Reagan or his campaign committee; or, who is or has been an officer of Gov. Reagan's campaign committee; or, who is or has been receiving any form of reimbursement or compensation from Gov. Reagan, his agents or committee. All personnel who are associated with FCM on this project must meet this test. Therefore, inquiry should be made of prospective personnel whether or not they fall within this defined group. Furthermore, any supplier of goods and services to FCM should be asked, when the initial contact is made, whether or not the supplier falls within this category.

Another prohibition is that FCM may not pay to disseminate or republish any of Gov. Reagan's authorized campaign material. In other words, FCM may not make an expenditure to distribute copies of campaign brochures produced by the Reagan Committee, or to publish an advertisement

8304042140 3

utilizing a text prepared by his committee. Therefore, the content of any proposed communication produced by FCM personnel should be cleared as to source and content with the Executive Director of FCM before it is published or disseminated.

Disclaimers

Any communication which is published or disseminated must make it clear that "Citizens for Reagan in '80" is a project of Fund for a Conservative Majority. In addition, on the face or front page of all printed matter, or at the beginning or end of a broadcast or telecast, the following disclaimer must appear:

> "Paid for by Fund for a Conservative Majority and not authorized by any candidate."

Furthermore, if the communication solicits contributions, the following additional statement must appear:

> "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."

Reporting Requirements

FCM must itemize each independent expenditure it makes exceeding $100 at the end of any reporting period in which the expenditure is made. Independent expenditures of $100 or less are also reported as unitemized expenditures.

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Therefore, FCM will require its agents to report to it, as required, the name and address of the person to whom every expenditure was made; the amount; the date; and, the purpose. A receipted bill must be secured and be sent to FCM for its records.

Fund-Raising

No fund-raising activity should be conducted on behalf of FCM without the prior written authorization of FCM. FCM will provide instructions on the type of information that must be secured from each contributor. The required contributor information must be immediately reported to FCM and the contribution delivered to FCM within five days after receipt.

Conclusion

The Federal Election Campaign Act is complex. The specific rules relating to independent expenditures are particularly complex. All field personnel should be instructed to conduct their operations and activities only in compliance with the procedures developed by FCM. Questions should be directed to the Executive Director of FCM and all innovative plans and projects should receive a clearance from FCM before any funds are expended.

8304042140 3

Diversified Direct, Inc.

Exhibit E

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1493

DATE Jan. 25, 198[illegible]

TO:

Reagon for President
1828 L St., N.W.
Washington, D.C. 20036
Suite 201

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1/24/80	1141 / 10246	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
26 M	Computer forms, with 2 color face and back.	29.19/M	758.94
	Authors Alterations:		
	Line shots:		10.80
	Labor: stripping:		72.00
	TOTAL INVOICE:		$841.74

8304042106

2/24/80
#1267/2264
$40,772.4

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1495

DATE Jan. 25, 1981

Exhibit P-2

TO:
Reagon for President
1828 L St. N.W.
Washington, D.C. 20036
Suite 201
Attn: C. Swaim

SHIPPED TO:
Kiplinger Editors
East West Hwy.
Hyattsville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1/24/80	1329 / 10259	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
13.5 M	Computer forms, with 2 color face and blank back.	32.97/M	445.09
	Authors Alterations:		
	Labor: stripping:		31.50
	TOTAL INVOICE:		$476.59

8304021107

1/24/80
#126 1/2 LLS
#4077 2

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB COPY

Diversified Direct, Inc.

1936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INVOICE

NO. B 5163

DATE 1-29-80

TO:

Reagan for Pres., Committee
1828 L. St. N.W.
Washington, D.C. 20036

SHIPPED TO:

MH-11682
Exhibit F-3

DDI

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2010 DDI P.O. NO. CH 6253 DIVISIONAL JOB NO. 9305	SALESMAN	TERMS NET 30
	1-24-80			

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: Mailing Services		
7605	Stamp RAE 3-5¢	7.50/M	57.04
	Postage Used $1,140.75		
	Invoice Total		57.04

8304042142

3/24/:
#1321/2214
#4477.27

WHITE—CLIENT · GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Exhibit P-4

Ronald Reagan
Pacific Palisades, California 90272

January 25, 1980

Mr. M. Scott McFadden Jr.
702 Fairway Ln.
Columbia SC 29210

Dear Mr. McFadden:

Nancy and I would like you to have the enclosed photograph as a token of our appreciation for your past support of the Republican Party and conservative causes.

The picture was taken at our home in Pacific Palisades, California.

With your help we will win the White House. 1980 will be a year of Republican victory.

With that in mind, I've listed 4 questions which I'd like your answers to.

Please take a few minutes now to fill out your answers and mail them back to me today.

Your advice is important to me. And what you tell me by your answers will be an important tool in running a winning Reagan for President campaign.

For example, I'd like to know whether you believe Carter, Kennedy or Brown would be the most difficult Democrat candidate to beat.

Since I have personally selected you to give the answers for your area, I really do need to hear back from you right away.

If for some reason you don't want to answer my questions, I will need to know that so I can contact someone else in your area to take your place.

Running for President is an extremely difficult and long undertaking. Since I became a candidate just over three months ago, I have already visited 18 states and given over 70 speeches.

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 8641 Airport Blvd., Suite 1400, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463

8304042140 9

Exhibit P-4

But the fact I may win the chance to make America strong and proud again, to enrich the future of our children, makes the grueling days on the road all worthwhile. With your help, I will win that chance. Let me share some of my thoughts with you on a few of the issues of special concern to me:

Since 1976 we have seen the Democrats:

- give away our canal in Panama to a marxist dictator
- allow America to be humiliated by a terrorist regime in Iran
- fail to stand up to Communist aggression in Afghanistan, Angola, and other trouble spots in the world
- allow the presence of Russian combat troops only 90 miles from our own shores in Communist Cuba
- sign a pro-Soviet SALT II Treaty which would further weaken our military defenses and watch the Russians pull far ahead of us in the arms race
- destroy our intelligence capability so that we can be humiliated and embarassed around the world.

As President, I'll rebuild America's defenses. We need a coherent foreign policy that measures everything by this standard; what is best for the United States of America? It's time we stopped worrying about whether other countries in the world like us and start worrying about whether they respect us.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore prosperity and opportunity at home. I want to provide that leadership more than anything I have wanted in my life.

But without the necessary funds, I won't be able to run a winning campaign or stand up for the American ideals which you and I share.

Every respected national and regional poll shows that I can win. But not without your help.

Our campaign treasurer, Bay Buchanan, tells me we must raise $3,595,000 in the next two months. We need

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$230,000 just to pay for the rent, telephones, printing, postage, buttons, bumper stickers and other immediate expenses in the next two weeks.

<u>All the favorable polls in the world won't help if we can't raise this money.</u>

When you return your answers to me, perhaps you can send a check for $10, $15, $25 or even $50. Or possibly you can send us as much as $150 or $250.

Please don't think your contribution won't make a difference in my campaign because it will. I don't have alot of wealthy businessmen sending me checks for $1,000 each.

My campaign is mostly funded by $25 and $50 contributions or less.

If you could send a large check, we certainly could use it. This is maybe even as much as $250 or $500. But anything you can send will be deeply appreciated because it shows I have your trust and support.

I plan to hold a meeting of my top campaign advisors within the next 14 days. I want to discuss your answers to the questions I've enclosed at that meeting.

So please try to fill out and mail back the enclosed reply form today so I will know whether I can count on your financial help and your political advice. Let me know who you think will be the toughest Democrat to beat, and please send a check for $15, $25, $35, $50, or even $100 or more.

In 1980 we can elect a Republican President but only if you and other good people like you do their part now.

I'll be anxiously looking forward to hearing from you.

Sincerely,

Ronald Reagan

P.S. Again, it's important that I have your answers in the next 14 days. I must also know whether I can count on your support and whether you will help us meet our financial budget projections. Please let me hear from you today.

8304042111

From:

Mr. Lanar P. Brown BAA
710 Seven Oaks Ln.
Columbia SC 29210

(Please fill out as completely as possible)

1. Do you consider yourself: ☐ Republican
   ☐ Democrat
   ☐ Independent

2. Which 3 issues in your opinion should I stress in my campaign? (Check 3 only)
   ☐ Inflation
   ☐ National Defense
   ☐ Energy
   ☐ Decline in Morality
   ☐ Big Government
   ☐ Welfare Fraud
   ☐ Other _____
   _____

3. Do you consider yourself: ☐ conservative
   ☐ moderate
   ☐ liberal

4. Who do you feel would be easier for me to defeat?
   ☐ Jimmy Carter
   ☐ Teddy Kennedy
   ☐ Jerry Brown

5. Governor Reagan, to demonstrate my support for you, I am enclosing my check for
   ☐ 15 ☐ 25 ☐ 50 ☐ 100
   ☐ 250 ☐ 500 ☐ 1000 ☐ Other _____

PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT

I understand the following information is required by federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 8641 Airport Blvd., Suite 1433, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ed Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington D.C. 20463

8304042112

Diversified Direct, Inc.

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INVOICE

NO. A 1539

DATE Jan. 31, 1980

Exhibit F-5

TO:

Reagan for President
1828 L St., N.W.
uite 201.
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Kiplinger

CUSTOMER ORDER NO.	DATE SHIPPED/1/31/80 MAILED.	DDI JOB NO. 10281 DDI P.O. NO. 1343 DIVISIONAL JOB NO.	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
16,793	Computer forms, with 2 color face and back.	48.88/M	820.84
	Authors Alterations:		
	Line shots:		2.70
	Labor: stripping:		31.50
	TOTAL INVOICE:		$855.04

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WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

936 Dresperity Avenue · Fairfax (Manifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INVOICE

NO. A 1580

DATE Jan. 31, 19

TO:

Reagan for President
1828 L St., N.W.
Washington, D.C. 20036
Suite 201

Attn: C. Swaim

SHIPPED TO:

Kiplinger

Exhibit P-6

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1/31/80	1340 / 10277	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
16,294	Computer forms, with 2 color face and coded: No $ amt.	22.71/M	370.03
19,302	Computer forms, same specs. Coded: with $ amt.	same	438.34
	Authors Alterations:		6.00
	Line shots:		45.00
	Labor: stripping:		
	TOTAL INVOICE:		$859.37

8304042141

3/24/8:

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1555

DATE Feb 7, 198

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Exhibit F-7

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 2/4/80	DDI JOB NO. 10278 DDI P.O. NO. 1344 DIVISIONAL JOB NO.	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
38,605	Letters, with 2 color face and back.	24.39/M	941.57
	Authors Alterations: Labor: stripping:		9.00
	TOTAL INVOICE:		$950.57

8304042+4+5

Group III - ITF
OK, pay
CAS
2-11-80

#589/204
4-22-80
$1961.27

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc. INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5155

DATE Jan. 31, 19

TO:

Reagan for President
1828 L St. N.W. Suite 201
Washington, D.C. 20036

SHIPPED TO:

MH 011697
Exhibit F-8

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 1/29/80 1/30/80	DDI JOB NO. RF 2011 DDI P.O. NO. CM 1067 DIVISIONAL JOB NO. 9320	SALESMAN	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES GR 225.		
22,389	Insert, stamp burst, trim & fold, match.	45.00/M	1,007.
	Postage Used: $3,363.15		
	TOTAL INVOICE:		$1,007.

8304042-1116

Okay
Bob
2-6-80

3/24/80
#1207/2224
$4097.24

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Pacific Palisades, California 90272

Exhibit F-9

February 11, 1980

R Bay Buchanan
Apt 502
5974 Buckingham Parkway
Culver City, CA 90230

Dear Mr. Buchanan:

This may be the most important letter I've ever written you.

By now I'm sure you've heard the results of the Iowa Caucuses.

Although the public opinion polls showed on Caucus Day that I was favored by more Republican voters than any other candidate, enough of my supporters didn't turn out for me to win.

Although I'm confident that we are well organized and can win in New Hampshire, we can't let this happen again.

Once again the polls show that if every Reagan supporter votes in the early primary, we will win. But if the turn out of our supporters is light, we could be defeated.

I am deeply grateful for your past contribution of $100. But if we are to win in New Hampshire, I must ask you to send me a check in the same amount as before or $200 or $300 if you possibly could.

Let me explain.

We have the dedicated volunteers in New Hampshire to call every Reagan supporter and remind them to vote - but as of today we don't have the $279,000 which we need to install telephone banks in our headquarters in New Hampshire, Vermont, Massachusetts, Florida and South Carolina.

The telephone company insists on large deposits in advance. Frankly, we must raise this $279,000 in the next two weeks.

All the favorable polls in the world won't help if we can't

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 9841 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee - Paul Laxalt, Chairman, Bay Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, DC 20463

8304042147

raise this money for telephones today.

Please don't think that your contribution won't make a difference in my campaign because it will.

If you could send a large check today we really could use it. But anything you can send will be deeply appreciated because it shows I still have your trust and support.

I believe we can make this country great again.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore opportunity and prosperity at home. I want to provide that leadership more than anything I've wanted in my life.

Your friendship and support have meant so much to me in the past. I really need your help now.

I'm enclosing one of my favorite snapshots of Nancy and me that I'd like you to have as a small token of our appreciation.

I'm confident that we can win in New Hampshire. Please let me hear from you today.

Sincerely,

Ronald Reagan

RONALD REAGAN

P.S. The telephone company requires payment in advance to install our primary day telephones. Please let me hear from you today.

8304021411

TO: Governor Ronald Reagan

SUBJECT: Emergency in New Hampshire

FROM:

R Bay Buchanan
Apt 502
5974 Buckingham Parkway
Culver City, CA 90230

90230BCHN974 R
AAA

Dear Governor Reagan,

YES, I want to help win in New Hampshire. We must have the telephones needed to get out every Reagan voter.

Enclosed is my maximum contribution of:

☐ $100 ☐ $200 ☐ $300 ☐ _____ Other

towards the $279,000 we must raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

830404214 9

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 9441 Airport Blvd. Suite 1470 Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Bay Buchanan, Treasurer
A copy of our report is filed with the Federal Election Commission, Washington, DC 20463

Diversified Direct, Inc. — INVOICE

936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1616

DATE 2/18/80

Exhibit F-10

TO:

Reagan for President
1828 L St. N.W.
Washington, D.C. 20036
Suite 201
Attn: C. Swaim

SHIPPED TO:

Central Data Processing
Forestville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/18/80	1434 / 10330	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
0200 M	Computer forms, with 2 color face and back.	14.87/M	2,974.00
	TOTAL INVOICE:		$2,974.00

8304042142

OK amb printing #14

C-8/110.80 Prompt

C.S.

paid May 14, 80 #650-204 $11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1617

DATE 2/18/80

Exhibit P-11

TO:

Reagan for President
1828 L St., N.W.
Washington, D.C. 20036
Suite 201
Attn: C. Swain

SHIPPED TO:

Central Data Processing
Forestville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/18/80	1427 / 10331	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
100 M	Computer forms, with 2 color face.	14.72/M	1,457.00
	TOTAL INVOICE:		$1,457.00

3304042141

Travelling

Exp. response due 3-21/10-80

Paid
May 14, 80
#650-204
$1,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc. INVOICE

936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1655

DATE 2/25/80

Exhibit P-1

TO:

Reagan for President
1828 L St., N.W.
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/22/80	1441,1440 10354	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
55 M	Computer forms, with 2 color face and back. 1 - UP.	21.58/M	1,186.90
27.5 M	Computer forms with same specs. 2 - Up.	22.71/M	624.52
	TOTAL INVOICE:		$1,811.42

OK wgs Mailing #14

Paid. Dec 14, 80 #652 - 204 $11,614.25

B. 3/10. 80. pr. 20 ct -

CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5294

DATE 3-27-80

MH-11806

Exhibit F-13

TO:

Regan for President Committee
1828 L st. N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2030 DDI P.O. NO. CM 1102 DIVISIONAL JOB NO. 9630	SALESMAN	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES,		
230,505	Insert, Burst, fold, stamp and match.	38.25/M	8,816.82
	CODE QUANTITY DROP DATE		
	GR233 50,803 3/5/80		
	" 43,895 3/6/80		
	" 27,976 3/6/80		
	" 12,650 3/7/80		
	" 20,660 3/14/80		
	" 7,033 3/17/80		
	" 37,912 3/21/80		
	" 14,066 3/24/80		
	" 15,510 3/25/80		
	230,505		
19,995	Stamp to projected count:	5.00/M	99.98
			8,916.80
	Postage Used: $34,616.25		
	20% charge for excess postage affixed on 19,995 pieces @.15¢ due to client over-estimate.		+599.85
	TOTAL INVOICE:		$9,516.65

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

8304042142

Mr. Thomas C. Brown, Jr.
892 Hodges Dr
Orangeburg, South Carolina 29115

Dear Mr. Brown:

Ronald Reagan
Pacific Palisades, California 90272

March 3, 1980

Mr. Ladson Beach
PO Box 1304
Orangeburg, South Carolina 29115

Dear Mr. Beach:

Nancy and I would like you to have the enclosed photograph as a token of our appreciation for your past support of the Republican Party and conservative causes.

The picture was taken at our home in Pacific Palisades, California.

With your help we will win the White House. 1980 will be a year of Republican victory.

With that in mind, I've listed 4 questions which I'd like your answers to.

Please take a few minutes now to fill out your answers and mail them back to me today.

Your advice is important to me. And what you tell me by your answers will be an important tool in running a winning Reagan for President campaign.

For example, I'd like to know whether you believe Carter, Kennedy or Brown would be the most difficult Democrat candidate to beat.

Since I have personally selected you to give the answers for your area, I really do need to hear back from you right away.

If for some reason you don't want to answer my questions, I will need to know that so I can contact someone else in your area to take your place.

Running for President is an extremely difficult and long undertaking. Since I became a candidate just over three months ago, I have already visited 18 states and given over 70 speeches.

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 5841 Airport Blvd., Suite 1430 Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Jay Buchanan, Treasurer
A copy of our report is filed with and can also be purchase from the Federal Election Commission, Washington, D.C. 20463

8304042142S

But the fact I may win the chance to make America strong and proud again, to enrich the future of our children, makes the grueling days on the road all worthwhile. With your help, I will win that chance. Let me share some of my thoughts with you on a few of the issues of special concern to me:

Since 1976 we have seen the Democrats:

- give away our canal in Panama to a marxist dictator
- allow America to be humiliated by a terrorist regime in Iran
- fail to stand up to Communist aggression in Afghanistan, Angola, and other trouble spots in the world
- allow the presence of Russian combat troops only 90 miles from our own shores in Communist Cuba
- sign a pro-Soviet SALT II Treaty which would further weaken our military defenses and watch the Russians pull far ahead of us in the arms race
- destroy our intelligence capability so that we can be humiliated and embarassed around the world.

As President, I'll rebuild America's defenses. We need a coherent foreign policy that measures everything by this standard; what is best for the United States of America? It's time we stopped worrying about whether other countries in the world like us and start worrying about whether they respect us.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore prosperity and opportunity at home. I want to provide that leadership more than anything I have wanted in my life.

But without the necessary funds, I won't be able to run a winning campaign or stand up for the American ideals which you and I share.

Every respected national and regional poll shows that I can win. But not without your help.

Our campaign treasurer, Bay Buchanan, tells me we must raise $3,595,000 in the next two months. We need

8304042142 6

$230,000 just to pay for the rent, telephones, printing, postage, buttons, bumper stickers and other immediate expenses in the next two weeks.

All the favorable polls in the world won't help if we can't raise this money.

When you return your answers to me, perhaps you can send a check for $10, $15, $25 or even $50. Or possibly you can send us as much as $150 or $250.

Please don't think your contribution won't make a difference in my campaign because it will. I don't have alot of wealthy businessmen sending me checks for $1,000 each.

My campaign is mostly funded by $25 and $50 contributions or less.

If you could send a large check, we certainly could use it. This is maybe even as much as $250 or $500. But anything you can send will be deeply appreciated because it shows I have your trust and support.

I plan to hold a meeting of my top campaign advisors within the next 14 days. I want to discuss your answers to the questions I've enclosed at that meeting.

So please try to fill out and mail back the enclosed reply form today so I will know whether I can count on your financial help and your political advice. Let me know who you think will be the toughest Democrat to beat, and please send a check for $15, $25, $35, $50, or even $100 or more.

In 1980 we can elect a Republican President but only if you and other good people like you do their part now.

I'll be anxiously looking forward to hearing from you.

Sincerely,

Ronald Reagan

P.S. Again, it's important that I have your answers in the next 14 days. I must also know whether I can count on your support and whether you will help us meet our financial budget projections. Please let me hear from you today.

8304042142 7

From:

Mr. Lawson Beach MAD
PO Box 1304
Orangeburg, South Carolina 29115

(Please fill out as completely as possible)

1. Do you consider yourself: ☐ Republican
   ☐ Democrat
   ☐ Independent

2. Which 3 issues in your opinion should I stress in my campaign? (Check 3 only)
   ☐ Inflation
   ☐ National Defense
   ☐ Energy
   ☐ Decline in Morality
   ☐ Big Government
   ☐ Welfare Fraud
   ☐ Other _____

3. Do you consider yourself: ☐ conservative
   ☐ moderate
   ☐ liberal

4. Who do you feel would be easier for me to defeat?
   ☐ Jimmy Carter
   ☐ Teddy Kennedy
   ☐ Jerry Brown

5. Governor Reagan, to demonstrate my support for you, I am enclosing my check for
   ☐ 15 ☐ 25 ☐ 50 ☐ 100
   ☐ 250 ☐ 500 ☐ 1000 ☐ Other _____

PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT

I understand the following information is required by federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 5841 Arapen Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington D.C. 20463

8304042142 8

Diversified Direct, Inc. INVOICE

936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 8734686

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1657

DATE 2/29/80

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Exhibit F-115

Wiland & Assoc.
Culpepper, Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 2/29/80	DDI JOB NO. / DDI P.O. NO. 1454 / DIVISIONAL JOB NO. 10383	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
48,251	Computer forms, with 2 color face and back.	21.58/M	1,041.25
	Authors Alterations: Labor: stripping:		18.00
	TOTAL INVOICE:		$1,059.25

8304042142

OK pay. quantity 16

Proof

Tray 14,8

= 650/hr x 17.9

$11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc. INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1659

DATE 2/29/80

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

SHIPPED TO:

Wiland &

Exhibit P-16

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/29/80	1453 / 10384	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
23 M	Computer forms, with 2 color face and coded: With $ Amt.	17.25/M	396.75
24 M	Computer forms, with same specs. Coded: No $ Amt.	17.25/M	414.00
	TOTAL INVOICE:		$810.75

8304042145

Invoice #16 OK w/ us

R-DS-80
REP-HF

Cut

Pd.
Dec 14, 80
#652/ 224
$11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2938 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1806

DATE 3/19/80

Exhibit F-17

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036
Attn: C. Swaim

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	3/18/80	DDI P.O. NO. 1621 / 10464	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
45 M	2 Sheet letters, with 2 color face and back.	22.46/M	1,010.7
	TOTAL INVOICE:		$1,010.7

OK Mailing #16

Pd. Mar 14,
652 [illegible] 2
$11,614.25

8304042145-1

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5309

DATE April 7, 1980

FEC 011823

Exhibit F-18

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RF 2039 DDI P.O. NO. CM 1347 DIVISIONAL JOB NO. 9724	SALESMAN	TERMS NET—30
	4/2/80			

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES GR 337		
43,021	Burst, trim, and fold, stamp, insert and seal.	25.75/M	1,107.79
	Postage Used: $3,620.97		
	TOTAL INVOICE:		$1,107.79

33042143

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

NO. B 5310

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

DATE April 2, 1980

MH 011819

Exhibit F-19

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. REP 2037 DDI P.O. NO. CM 1357 DIVISIONAL JOB NO. 9722	SALESMAN	TERMS
	3/31/80		SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES, GR 137.		
11,075	Burst, trim, fold, stamp carr., & RAEm Match, insert.	61.75/M	683.88
	Postage Used: $3,324.90		
	TOTAL INVOICE:		$683.88

OK cwb

8304021435

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1606

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5301

DATE April 1, 1980

MH 011817

Exhibit P-20

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2038 DDI P.O. NO. CM 1348 DIVISIONAL JOB NO. 9723	SALESMAN	TERMS
	3/31/80		SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES, GR 237.		
36,755	Burst, trim and fold, stamp, match, insert and seal.	45.00/M	1,653.98
	Postage Used: $5,519.40		
	TOTAL INVOICE:		$1,653.98

8304042143 4

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

EXHIBIT F-21

8304042I435

Exhibit F-21

Senator Orrin Hatch
WASHINGTON, D.C. 20510

OEA

8304042143 6

WASHINGTON D.C. 20510

Mr. Morey I Stearns
1114 Parker St
Springfield, MA 01129

Dear Mr. Stearns:

Would the Russians have brutally savaged Afghanistan and pointed a red dagger towards the oil fields of the Middle East, if Ronald Reagan were President?

Would Iranian terrorists have held Americans hostage and humiliated our nation in the eyes of the world, if our President were Ronald Reagan?

Would Ronald Reagan have let the United States throw away its military superiority to the point where the Soviet Union and its mercenaries are emboldened to invade countries around the world?

Of course not.

There are many fine candidates for President this year, but there is only one candidate the Russians and their puppets cannot afford to see elected, and he is Ronald Reagan.

But you know that since Governor Reagan tells me you are one of his most trusted supporters.

That's why I am writing to you today - - to ask you to stand up with me for Ronald Reagan. To stand up with me for a thorough change of leadership in Washington.

I know you've been generous before but frankly the Reagan campaign urgently needs your check for $25.00 or $50.00.

We must raise $249,000 in the next two weeks to keep the Reagan campaign in Wisconsin, Texas, California, and all the western states on schedule.

This money is urgently needed for printing, postage, rent, telephones and radio and TV time.

[illegible] is an [illegible] of REAGAN FOR PRESIDENT Committee, 9841 Airport Blvd. Suite 1430 Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ed. Rollins, Treasurer
A copy of our report [illegible] with and may be obtained from the Federal Election Commission, Washington, DC 20463

8304042137

For many years now, Washington has been dominated by an elite clique which some people call the "liberal establishment." Presidents come and go, but the elitists who are responsible for our apologetic foreign policy and second-rate defense remain in Washington year after year undermining our nation's security.

Some absolutely vital questions we should ask about each of the candidates are:

- What kind of people will he bring with him to Washington?
- Will they be the same old crowd who feel ashamed of America's prosperity and power?
- Will they be the same old wishful thinkers who believe the Russians are as honest and trustworthy as we are?
- Will they be the same old proponents of unilateral disarmament?
- Will they be the same old appeasers?

My point is this: Unless we bring to Washington genuinely fresh leadership - - all across the board - - we will tragically have missed what is perhaps our last chance to restore American superiority and respect.

Only Ronald Reagan is free of ties to the elitist Liberal Establishment which has brought our country to its knees. Only by electing Ronald Reagan can we be sure of really changing things.

We are in very serious trouble. As a member of the United States Senate, I can tell you that matters are even worse than the President will admit to the American people. If ever there was a time when America needed a courageous and forthright leader, the time is now.

If ever there was a time when we needed a President and a government of men and women who are proud of America and willing to defend her, the time is now. If ever there was a time to totally reject the pessimism, defeatism and appeasement of the past, the time is now.

I believe had Ronald Reagan been President, the B-1 bomber would have been built, our Navy would still be the world's mightiest. And, our troops would have the equipment they desperately need to deter war. Because Ronald Reagan has always advocated a defense strong enough to command the world's respect, we would not have felt compelled to surrender the Panama Canal and compel-

8304042143 8

led to abandon our loyal allies on Taiwan. We would not have suffered a long train of humiliating defeats of which Iran and Afghanistan are only the latest.

I know that you and I share Ronald Reagan's vision of a strong, proud and respected America. I believe we have never shared the defeatist viewpoint of the Liberal Establishment any more than Ronald Reagan has.

We have the opportunity to help elect the kind of straight-forward President Americans yearn for. A man who will bring to Washington a wholly new team of men and women with a completely fresh point of view.

I am going to ask you to do two important things.

First, please use the yellow envelope I have enclosed for you to send me the largest contribution you can afford today..

Second, if you can, please try to raise a similar amount from three or four of your friends and neighbors. $10, $15, $25 or even $50 extra will give Governor Reagan's campaign a big boost. Please use the blue envelope to send me any money you can raise from your friends in the next two weeks.

We must elect Ronald Reagan. I urge you to send your largest possible contribution today. Let's have an honest-to-goodness change in Washington.

With warmest regards, I am

Orrin G. Hatch

Orrin G. Hatch
U.S. Senate

P.S. I am working my heart out to elect Ronald Reagan. I hope you will help me by sending your answer in the yellow envelope today.

P.P.S. If you can, remember to send the blue envelope to me in two weeks.

8304042 1439

Please mail today in the yellow *return* envelope.

TO: Senator Orrin Hatch

FROM: Mr. Morey I Stearns
1114 Parker St
Springfield, Massachusetts 01129

ORD 01129STRN114

Dear Senator Hatch,

Yes, we *must* have a President who will stand up to the Communist attack abroad. We must elect Ronald Reagan.

Enclosed is my contribution of:

☐$25.00 ☐$50.00 ☐$75.00 ☐_____Other

towards the $249,000 we need to raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

[illegible] on behalf of REAGAN FOR PRESIDENT Committee 3243 Anson Blvd. Suite 1430 Los Angeles California 90045
REAGAN FOR PRESIDENT Committee - Paul Laxalt Chairman, Ray Buchanan Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission Washington DC 20463

8304042144O

Diversified Direct, Inc.

INVOICE

2934 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 - (703) 573-1605

NO. A 1914

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

DATE April 15, 19

Exhibit P-22

TO:

Reagan for President
c/o Cheryl Swaim
435 Lee Street
Alexandria, Va. 22314

SHIPPED TO:

Wiland & Assoc.
Culpepper, Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/1 4/80	1697 / 10593	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
28.5 M	Computer forms, with 2 color face and coded: w/o $ amt.	20.55/M	585.67
27 M	Computer forms, with same specs. Coded: w $ amt.	20.55/M	554.85
			1,140.52
	4% Va. tax:		45.62
	TOTAL INVOICE:		$1,186.14

9304042 1 4 1 1

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1953

DATE April 21, 19

TO:

Reagan for President
c/o Cheryl Swaim
435 N. Lee St.
Alexandria, Va. 22314

SHIPPED TO:

Exhibit F-23

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/80	1698 / 10595	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
54 M	2 sheet letters, with 2 color face and back .	23.97/M	$ 1,294
	Authors Alterations:		
	Line shots:		4
	Labor: stripping:		36
	TOTAL INVOICE:		$1,334.

4.30.80 AK mails RFP Gr? CLS

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

8304042144

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1957

DATE April 21,

Exhibit F-24

TO:

Reagan for President
c/o Cheryl Swaim
435 N. Lee Street
Alexandria, Va. 22314

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/80	1867 / 10584	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, NEWSPAPER CLIPPINGS.		
108 M	Newspaper clippings, with 1 color face and blank backs.	8.80/M	950.4
	TOTAL INVOICE:		$950.4

8304042141

4-30-80
17th mailing
RFP
ok

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

Diversified Direct, Inc.

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1905

INVOICE

NO. A 1964

DATE April 22, 1980

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

TO:

Reagan for President
c/o Black, Manafort & Stone, Inc.
435 N. Lee St.
Alexandria, Va. 22314
Attn: Cheryl Swaim

SHIPPED TO:

Exhibit F-25

Wiland & Assoc.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/20/80	1866 / 10594	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
57 M	Computer forms, with 2 color face and 2 color back.	17.41/M	992.37
	Authors Alterations:		
	Line shots:		4.00
	Labor: stripping:		36.00
	Blueline and color sep.		19.50
			1,051.87
	4% Va. tax:		42.07
	TOTAL INVOICE:		$1,093.94

8304042-1-4-1-1

4-30-80
17th mailing
RFP
CW

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

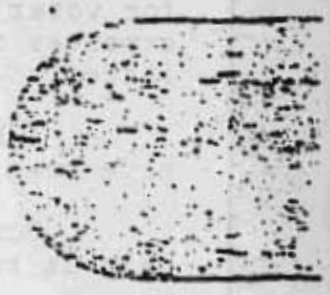
Exhibit F-26

Address Correction Requested

FROM: Mrs. Beatrice Shortliffe
2115 58th St
Sacramento, California 958

1634 NUUANU AVE #208.
HONOLULU HI 96817

8304042144 45



Dear Friend and Supporter:

You and I are on a winning streak.

If you have followed it in the news, you know that thanks to the dedication and support of people like you our campaign has swept the early primaries.

We have won over 400 delegates, almost one-half of the number needed to be nominated at the Republican National Convention this summer.

Never before have our chances of electing a conservative Republican President been better.

I am absolutely positive that with your continued help, we can go on to win the Republican nomination and beat Jimmy Carter or Teddy Kennedy in the fall.

There is one thing that deeply disturbs me. Although we have won every major contest so far our campaign funds have trickled off to almost nothing. I am enclosing a clipping from the Washington Post that details this dire situation. Our campaign treasurer, Bay Buchanan, reports that we currently have less than $10,000 on hand.

In the next three weeks we must lay out $199,000 for voter mailings, radio and television time and the expenses of my travelling to the middle and late primary states.

I hate like the dickens to ask you because you have been so generous to me in the past.

But I would deeply appreciate it if you could help us raise the $199,000.

Your check for $10 or $15 or $25 would go a long

8304042141416

way toward meeting our goal.

Everywhere I go in this country, I feel a spirit of hope and optimism about America's future. It is time to rebuild America's military strength and restore economic prosperity and opportunity at home.

The politicians say it can't be done. But I believe with your help we can balance the budget, we can cut taxes, we can create jobs and we can restore America's strength and prestige abroad.

I'm counting on you. I need your help.

Together you and I can make this a year of victory not only for our campaign but also for the American people.

Our financial situation is as urgent as I have stated to you. I know you share my dream for the future of our country. Please don't put this letter aside until you have acted.

With deepest appreciation for your past support.

Sincerely,

RONALD REAGAN

P.S. The Texas and California primaries are right around the corner. Our opponents are waiting for us to run out of money or make a serious campaign mistake. With your help, we will avoid these pitfalls and go on to victory. Please let me hear from you today.

8304042144 7

TO: Governor Ronald Reagan

FROM: Mr. Christian L Bendixen
98 400 Kaauka Lp No 419
Aiea, Hawaii 96701

PRV 96701BNDX098 CH8

Dear Governor Reagan,

I understand the campaign money situation is urgent. We *must* win the Republican nomination and I am willing to help.

Enclosed is my maximum contribution of:

☐ $10 ☐ $15 ☐ $25 ☐_____ Other

towards the $199,000 we need to raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 5841 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Jay Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463

8304042141418

Diversified Direct, Inc.

INVOICE

3218 Gallows Road (Merrifield), Virginia 22031 · (703) 573-1605

NO. A 1975

DATE April 25, 1980

TO: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

Exhibit G-1

TO:

Fund for a Conservative Majority
c/o Thompson & Associates
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

Wiland & Assoc.

CFM 180

MER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/24/80	1693 / 10599	SE	NET—30

TITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
5 M	Computer forms, with 3 color face and 1 color back.	13.69/M	2,806.45
	Authors Alterations:		
	Halftones reshot:		26.70
	Line shots:		5.40
	Labor: stripping:		36.00
			2,874.55
	4% Va. tax:		114.98
	TOTAL INVOICE:		$2,989.53

VP Planning page 1-2 only.

See attached.

8304042144 9

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

1936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1988

DATE April 25, 19[illegible]

TO:

Fund for a Conservative
Majority
c/o Thompson & Assoc.
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

CFR 180

Exhibit G-2
Wiland & Assoc.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/24/80	DDI P.O. NO. 1708 / DIVISIONAL JOB NO. 10609	SE	NET

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
133 M	Computer forms, with 3 color face and black back.	15.27/M	2,030.91
	4% Va. tax:		81.23
	TOTAL INVOICE:		$2,112.14

Find DRIVE

8304042143C

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Citizens for Reagan
in 80!

A project of FUND FOR A CONSERVATIVE MAJORITY

Exhibit G-3

FINAL VICTORY DRIVE PACKAGE

8304042145I

Citizens for Reagan in 80!

A project of FUND FOR A CONSERVATIVE MAJORITY

May 16, 1980

Mr. P C Davis
PO Box 1063
Quincy, FL 32351

Dear Mr. Davis:

Reagan as President and a Conservative Majority in the Senate is truly within our grasp!

National columnist Jack Anderson has referred to this possibility when he recently wrote:

> "... if a conservative Republican should win the presidency next year, his allies in the Senate could help him change the political direction of the country."

With your help we can soon nominate and elect Ronald Reagan as President! And we can control the Senate as well!

"Citizens for Reagan in '80" is a special project of the prominent multi-candidate political action committee -- Fund for a Conservative Majority. FCM is one of the oldest PACs in the country and its efforts have helped elect many of today's conservative leaders.

FCM is seeking to elect conservative candidates to federal office who will actively work to limit the size, price and control of government.

"Citizens for Reagan in '80" can be the deciding factor in electing Ronald Reagan as President of the United States.

If we are to succeed, we need your help. Please join with "Citizens for Reagan in '80" today.

A significant amount of "independent money" has already been raised to help nominate and elect Reagan our next President.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

JUNE 3 1980

But more, much more, needs to be done.

The Eastern Establishment and the liberal news media hope to deny victory to Ronald Reagan.

We must not allow them to succeed! Reagan can win!

"Citizens for Reagan in '80" is an independent campaign working to nominate and elect Ronald Reagan President of the United States.

Citizens for Reagan will encourage our fellow citizens to vote for Ronald Reagan in 1980.

Citizens for Reagan is campaigning in all the important primary and convention states. However, the extent to which we campaign depends directly upon the amount of support received from you and other patriotic Americans.

Citizens for Reagan budgeted a great deal of money for the important primaries in New Hampshire, the South, Illinois, Connecticut, Pennsylvania and Texas. Now its efforts are focussed on the important final primaries in California, Ohio and New Jersey, on June 3rd.

Radio and newspaper advertising, voter mailings, polling and literature distribution is being carried out by "Citizens for Reagan in '80".

<u>The goal is simple: to nominate and elect Ronald Reagan President of the United States.</u>

Ronald Reagan is a strong, articulate and experienced leader. He proved he was an effective executive while serving as Governor of California.

As a matter of fact, Reagan was the first major spokesman calling for a national "taxpayers revolt" by urging the citizens to join him in bringing government under control.

And Ronald Reagan has clearly understood the Soviet threat and has always called for a superior U.S. military force.

Once Reagan is nominated at the Republican convention, we will not stop our campaign -- no indeed. "Citizens for Reagan in '80" will continue to campaign right up to election day.

As an independent campaign, "Citizens for Reagan in '80" is not bound by the federal law to disband after Ronald Rea-

Reagan Country — Final VICTORY Drive

JUNE 3 1980

June 3 Primaries

California
168 delegates

Mississippi
22 delegates

Montana
20 delegates

New Jersey
66 delegates

New Mexico
22 delegates

Ohio
77 delegates

Rhode Island
13 delegates

South Dakota
22 delegates

West Virginia
18 delegates

Total delegates at stake on June 3:
428

8304042134

May 15, 1980

Mr. Bruce R Johnson
340 E Madison Ave
Wheaton, IL 60187

Dear Mr. Johnson:

Now we must secure the final nomination victory for Ronald Reagan and prove that he can defeat President Carter this fall!

On June 3, nine important states hold Republican Primaries -- for your future reference, I have noted the list of states on the margin of this page.

Ronald Reagan must use these elections to build a strong base of support for winning in the fall.

"Citizens for Reagan in '80" has budgeted a large amount of money to build a base of support in these important states -- a base for defeating President Carter.

Blue collar workers, conservative Democrats and Independents, religious Americans and small businessmen are the "key voters" who will secure final victory for Ronald Reagan.

And with your help "Citizens for Reagan in '80" will reach these voters in the nine important states which hold primaries on June 3. Five of these nine states -- Mississippi, New Jersey, Ohio, Rhode Island and West Virgini went for Carter in 1976.

But Reagan can carry all of them in 1980! These states can be the margin of victory for Reagan in the fall.

The June 3 primary elections not only must be won by Reagan -- but he must convince conservative Democrats and Independents to vote for him in large numbers. And these new Reagan voters must then be put to work campaigning for Reagan's final victory in November.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

It is now clear: President Jimmy Carter can be defeated this fall by Ronald Reagan!

President Carter has admitted that Governor Reagan will be a tough opponent. The national public opinion surveys show Reagan and Carter running neck and neck.

Even the national media now admits that Ronald Reagan will be a strong and effective candidate for President.

Let's put the "icing on the cake". Let's win BIG on June 3, in all nine primary states.

With your help, Reagan can go to the Republican Convention in Detroit with these important nine states "in his camp".

Support "Citizens for Reagan in '80", the highly successful independent campaign sponsored by Fund for a Conservative Majority, a multi-candidate political action committee. FCM is also concentrating its political expertise on gaining "Conservative Senate Control" in 1980.

"Citizens for Reagan in '80" has been an important factor in the tremendous Reagan campaign successes this spring. The official Reagan for President organization is limited by federal law on how much it can spend. "Citizens for Reagan in '80" has no legal limits on its expenditures.

And the same is true this fall. "Citizens for Reagan in '80" will be able to spend as much as it can raise to help Ronald Reagan defeat Jimmy Carter on November 4.

Send your maximum contribution today.

Help Ronald Reagan win all nine primaries on June 3. Help build the base of support that will be so necessary for victory this fall.

I am looking forward to your support. Only with your help will Ronald Reagan be our next President.

Sincerely,

Bob Heckman

Robert C. Heckman, Chairman
Fund for a Conservative Majority

P.S. A Big Reagan win in these nine states on June 3 -- with large voter support from Democrats and Independents -- will prove Governor Reagan can defeat President Carter in the fall.

Please help FCM "wrap up the nomination" for Reagan on June 3, by sending your maximum contribution today.

8304042143 5

THERE IS A DIFFERENCE!

Republicans need
to understand that
when they vote
for their choice for
President, they really
do have a choice!

RONALD REAGAN
is the best candidate
for Republicans.
He is a better choice
than George Bush.

HERE'S THE DIFFERENCE:

Ronald Reagan

TAX CUTS: Ronald Reagan supports the major Kemp-Roth tax cut proposal (30% across the board tax cut in three years) which is also endorsed by the Republican National Committee and the majority of Republicans in Congress.

EXPERIENCE PROVEN: Ronald Reagan has successfully governed the largest state in the Union for eight years. As Governor of California he proved to be an excellent administrator, an innovative and strong leader and a man who can limit the power and cost of government.

DRAFTING WOMEN: Ronald Reagan agrees with the experts and is opposed to drafting women into our armed forces. At a time when America must quickly rebuild its military strength Reagan does not believe that drafting women will benefit our nation's defense needs.

GOVERNMENT GROWTH: Ronald Reagan will cut government size, government power and government taxes. He did it in California and he will do it again as president.

GUN CONTROL: Ronald Reagan opposes gun control and has clearly spoken out for the right of every citizen to keep and bear arms.

George Bush

TAX CUTS: George Bush is opposed to the Kemp-Roth tax cut. He voted for a 10% income tax surcharge in 1968, against a tax cut in 1969 and to increase the national debt in 1969 and 1970. Then the people of Texas defeated Bush in 1970 when he ran for the Senate.

EXPERIENCE LIMITED: George Bush has never had the responsibility of running government, large or small. We can't afford another President who doesn't understand how to effectively and efficiently run our federal government.

DRAFTING WOMEN: George Bush has endorsed the drafting of women into the American armed forces.

GOVERNMENT GROWTH: George Bush supports further growth in the federal government as he did while in Congress. For example, he voted to establish OSHA, the most dictatorial of all federal agencies, and to nationalize welfare programs under the federal government.

GUN CONTROL: George Bush favors gun control. While in Congress he voted for the infamous 1968 Gun Control law.

Don't be misled.

Vote for Ronald Reagan!

Paid for by Fund for a Conservative Majority
and not authorized by any candidate or candidate's committee.

CITIZENS FOR REAGAN IN '80

For more information about Citizens for Reagan in '80 and how you can help nominate and elect Ronald Reagan President of the United States, send your name and address to:

Citizens for Reagan in '80
A project of Fund for a Conservative Majority
7777 Wilson Boulevard, Suite 1401
Arlington, Virginia 22209

☐ Enclosed is my contribution of $ _____

Make check payable to: Fund for a Conservative Majority.

Name _____

Address _____

City/State/Zip _____

Be a part of the Reagan Team for 1980!

8304042145

Final VICTORY Drive

JUNE 3 1980

Reply Memorandum

Reagan Country

June 3 Primaries

California
168 delegates

Mississippi
22 delegates

Montana
20 delegates

New Jersey
66 delegates

New Mexico
22 delegates

Ohio
77 delegates

Rhode Island
13 delegates

South Dakota
22 delegates

West Virginia
18 delegates

Total delegates at stake on June 3:
428

Dear Bob:

The nomination of Ronald Reagan is in sight! Now we must prove he can defeat President Carter this fall.

The national polls show we can win. But we must use the up-coming June 3 primaries to build the organization to defeat President Carter and elect Ronald Reagan.

Here is my "Final Drive" contribution:

___ $25 ___ $50 ___ $100 ___ $250

___ $500 ___ $1,000 ___ $5,000 ___ Other

(Make check payable to Fund for a Conservative Majority or FCM)

Corporate Contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority – State Fund.
These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

330421

8 3 0 4 0 4 2 1 4 5 8

THANKS FO HELPING US PAY POSTAGE

Final VICTORY Drive

JUNE 3 1980

CITIZENS FOR REAGAN IN '80!
A project of:
Fund for a Conservative Majority
927 Fifteenth Street NW
Washington, DC 20005

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street NW
Washington, DC 20005

Final VICTORY Drive

JUNE 3 1980

Diversified Direct, Inc.

36 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

mit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INVOICE No. [redacted]

DATE May 10, 1980

Exhibit G-4

TO:

Fund for a Conservative Majority
c/o Thompson & Assoc.
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

Bond Office Supply

CFR 160

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	5/7/80	1756 / 10646	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
410 M	Letters, with 1 color face and 2 color back.	7.22/M	2960.20
	4% Va. tax:		118.40
	TOTAL INVOICE:		$3078.60

8304042145

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

MEMORANDUM

Exhibit, F-1

Ex. 1 (b) OT
11-17-81, hearings
DV

To: Bay Buchanan

From: Cheryl Swaim

Subject: Required Checks

Date: February 20, 1980

In order to procure goods and services required for our March 3, 1980, prospect mailing and March 7, 1980, Reagan for President house file mailing, it is necessary that the following three checks be federal expressed to me today.

Amount of Check	Provider (to whom check should be made) & Address
1. $1,763.00 #1228/2264 Feb 22, '80	Todd Allan Printing 802 Rhode Island Avenue, N.E. Washington, D.C. 20018 to be used to pay for 265,000 Ronald Reagan pictures to be used as inserts for prospect mailings - at $ 6.65 per thousand.
2. $3925.00 #1229/2264 Feb. 22	Wiland & Associates ~~219 East Davis Street~~ Culpepper, Va. 22701 to be used for laser printing of approximately 75,000 letters and response devices for RFP-house file mailing - at $ 46.00 per thousand, plus $250 for tape conversion
3. $3,347.50 #1230/2264 Feb. 22	Atlantic List Company, Inc. 2100 M Street, N.W., Suite 307 Washington, D.C. 20037 to be used to rent names from Daily News Digest at $ 75.00 per thousand and California Ringmakers at $ 60.00 per thousand - these lists have been proven to work for us.

Without my immediate receipt of these checks, the necessary goods and services cannot be possibly obtained.

Thank you.

Cheryl Swaim

8304042145C

Diversified Direct, Inc.

INVOICE

9300 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1699

DATE 2/29/80

Exhibit P-2

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

SHIPPED TO:

Wiland &

EX 1 (c)
11-17-81 - lawsuit
SK

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 2/29/80	DDI JOB NO. / DDI P.O. NO. 1453 / DIVISIONAL JOB NO. 10384	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
23 M	Computer forms, with 2 color face and coded: With $ Amt.	17.25/M	396.75
24 M	Computer forms, with same specs. Coded: No $ Amt.	17.25/M	414.00
	TOTAL INVOICE:		$810.75

8300421451

Invoice #16 OK w/ us.

C.O.S. FC
DEP. HF

Cut

pd.
Dec. 14, 80
#652/ 5[illegible] 214.
$11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1600

NO. A 1657

DATE 2/29/80

Mail to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Wiland & Assoc.
Culpepper, Va.

Exhibit B-3 77(d)
Ex
11-17-81, Lawrence

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/29/80	DDI P.O. NO. 1454 / 10383	SK	NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
53,251	Computer forms, with 2 color face and back.	21.58/M	1,041.25
	Authors Alterations: Labor: stripping:		18.00
	TOTAL INVOICE:		$1,059.25

8304042145

OK auth. quantity 16

Proof 14,8[illegible]
= 45[illegible]/54 2.64
$11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Ex 1(i)
11-17-81, Lawrence

MEMORANDUM

To: Bay Buchanan

From: Cheryl Gwaim

Date: April 10, 1980

Enclosed are invoices for the Reagan for President-House File 16th mailing which dropped on March 28, 1980. Among these invoices is a warehouse charge by Diversified. All have been reviewed and found to be according to agreements.

Samples of the 16th mailing are enclosed. In addition, a cost analysis for this mailing is enclosed.

With my memorandum of March 1, 1980, were samples of the "$1,000 Legal Limit" letters. I have sent additional samples to Judy Harrison, at her request, who will deliver them to you.

The 17th mailing is scheduled for the week of April 20, 1980. Immediate expenses for this mailing are as follows:

Amount	Vendor & Address	Purpose
$5,710.13	Wiland & Associates 219 East Davis Highway Culpeper, Va. 22701 Attn: Bob Perrott	laser-printing of 53,121 letters and 56,622 2-up response devices
$14,238.05	U.S. Postmaster	12,611 @ .30 each (high do 40,510 @ .15 each 52,122 @ .084 each

Thank you for your time.

Cheryl

RECEIVED APR 17 1980

8304042146 3

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1911

DATE April 15, 19[illegible]

TO:

Reagan for President
c/o Cheryl Swaim
435 Lee Street
Alexandria, Va. 22314

SHIPPED TO:

Exhibit I-2

Wiland & Assoc.
Culpepper, Va.

Ex 1 (1) 11-17-81, Haus

CUSTOMER ORDER NO.	DATE SHIPPED/ 4/1 4/80 MAILED.	DDI JOB NO. 10593 DDI P.O. NO. 1697 DIVISIONAL JOB NO.	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
28.5 M	Computer forms, with 2 color face and coded: w/o $ amt.	20.55/M	585.67
27 M	Computer forms, with same specs. Coded: w $ amt.	20.55/M	554.85
			1,140.52
	4% Va. tax:		45.62
	TOTAL INVOICE:		$1,186.14

8304042145

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

INVOICE

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22313

NO. A 1964

DATE April 22, 1980

TO:

Reagan for President
c/o Black, Manafort & Stone, Inc.
435 N. Lee St.
Alexandria, Va. 22314
Attn: Cheryl Swaim

SHIPPED TO:

Wiland & Assoc.

Exhibit I-3

Ex 1 (K)
11-17-81, Lawrence

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 4/20/80	DDI JOB NO. / DDI P.O. NO. 1866 / DIVISIONAL JOB NO. 10594	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
57 M	Computer forms, with 2 color face and 2 color back.	17.41/M	992.37
	Authors Alterations:		
	Line shots:		4.00
	Labor: stripping:		36.00
	Blueline and color sep.		19.50
			1,051.87
	4% Va. tax:		42.07
	TOTAL INVOICE:		$1,093.94

B3040421465

4-30-80
17th mailing
RFP
CW

OK
[illegible]

1st. [illegible] 15.50
= 129-204
4 17,527 15

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

Exhibit J-1

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
23197,23199	16	Phone/Thompson	November 21, 1979	24681

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Smarr Mailing Alexandria, Virginia

Ex 2(c)
11-17-81, Lawsuit
SJ

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert Foreign Files				
Programming	.22 hrs.	25.00/hr	$ 5.50	
Computer Time for Assembly and Test	.09 hrs.	120.00/hr.	10.80	
Convert, Sort and Consolidate Three Foreign Files (input size)	40,150	8.13/M	326.42	
Split Foreign File by File Type Code				
Process input records	36,007	1.20/M	43.21	
Process output records - Reagan Donors	2,810	1.23/M	3.46	
Process output records - FCM 1977-1979	19,710	1.23/M	24.24	
Process output records - FCM 1976 + Prior	12,460	1.23/M	15.33	
Print Reagan Grams to:				
Reagan Donors	2,810	40.00/M	112.40	
FCM 1977-1979	19,710	40.00/M	788.40	
FCM 1976 + prior	12,460	40.00/M	498.40	
Virginia Sales Tax			72.47	

TERMS: NET 30 DAYS TOTAL $1,900.63

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A PAY THIS AMOUNT N/A

2-4

Exhibit J-2

REAGAN IN '80 GRAM

REAGAN GRAM PACKAGE

8304042145 57

EX 2(d)
11-17-81, Lawrence

5 pages

REAGAN CAN WIN!

REAGAN IN '80 GRAM

REAGAN IN 1980

NOVEMBER 13, 1979

MRS. RUBY K BREAUX
103 E HATHAWAY DR
SAN ANTONIO, TX 78209

DEAR MRS. BREAUX:

TONIGHT RONALD REAGAN ANNOUNCED FOR PRESIDENT OF THE UNITED STATES.

AS I WATCHED HIM ON TELEVISION, I BECAME MORE CONVINCED THAN EVER THAT REAGAN CAN WIN AND THAT HE WILL BE A STRONG LEADER FOR THE UNITED STATES AND FOR THE FREE WORLD.

REAGAN CAN BE ELECTED PRESIDENT! HIS ELECTION WILL BRING WITH IT SEVERAL NEW CONSERVATIVE SENATORS AND MANY NEW CONGRESSMEN. THE POLITICAL DIRECTION OF OUR NATION WILL DRAMATICALLY CHANGE FOR THE BETTER.

"CITIZENS FOR REAGAN IN '80" IS AN INDEPENDENT EFFORT BY A HIGHLY RESPECTED POLITICAL ACTION COMMITTEE -- FUND FOR A CONSERVATIVE MAJORITY.

NOT BOUND BY GOVERNMENT RESTRICTIONS WHICH LIMIT REAGAN'S CAMPAIGN EXPENDITURES IN EACH STATE, THE FUND FOR A CONSERVATIVE MAJORITY CAN RECEIVE INDIVIDUAL CONTRIBUTIONS OF UP TO $5,000 PER PERSON EACH YEAR.

FCM IS ACTIVELY WORKING FOR THE NOMINATION AND ELECTION OF RONALD REAGAN AND ALSO HELPING TO CAPTURE CONSERVATIVE CONTROL OF THE SENATE IN '80.

YOUR PAST SUPPORT OF FCM HAS HELPED BUILD "CITIZENS FOR REAGAN IN '80" INTO A POWERFUL POLITICAL VOICE IN THE 1980 PRESIDENTIAL CAMPAIGN.

WITH YOUR CONTINUED SUPPORT RONALD REAGAN AND A CONSERVATIVE SENATE WILL BE ELECTED NEXT YEAR, MRS. BREAUX.

WE CAN ELECT REAGAN AND ALSO DEFEAT ULTRA-LIBERAL BIG SPENDING SENATORS SUCH AS GEORGE MCGOVERN, FRANK CHURCH, JOHN CULVER, ALAN CRANSTON, BIRCH BAYH, AND OTHERS.

"Paid for by Fund for a Conservative Majority and not authorized by any candidate. A copy of our report is filed with the Federal Election Commission"

8304042146

"CITIZENS FOR REAGAN IN '80" HAS DEVELOPED A SERIES OF HARD-HITTING AND CREATIVE NEWSPAPER AND RADIO ADS. VOTER MAILINGS WILL BE SENT INTO EACH OF THE KEY PRIMARY STATES.

IN 1976, FCM RAN RADIO ADS FOR RONALD REAGAN BY EFREM ZIMBALIST JR. IN EACH STATE WHERE THESE IMPRESSIVE RADIO SPOTS RAN, REAGAN WON THE PRIMARY.

WE MUST RAISE AT LEAST $47,543 BY DECEMBER 1ST TO BEGIN TO RESERVE RADIO TIME AND NEWSPAPER ADVERTISING SPACE IN THE EARLY PRIMARY STATES.

IF WE DON'T RAISE THIS MONEY, OUR CAMPAIGN FOR REAGAN WILL HAVE TO BE CUT BACK DRASTICALLY.

REAGAN CAN WIN IN 1980 IF WE CONTINUE TO RECEIVE YOUR FINANCIAL SUPPORT, MRS. BREAUX.

TODAY THE AVERAGE 60 SECOND RADIO AD IN KEY PRIMARY STATES COSTS $16.47 APIECE.

I AM HOPING YOU WILL SEND FCM AT LEAST $32.94 TO PAY FOR TWO OF THESE CRITICALLY IMPORTANT REAGAN RADIO ADS.

IF YOU CAN'T SEND $32.94, PLEASE TRY TO CONTRIBUTE $16.47 TO PAY FOR ONE RADIO AD. WHATEVER YOU CAN AFFORD TO SEND WILL BE USED TO NOMINATE AND ELECT RONALD REAGAN IN 1980.

REAGAN'S ANNOUNCEMENT TONIGHT TRULY PROVED HE IS CAPABLE OF NOT ONLY WINNING BUT ALSO OF BEING THE STRONG, STABLE PRESIDENT OUR NATION SO BADLY NEEDS AT THIS TIME.

PLEASE SEND YOUR CONTRIBUTION TODAY.

THANK YOU VERY MUCH,

ROBERT HECKMAN
CHAIRMAN

P.S. IT IS BECOMING MORE AND MORE OBVIOUS THAT THE ULTRA-LIBERAL, BIG SPENDER -- TED KENNEDY -- COULD WELL BECOME THE DEMOCRATS' NOMINEE FOR PRESIDENT.

THIS DANGEROUS FACT MAKES IT ALL THE MORE IMPORTANT THAT RONALD REAGAN BE NOMINATED AND ELECTED.

WITH YOUR HELP, REAGAN CAN WIN!

8304042145

REAGAN REPLY GRAM

Dear Bob Heckman:

I support Ronald Reagan for President! We must also elect a Conservative Senate in 1980.

You can count on my support. We are close to victory and I want to be an active part of that success.

I am proud to continue my support of the Fund for a Conservative Majority.

Enclosed is my contribution:

_____ $16.47 for one 60 second REAGAN RADIO AD

_____ $32.94 for two 60 second REAGAN RADIO ADS

_____ $50 _____ $100 _____ $250 _____ $500

_____ $1,000 _____ $2,500 _____ $5,000 _____ other

(Make check payable to: FUND FOR A CONSERVATIVE MAJORITY OR FCM)

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

OCCUPATION _____ SELF-EMPLOYED? _____

PLACE OF BUSINESS _____

"Paid for by Fund for a Conservative Majority and not authorized by any candidate. 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."

8304042147C

Wilana & Associates, Inc.

Exhibit J

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

C.FR '80 IE

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
25309	16	1415	February 15, 1980	25688

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert FCM Files				
Programming	.50 hrs.	25.00/hr.	$ 12.50	
Computer Time for Assembly and Test	.13 hrs.	120.00/hr.	15.60	
Convert and Sort FCM 1977-1979 $5+ Donors				
Process input records	22,528	5.48/M	123.45	
Process output records	22,204			
Convert and Sort FCM 1976 and Prior $10.00+ Donors				
Process input records	14,070	6.60/M	92.86	
Process output records	13,912			
Convert and Sort FCM CIT Reagan 1980 Donors				
Process input records	2,685	stp.chg.	67.50	
Process output records	2,681			
Print 4-up Cheshire labels to:				
$5.00+ Donors 1977-1979	22,204	2.85/M	63.28	
$10.00+ Donors 1976 and Prior	13,912	3.15/M	43.82	
1980 Reagan Donors	2,681	stp.chg.	22.50	
Virginia Sales Tax			17.66	

EX 2 (i)
11-17-81, Lawrence

TERMS: NET 30 DAYS

TOTAL $459.17

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT N/A

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

Exhibit J-4

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
23979	16	1485	April 14, 1980	26441

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
ce/Purge #4 - FMC March 1980 - Texas kage				
cess Mail File Input (including List nversion and Duplicate Identification ocessing)	213,906	$3.24/M$	693.06	
ss Mail File Output (including lits, Key Assignments and Printing)	165,329	3.00/M	495.99	
pping and Handling to Return Magnetic pes	9 tapes	2.50/tp.	22.50	
ginia Sales Tax			47.56	

CF 2160 ✓

TERMS: NET 30 DAYS

TOTAL $ $1,259.11

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT $ N/A

8304042147 3

Exhibit J-5

TEXAS PACKAGE

Ex 2(p)
11-17-81, lawrence
SV

TEXAS FOR REAGAN!

PRIMARY DATE: MAY 3
DELEGATES: 80

April 15, 1980

Dear Friend of Reagan:

"REAGAN WINS TEXAS - BUSH QUITS RACE".

Those headlines could greet us on Sunday morning, May 4, if you help "Citizens for Reagan in '80" today.

The important Texas primary is held in less than one month -- on Saturday, May 3.

Reagan must win this important election by an overwhelming margin. By doing so, he can prove to the liberal news media, to President Carter and to the country that he can indeed win the Presidency this fall.

In 1976, Governor Reagan defeated President Ford in Texas by winning all the delegates.

This year Reagan can land the "knockout punch" to George Bush by again winning all 80 delegates in the Texas Primary.

Texas is Bush's adopted home state. An overwhelming Reagan victory here will go a long way in finally defeating Bush.

And it is here in Texas that Ronald Reagan can prove just how strong he will be this fall against Jimmy Carter.

Texas is the electoral linchpin to the entire South. If we can win Texas in the fall then President Carter will lose and Reagan will be our next President.

In the May 3 primary, Ronald Reagan can attract such large numbers of conservative Texas Democrats and Independents that the "Lone Star State" will be considered a "Reagan state" this fall. Democrats and Independents who vote for Reagan on May 3, will be the base from which to build yet another Reagan victory in Texas this November.

"Citizens for Reagan in '80" is targetting Texas with a proposed budget of $100,000 for the May 3 primary.

8304042147

This independent campaign is sponsored by Fund for a Conservative Majority, the nationally known and highly respected political action committee. FCM is also using its talent and expertise to help win "Conservative Senate Control" in 1980.

FCM's "Citizens for Reagan in '80" campaign has been very successful this year. The enclosed letter from William Loeb, publisher of the Manchester Union Leader (in New Hampshire), shows just how important this independent campaign has been.

Thanks to tens of thousands of contributors to FCM, Ronald Reagan is well on his way to winning the Republican nomination for President.

Governor Reagan has proven he is a strong candidate. He can attract large numbers of conservative Independent and Democratic voters, as well as the overwhelming majority of Republicans.

But Reagan must continue to attract non-Republicans if he is to win the Presidency this year.

First, Reagan must win and win overwhelmingly in Texas on May 3. Your support of "Citizens for Reagan in '80" will help assure that victory and help knock Bush out of the race.

Radio time, voter mailings and newspaper ads have already been planned.

Campaigns are expensive but look at the goal -- Reagan as President! I know you agree that the investment is well worth it.

Please send your maximum contribution today to Fund for a Conservative Majority. As a multi-candidate PAC, FCM can accept contributions up to $5,000 each year per individual.

Sincerely,

Bob Heckman

Robert C. Heckman, Chairman
Fund for a Conservative Majority

P.S. George Bush considers Texas his home state. He has lived there for 30 years. Help us show him on May 3, that Texas is still Reagan Country!

8304021475

Texas must remain REAGAN country!

Dear Bob:

Reagan must win in Texas on May 3rd! In 1976 he won 100% of the delegate votes in Texas. Reagan can do it again. He must also prove that Texas is a state he can carry in November against Jimmy Carter.

You can count on my support to keep TEXAS for REAGAN!

Enclosed is my contribution of:

___$25	___$50	___$100	___$250
___$500	___$1,000	___$5,000	___Other

Make check payable to Fund for a Conservative Majority

Corporate Contributions can be accepted. They should be issued to the order of the Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

8304042147 6

8 3 0 4 0 4 2 1 4 7 7

TEXAS FOR REAGAN!

PRIMARY DATE: MAY 3
DELEGATES: 88

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, N.W.
Washington, D.C. 20005

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

TEXAS FOR REAGAN!

PRIMARY DATE: MAY 3
DELEGATES: 88

THANKS FOR HELPING US PAY POSTAGE

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, N.W.
Washington, D.C. 20005

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

Exhibit J-6

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
775,6107,92,419	16		May 19, 1980	26910

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

CFM 80

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
ude California Records from CCM				
& File				
Process input records	94,305	$ .75/M	$ 70.73	
Process output records	76,541	.60/M	45.92	
t 4-up Cheshire Laser labels to				
s California	76,541	2.33/M	178.34	
lop and Print Vice Presidential				
s to CCM Less California	76,541	15.00/M	1,148.12	
ia Sales Tax			57.72	

EX 2 (S)
11-17-81, Lawsuit SV

TERMS: NET 30 DAYS

TOTAL ▷ $1,500.83

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▷ N/A

[redacted] EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • [redacted] AREA CODE [redacted]

Exhibit J-9

82,910,26125,126, 181.	16	1520	May 19, 1980	26892

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Bond Mailing
Woodbridge, Virginia

INVOICE

ge/Purge #5 - PCH May 1980 VP Prospect Continuations			
ess Mail File Input (Including List rsion and Duplicate Identification essing)	422,656	$2.70/M	1,141.17
ess Suppression File Input (Including Conversion and Duplicate Identifica- Processing)	46,485	min.chg.	150.00
Mail File Output (Including ts, Key Assignments and Printing Cheshire Labels)	310,830	2.22/M	690.04
ge/Purge #6 - PCH May 1980 Final Drive			
ess Mail File Input (Including List rsion and Duplicate Identification essing)	295,665	2.70/M	798.30
ess Mail File Output (Including ts, Key Assignments and Printing Cheshire Labels)	247,252	2.22/M	548.90
pping and Handling Charges to Return atic Tapes	24 tapes	2.50/tp.	60.00
t Vice Presi nt Lener Letters to:			
Merge/Purge #5 Label Set 1	6,859	15.00/M	102.89
rge/Purge #5 Label Set 2	1,950	15.00/M	29.37

TERMS: NET 30 DAYS TOTAL $ 2,858.93

PAID

Ex 2 (t) 11-17-81 SV 2-pages

[redacted] 218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • [redacted] AREA CODE [redacted]

Exhibit J-7

82,910,26125,126, 181	16	1520	May 19, 1980	26892

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Bond Mailing
Woodbridge, Virginia

INVOICE

e/Purge #5 - PCH May 1980 VP Prospect Continuations			
ess Mail File Input (Including List ersion and Duplicate Identification ssing)	422,656	$2.70/M	1,141.17
ess Suppression File Input (Including Conversion and Duplicate Identification Processing)	46,485	min.chg.	150.00
Mail File Output (Including ts, Key Assignments and Printing Cheshire Labels)	310,830	2.22/M	690.04
e/Purge #6 - PCH May 1980 Final Drive			
ess Mail File Input (Including List ersion and Duplicate Identification ssing)	295,665	2.70/M	798.30
ess Mail File Output (Including its, Key Assignments and Printing Cheshire Labels)	247,252	2.22/M	548.90
pping and Handling Charges to Return etic Tapes	24 tapes	2.50/tp.	60.00
nt Vice Presi nt Laser Letters to:			
Marge/Purge #5 Label Set 1	6,859	15.00/M	102.89
rge/Purge #5 Label Set 2	1,953	15.00/M	29.37

TERMS: NET 30 DAYS TOTAL $ $25893

Ex 2 (t) 11-12-81 hw SV (2 pages)

6893

24782,910,26125,126 181 | 16 | I520 | May 19

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Bond Mailing
Woodbridge, Virg

INVOICE

Merge/Purge #5 Label Set 3	3,864	15.00/
Merge/Purge #5 Label Set 4	2,612	15.00/
Merge/Purge #5 Label Set 5	98,798	15.00/
Merge/Purge #5 Label Set 6	9,038	15.00/
Merge/Purge #5 Label Set 7	34,337	15.00/
Merge/Purge #5 Label Set 8	13,491	15.00/
Merge/Purge #5 Label Set 9	18,492	15.00/
Merge/Purge #5 Label Set 10	14,405	15.00/
Merge/Purge #5 Label Set 11	20,832	15.00/
Merge/Purge #5 Label Set 12	47,112	15.00/
Merge/Purge #5 Label Set 13	39,032	15.00/
Print "Final Drive" Laser Letters to:		
Merge/Purge #6 Label Set 1	82,786	15.00/
Merge/Purge #6 Label Set 2	92,457	15.00/
Merge/Purge #6 Label Set 3	13,911	15.00/
Merge/Purge #6 Label Set 4	11,732	15.00/
Merge/Purge #6 Label Set 5	5,701	15.00/
Merge/Purge #6 Label Set 6	3,214	15.00/
Merge/Purge #6 Label Set 7	3,214	15.00/
Merge/Purge #6 Label Set 8	6,491	15.00/
Merge/Purge #6 Label Set 9	9,968	15.00/
Merge/Purge #6 Label Set 10	6,910	15.00/
Virginfa Sales Tax		

WELLS NET 30 DAYS

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____ PAY THIS AMOUNT

ORIGINAL INVOICE

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

Exhibit J-93

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26425	16	1610	June 24, 1980	27261

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 703 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
ge/Purge #10 - FCM - V. P. Convention		Ant Cont		
cess Mail File Input (Including List ersion and Duplicate Identification cessing)	391,968	$2.70/M	$1,058.31	
cess Mail File Output (Including lits, Key Assignments and ~~Proof~~ ~~ing~~)	278,514	2.40/M	668.43	
pping and Handling Charges to Return netic Tapes	16 tapes	2.50/tp.	40.00	
ginia Sales Tax			69.07	

Ex 2-(aa) 11-17-81 - Lawrence

TERMS: NET 30 DAYS

TOTAL $1,835.81

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT N/A

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

Exhibit I-19

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26424	16	1611	June 24, 1980	27262

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
/Purge #9 - FCM - Anti-Carter				
Mail File Input (Including List rsion and Duplicate Identification ing)	235,501	$3.60/M	$ 847.80	
Mail File Output (Including Key ments and Printing)	222,658	3.00/M	667.97	
g and Handling Charges to Return ic Tapes	2 tapes	2.50/tp.	105.00	
ght Shipping and Handling Charges			46.92	
ia Sales Tax			60.63	

Ex 2 (dc)
11-17-81 Lawrence Sr

TERMS: NET 30 DAYS TOTAL $ $1,728.32

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____ PAY THIS AMOUNT $ N/A

Wright & Associates, Inc.

[illegible] • TELEPHONE AREA CODE [illegible]

Exhibit 11

26928	16	Late Lists	June 25, 1980	27312

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

INVOICE

ge/Purge Late Lists - Anti-Carter			
Each List Involved	1	15.00/list	$ 15.00
	2	10.00/list	20.00
Mail File Processing (Convert, Sort and Print)			
Business Week	5,000	3.00/M	15.00
Forecaster	10,000	2.50/M	25.00
Conservative Business Contributors	5,000	2.50/M	12.50
Ping and Handling Charges to Return netic Tapes	3 tapes	2.50/tape	7.50
ginia Sales Tax			2.10

Ext Late Lists
11-17-81 Ltr

TERMS NET 30 DAYS TOTAL $

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____ PAY THIS AMOUNT $ 8/2

Anti-Carter Letter A & B

8304042148 5

- Ex 2(ii) & 2(iii) 2
Lawrence
11-17-81, 8v

14 pp

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Dear Friend of Governor Reagan:

Ronald Reagan can be elected President of the United States!

But only with your help and that of tens of thousands of other concerned and patriotic Americans will President Carter be defeated.

To "top off" our victory on election night, as many as ten or twelve Big Spending Liberal Democratic Senators can be replaced with responsible conservative Republicans! Many powerful Democratic Congressmen can also be defeated.

All this can happen in just a few short months -- on November 4th, National Election Day.

Ronald Reagan must be elected. President Carter simply has not been the strong, creative and effective leader our country and the Free World so desperately needs in these difficult times.

Jimmy Carter has failed as President.

His domestic policies have produced economic chaos for our people.

Carter's foreign policy failures have shaken the Free World.

Carter must be defeated.

Today's inflation rate is running at over 18% -- over three times the inflation rate as when Carter was elected in 1976.

Government spending is projected to be over $615 billion in the next federal budget! This is almost three times the budget of 1972 and over $200 billion more than President Ford's budget in his last year as President.

You and I worked until mid-May this year just to pay our taxes! And taxes take about 40% of the nation's overall earnings.

This year the average American family will pay over $7,000 in federal taxes!

Most of us pay more in taxes than for our combined costs for food, clothing and shelter.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

And in our international dealings with friends and enemies, Carter has also been a terrible failure.

Our military has severely deteriorated under the guidance of Jimmy Carter.

The Russians have brazenly invaded Afghanistan and supported Cuban backed revolutions throughout Central America and Africa. Carter's appointments have supported these communist forces as "stabilizing influences"!

President Carter has managed to destroy our political alliance with Iran and today our American compatriots remain hostages to fanatic terrorists in Iran.

Communist China finally got from Jimmy Carter what no other American President would even seriously consider giving it -- the de-recognition of a loyal ally (The Republic of China on Taiwan) and the help of the U.S. in building up the economic and military strength of this communist giant.

And our Free World allies shake their heads in disbelief as they watch America -- only a few short years ago the strong leader of the non-communist world -- quickly becoming a second rate world influence behind the Soviet Union.

But right now you can join with tens of thousands of your fellow Americans to change the direction of our country -- to rebuild our military strength; to begin to dismantle the over-sized federal government; to give each of us and our businesses a large tax cut; and to bring proven, responsible and strong leadership to the Presidency of the United States.

You can join with "Citizens for Reagan in '80" and help elect Ronald Reagan as our next President.

"Citizens for Reagan in '80" is an independent campaign effort sponsored by the highly respected and nationally recognized Fund for a Conservative Majority.

FCM is also using its expertise and resources to help elect a conservative majority in the Senate. Its "Conservative Senate Control" campaign has already had a significant impact this year and the Liberal Democrats are scared.

This fall Ronald Reagan will be running against Jimmy Carter. Both men will receive their limited campaign budgets from the federal government.

But FCM knows that Ronald Reagan will be running against more than just Jimmy Carter.

The incumbent President will use the White House and federal spending to the maximum to try to buy the election.

Just watch as Carter stages important news events close to the election. Large federal programs will be announced... new appointments will be made from "swing states"... Carter will desperately try to force some sort of international "success"... Presidential press conferences and urgent national messages requiring full network coverage will suddenly become more frequent.

The Big Union Bosses will "pull out all the stops" to defeat Ronald Reagan. Since the Democratic Congress has given the unions special election advantages, you can expect these powerful men to spend millions of dollars in 1980 to stop Ronald Reagan from becoming President.

And the various left-wing, consumer, anti-defense and pro-abortion groups will be supporting Carter and attacking Reagan. Millions of dollars will be spent by these left-wing organizations to secure the jobs of their government friends and to continue the discredited policies of the Carter Administration.

Finally there is the news media. The men and women who "report" the news will try to destroy Governor Reagan. The reports will show Reagan in the worst possible light. Tens of millions of dollars in "news time" will be spent by the media to stop Ronald Reagan from becoming President.

Only you can help offset these built-in disadvantages faced by Ronald Reagan. And you can help defeat Jimmy Carter.

Your support of FCM's "Citizens for Reagan in '80" campaign will directly help elect Ronald Reagan our next President.

Because of the way the federal campaign law is written, this independent effort for Ronald Reagan can spend as much money as can be raised from people like you.

"Citizens for Reagan in '80" hopes to spend at least $3,000,000 this fall to help elect Ronald Reagan and also to elect a conservative Senate to work with Reagan in turning our country around.

But to meet this goal "Citizens for Reagan in '80" must find 120,000 people to give at least $25 each to this terribly important campaign effort.

The campaign plans are simple: to carefully and professionally spend as much money as can be raised to reach the American people with good, strong and effective television advertising, with creative radio and newspaper ads and by sending voter mailings to as many voters as possible in key states.

"Citizens for Reagan in '80" has been working for over a year to

nominate and elect Ronald Reagan. The sponsoring political action committee -- Fund for a Conservative Majority -- is well-known as a cost-efficient and professionally run organization. "Citizens for Reagan in '80" was a key factor in the Governor's primary victories earlier this year.

The money you give to "Citizens for Reagan in '80" will be spent effectively and professionally to help elect Ronald Reagan.

Send your maximum contribution today and join with tens of thousands of other Americans in support of "Citizens for Reagan in '80".

Your contribution can range up to $5,000.

Remember, you will not be able to contribute to the official Reagan for President organization after Ronald Reagan is nominated. Federal law prohibits it.

But you can help elect Ronald Reagan President by sending your contribution today to the Fund for a Conservative Majority.

After receiving your contributon of at least $25 I will send you a beautifully designed and individually personalized Certificate of Appreciation. You will be proud to hang this document on your wall.

I will also send you timely updates on the election and ask your help and advice as Election Day draws near.

Please send your contribution today. Help elect Ronald Reagan President of the United States.

I am counting on you. Reagan's election as President could well be determined by the support you give today.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Jimmy Carter has simply failed as President. Our economy is in turmoil and our military strength is dangerously weak.

Help turn our country around! Join "Citizens for Reagan in '80" today. With your help Ronald Reagan can be elected our next President.

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Dear Friend:

I'm angry and frustrated when I hear Jimmy Carter rationalize away incredible errors. I'm tired of humiliating defeats all over the world.

A child recently asked me, if the United States were the "good guys", then why weren't we winning? That is a difficult question.

It's hard to explain to a 7 year old how quickly a President can damage a once strong and proud country.

In just four short years President Carter has managed to bring chaos to our economy and to our foreign policy.

We are suffering under an 18% inflation rate which is the highest in over thirty years. If it continues the cost of living will double in less than 5 years!

The average American family will spend over $7,000 just to pay federal taxes this year. In fact most families are forced to spend more on taxes than they do on food, clothing and shelter combined.

Our military strength has been dangerously weakened during the four years of the Carter presidency.

Our friends and allies look to us for leadership -- but all this American President seems able to do is sit back and watch the world slide hopelessly into turmoil.

Jimmy Carter has had his chance as President. And he has failed.

Now it's time for a change. It's time to elect Ronald Reagan!

I've enclosed a sample Certificate of Appreciation for you in what could be the most important campaign group you have ever been asked to help -- "Citizens for Reagan in '80".

This is an independent campaign sponsored by one of the oldest and most respected political action committees in the country -- the Fund for a Conservative Majority. FCM is also working this year to elect a

conservative controlled Senate which will work with the Reagan Administration to make our country strong again.

Once Ronald Reagan is nominated you will not be able to contribute to the official Reagan for President campaign. Federal law prohibits you from contributing. The federal treasury will give Reagan a limited amount of money to spend on his election for President. Jimmy Carter will get the same amount.

But Carter will have many additional and very powerful campaign forces working for him -- these will be worth tens of millions of dollars to Carter. Reagan will not have these resources.

First, Carter will have the White House and the power of the federal government to campaign for him. News events, international crises and special new federal programs will be announced -- with Carter's picture on the front pages of our morning papers and on the nightly TV news.

Second, the Union Bosses will spend over $10 million dollars to support Jimmy Carter. This will happen even as the polls show almost 40% and maybe more of the union members support Ronald Reagan.

Many other left-wing groups will also join in support of Jimmy Carter. They will spend millions of additional dollars in order to defeat Ronald Reagan.

Third, and most disturbing, the national news media will try to destroy Ronald Reagan. They have already started, and their efforts will surely increase.

These important allies of Jimmy Carter -- the White House, powerful Union Bosses, left-wing organizations and the influential national news media -- must be offset by the support of Ronald Reagan's friends.

That is why "Citizens for Reagan in '80" began its work over one year ago to help nominate and elect Ronald Reagan President. Hundreds of thousands of dollars were effectively and professionally raised and spent in the important 1980 primary elections in support of Ronald Reagan.

A highly trained and professional campaign staff is guiding FCM's "Citizens for Reagan in '80" program. The contributors to FCM can feel confident that their money is being effectively and efficiently spent in a professional and successful manner.

"Citizens for Reagan in '80" hopes to spend at least $3,000,000 this fall to help elect Ronald Reagan our next President. That means it must raise at least $3,000,000 from citizens like you.

Creative hard hitting television and radio ads are being written. A half-hour television program is being prepared.

Full page advertising is ready to be sent to major newspapers and magazines.

Voter mailings into key states are being prepared -- to businessmen, union families, farmers, housewives and veterans.

"Citizens for Reagan in '80" can be the difference between Ronald Reagan winning or losing.

If the funds can be raised to execute the professional campaign outlined above then "Citizens for Reagan in '80" can be the effective and critical difference in Reagan's victory.

If not -- then you and I will be faced with yet another four years of Jimmy Carter. That would truly be a disaster.

Please join with tens of thousands of other concerned Americans in supporting "Citizens for Reagan in '80".

After receiving your contribution of at least $25 I will send you a beautifully designed and individually personalized Certificate of Appreciation. You will be proud to hang this document on your wall. Of course, if you can't send $25, any amount will help in our efforts to elect Ronald Reagan our next President.

During the next several months I will send you important campaign updates, ask for your advice and for your help to make sure we elect Ronald Reagan our next President.

Please send your contribution today. Donations up to $5,000 can be accepted.

I am counting on you to help us elect Ronald Reagan our next President.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Jimmy Carter has failed in his four years as President. Our prestige as a nation has never been so low.

Join "Citizens for Reagan in '80" today and become part of the solution to America's problem -- help elect Ronald Reagan our next President!

8304042149 2

Help Elect Ronald Reagan!

Dear Bob:

I am most happy to join you in support of Ronald Reagan for President in 1980. I am firmly committed to the defeat of Jimmy Carter this year.

Ronald Reagan is the best man to be President!

Enclosed is my contribution. I understand that an official "Citizens for Reagan in '80" Certificate of Appreciation will be sent to everyone who sends in at least $25.

__$25. __$50 __$100 __$250 __$500

__$1,000 __$2,500 __$5,000 $___ Other

(Make check payable to Fund for a Conservative Majority or FCM)

Corporate contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority – State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/City/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

04042149

Certificate of Appreciation

Presented to

SAMPLE

for active participation in the national campaign to elect Ronald Reagan President of the United States in 1980.

The Officers and Directors of "Citizens for Reagan in '80" thank you for your generous support of Ronald Reagan during the 1980 presidential campaign. "Citizens for Reagan in '80" is an independent campaign sponsored by the nationally-recognized political action committee, Fund for a Conservative Majority.

Robert C. Heckman

Robert C. Heckman, Chairman

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

It's time for a better America
ELECT RONALD REAGAN!

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan In '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

Paid for by Fund for a ... rvative ...ority and not authorized by any candidate.

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

Exhibit J-13

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26799	16	1651	July 11, 1980	27453

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
rge/Purge #10 - Thompson & Associates - the White House				
ocess Mail File Input (Including List nversion and Duplicate Identification ocessing)	938,803	$2.46/M	$2,309.46	
ocess Mail File Output (Including lots, Key Assignments and Laser Labels)	637,187	1.80/M	1,146.94	
ipping and Handling Charges to Return gnetic Tapes	28 tapes	2.50/tp.	70.00	
ginia Sales Tax			138.26	

Ex 2 (nn) 11-17-81 Lawsuit

TERMS: NET 30 DAYS

TOTAL $ $3,664.66

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT $ N/A

Wiland & Associates, Inc.

Exhibit J-14

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

FCM

CFILE 10

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
7662,63,64	16	1660,65,69,70	July 31, 1980	27732

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	1660 - Thompson & Associates, Springfield, Virginia; 1665 - Republican National Committee, Washington, D. C.; 1669 - Atlantic List Co. Wash, D.C. 1670 - American Spectator Bloomington, ID

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
- Merge/Purge Late Lists				
List Conversion	1	15.00/ list	$ 15.00	
ail File Processing (Convert, Sort and Print) CFR '76	106,060	3.00/M	318.18	
ia Sales Tax			12.73	
ag Tape Output of 15M Merged lected SCF's	15,000	4.30/M	64.50	
Mag tape output of Net ALEC t Master File	62,207	2.55/M	158.63	
Keycoded Cheshire label output of ublican High Donors	3,009	min.chg.	30.00	
posit to be refunded when tapes turned	2 tapes	20.00/tp.	40.00	
ng and Handling Charges			1.47	

Electric

Ex 2 (rr) 11-17-81, Lawrence 80

TERMS: NET 30 DAYS

TOTAL ⇩ $640.51

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ⇩ N/A

Exhibit

ELECTION # 1 PACKAGE

8304042197

Ex 2 (SS)
11-17-81 -
84 Lawrence

9 pp

August 15, 1980

Dear Reagan Supporter:

Our campaign to elect Ronald Reagan President has now entered it final stage.

In just three months the election will be over! Either Ronald Reagan or Jimmy Carter will be President.

And you can help decide who will win this fall.

Most political observers expect the Carter campaign to be a nasty, even vicious, anti-Reagan effort.

Jimmy Carter has the active support of dozens of left wing, ultra-environmental and disarmament groups.

The nation's labor czars have already committed millions of dollars to help re-elect Jimmy Carter.

And the news media will soon attack Ronald Reagan in an effort to reduce his current and commanding lead over Jimmy Carter.

Your help is needed today!

"Citizens for Reagan in '80" is the oldest and most effective independent campaign helping to elect Ronald Reagan our next President. It is sponsored by the Fund for a Conservative Majority -- a highly competent and professional political action committee which is also working to elect conservatives to the Senate and the House.

"Citizens for Reagan in '80" has drafted a professional campaign plan to help elect Ronald Reagan. It is a strong, positive plan -- and it is ready to go into effect today!

But your help is needed-if our campaign is to succeed and Jimmy Carter is to be defeated.

"Citizens for Reagan in '80" must raise another $275,000 just as fast as possible.

* Radio ads are prepared.

* TV commercials are complete.

* Newspaper ads are ready to be placed.

* Voter mailings are being written now for special voting blocs.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

To buy initial advertising on TV, radio and in newspapers and to begin to contact the key voters in "swing states", $275,000 must be raised within the next three weeks.

Volunteer efforts are also need to elect Ronald Reagan.

Please send the enclosed post card to Ronald Reagan and pledge not only your personal support, but also promise to find at least 10 more citizens who will vote for Reagan on election day. These votes will be absolutely critical in electing Ronald Reagan President of the United States.

"Citizens for Reagan in '80" needs your active support today.

Send the enclosed post card to Ronald Reagan at his National Headquarters right outside Washington, D.C. Pledge your vote and also the votes of 10 other citizens you will personally recruit for Ronald Reagan.

With you financial help we can find one million people who will pledge to vote for Ronald Reagan and who will also pledge to find 10 more Reagan voters.

If we succeed we can promise to deliver 11 million votes for Ronald Reagan on election day -- a healthy percentage of the total votes needed to win.

Send Ronald Reagan your voter pledge card and send your maximum contribution today to FCM's "Citizens for Reagan in '80".

Only with your help can we win!

Sincerely,

Bob Heckman

Robert C. Heckman

P.S. Continued support of Ronald Reagan by patriotic Americans like you is critical. With that help Ronald Reagan will be elected President in three short months -- on November 4th!

8304042I495

Citizens for Reagan in '80!

A project of FUND FOR A CONSERVATIVE MAJORITY

I support RONALD REAGAN

Dear Mr. Hoskman:

I support Ronald Reagan for President and will do all I can to help elect him this fall.

☐ I have sent my post card to Governor Reagan pledging my vote and agreeing to find at least 10 more people who will vote for him on November 4.

☐ Enclosed is my contribution to help FCM in its independent campaign, "Citizens for Reagan in '80."

___$25	___$50	___$100	___$250
___$500	___$1,000	___$5,000	___Other

(Make check payable to Fund for a Conservative Majority or FCM.)

Corporate contributions not accepted.
They should be issued to the order of The Fund for a Conservative Majority—Joint Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

This communication and all expenditures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

A 30 4 0 4 2 1 5 0 G

CITIZENS FOR REAGAN IN '80!

PLACE STAMP HERE

Governor Ronald Reagan
National Campaign Headquarters
901 South Highland Street
Arlington, Virginia 22204

830402150 1

Dear Governor Reagan:

I pledge that I will vote for you for President on November 4th.

I will also find at least 10 more voters who will support you. On election day I will take the responsibility to make sure they go to the polls and vote for you.

Name _____

Address _____

City/State/Zip _____

8304042150 2

Reagan. . .Reagan. . .Reagan. . .Reagan

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
827 Fifteenth Street, NW
Washington, D.C. 20005

Paid for and distributed by Fund for a Conservative Majority
Not authorized by any candidate.

Telecommunications Industries, Inc. [illegible] Meadow Road
McLean, Virginia
22102
(703) 821-8200
A subsidiary of Hadron, Inc.

Exhibit K-I

Commission Ex. 1-I
10/29/81 RD

TELEPOST

February 15, 1980
Invoice No. 656

RECEIVED FEB 19 1980

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms Cheryl Swaim

159,059 TELEPOST Letters for RFP and CFTR names, Groups I, II and III generated for mailing February 15, 1980 @ 40¢ each
= $63,623.60

Payments received: $24,386.55 (check no. 372) — postage
5,613.45 (check no. 373)

$30,000.00

BALANCE DUE: $33,623.60

8304042150

$1871.17
#1951/2069
#4454/542
5-2-5[illegible]
$10.21
#13
#1279/2264
#582/104

I-6

Exhibit I-2

Commission Ex. 1-g
04/9/81 299

Telecommunications Industries, Inc.
A subsidiary of Hadron, Inc.

1700 Old Meadow Road
McLean, Virginia
22102
(703) 821-8200

TELEPOST

February 15, 1980
Invoice No. 656

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms Cheryl Swain

159,059 TELEPOST Letters for RFP and CFTR names, Groups I, II and :
generated for mailing February 15, 1980 @ 40¢ each
= $63,623.60

Payments received: $24,386.55 (check no. 372)
5,613.45 (check no. 373)

$30,000.00

BALANCE DUE: $33,623.60

8304021505

A subsidiary of [illegible]
McLean, Virginia
22102
(703) 821-8200

Exhibit K - 3

Commission Ex 1-h 10/19/81

TELEPOST

RECEIVED FEB 1980

February 15, 1980
Invoice No. 657

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms. Cheryl Swaim

3,518 Live Postage Group I BRE's. (CFTR & RFP) @

..15¢ each = $527.70

BALANCE DUE: $527.70

March 24
$ 70,21-17
#1951/2009

Mailing #13

A subsidiary of Fidelity Inc.
1700 Old Meadow Road
McLean, Virginia
22102
(703) 821-8200

Exhibit K -3

Commission Ex. 1-h 10/19/81

TELEPOST

RECEIVED FEB 19 1980

February 15, 1980
Invoice No. 657

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms. Cheryl Swaim

3,518 Live Postage Group I BRE's. (CFTR & RFP) @

..15¢ each = $527.70

BALANCE DUE: $527.70

2 - 15 Mailings

830404215007

March 24
$ 70.21-17
#1951/2009

Invoice #13

Exhibit F-4

Telecommunications Industries, Inc.
A subsidiary of Modrom, Inc.
1708 Meadow Road
McLean, Virginia
22102
(703) 821-8200

TELEPOST

Communication Politic 14918/

February 15, 1980
Invoice No. 657

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms. Cheryl Swaim

3,518 Live Postage Group I BRE's. (CFTR & RFP) ¢

.15¢ each = $527.70

BALANCE DUE: $527.70

Paid
Madrid 4 13

8304042150 8

8304042151 -

CFTR RFP

#44514742
7:31 ¢
F 5-2-80

TELEPOST

HIGH PRIORITY COMMUNICATION

I-5

Exhibit K-5

Communication 21-j 4/9/80

FEBRUARY 15, 1980

R. BAY BUCHANAN
APT 502
6974 BUCKINGHAM PARKWAY
CULVER CITY, CA 90230

8304215 09

DEAR BAY:

NEW HAMPSHIRE PRIMARY LESS THAN 14 DAYS AWAY. POLLS SHOW IF EVERY REAGAN SUPPORTER VOTES WE WILL WIN - LAST MINUTE RADIO ADVERTISING CRUCIAL TO GET OUT PRO-REAGAN VOTERS. MUST RAISE $29,000 AS SOON AS POSSIBLE. RADIO STATIONS DEMAND CASH IN ADVANCE.

RADIO COMMERCIALS HAVE BEEN TAPED AND "AIR-TIME" HAS BEEN RESERVED BUT RADIO STATIONS WON'T PUT THEM ON THE AIR UNTIL THEY HAVE OUR PAYMENT IN HAND. MUST HAVE YOUR CHECK IN THE NEXT SEVEN DAYS.

YOUR CHECK FOR $25 WILL BUY ONE 60 SECOND RADIO AD ON BOSTON STATIONS THAT REACH NEW HAMPSHIRE. WOULD BE A GOODSEND IF YOU COULD SEND MORE.

YOUR CHECK FOR $25, $50 OR EVEN $100 COULD MAKE DIFFERENCE BETWEEN VICTORY OR DEFEAT IN NEW HAMPSHIRE.

PLEASE SEND CHECK TODAY WITH T IS TELEPOST LETTER IN ENCLOSED URGENT REPLY ENVELOPE.

GOD BLESS YOU.
RONALD REAGAN

****

URGENT REPLY TO GOVERNOR REAGAN:
WE "MUST" WIN IN NEW HAMPSHIRE! ENCLOSED IS MY CONTRIBUTION TO HELP BUY LAST MINUTE RADIO ADS WE NEED TO GET EVERY REAGAN VOTER TO THE POLLS.
ENCLOSED IS MY CHECK FOR:

_____ $25 _____ $50 _____ $100 _____ OTHER

MAKE CHECK PAYABLE TO: REAGAN FOR PRESIDENT, 9841 AIRPORT BLVD., SUITE 1-030, LOS ANGELES, CA 90045

I UNDERSTAND THE FOLLOWING INFORMATION IS REQUIRED BY FEDERAL LAW:
OCCUPATION_____
PLACE OF BUSINESS_____
CITY/STATE_____ AAG

THIS SOLICITATION IS ON BEHALF OF REAGAN FOR PRESIDENT COMMITTEE, 9841 AIRPORT BLVD., SUITE 1430, LOS ANGELES, CA 90045. REAGAN FOR PRESIDENT COMMITTEE--PAUL LAXALT, CHAIRMEN, BAY BUCHANAN, TREASURER. A COPY OF OUR REPORT IS FILED WITH AND AVAILABLE FOR PURCHASE FROM THE FEDERAL ELECTION COMMISSION, WASHINGTON, DC 20463

TELEPOST.

MC LEAN VA. FEB 16 '90 U.S. POSTAGE 15

HIGH PRIORITY COMMUNICATION

CONTENTS REQUIRES IMMEDIATE ATTENTION

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 61119 LOS ANGELES, CA

POSTAGE WILL BE PAID BY ADDRESSEE

Ronald Reagan
9841 Airport Blvd., Suite 1430
Los Angeles, CA 90045

8304042151C

Telecommunications Industries, Inc.
A subsidiary of Hudson, Inc.
Meadow Road
Virginia
22102
(703) 821-8200

Exhibit K-6

Commission Ex 1-L 12/19/81 ADJ

TELEPOST

February 11, 1980
Invoice No. 355

RECEIVED

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms Cheryl Swaim

7,625 Three-page laser letters with two insertions and signature block @ 90¢ each = $6,862.50

Payments received: $3,992.63 (check no. 1214)

BALANCE DUE: $2,869.87

930402151

$ 7021.17
- 1851/2004

Invoice 12

Telecommunications Industries, Inc.
A subsidiary of Nashua, Inc.
1[illegible] Meadow Road
Me[illegible], Virginia
22102
(703) 821-8200

Exhibit K-7

Commission Ex 1-57

TELEPOST

February 11, 1980
Invoice No. 855

Reagan For President
1828 L Street, N.W., Suite 201
Washington, DC 20036

Attention: Ms Cheryl Swaim

7,625 Three-page laser letters with two insertions and signature block @ 90¢ each = $6,862.50

Payments received: $3,992.63 (check no. 1214)

BALANCE DUE: $2,869.87

Paid

mailing of 12

2-8-80 Ck

#4454/342
5-2-80
$76.21

8304042151 2

Commission Ex. 2-C

Telecommunications Industries, Inc.
A subsidiary of Hadron, Inc.
2000 Old Meadow Road
McLean, Virginia
22102
(703) 821-8300

Exhibit L-1

IE
FEB '80

TELEPOST

4/29

February 29, 1980
Invoice No. 688

Mr. J. Londino
Thompson & Associates, Inc.
7015 Old Keene Mill Road, Suite 203
Springfield, VA 22150

INVOICE

2,232 TELEPOST Letters generated on February 27, 1980
with BRE insertions @ 42¢ each = $937.44

Check for postage received = $334.80

TOTAL DUE: $602.64

TERMS: Net 10 days

Dixie Little Report

FCM

8304021.5

Exhibit 1

1700 Old Meadow Road
McLean, Virginia
22102
(703) 821-8200

A subsidiary of Mgmt. Inc.

Commission Ex. 7-g
11/9/81 AM

TELEPOST

April 18, 1980
Invoice No. 739

Mr. Kenneth Boehm
Fund for a Conservative Majority
1022 Wilson Boulevard, Suite 1401
Arlington, VA

INVOICE

5,000 TELEPOST Letters generated on April 16, 1980 = $1,850.00

Payment Received: $750.00

TOTAL DUE: $1,100.00

TERMS: Net 10 days

8304042151

FLEETCAST

HIGH PRIORITY COMMUNICATION

Exhibit 7-3

APRIL 14, 1980

MRS DOROTHY D GAERTNER
275 N PORTAGE PATH 3F
AKRON, OH 44303

PENNSYLVANIA PRIMARY APRIL 22ND FIRST "HEAD TO HEAD" CONTEST BETWEEN RONALD REAGAN AND GEORGE BUSH.

LIBERAL REPUBLICANS HOPE TO SLOW THE REAGAN BAND-WAGON IN PENNSYLVANIA. BUSH TO SPEND ONE MILLION DOLLARS.

POLLS RELEASED TODAY SHOW A VERY CLOSE RACE.

"ANTI-REAGAN" FORCES ARE CONCENTRATING ALL RESOURCES IN PENNSYLVANIA TO DEFEAT RONALD REAGAN.

WE MUST NOT LET THIS HAPPEN!

"CITIZENS FOR REAGAN IN '80", THE INDEPENDENT CAMPAIGN SPONSORED BY FUND FOR A CONSERVATIVE MAJORITY WILL SPEND A LARGE AMOUNT OF MONEY ON THIS PRIMARY. FCM IS ALSO WORKING TO ELECT A CONSERVATIVE SENATE IN 1980.

SEND YOUR ADDITIONAL CONTRIBUTION TODAY.

SINCERELY,

ROBERT C. HECKMAN, CHAIRMAN
FUND FOR A CONSERVATIVE MAJORITY

REAGAN MUST WIN IN PENNSYLVANIA!

ENCLOSED IS MY MAXIMUM CONTRIBUTION:

_____ $100 _____ $500 _____ $1000 _____ $5000 _____ OTHER

FCM CAN LEGALLY RECEIVE UP TO $5,000 A YEAR PER INDIVIDUAL.

MAKE CHECK TO: FUND FOR A CONSERVATIVE MAJORITY

I UNDERSTAND THE FOLLOWING INFORMATION IS REQUIRED BY FEDERAL LAW:
OCCUPATION_____
PLACE OF BUSINESS_____
CITY/STATE_____

THIS COMMUNICATION AND ALL ENCLOSURES ARE PAID FOR BY FUND FOR A CONSERVATIVE MAJORITY AND NOT AUTHORIZED BY ANY CANDIDATE OR

8304021-31

Exhibit No. 1

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 9763

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA, OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
2-12-80	2-0252-80M	0143	x		DMS MD

Reagan for President Committee
1828 L St NW #201
Wash DC 20036

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
285,000	#9 24 WW OS DS std sty wdw	12.25M	3491.25
	plate		7.50
			3498.75
	MD 5%		174.93
	Total		3673.68
	#588/204 $692.71 4-22-80		
	Okay 2.10-80 To be sent 3-3-80 for prompt payment discount		
	Please ship #14		

BAL. NO.	SALES	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

8304042151 6

Exhibit No.

THIS MEMORANDUM

DESIGNATE WITH AN (X)

BY TRUCK ☐ FREIGHT ☐

From: THE STATE CIRCUIT OF ID INC
ELSINORE ID

DATE: 8/ 19

SHIPPER'S NO.

A: (Mail or street address of consignee—For purposes of notification only.)

CARRIER

CARRIER'S NO.

CONSIGNEE AND DESTINATION

OR TRUCK 9163

ROUTE

DELIVERING CARRIER

CAR OR VEHICLE INITIALS & NO.

NO. PACKAGES	DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS	*WEIGHT (SUBJECT TO CORR.)	CLASS OR RATE	✓
	[illegible] 9 24 [illegible] OS DS STD STK [illegible] PRINTED			
	JOB# 2-0262-8C[illegible] REAGEN FOR PRESIDENT COM[illegible]			
		21160		
		57		

Subject to Section 7 of conditions of applicable bill of lading, if shipment is to be delivered to consignee without recourse on consignor, the consignor shall sign the following statement.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

If charges are to be prepaid write or stamp here, "To be Prepaid."

PREPAID

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges advanced:

$ _____

C.O.D. SHIPMENT

C.O.D. Amt _____

Collection Fee _____

Total Charges _____

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE _____ TITLE _____

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

* Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of Consignor

If charges are to be prepaid, write or stamp here, "To be Prepaid."

PREPAID

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges advanced:

$ _____

C.O.D. SHIPMENT

C.O.D. Amt _____

Collection Fee _____

Total Charges _____

THIS SHIPMENT IS CORRECTLY DESCRIBED

CORRECT WEIGHT IS _____ LBS

* The blank spaces must for this shipment conform to the specifications set forth in the box marked perishable hereon, and all other requirements of the Consolidated Freight Classification.

Per _____

Shipper, Per _____ Agent, Per _____

Permanent post office address of shipper

Exhibit M-3

RECEIVED

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 9898

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
2-22-80	2-0327-80M		X		DMS MD	1	1	1		

Reagan for President Committee
1828 L Street NW #201
Wash DC 20036

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
10,000	#9 24 WW OS DS Std Sty Wdw	18.00M	180.00
	State		7.50
			187.50
	MD 5%		9.37
	Total		196.87

Edwin Meese
Counsellor
Proposed mailing
will be made
last

4-22-80
$ 6921.71
#588/204

SLF 11307 Date

WT. INC.	SLSM.	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

8304042151

Exhibit M-4

RECEIVED APR 01 1980

tri-state envelope corporation of Maryland INVOICE

ENVELOPE MANUFACTURERS • 4900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 10100

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
3-11-80	2-0389-80M	SWAIN	X		DMS	MD	1	1	1	

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

Reagan for President
1828 L Street NW Suite 201
Wash DC 20036

QUANTITY	DESCRIPTION	PRICE	AMOUNT
91,500	6-3/4 24 Blue Wove OS DS Regular	11.25M	1029.38
	plates		12.50
			1041.88
	MD 5%		52.09
	Total		1093.97

Invoice # 14

R. 25.80 PTP Hi-Mailing Cut

4-22-80 #588/204 $1093.71

BL# 12115 Dave

S/I NO.	SLSM.	CUT CHG.	PRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

830402151

Exhibit H

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 9867

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO SAME AS "SOLD TO"
2-20-80	2-0261-80M	0143	X		DMS MD

Reagan for President
1828 L St NW #201
Wash DC 20036

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B DESTINATION 2=F.O.B OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
295,000	3-5/8 x 7-3/4 24 WW OS DS Regular	10.50M	3097.50
	plate		7.50
			3105.00
	MD 5%		155.25
	Total		3260.25

BLY 11781 Dave

all 1-3-80 Prepaid postage Chk

pd. May 14, 80 # 655 201 $4863.19

OK mailing #14

24600-001 860-25

SLS NO	SHIP	CUR CHG	FRT CHG	SUB TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

Exhibit M-6

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170 (202) 953-3570

NUMBER 10462

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED IN: SAME AS "SOLD TO"					
4-7-80	3-0664-80M		X		DMS	MD	1	1	1	

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B DESTINATION 2=F.O.B OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

Reagan for President
1828 L Street NW Suite 201
Wash DC 20036

QUANTITY	DESCRIPTION	PRICE	AMOUNT
25,000	6-3/4 24 WW OS DS Regular RAE Full Gum	11.15M	278.75
	plate		7.50
			286.25
	MD 5%		14.31
	Total		300.56

4.24.80 Bill mailing Cw 1 RFP Cub

17th mailing OK Cub

BL# 12567 Dave

B/L NO	SISM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

APT030

Exhibit - M

REAGAN & BUSH

Batch # 1

INVOICE MAINTENANCE

Batch Date 10/23

Vendor Name Metro Printing + Mailing Service

VOUCHER NO. /12/ VENDOR NO. /1121912191 INVOICE NO /1111113/

INVOICE DATE /111111/

EXPLANATION /P101S1T1A1G1E/1111111111/

TOTAL SALE AMT $ 10,800.00

MANUAL CHECK:	COMPUTER CHECK:
PAY CODE /M/	
BANK CODE /011/	BANK CODE /11/
CHECK NO. /1111131618/	
CHECK DATE /110121218101/	PAYMENT DATE /111.1111/

	FINANCIAL ORG. (FOC)	GL ACCT (GLA)	DIST SALE AMT (D:
01	/2/ - /6101 - 10101011/	/5181210101/	$ 10,800.00
02	/2/ - /11/ - /1111/	/111111/	$
03	/2/ - /11/ - /1111/	/11117/	$
04	/2/ - /11/ - /1111/	/111111/	$
05	/2/ - /11/ - /1111/	/111111/	$
06	/2/ - /11/ - /1111/	/111111/	$
07	/2/ - /11/ - /1111/	/111111/	$
08	/2/ - /11/ - /1111/	/111111/	$
09	/2/ - /11/ - /1111/	/111111/	$
10	/2/ - /11/ - /1111/	/111111/	$

8304042152

Reagan Bush

TO: COST CENTER COMMITMENT CONTROL GROUP

FROM: Vets Group - Veterans
(COST CENTER NAME)

DATE: 10-20-80

********** USE FOR ALL EXPENSES INCLUDING TRAVEL **********

EXPENSE AUTHORIZATION REQUEST
(EAR)

#11368-3
10-22

I request approval to commit the following funds: 498

VENDOR: Metro Printing and Mailing Services
1200 S. Sterling Blvd
Sterling, Va 22170

(1)
10-21-80

AMOUNT: $ 10,800—

DATE TO BE PAID: _____

PURPOSE: Direct mail - Postage.

Signature: Robert A Tinsdell
(COST CENTER MANAGER)

Signature: _____
(REQUESTING INDIVIDUAL)

Robert Tinsdell for ...

COST CENTER COMMITMENT CONTROL GROUP

✓ Approved _____ Disapproved

Signature: _____ Date: 10/22/80

TREASURER'S OFFICE

_____ Approved _____ Disapproved

Signature: _____ Date: _____

Bank Code - 01
Cost Center No. 60
Expense Acct No. 582
772

RB Form C (8/1/80)

WHITE - Accounting YELLOW - Cost Center Commitment Control Group PINK - Cost C

8304042152

METRO ★ ★ ★
P[illegible] G[illegible] MAILING SERVICES, INCO[illegible]T.
[illegible] South Sterling Blvd., Sterling, Va. 2[illegible]0—Main Office (703) 471-9000
8446 Lee Highway, Fairfax, Virginia 22031 (703) 573-0900

Invoice No. X1903

Date 10/31/80

Job No.

Cust. P.O.

Reagan-Bush Committee
901 So. Highland St.
Arlington, VA

SALES CODE	EC	ACCOUNT NUMBER	IC	SHIPPED VIA	TERMS
04					

DESCRIPTION	QUANTITY	PRICE/UNIT	AMOUNT
Check Received:			$10,800.
Postage Cost:			- 6,296.
Printing & Mailing Cost:			- 3,722.
Refunded to Customer:			$ 780.

Ck # 11368

8304215

Transactions not paid after 30 days of invoice date will be subject to a finance charge of 1.5% per month. This amounts to an annual interest rate of 18% per year.

★ ★ Exhibit 9

RECEIVED FEC 1 5 1980

February 5, 1980

Mr. Charlie Black
Reagan for President
1828 "L" Street, NW
Suite # 201
Washington, DC 20036

Dear Charlie;

This should serve as an invoice for work conducted for the Reagan for President Committee:.

Study	Month	Cost
Iowa (600 samples)	11/79	$12,000 pd.
Iowa (600 samples)	12/79	6,000
Consulting	1/1-1/31/80	3,000
Consulting	2/1-2/29/80	3,000
Expenses		44

Please make check payable to A.J.F. & Associates for $24,044.00.

Your attention to this matter would be greatly appreciated.

Sincerely,

Ronald W. Finkelstein

RWF:emk

83040421525

★ ★ ★ MAILING SERVICES, INC.
South Sterling Blvd., Sterling, Va. 22170 — Main Office (703) 471-9000
8446 Lee Highway, Fairfax, Virginia 22031 (703) 573-0900

Invoice No. X1:03

Date 10/31/80

Job No.

Cust. P.O.

Reagan-Bush Committee
901 So. Highland St.
Arlington, VA

SALES CODE	EC	ACCOUNT NUMBER	IC	SHIPPED VIA	TERMS
04					

DESCRIPTION	QUANTITY	PRICE/UNIT	AMOUNT
Check Received:			$16,[illegible]
Postage Cost:			- 6,296.00
Rebating & Mailing Cost:			- 3,[illegible].53
Refunded to Customer:			$ 7,[illegible].47

Ck # 1368

830401 0

Transactions not paid after 30 days of invoice date will be subject to a finance charge of 1.5% per month. This amounts to an annual interest rate of 18% per year.

CUSTOMER COPY

A.J.F. & Associates
562 South Avenue
Mount Vernon, N.Y. 10549
(914) 668-2750

March 4, 1980

Ms. Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite # 1430
Los Angeles, CA 90045

Dear Ms. Buchanan;

This should serve as an invoice for work conducted for the Reagan for President Committee:

STUDY	MONTH	COST
Iowa (600 samples)	12/79	$6,000
Consulting	1/1-1/31/80	$3,000
Consulting	2/1-2/29/80	$3,000
Consulting	3/1-3/31/80	$3,000
Expenses		44
Expenses (see attached)	2/12/80	270.02

Please make check payable to A.J.F. & Associates for $15,314.02.

Your attention to this matter would be greatly appreciated.

Sincerely,

Ronald W. Finkelstein

RWF:emk

RECEIVED MAR 10 1980

A10

8304042152?

Ronald W. Finkelstein & Associates
111 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

April 7, 1980

Ms. Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite # 1430
Los Angeles, CA 90045

Dear Bay;

Thank you for the recent check.

This should serve as an invoice for work conducted for the Reagan for President Committee:

STUDY	MONTH	COST
Consulting	1/1 - 1/31/80	$3,000.00
Consulting	2/1 - 2/29/80	3,000.00
Expenses		44.00
Expenses (letter 3/4/80)		270.02
	Total	~~$6,314.02~~ 6044.02

As per our agreement $3,000, is due in April, and the balance due in May.

Sincerely,

RW Finkelstein
Ronald W. Finkelstein

RWF:emk

RECEIVED APR 14 1980

8304215 28

Arthur J. Finkelstein & Associates

[redacted]
Mount Kisco, N. Y. 10549
(914) 666-2730

May 1, 1980

Ms: Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite #1430
Los Angeles, CA 90045

Dear Bay;

Thank you for the recent check.

This should serve as an invoice for work conducted for the Reagan for President Committee:

Consulting	2/1 - 2/29/80	$3,000.00
Expenses		44.00
Expenses (letter 3/4/80)		270.00
Total		3,044.00

Rd. 6-5-80 ck #435. Rec'd $3044.00

Your attention to this matter would be appreciated.

Sincerely,

Ronald W. Finkelstein

P.S. Thanks for keeping your word to me.

Have a good trip according to agreement

RWF:emk

RECEIVED MAY - 7 1980

I 12

8304042529

Exhibit #-1

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Request for Answers to Written Questions

TO: Arthur J. Finkelstein
Arthur J. Finkelstein and Associates
117 Smith Avenue
Mount Kisco, New York 10549

RE: MUR 1252/1299

Arthur J. Finkelstein is asked to submit responses in writing and under oath to the interrogatories propounded herein to the Federal Election Commission within ten days of receipt of this request.

Please answer the following interrogatories:

A. Describe the nature of your work as a political consultant for the Reagan for President Committee between March, 1979 and July 15, 1980.

Describe in detail the specific services and activities which you performed in connection with your work for the Reagan for President Committee for which you received compensation in February, March and April, 1980. What was the date of your final assignment as a consultant for this Committee?

Did you maintain contacts with representatives of the Reagan for President Committee after completion of your final assignment and through the remainder of 1980? If so, with whom did you remain in contact?

B. Did you ever serve as a consultant for the Reagan/Bush Committee? If so, please describe your responsibilities in this regard.

C. Describe the nature of your work, and that of other representatives of Arthur J. Finkelstein and Associates, for the Fund for a Conservative Majority ("FCM") in 1979 and 1980?

Did you, or anyone else at your firm, suggest that FCM pay for an opinion survey in Wisconsin in March, 1980? If your answer is yes, please describe the circumstances that led to this suggestion. If your answer is no, please state who originated the idea for such a survey?

Please describe your role, and the roles of others at Arthur J. Finkelstein and Associates, in the formulation of questions to be asked during the March, 1980 survey in Wisconsin paid for by FCM?

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Did you ever inform representatives of FCM of information concerning the Reagan for President Committee's strategy, priorities or concerns which was gleaned as a result of your work as a consultant for the latter committee?

Did you use any such information in the formulation of questions to be used in the March, 1980 survey in Wisconsin by FCM? If your answer is yes, please specify the information used.

Please describe your role, or that of other representatives of Arthur J. Finkelstein, in the utilization by FCM of information derived from the March, 1980 survey in Wisconsin conducted by your firm for FCM.

D. Please describe the nature of your work, and that of other representatives of Arthur J. Finkelstein and Associates, for the National Conservative Political Action Committee ("NCPAC") in 1979 and 1980.

Please summarize the content of the surveys undertaken by Arthur J. Finkelstein and Associates for NCPAC for which payments of $2,000 and $10,700 were made on May 9, 1980 and November 13, 1980, respectively.

What were the populations targeted by these surveys?

Please describe your role, and the roles of others at Arthur J. Finkelstein and Associates, in the formulation of questions to be asked during these NCPAC surveys.

Did you ever inform representatives of NCPAC of information concerning the Reagan for President Committee's, or the Reagan/Bush Committee's, strategy, priorities or concerns which was gleaned as a result of your work as a consultant for an authorized Reagan committee?

Did you use any such information in the formulation of questions to be used in the voter surveys paid for by NCPAC on May 9, 1980 and November 13, 1980?

8304042153 1

HAND DELIVERED

Exhibit #-2

Arthur J. Finkelstein & Associates
117 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-8750

JUL 6 P4:25

DATE: July 1, 1982

TO: Federal Election Commission

FROM: Arthur J. Finkelstein & Associates, Inc.

RE: MUR 1252/1299

A. Between September, 1979 and February 28, 1980 I was retained as a consultant by the Reagan for President Committee, but was not utilized extensively. During this period the total scope of services were:

1. Reviewed Ronald Reagan's announcement speech.
2. Conducted Iowa statewide survey, 600 interviews prior to January delegate caucuses. All services were terminated as of February 28, 1980.
3. During the time period mentioned, occassional phone conversations concerning strategy - Plus perhaps three or so days of work: One in New Hampshire, one in California, and one hour speech in Wisconsin.
4. I did not, nor did anyone at A.J.F. & Associates, Inc., have any further contact with any representative with the Ronald Reagan for President Committee.

B. No

C. Conducted statewide Wisconsin survey, 600 interviews, in March, 1980 and gave report.

No, I did not nor did anyone else to my knowledge at A.J.F. & Associate Inc. suggest that the Fund for a Conservative Majority pay for an opini survey in Wisconsin in March, 1980. Ralph Galliano, former executive director of F.C.M., came to us with the idea to "piggy-back" questions on a survey originally planned for our client Doug Cofrin, United State candidate for Senate.

83040421532

In the formulation of questions to be asked during the March, 1980 survey in Wisconsin paid for by F.C.M., we wrote the questions. Submitted them to F.C.M. in draft form. They made changes they returned the final draft to us.

I never informed representatives of F.C.M. of information concerning the Reagan for President Committee's strategy or any other matters. No such information was used in the formulation of questions to be used in the March, 1980 survey in Wisconsin by F.C.M.

I, nor any other representative of Arthur J. Finkelstein & Associates, Inc., played a role in the utilization by F.C.M. of the information derived from the March, 1980 survey in Wisconsin.

D. The nature of work done by representatives of Arthur J. Finkelstein & Associates, Inc. and myself for the National Conservative Political Action Committee included surveys for which our firm was compensated and voluntarily speaking at NCPAC campaign schools without compensation.

The payment of $2,000 on May 9, 1980 was made for a survey of the Fifth Missouri Congressional District. This survey was designed to probe the feasibility of defeating Congressman Richard Bolling.

The payment of $10,700 on November 13, 1980 was made for a statewide survey of Iowa. This survey was designed to probe the feasibility of defeating Senator John Culver.

300 interviews and 500 interviews were the sample sizes for the 5th Missouri C.D. and Iowa surveys, respectively. Interviews were conducted randomly within predetermined election units of registered voters.

In the formulation of questions to be asked in these surveys paid for by NCPAC, we wrote the questions. Submitted them to NCPAC in draft form. NCPAC made the changes they desired.

I never informed representatives of NCPAC of information concerning the Reagan for President Committee's, or the Reagan/Bush Committee's strategy, priorities or concerns. No such information was used in the formulation of questions to be used in these surveys. Nor was I aware, other than through normal news channels, of the Reagan or Reagan/Bush strategies.

Arthur J. Finkelstein — Date 6-30-82

Sworn to Notary Dion P. Hoey

DION P. HOEY
NOTARY PUBLIC, State of [illegible]
No. 4743224
Qualified in Nassau County
[illegible] 83

8304042153

Exhibit 2-1

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

REQUEST FOR ANSWERS TO ADDITIONAL WRITTEN QUESTIONS

TO: Arthur J. Finkelstein
Arthur J. Finkelstein and Associates
117 Smith Avenue
Mount Kisco, New York 10549

Arthur J. Finkelstein is asked to submit responses in writing and under oath to the interrogatories propounded herein to the Federal Election Commission within ten days of receipt of this request.

1. In sub-section A, paragraph 3 of your July 1, 1982 response to question A of the Commission's Request for Answers to Written Questions, dated June 5, 1982, you indicated that between September, 1979 and February 28, 1980, you were involved in "occasional phone conversations concerning strategy" in connection with your work for the Reagan for President Committee for which you received compensation in February, March and April, 1982. Please answer the following questions with regard to these conversations:

   a. With which individual or individuals at the Reagan for President Committee were the conversations conducted?

   b. When did these conversations take place?

   c. What particular element(s) of strategy was discussed during each conversation?

   d. What was the strategy discussed? In particular, did the strategy discussed involve campaigns in certain specific states? If so, which states?

   e. To your knowledge, was any action taken as a result of these strategy discussions? If so, what action?

2. In sub-section A, paragraph 5 of your July 1, 1982 response, you also cite "three or so days of work" for the Reagan for President Committee in New Hampshire, California and a one hour speech in Wisconsin. Please answer the following questions with regard to these assignments.

   a. What was the specific nature of your work for the Reagan for President Committee in New Hampshire?

   Who served as your contact(s) within the Reagan for President Committee regarding this assignment in New Hampshire?

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b. What was the specific nature of your work for the Reagan for President Committee in California?

Who served as your contact(s) within the Reagan for President Committee regarding this assignment in California?

c. Before what organization or group did you speak in Wisconsin on behalf of the Reagan for President Committee?

What was the topic of this speech?

3. Sub-section C, paragraph 5 of your response could be read as stating that you personally played a role in using the results of the survey in Wisconsin which your organization undertook for FCM. Is that a correct interpretation? If not, please clarify the meaning of your response.

8304042153535

Case 82-27
82 AUG 5 P1:31
Exhibit F-4
AUG 5 P3:56

Arthur J. Finkelstein & Associates
117 Smith Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

FEDERAL ELECTION COMMISSION
July 28, 1982 RE: MUR 1252/1299

1a. I was not called often - And I can't recall each call, but I received calls by and large from people with the Committee who know me from previous campaigns and not necessarily campaign related. Among calls that were related, were calls from Elizabeth Doyle in New York State, Frank Donatelli, the Mid-West Coordinator, and the New Hampshire State Chairman Senator Gordon Humphrey.

b. During normal business hours.

c. Frank Donatelli asked me if I would speak in Wisconsin. Elizabeth Doyle asked me if I thought Reagan would win. Senator Humphrey asked me what Ronald Reagan should do after the Iowa loss.

d. I wasn't engaged in strategy with anyone by phone other than New Hampshire. In New Hampshire I suggested that Governor Reagan should go on television and speak out strongly on conservative principles.

e. I have no reason to believe any specific action was taken on my advice.

2a. I went to New Hampshire to look at their campaign plan and make suggested changes. I made none other than they should buy television time for older voters.

I met with Bob Monier and others I don't recall.

b. None. I looked at the Reagan announcement speech before he gave it. I went to Los Angeles to see the speech - I read it in my hotel room. The speech was left in an envelope with a secretary.

c. Reagan volunteers. Topic - Why Reagan would win.

3. I played no role in the utilization of the F.C.M. survey.

Arthur J. Finkelstein — 8-4-82
Arthur J. Finkelstein — Date

Dion P. Hoey
Sworn to Notary
DION P. HOEY
NOTARY PUBLIC, State of New York

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Exhibit Q

Arthur J. Finkelstein & Associates

October 16, 1980

Mr. Curtis Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Curtis:

The Fund For A Conservative Majority contracted with Arthur J. Finkelstein & Associates to do a statewide survey in the State of Wisconsin. The survey was conducted on March 15, and March 16, 1980.

The Fund For A Conservative Majority paid for and saw only the Wisconsin survey.

With regard to the Ronald Reagan For President Comm., A.J.F. & Associates did two surveys for them. Both of these surveys were conducted in Iowa during December, 1979. The Reagan For President Comm. paid for and saw only its surveys.

In every instance, no statements advocating either the election or the defeat of any candidate existed.

Arthur J. Finkelstein & Associates was a member of the National Republican Advisory Committee. His participation with this Committee was at best non-existent. He never went to meetings or got actively involved with other Advisory members concerning the Committee's business.

I hope this will answer all questions that you may have. If additional information is needed, please feel free to call.

Sincerely,

Ronald W. Finkelstein

RWF:dhd

DECLASSIFIED

OCT 1 1980

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Exhibit F

Arthur J. Finkelstein & Associates
111 Smith Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

WISCONSIN

MARCH - 1980

1. Media Markets

1. Wausau - Rhinelander 2. Green Bay 3. Milwaukee 4. Madison
5. La Crosse-Eau Claire 6. Minneapolis-St. Paul 7. Rest

2. Are you registered and intending to vote next November?

1. Yes 2. No/All other responses (TERMINATE)

3. If you were to label yourself, would you say you are a Liberal, a Moderate, or a Conservative in your political beliefs?

1. Liberal 2. Moderate 3. Conservative 4. Don't know

4. In your opinion, what is the most important issue facing the United States today?

_____

5. In your opinion, what is the most important issue facing the state of Wisconsin today?

_____

6. What is the first thing that comes to mind when you hear the name, Ronald Reagan?

_____

7. What is the first thing that comes to mind when you hear the name, John Anderson?

_____

8. What is the first thing that comes to mind when you hear the name, George Bush?

_____

12. Now I am going to read you a list of names. Will you please tell me if you have a favorable or unfavorable opinion of each? If you have no opinion or have never heard of the person, just say so.

	Favorable	Unfavorable	No Opinion	Never Heard Of
a. Jimmy Carter				
e. Ronald Reagan				
f. George Bush				
g. Gerald Ford				
h. John Anderson				

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15. In your opinion, what is the most significant accomplishment of the Carter Administration?

16. In your opinion, what is the most significant failure of the Carter Administration?

17. What do you like most about Ronald Reagan?

18. What do you like least about Ronald Reagan?

23. Which statement most accurately reflects your view regarding gun control?

1. Citizens should be free to own rifles, shotguns, and handguns
2. Citizens should be allowed to own rifles and shotguns, but not handguns
3. Citizens should not be allowed to own guns of any kind
4. Don't know/Refused

24. Which statement comes closest to your position on abortion?

1. Anyone should have the right to an abortion at any time
2. Abortion should only be permitted in certain cases, such as rape, incest, or if the mother's life is in danger
3. Abortion should never be permitted regardless of the situation
4. Don't know/Refused

25. Which best reflects your view concerning the possible reinstitution of the military draft?

1. Both men and women should be drafted, with equal duties including combat
2. Both men and women should be drafted, with only men having to serve in combat
3. Only men should be drafted
4. No one should be drafted
5. Don't know/Refused

26. Do you approve or disapprove of Federally funded abortions?

1. Approve 2. Disapprove 3. Don't know/Refused

27. I am going to read you a list of qualifications. Choosing from among George Bush, John Anderson, and Ronald Reagan, who do you feel is best described by each of the following phrases?

	Bush	Anderson	Reagan	All	None	Don't know
a. Experienced in foreign affairs						
b. Will appoint the best men to his administration						
c. Capable of maintaining a strong National Defense						
d. Able to restore honesty to government						

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35. Choosing between Jimmy Carter and Ronald Reagan, who do you feel could do a better job in each of the following areas as your President?

	Carter	Reagan	Both	Neither	Don't know
a. Fighting inflation					
b. Finding new alternatives of energy					
c. Cutting government spending					
d. Keeping the United States militarily strong					
e. Restoring honesty to government					
f. Bringing qualified men to government					

33. With which political party are you affiliated?

1. Republican 2. Democrat 3. Independent 4. Other(specify)_____

5. Don't know/Refused

36. As you are aware, very few people actually vote in the Primary for President of the United States. In which primary, if any, do you intend to vote - the Republican or Democratic Primary? If you do not intend to vote, just say so.

1. Republican(GO TO #37, 38,39) 2. Democratic(GO TO #37, 40)

3. Will not vote(GO TO #41) 4. Don't know/Refused(GO TO #41)

37. How likely is it that you will vote in the April 1st Primary? Would you say it is very likely, only somewhat likely, or not likely at all to vote in the Primary on April 1st?

1. Very likely 2. Somewhat likely 3. Not likely at all 4. Don't know/Refused

38. <u>IF REPUBLICAN PRIMARY VOTER, ASK -</u> If the Republican Primary Election for President were held today and the candidates were John Anderson, George Bush, Phil Crane, and Ronald Reagan, for whom would you vote?

1. Anderson 2. Bush 3. Crane 4. Reagan 5. Undecided

40. <u>IF DEMOCRATIC PRIMARY VOTER, ASK -</u> If the Democratic Primary Election for President were held today and the candidates were Jerry Brown, Jimmy Carter, and Ted Kennedy, for whom would you vote?

1. Brown 2. Carter 3. Kennedy 4. Undecided

44. If the election for President were held today and the candidates were Ronald Reagan, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Reagan 2. Carter 3. Undecided

45. If the election for President were held today and the candidates were Gerald Ford, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Ford 2. Carter 3. Undecided

46. If the election for President were held today and the candidates were John Anderson, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Anderson 2. Carter 3. Undecided

8 3 0 4 0 4 2 1 5 4 0

47. If the election for President were held today and the candidates were George Bush, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Bush 2. Carter 3. Undecided

48. Would you say you always vote Democrat, usually vote Democrat, vote for as many Democrats as Republicans, usually vote Republican, or always vote Republican?

1. Always Democrat 2. Usually Democrat 3. Democrat/Republican

4. Usually Republican 5. Always Republican 6. Don't know/Refused

49. Do you or does any member of your family who lives in this household work in agriculture or an agricultural related business?

1. Yes 2. No 3. Don't know/Refused

50. What is your annual family income - Is it under $8,000, between $8,001 & $15,000, between $15,001 & $20,000, between $20,001 & $30,000, or over $30,000?

1. Under $8,000 2. Between $8,001 & $15,000

3. Between $15,001 & $20,000 4. Between $20,001 & $30,000

5. Over $30,000 6. Don't know/Refused

51. What is your age?

1. 18-25 2. 26-40 3. 41-55 4. 56-65 5. Over 65 6. Refused

52. What is your race?

1. White 2. Black 3. Other 4. Don't know/Refused

53. Sex?

1. Male 2. Female

3 3 0 4 0 4 2 1 5 4 1

Exhibit 3

FCM CONTRIBUTIONS

August 31, 1980

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FCM

THE FUND FOR A CONSERVATIVE MAJORITY

Kenneth F. Boehm, Esq.
Treasurer

MEMORANDUM

To: Fund for a Conservative Majority Directors

From: Ken Boehm

Subject: Citizens for Reagan in '80 Strategy

8 3 0 4 0 4 2 1 5 4

ELECTORAL VOTE STRATEGY

In three of the last five presidential elections (1960, 1968 and 1972), the shift of a very small number of votes in a few key states could have changed the outcome of those elections.[1] The 1980 election could easily become a photo finish, especially if independent candidate John Anderson is able to capture several states. The wide lead in the polls established by Reagan following the Republican Convention has already been substantially closed. Even if Reagan kept the large lead into September, the volatility of such polls is such that Humphrey was able to close twenty points on Nixon in less than six weeks during the 1968 campaign.

The prospect of an extremely close election brings with it the real possibility that a well-organized independent expenditure campaign could have a decisive impact on the outcome. Properly targeted, the amount of money raised by Citizens for Reagan in '80 could be translated into thousands of votes in states where the popular vote totals of the two major candidates will be very close.

Strategically, an independent expenditure campaign can maximize its influence on the election results by carefully focusing its limited resources on those constituencies and states which offer the largest potential gain for the least possible outlay. Three specific steps are involved. First, a small number of states with a large number of electoral votes, but with prospects of a close popular vote, must be selected. The electoral college works to the benefit of the very largest states (those with more than 14 electoral votes) and the very smallest (those with less than four votes).

Second, voting constituencies which are issue-oriented, open to persuasion and easily reachable through direct mail/mass media must be selected for each targeted state. The electoral college increases the influence of any well-organized minority group which is capable of voting as a bloc. Thus, for example, the opposition of Jewish leaders to Senator Birch Bayh's plan to abolish the electoral college is perfectly rational.

Third, the most cost-effective (and politically effective) way to reach the targeted groups must be selected. Direct mail, radio and newspapers are more useful in targeting carefully defined groups than is television which necessitates a more generalized and less issue-oriented appeal.

The four target states of the Citizens for Reagan in '80 campaign are New York, Pennsylvania, Connecticut and Florida. A variety of criteria were used in selecting these four but the principal reason for their selection was that all four are states in which a concentrated effort by an independent campaign could effect the outcome. Together they represent 93 electoral votes, or more than one-third of the 270 a candidate needs to be elected president.

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	PA.	N.Y.	CONN.	FLA.
Electoral Votes	(27)	(41)	(8)	(17)
1976 Results	Carter 50% Ford 48%	Carter 51% Ford 46%	Ford 52% Carter 47%	Carter 52% Ford 47%
Evans/Novak 7/1/80	Leaning Carter	Leaning Ford	Leaning Anderson	Leaning Reagan
USN&WR 6/16/80	Swing State	Swing State	Swing State	Swing State
Governor's Prediction 8/18/80	Reagan	Too Close to call	No Response	Reagan
Reagan Strategists 7/28/80	Reagan Key Target	Long Shot for Reagan	Long Shot for Reagan	Reagan Key Target
Carter Strategists 8/25/80	Leaning Reagan	Leaning Reagan	Leaning Carter	Leaning Reagan
Evans/Novak 8/15/80	Leaning Reagan	Leaning Reagan	Leaning Anderson	Probable Reagan

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Having selected four target states, the difficult process of deciding how best to allocate scarce resources must begin. Some excellent guidelines exist. Political scientist Steven J. Brams and mathematician Morton D. Davis have devised a mathematical formula for the allocation of resources for maximum effectiveness.[2] After a careful study of presidential campaigns and the electoral college system, they decided that larger states should receive even more attention than their proportional share of the electoral college. Resources should be allocated approximately in proportion to the 3/2s power of the electoral votes of each state. This figure is calculated by taking the square root of the number of electoral votes and cubing the results. From there, the percentage of resources can be easily calculated.

The Brams - Davis Formula Applied to FCM's Target States

	Square Root	Cube	% of Time/Resources
N.Y. (41)	6.4	262	53%
PA. (27)	5.2	140	28%
FLA. (17)	4.1	69	13%
CONN. (8)	2.8	22	4%

If the target states and the Brams - Davis formula are accepted as our campaign priorities, the next step in formulating the FCM strategy is to identify those groups which are issue-oriented, open to persuasion, and reachable through direct mail and mass media. A number of such groups exist within the target states. Carter's gross mismanagement of the economy plus his mishandling of issues important to segments of the traditional Democratic coalition gives Reagan an opportunity to make large inroads into what used to be solid Democratic constituencies.

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BLUE COLLAR VOTE

Pollster Lou Harris has stated that it is an iron rule that any Democrat who slips below 60 percent of the union vote is in trouble. In May, Harris polled union members on which candidate could best handle the economy: 35% said Reagan, 30% said Carter, and 23% favored Anderson. Asked which candidate could best preserve the value of their money, union members in the eight largest states replied: Reagan 38%, Anderson 28%, and Carter 21%.

Reagan's primary victories in Democratic crossover states like Illinois and Wisconsin show his appeal to blue-collar Democrats. Dr. Don Devine's memo to the Reagan campaign ("The Devine Memo: A Winning Strategy for Ronald Reagan,"

Human Events, July 5, 1980), argued forcefully for a strategy aimed at attracting the "BCEC voter" (blue-collar, ethnic and Catholic). He calculated that the BCEC vote could represent 35% of Reagan's majority coalition and stated, "The real test of the campaign is its ability to attract the BCEC voter. This will win or lose the election."

To win the BCEC vote, Dr. Devine suggests the use of four issues: the economy (jobs creation, tax cuts, inflation, unemployment, the Carter "misery index"), a strong foreign policy (concern for plight of Eastern Europeans, a strong defense, an emphasis on Carter's incompetence in the face of Sovier aggression), the Reagan record in California (tax cuts, welfare reform, the size of California) and the right to life issue.

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THE CATHOLIC VOTE

Jimmy Carter received 57% of the Catholic vote in 1976. This year two issues can cut against Carter with the Catholic vote: abortion and tuition tax credits.

The right to life issue is going to play more of a role this time because the major parties have taken clearly opposite stands on it. Unlike Ford, who downplayed the issue, Reagan has taken an unequivocal stand in favor of a constitutional amendment to prohibit abortion. Since the official Reagan strategy, as outlined by Wirthlin, is to focus on the economy and foreign policy rather than "red-flag" social issues, this issue is perfectly suited for a large scale independent effort. The Robert Heckman memo of August 5 (Appendix) underscores the importance of the right to life vote in New York and suggests that the major focus of the Citizens for Reagan in '80 New York effort be directed toward winning the right to life voters for Reagan.

The second Catholic issue which helps Reagan tremendously is tuition tax credits. Carter, in pursuit of the support of the American Federation of Teachers, has taken a hardline stand against tuition tax credits. This gives Reagan a real opportunity to win the support of hundreds of thousands of Catholic parents who send their children to parochial schools and having to pay out both tuition and school taxes.

THE JEWISH VOTE

In 1976 Jimmy Carter received 72% of the Jewish vote. Since then a long series of Carter administration mistakes (the bungled UN vote, Andy Young's comments, Billy Carter's Libyan relationship, etc.) have seriously eroded that support. A number of polls give Anderson the lead with the Jewish voters. Should the Anderson candidacy collapse, there is a real possibility that Reagan can capitalize on his own strong pro-Israel stands plus the antipathy toward Carter. Although nationally Jewish voters are approximately 3% of the voting population, in New York, Pennsylvania and Florida the percentage is higher.

THE CUBAN VOTE

One constituency which is easily targeted and for which there are excellent issues available is the Cuban community. Dade County has more than 90,000 registered Cubans (out of 658,000 registered voters). Out of 112,000 Dade County voters with Spanish surnames, 54,000 are registered Democratic and 45,000 are registered Republican. The registered voter computer tape can be used to break out the names of Cubans and generate labels.

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FCM
THE FUND FOR A CONSERVATIVE MAJORITY

There are several important issues. One is Carter's inept, on-again, off-again handling of the refugee problem. A second is the series of news stories detailing Castro's preference for Carter over Reagan. Third, there is the totally ineffectual Carter "threat" to Castro to remove Soviet troops from Cuba.

A hardhitting direct mail piece targeted to Cuban voters and written in both Spanish and English could be an effective tactic for maximizing the Reagan vote in Florida.

****

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FCM

THE FUND FOR A CONSERVATIVE MAJORITY

Ralph W. Galliano
Executive Director

7/26/79

MEMO

TO: Ken Boehm
Jeff Kane
Ralph Galliano

FROM: Bob Heckman

RE: Enclosed Mailgram from Ronald Reagan

I have enclosed a mailgram that I received yesterday from Ronald Reagan. The mailgram repeats the request that was made by the Reagan for President attorney, Mr. Loren Smith, to our attorney, Curt Herge, this past Monday.

****

In my discussions with all of you, I have detected no leanings toward ceasing the Citizens for Reagan in '80 project. However, so that we will have the opportunity to discuss the project and the Reagan request in more detail, as well as transact other routine business, I am scheduling a meeting of the FCM Board for this August.

The meeting will take place at 10:00 p.m. on Wednesday, August 15, 1979, at the Shoreham-Americana Hotel. Please let me know if this is at all inconvenient.

RECEIVED
JUL 30 1979
SEDAM & HERGE

CHAIRMAN • Robert Heckman • DIRECTORS • Kenneth F. Boehm, Esq. • Jeffrey D. Kane
1022 WILSON BOULEVARD • SUITE 1401 • ARLINGTON, VIRGINIA 22209 • (703) 524-4400

8304042150

FEDERAL ELECTION COMMISSION

_____

_____

_____

_____

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

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

Signed Rose A. Wasserbauer

Date 6/23/83

FEC 9-21-77

Tabulated results of the Finkelstein survey in Wisconsin conducted for FCM have not be placed on the public record for reasons of economy. They are available upon request.

8304042155

Arthur J. Finkelstein & Associates
117 Smith Avenue
Mount Kisco, N. Y. 10549
(914) 666-2750

WISCONSIN

MARCH - 1980

1. Media Markets

1. Wausau - Rhinelander 2. Green Bay 3. Milwaukee 4. Madison

5. La Crosse-Eau Claire 6. Minneapolis-St. Paul 7. Rest

2. Are you registered and intending to vote next November?

1. Yes 2. No/All other responses (TERMINATE)

3. If you were to label yourself, would you say you are a Liberal, a Moderate, or a Conservative in your political beliefs?

1. Liberal 2. Moderate 3. Conservative 4. Don't know

4. In your opinion, what is the most important issue facing the United States today?

_____

5. In your opinion, what is the most important issue facing the state of Wisconsin today?

_____

6. What is the first thing that comes to mind when you hear the name, Ronald Reagan?

_____

7. What is the first thing that comes to mind when you hear the name, John Anderson?

_____

8. What is the first thing that comes to mind when you hear the name, George Bush?

_____

12. Now I am going to read you a list of names. Will you please tell me if you have a favorable or unfavorable opinion of each? If you have no opinion or have never heard of the person, just say so.

	Favorable	Unfavorable	No Opinion	Never Heard Of
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e. Ronald Reagan				
f. George Bush				
g. Gerald Ford				
h. John Anderson				

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15. In your opinion, what is the most significant accomplishment of the Carter Administration?

_____

16. In your opinion, what is the most significant failure of the Carter Administration?

_____

17. What do you like most about Ronald Reagan?

_____

18. What do you like least about Ronald Reagan?

_____

23. Which statement most accurately reflects your view regarding gun control?

1. Citizens should be free to own rifles, shotguns, and handguns
2. Citizens should be allowed to own rifles and shotguns, but not handguns
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4. Don't know/Refused

24. Which statement comes closest to your position on abortion?

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1. Both men and women should be drafted, with equal duties including combat
2. Both men and women should be drafted, with only men having to serve in combat
3. Only men should be drafted
4. No one should be drafted
5. Don't know/Refused

26. Do you approve or disapprove of Federally funded abortions?

1. Approve 2. Disapprove 3. Don't know/Refused

27. I am going to read you a list of qualifications. Choosing from among George Bush, John Anderson, and Ronald Reagan, who do you feel is best described by each of the following phrases?

	Bush	Anderson	Reagan	All	None	Don't know
a. Experienced in foreign affairs						
b. Will appoint the best men to his administration						
c. Capable of maintaining a strong National Defense						
d. Able to restore honesty to government						

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34. Choosing between Jimmy Carter and Ronald Reagan, who do you feel could do a better job in each of the following areas as your President?

	Carter	Reagan	Both	Neither	Don't know
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b. Finding new alternative of energy					
c. Cutting government spending					
d. Keeping the United States militarily strong					
e. Restoring honesty to government					
f. Bringing qualified men to government					

35. With which political party are you affiliated?

1. Republican 2. Democrat 3. Independent 4. Other(specify)_____

5. Don't know/Refused

36. As you are aware, very few people actually vote in the Primary for President of the United States. In which primary, if any, do you intend to vote - the Republican or Democratic Primary? If you do not intend to vote, just say so.

1. Republican(GO TO #37, 38,39) 2. Democratic(GO TO #37, 40)

3. Will not vote(GO TO #41) 4. Don't know/Refused(GO TO #41)

37. How likely is it that you will vote in the April 1st Primary? Would you say it is very likely, only somewhat likely, or not likely at all to vote in the Primary on April 1st?

1. Very likely 2. Somewhat likely 3. Not likely at all 4. Don't know/Refused

38. IF REPUBLICAN PRIMARY VOTER, ASK - If the Republican Primary Election for President were held today and the candidates were John Anderson, George Bush, Phil Crane, and Ronald Reagan, for whom would you vote?

1. Anderson 2. Bush 3. Crane 4. Reagan 5. Undecided

40. IF DEMOCRATIC PRIMARY VOTER, ASK - If the Democratic Primary Election for President were held today and the candidates were Jerry Brown, Jimmy Carter, and Ted Kennedy, for whom would you vote?

1. Brown 2. Carter 3. Kennedy 4. Undecided

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1. Reagan 2. Carter 3. Undecided

45. If the election for President were held today and the candidates were Gerald Ford, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Ford 2. Carter 3. Undecided

46. If the election for President were held today and the candidates were John Anderson, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Anderson 2. Carter 3. Undecided

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47. If the election for President were held today and the candidates were George Bush, the Republican, and Jimmy Carter, the Democrat, for whom would you vote?

1. Bush 2. Carter 3. Undecided

48. Would you say you always vote Democrat, usually vote Democrat, vote for as many Democrats as Republicans, usually vote Republican, or always vote Republican?

1. Always Democrat 2. Usually Democrat 3. Democrat/Republican

4. Usually Republican 5. Always Republican 6. Don't know/Refused

49. Do you or does any member of your family who lives in this household work in agriculture or an agricultural related business?

1. Yes 2. No 3. Don't know/Refused

50. What is your annual family income - Is it under $8,000, between $8,001 & $15,000, between $15,001 & $20,000, between $20,001 & $30,000, or over $30,000?

1. Under $8,000 2. Between $8,001 & $15,000

3. Between $15,001 & $20,000 4. Between $20,001 & $30,000

5. Over $30,000 6. Don't know/Refused

51. What is your age?

1. 18-25 2. 26-40 3. 41-55 4. 56-65 5. Over 65 6. Refused

52. What is your race?

1. White 2. Black 3. Other 4. Don't know/Refused

53. Sex?

1. Male 2. Female

8304215

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

63004204536

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

10244

RECEIVED

81 DEC 28 AM 9:25

GCC# 5981

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX 710-831-0896

CABLE SEDAMHERGE

December 21, 1981

DEC 28 P12:27

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

Re: Fund For A Conservative Majority/MUR 1252/1299

Dear Anne:

This is to advise you that I hold a complete copy of questions and responses thereto in connection with a survey conducted by Arthur J. Finkelstein & Associates in March, 1981, in Wisconsin, on behalf of Fund For A Conservative Majority. The cost incurred by this firm in reproducing this material on behalf of our client is $67.00, including the cost of copying at .20¢ per page, and clerical time to copy the survey. I look forward to receipt of the Commission's check in that amount.

Because of its bulk, please call me to let me know how you wish to have the survey delivered to your offices.

Sincerely,

Robert R. Sparks, Jr.

3304021317

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
6300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22101

83040421558

NORTHERN VIRGINIA, VA 220
PM
22 DEC
1981
RECEIVED
MCLEAN
VA.

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

1023540

RECEIVED
Gc# 5931
81 DEC 18 P2: 38

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
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A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX 710-831-0688

CABLE SEDAMHERGE

December 14, 1981

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

Re: Fund For A Conservative Majority/MUR 1252-1299

Dear Ann:

At the deposition of Mr. Heckman, Chairman of Fund For A Conservative Majority (FCM), at your offices on December 3, 1981, there was some confusion about portions of a Wiland & Associates, Inc. invoice which seemed to indicate that FCM may have rented certain mailing lists from the Republican National Committee (RNC).

I have talked to Mr. Thompson of Thompson & Associates, Inc. (TAI) about this matter, and he has told me that only the portion marked "Election #1" relates to FCM's Reagan independent expenditure project. The other items do not bear on that project, but relate instead to lists, owned by Mr. Thompson and rented by the RNC, Atlantic List and America Spectator from TAI. These rentals were mistakenly billed to FCM by TAI, rather than to the actual renters (RNC, et al.).

Mr. Thompson has also told me that, if requested, he can produce documentation to establish what really happened in these transactions. I know you intend to depose Mr. Thompson on the general nature of his services to FCM. You may wish to question him on this matter, as well. In any event, it appears that FCM did not rent any lists from the RNC.

Please feel free to call me if you have any questions on this matter.

Sincerely,

Robert R. Sparks, Jr.

8304215

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

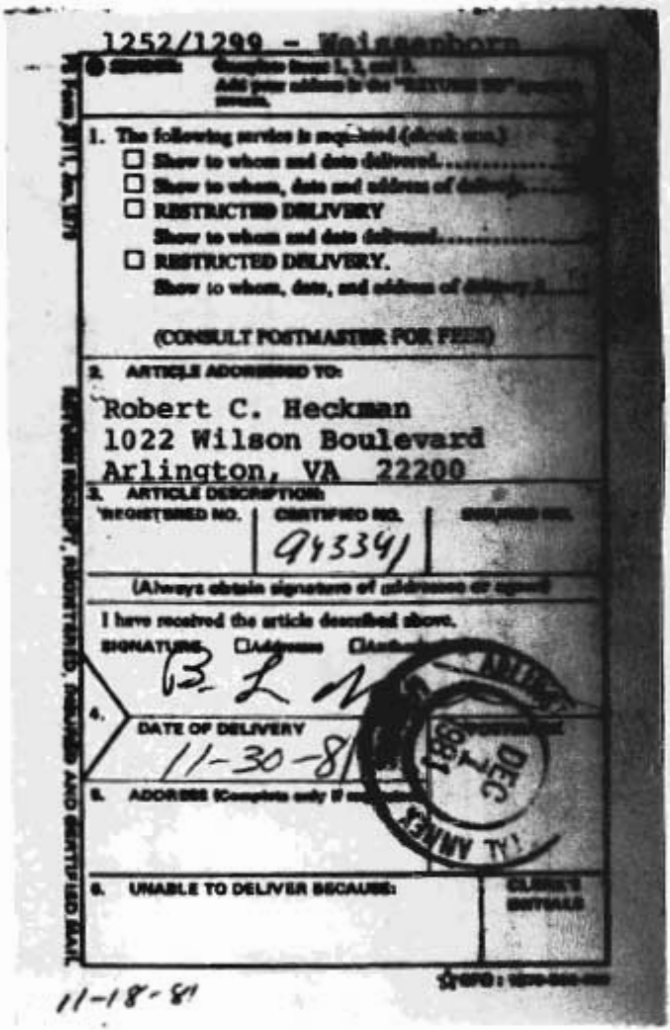
RECEIVED

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

8304042160

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463



1252/1299 - Weissenborn

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:
Robert C. Heckman
1022 Wilson Boulevard
Arlington, VA 22200

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 94334 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 11-30-81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

DEC 1981 AM

11-18-81

830404215S!

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert C. Heckman, Chairman
Fund for a Conservative Majority
1022 Wilson Boulevard
Arlington, Virginia 22200

RE: MUR 1252/1299

Dear Mr. Heckman:

On September 25, 1980, you were notified that the Commission had found reason to believe that the Fund for a Conservative Majority had violated 2 U.S.C. §§ 432(e)(4) and 441a(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 26 U.S.C. § 9012(f). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on December 3, 1981, at 10:00 a.m., which will assist in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapter 95 of Title 26, U.S. Code.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid $30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

If you have any questions, please direct them to Anne A. Weissenborn, the attorney handling this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

8304042156 2

83042156

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert C. Heckman, Chairman
Fund for a Conservative Majority
1022 Wilson Boulevard
Arlington, Virginia 22200

RE: MUR 1252/1299

Dear Mr. Heckman:

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If you have any questions, please direct them to Anne A. Weissenborn, the attorney handling this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena

AW 11/16/81

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO APPEAR FOR DEPOSITION
UPON ORAL EXAMINATION

In the Matter of	)	
	)	
Ronald Reagan	)	
Reagan for President General Election Committee	)	MUR 1252/1299
Republican National Committee	)	
Americans for Change	)	
Fund for a Conservative Majority	)	
National Conservative Political Action Committee	)	

TO:

Robert C. Heckman, Chairman
Fund for a Conservative Majority
1022 Wilson Boulevard
Arlington, Virginia 22200

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for oral deposition with regard to the Commission's investigation of MUR 1252/1299 relating to possible violations of 2 U.S.C. 432(e)(4), 441a(a), 441a(f) and 26 U.S.C. §§ 9012(b)(1) and 9012(f) by the above named respondents.

The deposition shall take place at the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C., on December 3, 1981, at 10:00 a.m.

WHEREAS, the Chairman of the Federal Election Commission has hereto set his hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this 24th day of Nov., 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8304042 1564

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

MC LEAN VA. OCT 14 '81
81 OCT 15 A12:04
U.S. POSTAGE

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

30404157

18804 RECEIVED
Ccdh 3647
81 OCT 15 P12:04

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
6300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102

(703) 821-1000

SUITE 870
1700 PENNSYLVANIA AVENUE, N. W.
WASHINGTON, D. C. 20006
(703) 634-4000
TELEX: 710-[illegible]-0866
CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

October 14, 1981

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

Re: Matter Under Review 1252/1299

Dear Anne:

This will confirm our telephone conversation by which we agreed that the deposition of Mr. Boehm will be rescheduled for 10:00 a.m., Thursday, October 22, 1981, at the office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C.

As subpoenas without warning to clients tend to upset and excite the recipient, I suggest that in the future, you contact me in connection with any deposition which you would like to conduct for either National Conservative Political Action Committee or Fund for a Conservative Majority in the referenced matters. If you and I can agree on a time and place to conduct such deposition, it will be unnecessary for you to issue a subpoena unless you wish to do so.

Sincerely,

Robert R. Sparks, Jr.

cc: Kenneth Boehm

8304042156

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: SEPTEMBER 23, 1981

SUBJECT: SUBPOENAS REGARDING MURs 1252/1299

The attached subpoenas regarding MURs 1252/1299 which were resubmitted for signature have been signed and sealed this date.

Attachments

8304021557

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO APPEAR FOR DEPOSITION
UPON ORAL EXAMINATION

In the Matter of	)	
	)	
Ronald Reagan	)	
Reagan for President General Election Committee	)	
Republican National Committee	)	MUR 1252/1299
Americans for Change	)	
Congressional Club	)	
Fund for a Conservative Majority	)	
National Conservative Political Action Committee	)	

TO:

Kenneth Boehm
1664A Chimney House Road
Reston, Virginia 22090

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for oral deposition with regard to the Commission's investigation of MUR 1252/1299 relating to possible violations of 2 U.S.C. §§ 432(e)(4), 441a(a), 441a(f) and 26 U.S.C. §§ 9012(b)(1) and 9012(f) by the above named respondents.

The deposition shall take place at 10:00 a.m., on October 14, 1981, at the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C.

WHEREAS, the Chairman of the Federal Election Commission has hereto set his hand at the Office of the Commission, 1325 K Street N.W., washington, D.C. 20463, this 23 day of September, 1981.

John Warren McGarry

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8304042156 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth Boehm, Treasurer
Fund for a Conservative Majority
1664A Chimney House Road
Reston, Virginia 22090

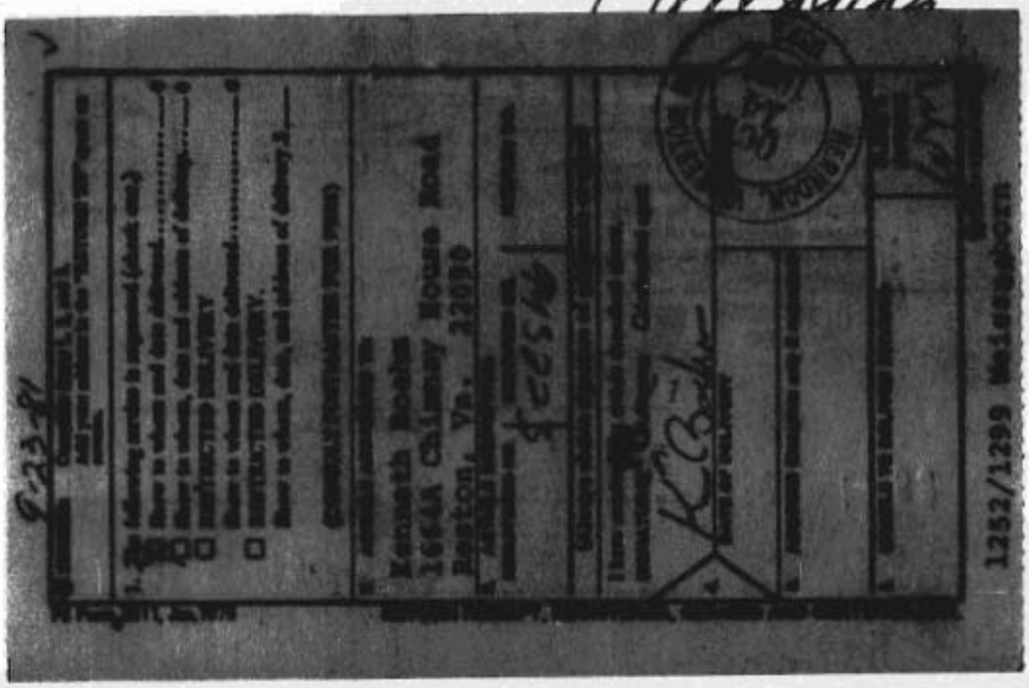
RE: Matter Under Review 1252/1299

Dear Mr. Boehm:

Enclosed is a subpoena to appear for deposition upon oral examination in connection with the Federal Election Commission's ("Commission's") investigation of Matter Under Review (MUR) 1252/1299. In accord with the Commission's regulation found at 11 C.F.R. § 111.14, witness fee checks will be tendered to witnesses at the time and place at which the witness appears for deposition, as noted in the enclosed subpoena.

If you should have any questions or problems with respect to the enclosed subpoena or proposed schedule for deposition, please contact Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-4175.

Sincerely,



8304021569

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth Boehm, Treasurer
Fund for a Conservative Majority
1664A Chimney House Road
Reston, Virginia 22090

RE: Matter Under Review 1252/1299

Dear Mr. Boehm:

Enclosed is a subpoena to appear for deposition upon oral examination in connection with the Federal Election Commission's ("Commission's") investigation of Matter Under Review (MUR) 1252/1299. In accord with the Commission's regulation found at 11 C.F.R. § 111.14, witness fee checks will be tendered to witnesses at the time and place at which the witness appears for deposition, as noted in the enclosed subpoena.

If you should have any questions or problems with respect to the enclosed subpoena or proposed schedule for deposition, please contact Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Subpoena

8304021570

9/3/81

8304042157 1

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Telepost
1700 Old Meadow Road
McLean, Virginia 22102

RE: Matter Under Review 1252/1299

Dear Sir:

Enclosed is a subpoena to appear for deposition upon oral examination in connection with the Federal Election Commission's ("Commission's") investigation of Matter Under Review (MUR) 1252/1299. In accord with the Commission's regulation found at 11 C.F.R. § 111.14, witness fee checks will be tendered to witnesses at the time and place at which the witness appears for deposition, as noted in the enclosed subpoena.

If you should have any questions or problems with respect to the enclosed subpoena or proposed schedule for deposition, please contact Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Subpoena

RW 9/3/81

101180

GCC#5140

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
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124
TWX/TELEX: 710-931-0696
CABLE: SEDAMHERGE

July 21, 1981

FEC MAIL ROOM
JUL 27 AM 11:36
GENERAL COUNSEL

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

Re: MUR 1252/Fund for a Conservative Majority

Dear Ms. Weissenborn:

This is in response to Mr. Steele's letter to me, dated June 24, 1981. By that letter, Mr. Steele raised questions with respect to certain documents withheld thus far by Fund for a Conservative Majority (FCM) in response to the Commission's subpoena in this matter.

Upon the representation in Mr. Steele's letter that the Commission will bear the reasonable expense of reproduction (including staff time involved in such reproduction), FCM will produce survey results, polls, memoranda or reports received by FCM from Arthur Finkelstein and Associates which relate to the March 26, 1980 expenditure reported to that firm by FCM.

FCM has also withheld a number of documents under a claim of attorney-client privilege. The Commission's objection to the assertion of the privilege, it appears, is based on a misunderstanding of the identities and the relationships of the individuals and entities involved in this matter.

Michael Thompson, who is identified in FCM's list of documents withheld as the recipient, and in some cases the author, of certain documents, is the President of Thompson and Associates. Thompson and Associates is a corporation engaged in the business of direct mail fund solicitation,

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including the drafting and preparation of fund-raising materials, and was retained by FCM for that purpose.

Thompson and Associates (through Mr. Thompson himself) prepared FCM's fund-raising solicitations and submitted them to this firm, as counsel for FCM, for review and approval. Acting in that capacity, this firm passed on the appropriateness of the documents submitted to us, in many cases making written notes on the face of the documents themselves of our comments and objections, if any, to the text of the documents.

It is important to note that copies of all fund-raising solicitation materials as actually sent to potential contributors have been submitted to the Commission in response to the Commission's request No. 9. The only documents withheld are early drafts of those materials submitted for our review and containing our comments thereon.

In the preparation and submission of draft fund-raising appeals, Thompson and Associates was acting as the agent, and on behalf, of our client, FCM. It is well-settled that statements by a client to an agent or representative of the client's attorney are protected by the attorney-client privilege. United States v. Kovel, 296 F.2d 918, 920-22 (2nd Cir. 1961). Likewise, communications are privileged so long as they are between the client or his agent and the client's attorney. United States v. Threlkeld, 241 F.Supp. 324 (W.D. Tenn., 1965), citing 8 Wigmore, §2317. The attorney-client privilege rests on the need for counsel to know all that relates to his client's business so that counsel may render effective legal representation. Trammel v. United States, 445 U.S. 40 (1980). The privilege exists to protect not only the giving of professional advice to those who can act on it, but also to protect the giving of information to an attorney in order to enable him to give sound and informed advice. Accordingly, the attorney-client privilege may validly be asserted not only as to communications directly between an attorney and his corporate client or those who manage the client, it may also be asserted as to communications between counsel and those who are in the employ of the corporate client, as well. Upjohn Company v. United States, 101 S.Ct. 677 (1981).

Moreover, because the written communications between Mr. Thompson and this firm which have been withheld from production contain the written thoughts and comments thereon of counsel for FCM, such documents constitute the work-product of counsel and may be withheld under the attorney work-product doctrine. Such documents are subject to the strongest protections against discovery. United States v. Nobles, 422 U.S. 225 (1975); Federal Rules of Civil Procedure, 26(b)(3). Although the Federal Rules of Civil Procedure may not be applicable to the current proceedings before the Commission, they would be applicable in the event the Commission attempts to enforce its subpoena in a court proceeding. Rule 81(a)(3), FRCP; see Donaldson v. United States, 400 U.S. 517 (1971).

So that there is no misunderstanding, we reiterate that FCM has already produced to the Commission copies of direct mail fund-raising solicitations which were actually sent to potential contributors. The only documents withheld in that connection are drafts of those documents submitted by FCM's agent to counsel for FCM for review and comment.

The Commission's concern that "unknown persons may have read certain of the documents withheld" is unfounded. The Commission's subpoena set forth the format to be used in itemizing documents withheld pursuant to a claim of privilege. One of the items required to be included in such itemization was a statement of the identity of any other person who may have read any document withheld. As used in our document production, the word "unknown" is not intended to mean that unknown persons had actually read those documents. Rather, by use of the word "unknown," we simply intended to advise the Commission that if the documents withheld were in fact read by other persons, their identities were unknown to us. We are not aware that any of the documents withheld have in fact been read by any person other than those persons to whom the documents were addressed.

Other than Mr. Thompson and, except as explained below, the authors or recipients of the documents withheld were employees or control persons of FCM, including Messrs. Heckman, Boehm, Kane, and Galliano. Mrs. Becki Donatelli, referred to as the recipient of a January 22, 1979 memorandum from Mr. Herge of this firm, was, at the time of that memorandum,

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Executive Director of FCM. Penny Rogers, the author of a document dated September 18, 1979, sent to Messrs. Galliano, Heckman and Herge, was at that time, an employee of Thompson and Associates. Mr. Seefeldt, the recipient of a December 7, 1979 letter from Mr. Hughes of this firm, was, at that time, under consideration to perform certain computer services for FCM in connection with its fund-raising program.

After further review, FCM's claim of attorney-client privilege is withdrawn as to a memorandum dated March 31, 1980 from Mr. Thompson to Bill Tucker in Senator Warner's office. I enclose a copy of that memorandum. I have been unable to locate copies of the attachments referred to in that memorandum.

Please feel free to contact me if you have any further questions in connection with the documents produced by FCM, or the privileges claimed with respect to the documents withheld.

Sincerely,

Robert R. Sparks, Jr.

enclosure

8304042157

File: FCM - General

Thompson & Associates, Inc.
7015 Old Keene Mill Road • Suite 203 • Springfield, Virginia 22150
(703) 451-6943
Michael W. Thompson, President

March 31, 1980

CONFIDENTIAL MEMORANDUM

RECEIVED
APR 2 1980
SEDAM & HERGE

TO: Bill Tucker

FROM: Mike Thompson

RE: Senator John Warner and Citizens for Reagan in '80

As a follow up to our telephone conversations, I am outlining herein how our client, Fund for a Conservative Majority, would like to work with Senator John Warner.

FCM is a conservative PAC although not of a "hard-right" complexion. It is quickly becoming one of the largest conservative PAC's in this city in 1980 -- over $400,000 has been raised since January 1st.

FCM has two major campaigns for 1980 -- "Conservative Senate Control" and "Citizens for Reagan in '80". It is with this second campaign that FCM would like to work with Senator Warner.

(1) Senator Warner would serve as Honorary Chairman of "Citizens for Reagan in '80". As an independent campaign effort, the Senator could not formally join the official Reagan for President campaign nor coordinate any FCM activities with any Reagan officials.

Senator Warner endorsed Ronald Reagan this past weekend. As long as he doesn't "officially" join the campaign organization, Senator Warner can serve as FCM's National Chairman for "Citizens for Reagan in '80".

(2) The Senator would sign the fund raising letters. The turn around time for approval of these letters would have to be very quick. I have enclosed a complete sample of mailings we have created and mailed to date.

We plan several more major "specific issue" mailings before the convention -- a Texas Primary mailing to 250,000 in mid April, a mailing aimed at California and Ohio, etc. to 300,000 in early May; and 350,000 continuation of the Vice Presidential survey mailing; 300,000 or more in mid June

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aimed at the Reagan Convention; and testing of a couple of new prospecting texts which could be mailed to 200,000 to 400,000 or more people prior to the convention. Other mailings might be needed.

Large mailings will be sent beginning with the night of the Reagan nomination (to 500,000 or more) with the final pre-election mailing sent October 10th to 15th and an election night mailing on November 4th.

A large telephone bank has been installed for solicitation purposes also. A tape of the Senator might be used in this effort.

(3) A television program may be produced to promote Reagan and his record of achievement. This 30 minute program would be hosted by Senator Warner.

Other television ads will be produced to expose the weaknesses of President Carter and to promote the strengths of Governor Reagan.

(4) Special fund raising events -- dinners, luncheons, receptions, etc. -- would be hosted with Senator Warner as the honored guest. These events would preview FCM's advertising program for Reagan -- newspaper ads, radio spots, TV program, TV spots, etc. There would be gatherings of "high dollar" donors and potential donors.

Of course, Senator Warner will need to talk with Bob Heckman who chairs FCM. Bob is also Executive Director of Young Americans for Freedom.

Even if Senator Warner does not want the responsibility of serving as the official Honorary Chairman of "Citizens for Reagan in '80", he could still do all the above. Howerver, Honorary Chairman is the position FCM would like to fill with Senator Warner. Should the Senator not serve, Phil Crane will be asked to serve as Honorary Chairman.

Bill, as FCM continues to build itself into a strong responsible conservative PAC, it would very much like to work closely with Senator Warner on all of its programs.

I frankly feel that the Senator's close involvement with a creative and constructive PAC like FCM could be mutually beneficial.

Please call me after you have read this memo and reviewed the enclosed material.

Thank you for your help.

MWT/tv

cc: Bob Heckman, Chairman
Fund for a Conservative Majority

bcc: Curt Herge
Ralph Galliano

8304042157

8304042178

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7900 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

Ms. Anne Weissemborn
Federal Election Commission
1325 K Street
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1981

Robert R. Sparks, Jr.
Counsel, Fund for a
Conservative Majority
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Sparks:

A review of the documents which you have submitted on behalf of the Fund for a Conservative Majority ("FCM") in response to the Commission's subpoena of October 1, 1980, has revealed two areas of continuing deficiencies.

The first deficiency involves specification number five which requires production of "a copy of any survey results, poll, memoranda, or report" transferred to FCM by Arthur Finklestein and Associates which was related to the reported FCM expenditure to that firm dated March 26, 1980. In a response to this specification, you have stated that the poll and results are being withheld on grounds of burdensomeness, and you cite the number of pages, time and expense involved in production. We cannot agree that production of the poll and its results would be so burdensome as to warrant the Commission's dropping of the requirement that they be produced. Any reasonable expenses involved may be billed to the Commission. Failure to produce these documents could lead to a subpoena enforcement action.

The second area of deficiency involves certain claims of attorney-client privilege contained in your recent response to specification numbers 2, 3 and 9. While such a claim as to documents authored by counsel for FCM and addressed to an FCM officer or employee, or vice versa, would apparently be valid, a challenge is contemplated as to similar claims regarding documents prepared by or addressed to a third party, e.g. Michael Thompson. In addition, claims of attorney-client privilege as to documents which may have been read by an

8304042157 9

"unknown" person raise questions of whether the control, or lack there of, exerted over such documents has resulted in a waiver of any claim of confidentiality. Please provide within a week of your receipt of this letter a more complete response as to the third parties involved with certain of the documents for which privilege is cited, and also as to the issue of the control exerted by FCM over those documents which may have been read by "unknown" persons. Otherwise, these claims could be challenged in court.

Sincerely,

Charles N. Steele
General Counsel

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100465

RECEIVED
GCOMM 4645
81 MAY 11 AM 8:58

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
KAREN LUBSEN BLAIR
JOHN ROBERT CLARK III

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

TWX/TELEX: 710-831-0898

CABLE: SEDAMHERGE

May 4, 1981

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

Re: MUR 1252/Fund For A Conservative Majority

Dear Ms. Weissenborn:

In further compliance with the Commission's subpoena to produce documents in this matter, I enclose those documents, for which no claim of privilege is made, within the control or possession of Fund For A Conservative Majority.1/ These documents are responsive to Commission request nos. 2, 3 and 9. I also enclose a list of documents withheld under a claim of privilege, indexed in accordance with the Commission's instructions contained in its subpoena. Please feel free to call me if you have any questions about our claims of privilege.

By letter of January 14, 1981, I forwarded to you documents responsive to Commission request nos. 6, 7 and 10. By letter of October 22, 1980, I forwarded to Ms. Gentner of your office documents responsive to request nos. 4 and 5 of the Commission's subpoena.

In response to request no. 1 of the Commission's subpoena, please refer to FCM's sworn response to Interrogatory E, filed with the Commission on January 15, 1981, and to the Mailgram to FCM from Ronald Reagan, dated July 24, 1979, attached to the letter dated October 20, 1980 from

1/As used herein, and in previous responses to the Commission's discovery requests in this matter, Fund For A Conservative Majority includes its project, Citizens For Reagan in '80.

8304042158 1

RECEIVED
81 MAY 11 A8:38

J. Curtis Herge, Esq. to Charles N. Steele, General Counsel to the Commission, concerning MUR 1299.2/ No documents or materials exist which are responsive to Commission request No. 8. FCM and/or Citizens for Reagan in '80 did not broadcast or disseminate any of the materials listed in that request.

This submission constitutes compliance with the Commission's subpoena.

Sincerely,

Robert R. Sparks, Jr.

enclosures

8304042158 2

2/On October 15, 1980, the Commission voted to merge the complaint in MUR 1252 with MUR 1299, and to treat both as a single investigatory matter. See letter, dated October 23, 1980, from Charles N. Steele, General Counsel to the Commission, to J. Curtis Herge, Esq.

FCM REPORT
FUND for a CONSERVATIVE MAJORITY
1022 Wilson Blvd. / Suite 1401 / Arlington, VA 22209
Vol. I, No. 1
Fall 1979

2 of 7
File: FCM
'86007

Reagan Wins Major Youth Endorsement

8304042195 3

YAF National Convention delegates demonstrate for Reagan.

Ronald Reagan won a major victory recently when he was nominated with an overwhelming 78 percent of the vote at Young Americans for Freedom's (YAF) mock 1980 presidential nominating convention held at the Shoreham-Americana Hotel in Washington, D.C. FCM Chairman Robert C. Heckman gave the seconding speech for the Reagan nomination.

YAF, comprised of 55,000 members across the country, includes 65 members who were delegates to the 1976 Republican Convention in Kansas City.

Covered prominently in the *Washington Post*, *Washington Star*, *New York Times*, and by United Press International (UPI), YAF's mock convention was the first major sounding board of conservative presidential preferences for 1980.

The only other candidate receiving measurable support was Representative Philip M. Crane (R-Ill.), with 15 percent of the 400 votes. John Connally, Howard Baker, and George Bush received but a smattering of votes, with Connally garnering not a single vote from his native Texas delegation.

FCM was the only political action committee running a major floor operation at the Convention. Beforehand, it lobbied heavily for Governor Reagan, getting a reliable sounding of the outcome by poll-

(continued on page 3)

Senate Control in '80!

Agriculture Committee

Armed Services Committee

Judiciary Committee

Labor Committee

Banking Committee

Percentage figures indicate most recent American Conservative Union (ACU) ratings (100% – Conservative; 0% – Liberal)

One of FCM's two major programs is the "Senate Control in '80" campaign. If successful, it could alter the course of our country dramatically.

Our study of the 34 Senate seats up in 1980 shows the following liberals to be most beatable: Durkin (NH), Stewart (Al), Gravel (Ak), Leahy (Vt), Long (La), Bayh (In), Magnuson (Wa), Church (Id), McGovern (SD), Culver (Ia), Nelson (Wi), Hollings (SC), and Cranston (Ca). FCM is helping to recruit and develop viable conservative alternatives to these liberals with contributions of money and campaign services.

Conservatives need but ten more seats to capture the United States Senate. If we win them, we'll gain control of the vital Committee chairmanships which exercise such influence over America's affairs. At Judiciary, solid conservative Strom Thurmond would replace Ted Kennedy; at Armed Services, Texas' John Tower would succeed John Stennis, at Labor, Orrin Hatch would replace Harrison Williams. The list goes on. Conservatives would control these vital committees and more.

Imagine how different things would be if conservatives had controlled the Senate over the last two years. We would have retained the Panama Canal; the D.C. Amendment granting our nation's capital two liberal U.S. Senators would have been defeated; and the dangerous SALT II treaty wouldn't have a chance of passing, as it does now. Our nation would be more secure militarily and more prosperous at home.

Though we can't undo the past, we can make certain that blunders like the ones above don't happen in the future. A conservative majority in the Senate, starting in 1980, would help assure a secure and affluent new decade for America. With your help, FCM can play an integral part in attaining it.

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FCM Launches State Fund

The Fund for a Conservative Majority's State Fund, incorporated in October 1978, supports conservative state and local candidates across the nation—from gubernatorial through state legislative and mayoral candidates.

On June 3 of this year the board of directors met in New Orleans to elect officers and to determine the organizational structure of the State Fund.

In 1980, there will be a ten-year U.S. census, followed by Congressional redistricting in 1981. Since state legislatures, for the most part, redraw the boundaries of their states' Congressional districts, the 1980 gubernatorial and state legislative elections will be crucial to the future composition of the United States Congress. If conservatives can gain control of more state legislatures – and 1980 looks like a year they could go over the top in several – more U.S. Congressional districts will be redrawn in ways favorable to conservatives. FCM's State Fund can help in this important battle. The State Fund's acceptance of corporate contributions will be utilized in connection with state and local races where they are permitted. FCM'S State Fund can accept both individual and corporate contributions.

Also, developing effective conservative leaders on the state and local level will pay off when they serve as tomorrow's U.S. Senators and Congressmen! If FCM's State Fund had been in existence when Jimmy Carter was a Georgia state legislator, he may never have been elected governor – or be President of the United States. FCM has high hopes for its State Fund – *that it will help not only in the future but in the elections at hand in 1980 as well.*

FCM Report

Fall 1979 Vol. I, No. 1

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Editor: Richard F. LaMountain

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Reagan Wins Major Youth Endorsement

(continued from page 1)

ing state delegations through its network of young leaders from across the country.

FCM Executive Director Ralph J. Galliano headed the floor operation. Galliano's experience as a political convention operative extends from activity at the Virginia GOP's U.S. Senate nominating convention – the largest ever held in the country – through county convention and caucus activity at other levels.

Reagan's victory at the YAF Convention proves further what polls across the country have been demonstrating for some time: that Ronald Reagan is the overwhelming favorite for the 1980 Republican presidential nomination and stands an excellent chance of winning the general election as well. FCM will continue its ongoing efforts to nominate and elect Ronald Reagan President of the United States.

FCM Executive Director Ralph J. Galliano (left) readies for Reagan floor operation

Citizens for Reagan in '80!

FCM's "Citizens for Reagan in '80" campaign could prove a major factor next year in Ronald Reagan's pursuit of the Presidency.

"Citizens for Reagan in '80" is FCM's special independent campaign effort to help secure the nomination and election of Ronald Reagan as President of the United States.

The Federal Election Commission (FEC) will restrict the official Reagan campaign with predetermined spending limits in each state during the course of the primary season and all the way up to the nominating convention in Detroit next year. At the same time, the Reagan campaign is limited to receiving $1000 per individual and $5000 per political action committee. As the high cost of living has risen, so has the cost of presidential campaigning, thus rendering a mere $5000 contribution by FCM nearly meaningless. But the 1976 Supreme Court decision of *Buckley v. Valeo* ruled that individuals and political action committees like FCM can support candidates with unlimited, independent expenditures. So, in states where Reagan faces critical early primaries, FCM will be there campaigning.

FCM will go into important GOP primary states (in particular New Hampshire, Florida, North Carolina) with Reagan literature, volunteers, and media spots. FCM especially will run Reagan radio and television campaigns in areas where the official campaign is restricted by law.

Already, Reagan literature, bumperstrips, and buttons have been developed and distributed across the nation. Much more will be done when the campaign season swings into high gear early next year. FCM's independent efforts are expected to be the extra boost Reagan needs to win the Presidency.

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FCM Chairman's Column

Dear Friend:

The conservative movement has never had a better chance to affect the course of American politics than it has in 1980.

If our preparations continue to go as planned, the Fund for a Conservative Majority will be ready too ... ready to have the most effective year it has had to date.

Already, we at FCM have begun to gear up for the races ahead in the first year of the new decade. And what an opportunity exists! Besides the race for the Presidency, there will be 34 Senate seats up 24 of which are currently held by liberal Democrats!

In 1979, FCM took a number of steps so that the opportunity of 1980 would not be wasted. We launched two major campaigns that we hope will be huge successes: "Citizens for Reagan in '80" and "Senate Control in '80."

I think that the goals of these two campaigns are very realistic. Certainly, it is possible to tip the balance of the United States Senate in 1980; and tip it so that a coalition of conservatives and Republicans have control for years to come.

I also am firmly convinced that Ronald Reagan is the one man who can capture the spirit of America and return our country to the paths of greatness. Ronald Reagan can and must be nominated for President, and elected to that high office, in 1980.

To prepare for this assault on the Presidency, FCM has hired a small but highly knowledgeable staff, headed by our new Executive Director, Ralph J. Galliano. In addition, we have cut our overhead to the bone, so that we might help as many candidates as possible get elected.

God willing, and with the continued support of our friends around the country, we can elect a conservative Senate in 1980 – and elect Ronald Reagan as President. The future of this nation may depend upon our success.

Sincerely,

Robert C Heckman

Robert C. Heckman,
Chairman

FUND for a CONSERVATIVE MAJORITY
1022 Wilson Blvd., Suite 1401
Arlington, VA 22209
(703) 524-4400

☐ YES, I would like to receive the FCM Report.
☐ Please send me more information.
☐ Enclosed is my contribution of $ to help FCM elect Reagan as President and a Conservative Majority in the Senate.

NAME _____ HOME PHONE ( ) _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____
OCCUPATION _____
PLACE OF BUSINESS _____
Federal Regulations require that we request occupation and employer.

Paid for by FUND for a CONSERVATIVE MAJORITY. Not authorized by any candidate. A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463.

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March 20, 1980

Mr. Mark Kleinman
Reports Analyst
Reports Analyses Division
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Fund for a Conservative Majority

Dear Mr. Kleinman:

On behalf of Fund for a Conservative Majority, we are writing in response to your four letters, each dated March 5, 1980, in which you requested explanations of the following:

1. The entries on Schedule A, Line 14(a), entitled "Reagan in 80 File", of the November Monthly Report (10-1-79 to 10-31-79), the December Monthly Report (11-1-79 to 11-30-79) and the Year End Report (12-1-79 to 12-31-79).

2. The entry on Schedule E, Line 23, to Pyramid Video "Recording Reagan Speech" 1-4-80 $62.40, in the February Monthly Report (1-1-80 to 1-31-80).

3. The listed expenditures to Lloyd Daugherty for $343.00 and $198.00 respectively in the February Monthly Report (1-1-80 to 1-31-80).

With reference to the entries on Schedule A, Line 14(a) of the subject reports filed by Fund for a Conservative Majority, you have inquired whether the referenced contributions were earmarked by reason of the fact that the entries on Schedule A were captioned "FCM Reagan in 80 File". The referenced contributions were not earmarked, as that term is defined in the Federal Election Campaign Act of 1971, as amended, and 11 CFR 110.6. Fund for a Conservative Majority

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has neither solicited nor accepted contributions on behalf of the Reagan for President Committee, or which are in any way earmarked or otherwise directed to Governor Reagan's campaign.

Fund for a Conservative Majority has established and is administering a program, consisting of making independent expenditures advocating the election of Governor Reagan as President. This program is one portion of the activities of Fund for a Conservative Majority, which is a multi-candidate committee (FCM is not a single candidate committee), and it is advertised as "Citizens for Reagan in '80, a project of Fund for a Conservative Majority" over a non-authorization notice, as required by 11 CFR 109.4, which reads "Paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee". In all solicitations for contributions to Fund for a Conservative Majority, it is made clear that contributions will be used in connection with its independent expenditure program and also in connection other Federal campaigns. The contributor is directed to make his or her checks payable to Fund for a Conservative Majority or FCM.

The caption, "FCM Reagan in 80 File" on Schedule A, refers to the name of a list of contributors who contributed to Fund for a Conservative Majority in response to direct-mail solicitations captioned, "Citizens for Reagan in '80, a project of Fund for a Conservative Majority", and which otherwise contain the statements referred to above.

As a result of the foregoing, Fund for a Conservative Majority cannot be termed a conduit or intermediary. In order to avoid any confusion in the future, however, the caption will not appear on future reports.

With reference to the entry on Schedule E, Line 23, regarding an expenditure to Pyramid Video, for recording a speech by Governor Reagan, you have inquired whether the expenditure is subject to the provisions of 11 CFR 109.1 (d). The expenditure was incurred in connection with the independent expenditure program of Fund for a Conservative Majority in support of the election of Governor Reagan as President. The recording was made of a speech made by Governor Reagan which was not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, Governor Reagan or any

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agent or authorized committee of Governor Reagan. The recording fee paid to Pyramid Video did not constitute "the dissemination, distribution, or republication, in whole or in part, of any broadcast or any written, graphic, or other form of campaign materials prepared by the candidate, his campaign committees or their authorized agents...." See 11 CFR 109.1(d).

With reference to the listed expenditures to Lloyd Daugherty, we are advised that the sum of $343.00 was paid to Mr. Daugherty to reimburse him for travel expenses ($289.00) and telephone charges ($54.00) incurred by him on behalf of Fund for a Conservative Majority; and, that the sum of $198.00 was paid to Mr. Daugherty to reimburse him for travel expenses ($110.00) and telephone charges ($88.00) also incurred by him on behalf of Fund for a Conservative Majority.

Fund for a Conservative Majority will amend the applicable reports to reflect the expenditure made to Pyramid Video as an operating expense on Schedule B and to provide the explanation for the sums paid to Mr. Daugherty.

Sincerely yours,

J. Curtis Herge

bcc: Mr. Ralph Galliano

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Legal loophole to help Reagan

By David Nyhan
Globe Staff

WASHINGTON — Conservative political groups plan to spend millions of dollars this fall to elect Ronald Reagan by taking advantage of a legal loophole in federal election laws.

The November elections will usher in a new phenomenon in American politics. Groups pledged to defeat liberal candidates are raising huge sums to be spent on "independent expenditures" for conservative candidates, including Reagan, whose presidential campaign committee is limited to spending ceilings imposed by federal law.

These independent expenditures, which are legal only so long as the spenders do not coordinate their plans with the presidential candidates they help, were a mere trickle in 1978, the first election year the new regulations took effect.

But that trickle, amounting to about $200,000 in all in 1978, is expected to become a huge flood when conservative voters realize they cannot legally contribute directly to Reagan's fall campaign against President Jimmy Carter.

Reagan, if nominated in July as expected, would accept $29,440,000 in federal campaign funds, paid by taxpayer check-offs on income tax returns. The Democratic nominee gets the same amount, and both are limited to spending no more than that.

The Federal Election Commission is aware of the tremendous flood of money going through the loophole, but is apparently powerless to stop it, so long as the groups involved insure they are not caught coordinating their efforts with candidates they seek to elect.

Off their performance to date, the chief beneficiary is likely to be Reagan, whose own primary campaign this season came close to running out of money. His candidacy al-

MONEY, Page 2

Election law loophole to help Reagan bid

★ MONEY
Continued from Page 1

ready has received more than $500,000 worth of political help, outside the spending limits imposed on primary candidates.

The largest conservative group taking advantage of the loophole, the Fund for a Conservative Majority (FCM), hopes to raise between $3 million and $10 million to spend for Reagan and other conservative candidates.

The Democrats seem ill-prepared to match the right's fall ambitions for the GOP. FCM treasurer Ken Boehm chuckled when talking of the group's plans to unseat Carter: "When he sees what we are going to do in the general election, he will probably despise us."

Richard Viguerie, the conservative who has become known as the postmaster general of the New Right because of his skill in direct-mail operations, said, "I've got the feeling we are going to see the independent expenditure thing dwarf the past. In the fall, for all candidates. It is going to be phenomenally greater than anything we have seen in the past."

Fred Wertheimer, senior vice president of Common Cause, said: "We were concerned about this area from the very beginning [of federal campaign law reform]. There is little we can do about independent expenditures, given the Supreme Court decision [Buckley v. Valeo, 1976]." That ruling struck down spending limits unless public money was involved.

Wertheimer estimated that out of $36 million spent in the 1978 elections by political action committees (PACs), only about $300,000 was made via the independent expenditure route. The court "opened the door," Wertheimer said, by ruling that while the potential for corrupting the campaign process had been demonstrated by the track record of political contributions, no such record existed at that time to rule independent expenditures out of bounds, so long as there was no provable collusion between various PACs and candidates' own campaign committees, which are limited to strict ceilings on how much they can spend.

"If independent expenditures were to grow to an overwhelming amount," said Wertheimer, "it could crush the whole system. I don't think we'll see that happen in the 1980 elections. Certainly it is a danger area that needs watching, and one in which the court has left us very little control."

When it comes to monitoring spending for political candidates outside of federal spending limits, the FEC can only watch as political groups, many of them conservative, pour money through the independent expenditure loophole. There are liberal independent groups, but none seemingly as active as their conservative counterparts.

The FEC is in the position of being a traffic cop who can only flag down speeders in the right-hand lane; those who take the high-speed lane of independent expenditure can speed with impunity, so long as they don't cross into the right lane.

The law says candidates and their political committees can only spend up to certain amounts. But the loophole, the so-called "independent expenditure," legally allows any group to spend unlimited sums on behalf of a candidate. A fine can be imposed if an independent group is found to be in any way working with a candidate's official organization.

The regulation says:

"'Independent expenditure' means an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate."

The key is whether there is any cooperation or consultation.

The political technicians experienced in this field go to great lengths to avoid potential entanglement with the FEC. Lawyers retained by some conservative groups have become expert at new election law regulations. The agency's own lawyers have a lot of work: more than 1000 complaints of all sorts have been filed in its less than five years of existence, and each day the FEC computers spew out hundreds of fresh pages of reports and lists that must be checked afresh, a huge bookkeeping task.

An official of the FEC said privately that the groups specializing in independent expenditures have very skilled legal advi "These lawyers from the right wing are very quiet, they don't respond to questions. They are in here all the then all of a sudden, they come at you a direction you don't expect. We've some very rough opinions handed do court against us. Bureaucracy tends t over its own shoelaces."

A leading liberal, attorney Joseph a vice president of Americans for Demo tic Action, questions whether some co vative groups may be flouting federal and regulation in their degree of assist to the Reagan campaign.

"The real question is whether these aren't lying, and whether there is coor tion under the table. I think there ough be a damn close look by the FEC whe there is any under-the-table cooperatio there isn't any, the Constitution as it preted under Buckley v. Valeo gives t the right to do it."

Boehm says FCM has legally sp $500,000 for Reagan so far this prim season, and hopes to spend from anyw between $3 million and $10 million in fall general election on his behalf, all of outside the spending limit that applie presidential candidates.

"We are obviously the largest tion doing independent expenc Reagan," said Boehm.

He insists his organization has ... mal, legally prohibited consultation w the Reagan campaign, even though fund has pumped in funds in eight states to help Reagan defeat his primary powerful.

FCM
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Reagan

CONVENTION SPECIAL!

FCM REPORT

FUND for a CONSERVATIVE MAJORITY

1022 Wilson Blvd/ Suite 1401/ Arlington, Va. 22209

Vol. 1, No. 3

Spring 1980

FCM Goes to Detroit!

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Despite the certainty of its candidate's nomination for President, FCM's "Citizens for Reagan in '80" program is far from over. Just as "CFR" was as visible and active (if not more so) than some of the official candidates at Orlando last November, Detroit will be a beehive of activity for the independent Reagan effort. "We'll be working the national convention night and day," according to FCM Special Projects Director, Ken Boehm.

Located at 461 Congress and First Street, the FCM "Citizens for Reagan in '80" headquarters is one block from Cobo Hall, site of the 1980 Republican National Convention. Two areas will augment the FCM convention operation—visibility and press. Regarding the former, Boehm estimates that the convention team will hand out 4000 "CFR" balloons, 2000 information kits, (one for each delegate), and enough buttons, ballons, and paraphenalia for delegates as well as guests.

At the same time, FCM will man a "round the clock" hospitality suite, serving coffee, doughnuts, and soft drinks. The press end of the convention operation is also elaborate; according to Ken Boehm, a press release a day will go out and the convention operation intends to be in close contact with the lion's share of media correspondents.

Such a well-planned and expensive operation is even more impressive when one considers that nine months ago, FCM/CFR was a one-man operation in one room. It has gone from there to being the largest single independent expenditure on Governor Reagan's behalf. At the same time, FCM has a special program devoted to achieving conservative control of the Senate in 1980. And that's still not all; in Executive Director Ralph J. Galliano's words, "we're doing more things in more House races than I ever imagined possible."

For FCM, the "icing on the cake" will be "Project Detroit."

The Big Question . . . REAGAN and WHO?

The names and the odds on Convention eve . . . FCM plays oddsmaker in the "Veepstakes."

George Bush—56, the all-purpose appointee of the Nixon-Ford Administration, who waged a strong-but-losing primary fight against Ronald Reagan. His selection would mean the first selection of a nominee's chief rival for vice-president since JFK tapped Lyndon Johnson in 1960. Bush's selection would not anger conservatives as much as Baker's . . . currently the favorite of the press and of convention delegates. **3-5**

Richard Lugar—48, the lead name in the ABB (Anybody But Baker) winterbook. Solid credentials as ex-mayor of Indianapolis and pro-defense, anti-Communist U.S. Senator. Georgraphically, Lugar comes from the area (Midwest) recent surveys show Reagan weakest. However, the one-time Rhodes scholar may have blundered in backing aid for Nicaragua. His star is still rising, though.

Even Money

Howard Baker—55, the perennial Number Two man on any GOP ticket. Might have been an ideal choice, acceptable to all sides had he not backed Panama Canal treaties in 1978. Criticism rises with every mention of his name and his veepship chances grow dimmer by the day. **5-1**

Jack Kemp—44, Many Reagan watchers say that one-time Reagan-aide and five-term congressman Kemp is the governor's personal choice to share the ticket and eventually pick up the mantle of Reaganism. But the Kemp-Roth bill's co-author has ties to Laffer-esque econmics which might frighten more moderate GOP-ers. **6-1**

William Simon—53, a genuine cult hero to conservatives, ex-Treasury Secretary Simon is lionized for his championship of free market economics, his dry wit, and his best-selling treatise *A Time for Truth*. Like Kemp, however, Simon's economic philosophy makes him a media target. Nearly out of the "veepstakes," Simon is good money to be in a Reagan Cabinet. **10-1**

Paul Laxalt—58, Reagan's closest political friend and one of the best-liked Senators on either side of the aisle; solid conservative, informed on all issues, and has excellent credentials as a former district attorney and governor of Nevada. Hampered by geography (from Nevada) and closeness to Reagan. A "dream running mate" but more likely to wind up Senate Republican Leader. **15-1**

Phil Crane—49, the conservative's conservative, Phil Crane's stature is second only to that of Ronald Reagan in the hearts and minds of conservatives. One of a handful of office-holders to stump vigorously for Reagan in '76, Crane is natural for a spot on a national ticket, but probably not this year. **25-1**

Pete Domenici-48, A long-shot, but an intriguing possibility. The son of Italian immigrants, Domenici is fluent in Spanish and has close ties with his state's Indian community. A strong conservative, Domenici has an excellent background as mayor of Albuquerque and issue-oriented U.S. Senator for eight years. Like Laxalt, Domenici voted right on Panama Canal and favors the Human Life Amendment. Also hampered by geography (New Mexico), Domenici offers attraction to traditional Northeast-Midwest Democratic blue-collar vote. **Long Shot**

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The Story of Citizens for Reagan in '80

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From Orlando to Detroit

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I truly believe FCM was responsible for five to ten of the percentage points in Governor Reagan's big win in New Hampshire," said FCM Executive Director, Ralph J. Galliano. He was speaking to one of the ten Republican candidates for the U.S. Senate nomination in New Hampshire shortly after the Reagan victory in the Scenic State's first-in-the-nation Presidential primary. Like many a Hampshireman, the Senate candidate was eager to discuss FCM's work in what Galliano called "the most intensive and well-executed independent political campaign New Hampshire has ever seen."

While FCM's New Hampshire project has been well-publicized, its independent program on behalf of Governor Reagan—the largest such independent expenditure for Reagan in the U.S.—has been operating smoothly and successfully before and after New Hampshire. "Citizens for Reagan in '80" received its political "baptism of fire" last November in Orlando, Florida—site of the Presidential "straw vote" at the Republican State Convention.

Three FCM volunteers manned a table to greet and solicit delegates at the convention. With its popular buttons featuring both Governor and Mrs. Reagan, the FCM table at times attracted more visitors than those of the official campaigns of other candidates. Nearly one thousand Florida Republicans signed cards to receive the *FCM Report* and, according to State Sen. Vince Fechtel, Jr. (R-Tavares), "those Ronnie-and-Nancy buttons became hot items!" Even John Connally campaign chief Eddie Mahe and Marvin Bush (son of George) stood in line to acquire "collector's items."

Then came New Hampshire—a "must" situation for the "Citizens for Reagan" following George Bush's surge in Iowa. The New Hampshire operation involved sending bus caravans of young volunteers to the state whereupon a detailed strategy of newspaper advertising, radio spots, and door-to-door canvassing was executed. The rest is history—Reagan steamrollered his five GOP foes with 51 per cent of the primary vote and *Manchester Union Leader* publisher William Loeb has said "Fund for a Conservative Majority helped a great deal."

Belting out the differences on issues between Reagan and his chief GOP rivals, FCM's creative radio spots hit the air in Illinois, where Reagan romped to a big win with blue-collar Democrats crossing over to back him. The same spots aided Reagan in another big win, Alabama. In South Carolina, radio commercials as well as carloads of FCM volunteers led by Dave Sanders helped catapult Governor Reagan into one of his most crucial primary wins—one in which he forced John Connally to the sidelines. "And here in Connecticut, Reagan lost the state but carried three of the six congressional districts," according to the New Britain Republican Town Chairman. "FCM's radio was a big help."

But the most extensive post-New Hampshire effort by "CFR" surfaced in Texas. Nearly $80,000 was spent on mail, radio, and newspaper ads, including an extensive and much-publicized layout in the Southwest edition of the *Wall Street Journal*. In a state where Ronald Reagan only narrowly staved off a push from former Houston Congressman Bush with 52 per cent of the vote, the impact of FCM involvement cannot be measured accurately.

One of the best-organized operations was in Tennessee, where a CFR team under the aegis of Lloyd Daugherty had long planned an all-out Reagan effort no matter what the Volunteer State's own Howard Baker did. "I was supervising literature drops and making four and five speeches a day," said Daugherty. "After some of the Republican functions we had canvassed, informal polls actually showed Reagan leading Baker!" With no other candidate having an organization in place, the withdrawal of Senator Baker paved the way for a Reagan sweep of the primary, with record vote totals being registered in areas where the Tennessee Citizens for Reagan had done their early spadework.

Having spent nearly $600,000 thus far, "Citizens for Reagan in '80" is now gearing up for the post-primary independent effort, which should cost over $3 million. "We've done an awful lot so far," says Special Projects Director Ken Boehm. "And you ain't seen nothing yet!"

FCM Chairman's Column

The First Amendment is Not a Loophole

When independent expenditures on behalf of a particular candidate are successful, some people are bound to be angry. In this case, the successful independent effort is FCM's "Citizens for Reagan in '80" and the outraged party is Common Cause, the liberal lobby, and the Carter-Mondale re-election committee.

They see something wrong, something "fishy" in the unlimited spending which independent efforts are legally allowed—a result of the historic 1976 Supreme Court decision, *Buckley vs. Valeo*. To them, such limitless expenditures are the end product of some legal "loophole" in the *Buckley* decision.

Having read and re-read *Buckley vs. Valeo*, I say simply that the decision speaks for itself—if one will let it. "These (expenditure) provisions," *Buckley* reads, "place substantial and direct restrictions on the ability of candidates, citizens, and associations to engage in protected political expression, restrictions that the First Amendment cannot tolerate."

That's it in a nutshell: Common Cause's alleged "loophole" is none other than the First Amendment, the constitutional guarantee to all Americans of their right of free speech and peaceful political advocacy without obstruction by the federal government. Had the court imposed a ceiling on independent and unafiliated political expenditures, it would in essence be giving the "green light" to an obstruction of political expression—a fundamental part of the First Amendment.

For the record: under this legal definition, independent efforts like "Citizens for Reagan in '80" might well be the last means of free and unlimited political expression, as candidates and political parties now operate under the strict restraints of the Federal Elections Commission (FEC). And the FEC is the outgrowth of the 1974 campaign "reform" law, conceived and created by Common Cause.

A Word on the Second Spot . . .

FCM vigorously joins with the legions of conservatives throughout the nation in urging Governor Reagan to select a fellow conservative as his running mate in Detroit this week.

In primary after primary, the Governor demonstrated that his appeal vastly transcended party labels—that his strong stands on fiscal and such social issues as abortion struck Democratic heartstrings as well as those of conservative Republicans.

An ideological balance, then, is not what is required on the Republican ticket. What *is* required is a vice-president who, in Governor Reagan's own words, is "philosophically compatible."

There are a number of excellent conservative Republicans who share both the Reagan philosophy and his blue-collar appeal. Among them, for example, are Reps. Phil Crane (R-Illinois) and Jack Kemp (R-New York). A Dynamic and scholarly man of principle, Phil's eloquence and total mastery of issues can mobilize and inspire GOP partisans. Onetime Buffalo Bills quarterback Jack Kemp's tax cut "play" has breathed new life into the Grand Old Party.

As Governor Reagan prepares to select his vice-president and ready himself for his "rendezvous with destiny," we at FCM thank you for all you have done to make the Reagan story a true success.

Sincerely,

Robert C. Heckman

Robert C. Heckman

Spring 1980 **Vol. I, No. 3**

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Editor: John Gizzi

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FCM

THE FUND FOR A CONSERVATIVE MAJORITY

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Ralph J. Galliano
Executive Director

May 29, 1980

Mr. Bruce Eberle
8330 Old Court House Rd.
Vienna, Virginia

Dear Bruce:

I am writing to you today to express my displeasure with Tom Robertson's cancellation of FCM's July,14 booking of Omega's "Citizens for Reagan in '76" list. I understand this is a list of approximately 106,000 names which FCM has recently rented on several other occasions.

You, I'm certain, as much as anyone else in the direct mail business appreciate the importance to FCM of its Reagan independent expenditure project. Accordingly, I find it difficult to believe and even more difficult to accept Robertson's excuse that he double booked the rental of this list both to FCM and to Jesse Helm's Congressional Club PAC which just so happens to be mailing this list for a similar and competitive Reagan independent expenditure of their own called Americans for Reagan. Moreover, given Robertson's actions in this case and the fact that the Congressional Club just happens to be your client, I believe pose some serious ethical questions.

I have seen Robertson's list-rental-log by virtue of Omega's past use of FCM's list for debt payment purposes and I contend that it is virtually impossible for him to double-book a list client. The excuse that Helms booked the '76 Reagan list in March I find rather strained since Helms was not mailing his independent Reagan project at that time.

I should also point out the obvious significance of the July 14 mail date currently in dispute. FCM intended to drop this mailing at the time of the Republican Convention. I'm certain Helms intends to do the same. The fact that Omega has bumped FCM at this particular time will no doubt be costly to FCM insofar as envelopes and supplies ordered and revenue lost is concerned. This cannot be ignored.

-more-

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Furthermore, this letter is to confirm in writing the remainder of FCM's mail dates for the '76 Reagan list. Those dates are: 6/16, 7/14—in dispute, 8/25, 9/8, 10/13, 11/5. I consider these mail dates binding.

Bruce, we should work together rather than at cross-purposes. FCM has, I feel, worked with you in the past with respect to various causes. FCM's $1000 postage loan to "Republicans for Victory in '80", a PAC for which you are doing the fundraising immediatly comes to mind. Clearly, the point to be made here is that the need to cooperate and work together in the future will certainly arise. I would appreciate it if you re-evaluate your policy with respect to list-bookings.

Sincerely,

Ralph J. Galliano

Ralph J. Galliano

RJG: rlg

cc: Bob Heckman
Ken Boehm
Jeff Kane
Jim Roberts
Mike Thompson
Curt Herge

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FCM

THE FUND FOR A CONSERVATIVE MAJORITY

File

A88003

Ralph J. Galliano
Executive Director

27 August 1979

To: FCM Board and contacts

From: Bob Heckman

Re: Citizens for Reagan in '80

I have enclosed an article from the August 4, 1979 edition of Congressional Quarterly, which gives an in-depth analysis of the primary process. I think all of the information in the article will be extremely useful as we get closer and closer to the point where Citizens for Reagan in '80 will be participating in these events.

I have also enclosed a copy of the Washington Star's coverage of the mock nominating portion of YAF's National Convention. Ronald Reagan's fine showing there is due principally to the fine work done by Ralph Galliano and the FCM team of volunteers and staff workers. As you can see, FCM is given credit for Reagan's victory.

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Presidential Primaries Reach Record Level

With the political calendar for the 1980 presidential nominating process nearly complete, it is clear that the current crop of candidates will have to endure more primary elections than any previous group of White House aspirants.

As of early August, a record 35 presidential primaries had been scheduled for 1980 — an increase of five from the previous high of 30 that were held in 1976. Next year's primaries will be held in 33 states and in the District of Columbia and Puerto Rico.

Republican leaders in Mississippi and South Carolina also have expressed interest in holding presidential primaries. But a final decision by either state party may not be made for several months.

States and territories without primaries will elect their delegates through the multi-tier caucus process, which usually begins with open, but often lightly attended, meetings at the precinct level and concludes with the election of national convention delegates weeks later at district and state conventions.

Primary Growth

The growth in primaries has been made at the expense of the caucuses. And the recent increase in primaries has been dramatic — from 17 in 1968, to 23 in 1972, to 30 in 1976. Only about 40 percent of the delegates were elected from primaries to the Democratic and Republican conventions in 1968. About three-quarters of the delegates next year will be the product of primary elections.

The proliferation of primaries in the last decade has been principally the outgrowth of Democratic reform rules, written and rewritten since the party's tumultuous 1968 convention to increase grass-roots participation in the delegate selection process. *(Delegate selection background, 1975 Weekly Report p. 1807)*

However, many party leaders are beginning to feel the growth in primaries has gone too far, creating a nominating system that emphasizes candidates' personal campaign organizations and media advertising while relegating the national, state and local party leadership to a back seat.

The party's most recent rules review commission, headed by Michigan state Chairman Morley Winograd, recommended in January 1978 two major rules designed to curb the future growth of primaries and increase the influence of the party hierarchy. The Democratic National Committee (DNC) adopted those rules in June 1978.

The Winograd Commission proposed that the delegate selection season be shortened from about six months to three months (a period known as the "window") with all primaries and the first stage of the caucus process to be held between March 11 and June 10, 1980. The commission believed that the importance of individual primaries would be diminished if the elections were clustered together.

But the "window" rule is not expected to effectively shorten the process until 1984. Early states like New Hampshire (which has scheduled its primary Feb. 26) and Iowa (which will hold precinct caucuses Jan. 21) are seeking exemptions from the rule next year.

The commission also recommended the expansion of each state delegation by 10 percent to accommodate state party and elected officials. The "automatic" delegates are to be elected by either a state convention or the previously-selected national convention delegates with priority consideration given to Democratic governors, the state party chairman and vice chairman, other Democratic National Committee members, U.S. senators and representatives. The "automatic" delegates must reflect for one ballot the presidential preferences of the national convention delegates chosen earlier in caucuses and primaries. *(1980 Democratic rules, 1978 Weekly Report p. 1571)*

—By Rhodes Cook

Political Impact

The complexion of the 1976 Democratic nominating campaign was determined in the early primary and caucus contests last year, and some believe that pattern will be repeated in 1980.

Officials in President Carter's re-election campaign are expecting the Democratic race to be settled quickly again next year. "If anyone wants to take us on they have got to beat us early," Evan Dobelle, the Carter-Mondale campaign chairman, said.

"If anyone wants to take us on they have got to beat us early."

—Evan Dobelle, Carter-Mondale campaign chairman

A late-starting campaign like that of Democratic Gov. Edmund G. Brown Jr. three years ago could be handicapped by the reality of the political calendar. In 1980 that could affect Sen. Edward M. Kennedy, D-Mass., who is seen by some political observers as a possible late entrant.

By the time of the Jan. 21 Iowa caucuses next year, the filing deadlines in five states already would have passed, including Illinois, New Hampshire and Massachusetts (if it does not change its March 4 primary date).

By Feb. 26, the day of the New Hampshire primary, a total of 15 primary filing deadlines would have passed, with access to the ballot closed in Florida, Pennsylvania, New

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York (for its current primary date) and, for Republicans, in Texas.

By March 11, when primaries are scheduled in Alabama and Florida, filing deadlines would have passed for five more primaries, including Indiana and Wisconsin. By the end of March, a newly announced candidate would be able to get on the primary ballot in just seven states, none of apparent importance except for New Jersey.

Regional Contests

There will be several small regional primaries — on March 4 in New England (Massachusetts and Vermont), on March 11 in the Southeast (Alabama and Florida with Georgia a possibility), on May 6 in the South (North Carolina, Tennessee with Georgia again a possibility), and on May 27 in the South (Arkansas and Kentucky) and the West (Idaho and Nevada).

The eight primaries on June 3 will include states in three regions — three primaries in the East, three in the West and two in the Midwest.

For the most part, candidates will be forced to criss-cross the country next year in their search for delegates. Critics have described the system as "institutionalized chaos."

According to Republican Sen. Bob Packwood of Oregon, the sponsor of legislation to mandate regional primaries, the present system "now resembles more a snowball racing downhill than a rational, humane method designed to choose our leader."

"No decision of this magnitude is made with so little logic," Packwood noted.

Attempts to establish a federal solution to the hodgepodge of delegate selection events have gone nowhere. Over 250 bills have been introduced in Congress since 1911 to federalize the presidential nominating system. The most popular approach in recent years has been to establish a national primary or a series of regional primaries. But none of the proposals has come close to passage and only three bills have even reached the floor — the last in 1952.

One of the main problems for supporters of federal action is the absence of any sense of urgency. "Unfortunately there is not enough time to change the method before the election and too much time after it," explains Democratic Rep. Douglas Applegate of Ohio, a promoter of a national primary.

Another problem is the resistance of the major parties to federal action. The 1976 Democratic convention went on record declaring the delegate selection process to be a party matter. Republicans traditionally have believed primary and caucus details should be determined by the individual states.

In its final report published in 1978, the Winograd Commission concluded that the present system was better than either a national primary or a series of regional primaries. Perhaps the basic strength of the current process, noted the commission report, "is that it allows the voters to study a field of candidates in many different settings. It also allows a little known candidate to emerge as the nominee."

Largest Democratic Convention

The 1980 Democratic convention will be the largest in the party's history. There will be a total of 3,331 delegate votes, 323 more than 1976. The 10 percent expansion for party and elected officials is responsible for nearly the entire increase.

1980 Presidential Primary Dates

Thirty-five presidential primaries already have been scheduled for 1980 — 33 state primaries plus the District of Columbia and Puerto Rico. Two more primaries may be added later, as Republicans in Mississippi and South Carolina are considering a change from the caucus to the primary system of delegate selection.

The Arkansas primary is for Democrats only and it is likely that the Texas primary will be held only by the Republicans.

Five primaries will be held in 1980 that were not conducted in 1976. They will be in Connecticut, Louisiana, Kansas, New Mexico and Puerto Rico.

At the beginning of August, several primary dates were still subject to change. Possible alternate primary dates are noted in parentheses.

Primaries by State

Alabama	March 11
Arkansas	May 27
California	June 3
Connecticut	March 25
District of Columbia	May 6
Florida	March 11
Georgia	May 6 *(March 11)*
Idaho	May 27
Illinois	March 18
Indiana	May 6
Kansas	April 1
Kentucky	May 27
Louisiana	April 5
Maryland	May 13
Massachusetts	March 4 *(April 15)*
Michigan	May 20
Montana	June 3
Nebraska	May 13
Nevada	May 27
New Hampshire	Feb. 26
New Jersey	June 3
New Mexico	June 3
New York	April 1 *(March 25 or April 29)*
North Carolina	May 6
Ohio	June 3
Oregon	May 20
Pennsylvania	April 22
Puerto Rico	March 16
Rhode Island	June 3
South Dakota	June 3
Tennessee	May 6
Texas	May 3 *(March 11)*
Vermont	March 4
West Virginia	June 3
Wisconsin	April 1

Primaries by Date

Feb. 26	New Hampshire
March 4	Massachusetts *(April 15)*
	Vermont
March 11	Alabama
	Florida
March 16	Puerto Rico
March 18	Illinois
March 25	Connecticut
April 1	Kansas
	New York *(March 25 or April 29)*
	Wisconsin
April 5	Louisiana
April 22	Pennsylvania
May 3	Texas *(March 11)*
May 6	District of Columbia
	Georgia *(March 11)*
	Indiana
	North Carolina
	Tennessee
May 13	Maryland
	Nebraska
May 20	Michigan
	Oregon
May 27	Arkansas
	Idaho
	Kentucky
	Nevada
June 3	California
	Montana
	New Jersey
	New Mexico
	Ohio
	Rhode Island
	South Dakota
	West Virginia

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1980 Delegate Selection: Major Party Differences

- Democrats require states to hold their primaries or the first stage of their caucus processes between March 11 and June 10, 1980. Only states that started earlier in 1976 can apply for an exemption. Republicans do not restrict delegate selection dates.
- Democrats require primary states to set their filing deadlines 30 to 90 days before the election. Republicans have no restriction.
- Democrats require proportional representation on the basis of presidential preference. Republicans do not and permit winner-take-all.
- The Democratic Party allows only Democrats to participate in its primaries and caucuses. Republicans allow cross-overs where state law permits.
- Democrats require delegates to declare presidential preference or uncommitted status. Republican delegates are not required to declare preference.
- Democratic delegates are bound for one ballot. Republicans require delegates bound to a candidate by state law in primary states to vote for that candidate.
- Democrats require states to elect an equal number of men and women delegates. Republicans request states to elect an equal number.

The largest gains were made by California, which picks up 26 votes and by Texas, which gains 22. *(State delegate count, box, p. 1612)*

With the 10 percent bonus, every state and territory except Vermont gained at least one delegate. But the inclusion of the "automatic" delegates in the count, obscures the fact that most states lost elected delegates. Only 18 states increased their total of elected delegates from 1976, and 12 of them were in the South.

Democratic delegates are allocated to the states by a formula that gives equal weight to population and the Democratic vote in the last three presidential elections. Carter's strength in his home region in the 1976 election enabled the South to show a larger gain in delegates than any other region. *(Regional delegate count, box, p. 1613)*

Democratic rules require that 75 percent of the elected delegates be chosen in units no larger than a congressional district. Delegates are apportioned to districts within a state through formulas that stress Democratic voting strength.

The remaining 25 percent are to be elected at-large by the state convention, the state committee or the delegates elected at the district level. States are encouraged to use their at-large delegates to meet requirements for affirmative action for minorities and for equal division of delegates between men and women.

In contrast to the Democrats, the 1980 Republican convention will be much smaller than its 1976 counterpart. The reason is the Republican allocation formula which awards bonus votes to states that went Republican in the last presidential election. In 1976, nearly all the states had bonus votes as the result of the Nixon landslide four years earlier.

But following the 1976 election, many states lost bonus delegates for 1980. Carter's near sweep of the South made that region the biggest casualty. But every other region also lost delegates.

Among the states, New York was the biggest loser, dropping 31 delegates. But several other large states also lost influence. Ohio, Pennsylvania and Texas each lost 20 delegates while Florida declined by 15.

The Republican delegate count is nearly final, but will reflect the outcome of this year's gubernatorial races. Under the party's system of bonus votes, Kentucky, Louisiana and Mississippi each could gain one more delegate if the GOP wins its state's governorship this fall.

Four votes also may be allocated to a Republicans Abroad category, but the 1980 convention first would have to vote its approval. In any case, the upcoming Republican convention will have no more than 2,000 delegates, down from 2,259 in 1976.

Republican rules encourage the state parties to elect three delegates per congressional district and the remaining delegates at-large.

Selection Uncertainties

With barely five months remaining until the Iowa caucuses launch the 1980 delegate selection process, most states have completed the mundane but important task of

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Two Parties' Delegate Apportionment for 1976

The chart below compares the 1980 delegate vote for each state, territory and the District of Columbia with its vote in 1976.

The 1980 Democratic apportionment is final. It is the total of both elected delegates and the new 10 percent add-on for party and public officials.

The 1980 Republican vote is subject to minor change. With a Republican gubernatorial victory this fall, Kentucky, Louisiana and Mississippi each could gain one more vote. Four votes also would be given to a new category called Republicans Abroad if the 1980 convention approves.

	DEMOCRATS			REPUBLICANS		
State	'80 Vote	'76 Vote	Change	'80 Vote	'76 Vote	Change
Alabama	45	35	+ 10	27	37	− 10
Alaska	11	10	+ 1	19	19	0
Arizona	29	25	+ 4	28	29	− 1
Arkansas	33	26	+ 7	19	27	− 8
California	306	280	+ 26	168	167	+ 1
Colorado	40	35	+ 5	31	31	0
Connecticut	54	51	+ 3	35	35	0
Delaware	14	12	+ 2	12	17	− 5
Dist. of Col.	19	17	+ 2	14	14	0
Florida	100	81	+ 19	51	66	− 15
Georgia	63	50	+ 13	36	48	− 12
Hawaii	19	17	+ 2	14	19	− 5
Idaho	17	16	+ 1	21	21	0
Illinois	179	169	+ 10	102	101	+ 1
Indiana	80	75	+ 5	54	54	0
Iowa	50	47	+ 3	37	36	+ 1
Kansas	37	34	+ 3	32	34	− 2
Kentucky	50	46	+ 4	27	37	− 10
Louisiana	51	41	+ 10	30	41	− 11
Maine	22	20	+ 2	21	20	+ 1
Maryland	59	53	+ 6	30	43	− 13
Massachusetts	111	104	+ 7	42	43	− 1
Michigan	141	133	+ 8	82	84	− 2
Minnesota	75	65	+ 10	34	42	− 8
Mississippi	32	24	+ 8	22	30	− 8
Missouri	77	71	+ 6	37	49	− 12
Montana	19	17	+ 2	20	20	0
Nebraska	24	23	+ 1	25	25	0
Nevada	12	11	+ 1	17	18	− 1
New Hampshire	19	17	+ 2	22	21	+ 1
New Jersey	113	108	+ 5	66	67	− 1
New Mexico	20	18	+ 2	22	21	+ 1
New York	282	274	+ 8	123	154	− 31
North Carolina	69	61	+ 8	40	54	− 14
North Dakota	14	13	+ 1	17	18	− 1
Ohio	161	152	+ 9	77	97	− 20
Oklahoma	42	37	+ 5	34	36	− 2
Oregon	39	34	+ 5	29	30	− 1
Pennsylvania	185	178	+ 7	83	103	− 20
Rhode Island	23	22	+ 1	13	19	− 6
South Carolina	37	31	+ 6	25	36	− 11
South Dakota	19	17	+ 2	22	20	+ 2
Tennessee	55	46	+ 9	32	43	− 11
Texas	152	130	+ 22	80	100	− 20
Utah	20	18	+ 2	21	20	+ 1
Vermont	12	12	0	19	18	+ 1
Virginia	64	54	+ 10	51	51	0
Washington	58	53	+ 5	37	38	− 1
West Virginia	35	33	+ 2	18	28	− 10
Wisconsin	75	68	+ 7	34	45	− 11
Wyoming	11	10	+ 1	19	17	+ 2
Puerto Rico	41	22	+ 19	14	8	+ 6
Guam	4	3	+ 1	4	4	0
Virgin Islands	4	3	+ 1	4	4	0
Latin American Democrats (Canal Zone)	4	3	+ 1	—	—	—
Democrats Abroad	4	3	+ 1	—	—	—
TOTAL	3,331	3,008	+323	1,993	2,259	−266

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settling the format and dates of their delegate selection events. But several key states remain unsettled, and their decisions could have a major impact on the Democratic and Republican nominating campaigns.

Most of the remaining uncertainty is due to the Democratic Party requirement that state delegate selection plans be reviewed and approved by the Democratic National Committee's Compliance Review Commission (CRC). The 25-member commission, headed by DNC Treasurer Peter Kelly of Connecticut, must act on all plans by Sept. 15. Meeting monthly since May, the commission has conducted an initial review of 35 plans but has only given final approval to one — Michigan's.

Unlike the Democrats, Republicans have neither a compliance review commission nor detailed requirements to which states must adhere. The result is that the mechanics of establishing the Democratic delegate selection procedures have gained more attention.

Three Democratic rules are giving some states significant problems:

- The "window" rule which requires delegate selection to begin between March 11 and June 10.
- The rule limiting all delegate selection events to Democrats only (outlawing crossovers by Republican and independent voters).
- The requirement that delegates be elected by proportional representation — the allocation of delegates to presidential candidates in proportion to their popular support in the primaries or at caucuses.

For 1980 the party has banned primaries that prevent proportional representation — the district level winner-take-all primaries (known as "loophole" primaries) and delegate selection primaries within single-member districts. They were permitted in 1976.

The new Democratic rule establishes a flexible threshold for determining when a candidate is guaranteed at least one delegate under proportional representation. In caucus states and for the election of at-large and "automatic" delegates, state parties may set a threshold no lower than 10 percent nor higher than 20 percent of the vote.

For the election of delegates at the district level in primary states, the threshold can be no higher than 25 percent.

Date Shifts

The Democratic "window" rule is a particular problem for Massachusetts, which presently has a March 4 primary. Several other states — Georgia, New York and Texas — may shift their primary dates voluntarily.

Massachusetts. Battle lines are being drawn in Massachusetts between the Democratic state and national parties. The state party has been warned by DNC Chairman John C. White that its March 4 primary is outside the "window" and that if it is not moved at least one week later, the Massachusetts delegation could be banned from the 1980 convention.

The Democratic state committee reluctantly is supporting a bill in the state legislature to hold the primary April 15. But both state Chairman Chester Atkins and Sen. Edward M. Kennedy favor keeping the primary March 4. Atkins has promised a lawsuit against the DNC if it goes through with its threat to ban the Massachusetts delegation.

Supporters of the early date in Massachusetts argue that New Hampshire has made no effort to move its first-in-the-nation primary inside the "window" and that a March 4 primary assures Massachusetts national influence in the nominating process. They add that the DNC is pressing for a date change because Carter could fare poorly in the Massachusetts primary. He finished a distant fourth in 1976, his worst showing in any primary state that he entered.

Legislative support for a change is unlikely, which would place responsibility for a final decision in the hands of the CRC. Democratic rules require that before applying for an exemption state parties take positive steps to comply with national regulations, such as drafting corrective legislation and lobbying their state legislatures.

But in spite of Massachusetts' technical compliance with the rule, it is unlikely that the CRC would grant an exemption for Massachusetts as quickly as it would for New Hampshire or Iowa. The latter two states have a Republican governor or legislature, which are regarded by the CRC as realistic barriers to change. Massachusetts has both a Democratic governor and a Democratic legislature.

The consequence is that if the Massachusetts primary is not moved later, the state party could be forced to adopt a caucus plan for delegate selection or the DNC could impose one.

Georgia. There is no conflict in Georgia with the DNC because it has been proposed to move its primary, tentatively set for May 6, to the beginning of the "window" — March 11. Proponents of the change claim that it would

Vote Apportionment by Regions in 1976 and 1980

The chart below compares the total number of Democratic and Republican delegates allocated to states and the territories in each region in 1980 with the total in 1976. The 1980 Democratic total includes elected delegates and the new 10 percent add-on for party and public officials.

	DEMOCRATS						REPUBLICANS					
	1980		1976		Change		1980		1976		Change	
	Delegates	%	Delegates	%	Delegates	%	Delegates	%	Delegates	%	Delegates	%
East	948	28.5	901	30.0	+ 47	−1.5	498	25.0	582	25.8	− 84	−0.8
South	793	23.8	662	22.0	+131	+1.8	474	23.8	606	26.8	−132	−3.0
Midwest	932	28.0	867	28.8	+ 65	−0.8	553	27.7	605	26.8	− 52	+0.9
West	601	18.0	544	18.1	+ 57	−0.1	446	22.4	450	19.9	− 4	+2.5
Territories	57	1.7	34	1.1	+ 23	+0.6	22	1.1	16	0.7	+ 6	+0.4
TOTAL	3,331		3,008		+323		1,993		2,259		−266	

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enhance the importance of the primary while likely providing an early boost for Georgian Jimmy Carter.

The prospects for a March 11 primary are good because Democratic Gov. George Busbee, a Carter supporter, is an influential member of the 11-member committee that is authorized by state law to set the primary date. The White House has told Busbee of its interest in an early primary, and the governor has expressed support for the March date as part of an early regional primary with Alabama and Florida.

An early Carter win in Georgia could help offset negative publicity from poor showings by the president in Iowa and New England. A final decision on the Georgia primary date is expected by early September.

Texas. A date change is less likely in Texas, where opponents of a March primary stopped passage of legislation to shift the primary date during the regular session of the legislature. If they choose, the two parties may hold primaries on May 3 — the same date as primary elections for state and local office. Democrats now are likely to use caucuses to choose their delegates, while Republicans are expected to hold a primary.

Opponents of shifting the authorized primary date contend that a separate presidential primary in March would not only be costly, but would benefit only one candidate — former Texas Gov. John Connally. It is speculated that his longtime conservative Democratic supporters would be free to cross over and vote for him in March in the GOP primary, but would be reluctant to do so in May with state and local Democratic nominations at stake.

The fight produced an interesting coalition when the Republican state committee and supporters of GOP candidates George Bush and Ronald Reagan joined the Democratic state committee and many liberal Democrats in opposition to any primary date change.

A feisty group of Democratic state senators, known as "the killer bees," successfully stopped legislative consideration of the date change this spring by going into hiding for several days. Their action has forced the measure's supporters, which include the Democratic lieutenant governor, to seek support for a special legislative session to consider a March primary date. But Republican Gov. William Clements, who has been quiet on the plan, is unlikely to call a special session before next January. That would probably be too late to establish a March primary.

Regardless of the final outcome, it appears likely that only the Republicans will hold a binding presidential primary. Texas Democrats have drafted a delegate selection plan calling for a return to the caucus system. The party may decide early next year to schedule a non-binding primary if a serious contest develops for the Democratic nomination.

Crossover Voting

For Michigan and Wisconsin, the issue is not a date change but compliance with the Democratic rule limiting participation in the delegate selection process to Democrats only. Both states traditionally have allowed crossover voting in their primaries.

The DNC granted exemptions for the Michigan and Wisconsin primaries in 1976. But the party has made it clear there will be no exemptions to the rule next year. If the Michigan and Wisconsin legislatures do not act to close their primaries, Democrats in both states could be forced to elect their delegates in caucuses rather than primaries. Republican delegates in both states would be elected in the primaries regardless of any Democratic action.

Michigan Democrats submitted two delegate selection plans to the CRC — one calling for a primary and the other, a caucus. In the event the legislature does not act to close the primary by Oct. 1, the caucus plan will be used with Democrats beginning the process with county meetings April 26.

No legislative action can take place before mid-September, when the legislature returns from its recess. A key to the final outcome will be Republican Gov. William G. Milliken, who has opposed efforts to prohibit crossover voting.

The situation is not so clear in Wisconsin. The CRC already has rejected Wisconsin's open primary plan, yet state law requires delegates to be elected in the primary. Although the state committee has submitted a bill to close the primary, the legislature is not expected to pass it.

At this point, it is likely that either the state party will formulate a caucus plan or the DNC will impose one. But this could be thwarted by the state attorney general, who is threatening a lawsuit if the Democrats move to a caucus system of delegate selection.

Loophole Primaries

The Democratic rule requiring proportional representation has created problems for other states. The controversial "loophole" primary was used by six of the 10 largest states in 1976 — Illinois, New Jersey, New York, Ohio, Pennsylvania and Texas.

Four of these states have been able to change easily. New Jersey, Ohio and Pennsylvania shifted to proportional representation primaries without legislative action, while Texas Democrats have decided to elect their delegates through the caucus process.

But the rule has created difficulty for Illinois and New York. The Illinois legislature has balked at adopting proportional representation and the state's Democrats are seeking an exemption that would allow them to retain their "loophole" primary in 1980.

New York Democrats have drawn up a plan for a proportional representation primary, which for the first time in the state's history would list presidential candidates on the ballot. Previously, only the names of delegates had appeared on the primary ballot and it was not until 1976 that the presidential preference of Democratic delegate candidates was included.

Legislative action this fall will be needed to approve proportional representation and select a new date. The existing state statute sets the primary for April 1, which next year is during the Jewish Passover. Republicans prefer a March 25 primary; the Democrats, April 29.

New York Republican leaders do not plan to join the Democrats in holding a presidential preference primary. Instead, as in the past, GOP leaders intend to run a slate of party-backed delegates that would be officially uncommitted.

That is also the plan of the Illinois Republican hierarchy, which earlier this year won legislative approval for a bill which permits them to list candidates for delegate on the primary ballot without their presidential preference. Both Democrats and Republicans will continue to have non-binding presidential preference primaries in Illinois.

The change was lambasted by the state Reagan leader, who claimed that it was a maneuver by Republican Gov. James R. Thompson and his allies to control the delegation

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Women Map Delegate Selection Plans

When the National Women's Political Caucus (NWPC) held its nationwide convention in Cincinnati in mid-July, its Democratic and Republican task forces plotted ways to elect women as delegates to the 1980 presidential conventions.

The Democratic and Republican strategies for electing women — particularly NWPC members — as delegates to next year's party conventions will be different because of varying party rules. Democrats require state delegations to be divided equally between men and women. Republican rules suggest — but do not require — that state delegations be split evenly between men and women.

Democratic Roots

The idea of equal divison of delegates between men and women dates at least to the days of Eleanor Roosevelt. The most recent push for a 50-50 division began at the Democratic Party rules committee meetings in the spring of 1976. The NWPC and the women's caucus of the Democratic Party were unhappy that the 1976 convention would have fewer women delegates than the 1972 conclave, when 40 percent of the delegates were women. In 1976, their share was 34 percent.

When the rules committee voted that the party should promote equal division rather than require it, some Democratic women threatened to fight the proposal on the convention floor. That was avoided when activist women were satisfied that Jimmy Carter would support energetically the Equal Rights Amendment (ERA) to the U.S. Constitution and appoint more women to federal office.

Although required equal division lost, the 1976 action gave momentum to the drive. The first victory for mandatory equal division was won when the Democratic rules required that one man and one woman be elected from each congressional district for the 1978 midterm convention in Memphis.

"It was a reflection of women's increased influence," Mary

—By Jo Freeman

Scheckelhoff, a former Democratic National Committee (DNC) staff member, said.

"Women have more clout than we did ten years ago."

That clout was not enough to get a recommendation for equal division from the party's Winograd Commission when it recommended 1978 convention rules to the DNC in January 1978. However, the DNC adopted the mandatory 50-50 requirement in December 1978.

Ann Campbell, a former head of the Democratic State Chair's Association, said the DNC was persuaded that a party requirement for equal division relieved individual presidential candidates from being pressured by women's groups to impose such a requirement on their delegate slates and thus alienating prominent male supporters.

The battle for women delegates at the Democratic convention is not over as the arena of conflict has shifted from the candidates' individual political camps to the national party. The DNC compliance review commission must approve all state delegate selection plans to ensure they conform to party rules.

The NWPC's Democratic task force plans to monitor closely the delegate selection process.

Others are getting into the act. Democratic women members of Congress have invited 4,000 Democratic women officeholders to an October conference in Washington to discuss delegate selection strategy. Right-to-life groups are educating their members about delegate selection procedures — for both parties — in the states where they believe they are strongest.

The fight for the Democratic women's delegate spots could create conflict between anti-abortion groups and their opponents. And in areas with strong party control battles could emerge between women who are the wives of state and party officials and insurgent women's groups.

Republican Rules

While the NWPC Republican task force is concerned with selecting its members as national convention delegates, the rules it must deal with are not as complicated as the Democratic requirements. There is no Republican mandate for equal division.

GOP task force leaders stated in 1976 that they considered such a requirement to be an "illegal quota," and they have not changed their minds. Susan McLane, the current leader of the task force, said "our first priority is to keep support of the ERA in the platform."

Republican rules state that "each state shall endeavor to have equal representation of men and women in its delegation."

One GOP presidential aspirant, John Connally, has said that he wants his delegations equally divided between women and men.

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for Connally. Party leaders have denied the charge, contending that a large uncommitted bloc of delegates would give the Illinois delegation large bargaining power next year.

The Reagan forces also are upset by an attempt by conservative Republicans in the California legislature to alter the GOP's winner-take-all primary, the last statewide winner-take-all primary in the nation. In 1976 Reagan won his home state easily and captured the large bloc of California delegates.

But state Sen. John Schmitz is promoting a bill that would establish proportional representation in the Republican primary if one candidate does not win a majority of the vote. Schmitz was the American Party presidential candidate in 1972 and is sympathetic to Connally.

The Republican state chairman and a slim majority of the state committee members oppose the Schmitz measure. But the Republican caucus in the state Senate favors it. The party is expected to take a formal position on the bill at its state convention next month.

Party Differences

The debate in California illustrates the attitude of the Republican National Committee (RNC) to delegate selection — leave all but the most essential aspects of the presidential nominating process to the states.

Except for basic guidelines, nearly all important decisions are left to the state parties or to state law. State delegate selection plans do not have to be reviewed by the RNC.

The Republicans' hands-off approach contrasts with the Democrats' increasing nationalization of the nominating process.

Democratic rules shortening the delegate selection season, limiting the process to Democrats only and mandating proportional representation are only a small part of the differences between the two parties in delegate selection. *(Party differences, box, p. 1611)*

Women Delegates

A major distinction between the parties concerns female representation on state delegations. The Democrats require that state delegations be divided equally between men and women. Republican rules only suggest there be equal division. *(Women delegates, p. 1615)*

The equal division mandate presents a potentially thorny problem for the Democratic Party in the handful of primary states where delegate candidates are listed on the ballot. For example, if four males ran ahead in a district electing four delegates, two might have to be "bumped" in favor of the top two female vote-getters.

To the dissatisfaction of the National Women's Political Caucus, the CRC has tried to skirt the problem by urging states to try for equal division at all levels of national delegate selection but to recognize that serious political, legal and affirmative action ramifications supercede a perfect sexual balance. The CRC opposes the bumping of elected delegates to achieve equal division, arguing that delegations can be sexually balanced when at-large delegates are chosen after the primary. *(CRC Equal Division debate, Weekly Report p. 1172)*

One of the major objectives of the Democrat's Winograd Commission was not only to curb the growth of primaries, but to decrease media and candidate emphasis on the early events.

In 1976, stories about the New Hampshire primary dominated early media coverage of the presidential campaign. Political scientists Michael Robinson and Karen MacPhearson reported that in the three months before the New Hampshire primary, more than half of the print stories and broadcast time devoted to the presidential race involved the New Hampshire contest.

While all states including New Hampshire may eventually be forced inside the three-month "window" by 1984, this has not lessened the importance of the early states in 1980. Ironically, their impact may be increased next year.

If the CRC approves selective exemptions for states like Iowa and New Hampshire, their influence would be enhanced. They would stand alone at the beginning of the 1980 nominating process while other states are forced to cluster together on later dates.

The desirability of an early date has created some competition for Iowa and New Hampshire. Puerto Rico tried unsuccessfully to schedule a primary on Feb. 17 — nine days before New Hampshire. But it was rebuffed when the CRC ruled them out of compliance. Puerto Rico has rescheduled its primary for Sunday, March 16.

Other states have tried more innovative techniques to achieve "firsts" in the delegate selection process. The Arkansas Republican Party has abandoned the state's May 27 primary and decided to elect 12 delegates at congressional district meetings Feb. 2 and the remaining seven at-large delegates at a state committee meeting Feb. 16.

Although those events will follow the Iowa precinct caucuses by several weeks, Arkansas Republicans advertise that they will have the first actual election of national convention delegates in 1980.

Fall Straw Votes

Party leaders in Massachusetts and Florida have not moved up their delegate selection dates, but they have done what they think is the next best thing — scheduling nonbinding presidential preference conventions this fall.

Massachusetts Republicans will hold their convention in Hyannis on Oct. 26 and 27 and expect most of the GOP presidential candidates to attend. It will be open to any registered Republican who pays the registration fee.

Two presidential preference polls will be taken, the first by mail before the convention begins and the second at the end of the convention.

Both parties will hold preference conventions in Florida the weekend of Nov. 17. Republicans will have a one-day event in Orlando attended by 1,357 delegates — a combination of party officials and activists and of registered Republicans selected by lot at county caucuses. The delegates will register their first and second choices for president on voting machines.

Although lining up delegates has diverted thousands of dollars from candidate coffers that might have been used in the primary campaign, party leaders feel that the convention has been worthwhile in gaining attention for the state.

A total of 1,717 delegates will attend the three-day Democratic convention in St. Petersburg. About three-fifths will be elected in county caucuses in October, while the rest will be either state party or elected officials, or selections of the state chairman. Delegates will indicate only their first choice and votes will be publicly announced by county.

Carter won a similar convention in the fall of 1975 that served as a launching pad for his successful primary campaign in Florida the following year. ■

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It's a Laugher for Reagan At YAF's Mock Convention

F0038

By Jules Witcover
Washington Star Political Editor

The Young Americans for Freedom, reputed to be the young fogies of American conservatism, cut up like Saturday night at the frat house yesterday at their 1980 mock presidential convention. They had a ball as they overwhelmingly backed old-timer Ronald Reagan, 68, over Rep. Phil Crane, 48, the Republicans' sweet bird of youth in the 1980 race.

Between the horseplay at the Shoreham Americana, the delegates to YAF's 10th national convention gave Reagan 308 of 391 first-ballot votes, or 78 percent, to only 69 votes or 17 percent for Crane, the only other candidate whose supporters worked the weekend's political version of Animal House.

Seven other candidates, including former President Richard Nixon, split the remaining 5 percent. Sen. Bob Dole got 4 votes, Sen. Howard Baker 3, former CIA Director George Bush and former New Hampshire Gov. Meldrim Thomson 2 each, and — amid cheers and boos — Nixon, former President Gerald Ford and former Sen. James Buckley one apiece.

In the balloting for the vice presidential nomination — highlighted by the day's most spirited floor demonstration, for the late Sen. Joseph R. McCarthy of Wisconsin and McCarthyism — Rep. Jack Kemp of New York won with 138 votes of 336 cast, or 41 percent. State Rep. Clay Smothers of Texas was second with 56 votes. Crane got 38, Sen. Richard Schweiker of Pennsylvania 31, former Secretary of the Treasury William Simon 30 and a whole mess of others — including McCarthy, Nixon, Spiro T. Agnew, Philadelphia Mayor Frank Rizzo, and even silent screen star Ben Turpin — the rest.

By this time, however, the YAF convention was taking on a close resemblance to Romper Room. The Wisconsin chairman reported six votes for McCarthy, "a man who truly believes it's better to be dead than Red." Whereupon another delegate inquired from the floor: "We know it's legal for dead people to vote for live people, but is it legal for live people to vote for dead people?"

YAF National Chairman James V. Lacy, presiding, replied: "Only in Cook County, Illinois."

That was the kind of afternoon it was as the YAFers concluded the business portion of their four-day meeting here. Last night, their main man, Reagan, spoke to the delegates via tape recording at their windup dinner. Reagan commended them for, among other things, their Stop SALT II campaign "to bring about the defeat of the administration's

See YAF, A-4

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RONALD REAGAN
Choice of YAF delegates

JOSEPH McCARTHY
'Better to be dead than Red'

YAF Delegates Have Fun As Reagan Wins in a Wal

Continued From A-1

dangerous SALT II treaty."

He alerted them, too, that "next year, YAF has an even more important role to fill, because next year you can make the difference in the philosophy of leadership America chooses." Reagan did not mention his own candidacy, for which an "exploratory" committee has been established, but it is as much assumed by this crowd as the divinity of Chang Kai-shek. (In the floor demonstration for Reagan in the afternoon, one delegate waved a Taiwanese flag).

Reagan in his taped remarks hit President Carter in all the places it hurts most before a YAF audience. "Three years of the Carter presidency," he said, "has brought us the fall of Afghanistan, the give-away of the Panama Canal, the sellout of Taiwan and the collapse of Iran."

And in another slap at SALT II, he added: "As icing on the cake, we now face the prospect of a SALT II treaty negotiated by the Carter administration which would virtually assure permanent Soviet nuclear superiority over the United States. But we're not going to let that happen."

The litmus-test issues with conservatives were much in evidence during the mock convention. When a Tennessee delegate rose to put Baker's name in nomination, cries went up of "Remember Panama!" and "Save the Canal!" And when Tennessee's votes were announced the state chairman reported "no votes, on principle, for Panama Howard Baker" — a reminder of Baker's votes for the Panama Canal treaties.

Former Texas Gov. John Connally, a Democrat when many of t delegates were in their chronol cal adolescence, got short shrift Several state chairmen pointed noted there were no votes for hi their delegations, and Texas ch man Steve Munisteri said his st shut Connally out "because we' been following him and his reco for years."

Representatives of the Reaga Crane, Connally, Dole and Bu campaigns all had addressed t YAF convention Friday, but onl Reagan and Crane supporters wa active campaigns for votes. The R gan lobbying was handled by independent committee that call self the Fund for a Conservati Majority, and Crane's by YAF su porters, not Crane's national cam paign.

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TREASURER'S REPORT

TREASURER'S REPORT

Current Financial Position

The Fund for a Conservative Majority's current financial position is extremely good. As of Thursday, September 4 our cash on hand was $116,364.50. The current accounts payable total approximately $100,000. Most of our accounts payable are in the 30 day range with some at 45 days and none over 60.

FCM has picked up a considerable number of new donors, so much so that Anagram is backed up in keypunching them. New donors picked up on earlier Reagan mailings are responding very well to our phonebank appeals. The high dollar appeals, though below earlier projections in income and a little behind schedule, are now shaping up. Quality full color reproductions of our Don Dyan print will be mailed to our own high dollar donors and offered as a premium to high dollar prospects.

Financial Growth Summary

The tremendous growth of the Fund for a Conservative Majority is best illustrated by the following figures taken from the monthly FEC reports.

Month	Cash on hand	Receipts	Debts
January	$ 27,545.	$ 82,822.	$ 86,934.
February	34,507.	111,284.	128,854.
March	1,798.	297,688.	104,913.
April	88,293.	172,263.	117,523.
May	53,884.	216,396.	122,800.
June	22,164.	190,660.	215,249.
July	39,318.	489,256.	104,567.

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Citizens for Reagan in '80

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The independent expenditure category of FCM's monthly FEC report continues to be the best barometer of our Citizens for Reagan in '80 project fulfillment.

Our monthly Reagan expenditures for the year are as follows:

January	$ 44,342.
February	110,643.
March	122,187.
April	126,235.
May	143,879.
June	109,179.
July	319,770.

Post Election Financial Concerns

From the beginning of FCM's recent financial upturn, a primary consideration has been: what can be done to avoid the traditional post-election downturn from turning into a financial disaster. The nightmare scenario we have to avoid could start off with FCM having $100,000 cash on hand the day after elections against $50,000 in debts. The decline in political interest following the elections precipitates two or three house mailings in a row which lose money. Overhead, though cut back sharply following the elections, is higher than the severely reduced income can support. FCM has very little in real assets with which to buffer the income decline. As our accounts payable lengthen to 90 days or more, the cost and availability of vendor's goods and services becomes a factor in getting out mailings.

The Toronto board meeting Treasurer's Report suggested four approaches to insuring that the financial disaster never occurs: 1). building equity in real estate (as YAF and ASC have done) giving a financial cushion to offset any severe down turn; 2). following a policy of keeping all debts extremely low and very current; 3). a careful plan scheduling prepayment of post-election expenses (rent, equipment, printing, etc.) and a detailed plan to cut back overhead; 4). increased emphasis on building institutional loyalty of donors through newsletters, membership cards, and public relations.

Ironically, a Reagan victory could really dry up financial giving to our PAC by producing a collective "resting on the laurels" effect among contributors. ACU, it must be remembered, went down the tubes the year after its most successful fundraising period. They overstaffed, overspent, didn't purchase real estate when they had the resources, didn't cut back when the income dropped off and are today facing a bleak and possibly short future. The NCPAC post 1976 financial crisis is also a good object lesson. This board meeting presents the best opportunity to avoid a future collapse by adopting an extremely prudent financial plan designed to insure a long future.

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FCM CONTRIBUTIONS

August 31, 1980

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THE FUND FOR A CONSERVATIVE MAJORITY

Kenneth F. Boehm, Esq.
Treasurer

MEMORANDUM

To: Fund for a Conservative Majority Directors

From: Ken Boehm

Subject: Citizens for Reagan in '80 Strategy

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ELECTORAL VOTE STRATEGY

In three of the last five presidential elections (1960, 1968 and 1972), the shift of a very small number of votes in a few key states could have changed the outcome of those elections.[1] The 1980 election could easily become a photo finish, especially if independent candidate John Anderson is able to capture several states. The wide lead in the polls established by Reagan following the Republican Convention has already been substantially closed. Even if Reagan kept the large lead into September, the volatility of such polls is such that Humphrey was able to close twenty points on Nixon in less than six weeks during the 1968 campaign.

The prospect of an extremely close election brings with it the real possibility that a well-organized independent expenditure campaign could have a decisive impact on the outcome. Properly targeted, the amount of money raised by Citizens for Reagan in '80 could be translated into thousands of votes in states where the popular vote totals of the two major candidates will be very close.

CHAIRMAN • [illegible]
1022 WILSON BOULEVARD • [illegible]

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Strategically, an independent expenditure campaign can maximize its influence on the election results by carefully focusing its limited resources on those constituencies and states which offer the largest potential gain for the least possible outlay. Three specific steps are involved. First, a small number of states with a large number of electoral votes, but with prospects of a close popular vote, must be selected. The electoral college works to the benefit of the very largest states (those with more than 14 electoral votes) and the very smallest (those with less than four votes).

Second, voting constituencies which are issue-oriented, open to persuasion and easily reachable through direct mail/mass media must be selected for each targeted state. The electoral college increases the influence of any well-organized minority group which is capable of voting as a bloc. Thus, for example, the opposition of Jewish leaders to Senator Birch Bayh's plan to abolish the electoral college is perfectly rational.

Third, the most cost-effective (and politically effective) way to reach the targeted groups must be selected. Direct mail, radio and newspapers are more useful in targeting carefully defined groups than is television which necessitates a more generalized and less issue-oriented appeal.

The four target states of the Citizens for Reagan in '80 campaign are New York, Pennsylvania, Connecticut and Florida. A variety of criteria were used in selecting these four but the principal reason for their selection was that all four are states in which a concentrated effort by an independent campaign could effect the outcome. Together they represent 93 electoral votes, or more than one-third of the 270 a candidate needs to be elected president.

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	PA.	N.Y.	CONN.	FLA.
Electoral Votes	(27)	(41)	(8)	(17)
1976 Results	Carter 50% Ford 48%	Carter 51% Ford 46%	Ford 52% Carter 47%	Carter 52% Ford 47%
Evans/Novak 7/1/80	Leaning Carter	Leaning ~~Ford~~	Leaning Anderson	Leaning Reagan
USN&WR 6/16/80	Swing State	Swing State	Swing State	Swing State
Governor's Prediction 8/18/80	Reagan	Too Close to call	No Response	Reagan
Reagan Strategists 7/28/80	Reagan Key Target	Long Shot for Reagan	Long Shot for Reagan	Reagan Key Target
Carter Strategists 8/25/80	Leaning Reagan	Leaning Reagan	Leaning Carter	Leaning Reagan
Evans/Novak 8/15/80	Leaning Reagan	Leaning Reagan	Leaning Anderson	Probable Reagan

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Having selected four target states, the difficult process of deciding how best to allocate scarce resources must begin. Some excellent guidelines exist. Political scientist Steven J. Brams and mathematician Morton D. Davis have devised a mathematical formula for the allocation of resources for maximum effectiveness.[2] After a careful study of presidential campaigns and the electoral college system, they decided that larger states should receive even more attention than their proportional share of the electoral college. Resources should be allocated approximately in proportion to the 3/2s power of the electoral votes of each state. This figure is calculated by taking the square root of the number of electoral votes and cubing the results. From there, the percentage of resources can be easily calculated.

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The Brams - Davis Formula Applied to FCM's Target States

	Square Root	Cube	% of Time/Resources
N.Y. (41)	6.4	262	53%
PA. (27)	5.2	140	28%
FLA. (17)	4.1	69	13%
CONN.(8)	2.8	22	4%

If the target states and the Brams - Davis formula are accepted as our campaign priorities, the next step in formulating the FCM strategy is to identify those groups which are issue-oriented, open to persuasion, and reachable through direct mail and mass media. A number of such groups exist within the target states. Carter's gross mismanagement of the economy plus his mishandling of issues important to segments of the traditional Democratic coalition gives Reagan an opportunity to make large inroads into what used to be solid Democratic constituencies.

BLUE COLLAR VOTE

Pollster Lou Harris has stated that it is an iron rule that any Democrat who slips below 60 percent of the union vote is in trouble. In May, Harris polled union members on which candidate could best handle the economy: 35% said Reagan, 30% said Carter, and 23% favored Anderson. Asked which candidate could best preserve the value of their money, union members in the eight largest states replied: Reagan 38%, Anderson 28%, and Carter 21%.

Reagan's primary victories in Democratic crossover states like Illinois and Wisconsin show his appeal to blue-collar Democrats. Dr. Don Devine's memo to the Reagan campaign ("The Devine Memo: A Winning Strategy for Ronald Reagan,"

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Human Events, July 5, 1980), argued forcefully for a strategy aimed at attracting the "BCEC voter" (blue-collar, ethnic and Catholic). He calculated that the BCEC vote could represent 35% of Reagan's majority coalition and stated, "The real test of the campaign is its ability to attract the BCEC voter. This will win or lose the election."

To win the BCEC vote, Dr. Devine suggests the use of four issues: the economy (jobs creation, tax cuts, inflation, unemployment, the Carter "misery index"), a strong foreign policy (concern for plight of Eastern Europeans, a strong defense, an emphasis on Carter's incompetence in the face of Soviet aggression), the Reagan record in California (tax cuts, welfare reform, the size of California) and the right to life issue.

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THE CATHOLIC VOTE

Jimmy Carter received 57% of the Catholic vote in 1976. This year two issues can cut against Carter with the Catholic vote: abortion and tuition tax credits.

The right to life issue is going to play more of a role this time because the major parties have taken clearly opposite stands on it. Unlike Ford, who downplayed the issue, Reagan has taken an unequivocal stand in favor of a constitutional amendment to prohibit abortion. Since the official Reagan strategy, as outlined by Wirthlin, is to focus on the economy and foreign policy rather than "red-flag" social issues, this issue is perfectly suited for a large scale independent effort. The Robert Heckman memo of August 5 (Appendix) underscores the importance of the right to life vote in New York and suggests that the major focus of the Citizens for Reagan in '80 New York effort be directed toward winning the right to life voters for Reagan.

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The second Catholic issue which helps Reagan tremendously is tuition tax credits. Carter, in pursuit of the support of the American Federation of Teachers, has taken a hardline stand against tuition tax credits. This gives Reagan a real opportunity to win the support of hundreds of thousands of Catholic parents who send their children to parochial schools and having to pay out both tuition and school taxes.

THE JEWISH VOTE

In 1976 Jimmy Carter received 72% of the Jewish vote. Since then a long series of Carter administration mistakes (the bungled UN vote, Andy Young's comments, Billy Carter's Libyan relationship, etc.) have seriously eroded that support. A number of polls give Anderson the lead with the Jewish voters. Should the Anderson candidacy collapse, there is a real possibility that Reagan can capitalize on his own strong pro-Israel stands plus the antipathy toward Carter. Although nationally Jewish voters are approximately 3% of the voting population, in New York, Pennsylvania and Florida the percentage is higher.

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THE CUBAN VOTE

One constituency which is easily targeted and for which there are excellent issues available is the Cuban community. Dade County has more than 90,000 registered Cubans (out of 658,000 registered voters). Out of 112,000 Dade County voters with Spanish surnames, 54,000 are registered Democratic and 45,000 are registered Republican. The registered voter computer tape can be used to break out the names of Cubans and generate labels.

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There are several important issues. One is Carter's inept, on-again off-again handling of the refugee problem. A second is the series of news stories detailing Castro's preference for Carter over Reagan. Third, there is the totally ineffectual Carter "threat" to Castro to remove Soviet troops from Cuba.

A hardhitting direct mail piece targeted to Cuban voters and written in both Spanish and English could be an effective tactic for maximizing the Reagan vote in Florida.

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PHONEBANK ANALYSIS
September 4, 1980

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The FCM phonebank began fundraising for our Citizens for Reagan project on June 28, 1980. Our Senate Control project ceased its fundraising July 31, 1980.

As of our second quarterly report ending June 30, $132,346.50 was raised on Senate Control showing a net income of $28,450.78 for a profit of 21%. From June 30 to July 31, an additional $30,093 was raised following the end of the second quarter. In addition, from July 31 to September 4, $26,546 has been raised on the Senate Control project without any telephoning at all. This is a result of the system we have established to follow-up on unpaid pledges. The money is expected to continue to come in at the rate of $2,500 per week until November 4.

Senate Control has raised a total of $188,985.50 as of September 4 for an average contribution of $23.89.

Citizens for Reagan has brought in $140,169.92 in approximately a two month period from June 28 to September 4. Our average contribution is $36.24 with a 27% response rate.

Both Senate Control and Citizens for Reagan have raised a total of $329,154.92 as of September 4:

Income	$329,154.92	
Cost	171,216.47	52%
Net	$157,938.45	48%

Phone Bank Projections

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Based on past performance it can be expected that the Citizens for Reagan phonebank will reach approximately 15,000 pledges in the next two months maintaining an average contribution of $36.24. Accordingly, we can expect to raise: gross

$135,900	25% return
163,080	30% return
190,260	35% return

Senate Control can be expected to average $2500 per week or $10,000 by November 4. Basing average costs for the next two months on July/August costs of $67,320, we should realize a net income of:

$ 68,580	25% return
105,760	30% return
122,940	35% return

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FCM

THE FUND FOR A CONSERVATIVE MAJORITY

September 5, 1980

MEMORANDUM

To: Ken Boehm, Bob Heckman, Ralph Galliano
From: Frank Cannon
Re: Students for Reagan - Revised Budget

I have itemized below the approximate budget for The Students for Reagan youth effort.

In general, my cost breakdowns were computed as follows:

—salary: $200/week for eight weeks
—food: $12/day flat rate for each day on the road
—travel: the cost of a rented car for 2 months; plus $60/week for gas and tolls
—misc.: a 20% addition to other expenses, to cover xeroxing, newspaper ads, etc.

These staff related expenses total	$27,321.20
Advance work expenses total	3,203.90
Total materials cost	9,433.00
Total project cost	39,958.10

Following is the total cost broken down by area of expenditure:

Advance Work

John Abernethy

Food	180.00
Lodging	32.90
Transportation	86.50
Salary	520.00
	819.40

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Frank Cannon

Food	144.00
Lodging	182.90
Transportation	32.00
Salary	400.00
	758.90

Phil Linderman

Food	24.00
Lodging	32.90
Transportation	256.00
	312.90

John Smathers

Food	120.00
Transportation	93.60
Salary	400.00
	613.60

Brian Tocco

Food	24.00
Lodging	32.90
Transportation	77.40
	134.30

Dave Tyson

Food	24.00
Transportation	100.80
	124.80

Training Session

Conference Room rental	52.00
Lunch during session	43.00
YAF manuals	10.00
YAF Carter-Watch brochures	5.00
	110.00

Off. Rental from YAF
(11 man/days @$30/day) 330.00

ADVANCE WORK SUBTOTAL 3,203.90

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Materials:

10,000	buttons	645.00
60	banners	1,020.00
500	posters	420.00
10,000	bumper stickers	880.00
50,000	brochures	1,500.00
50,000	flyers	1,500.00
10,000	pieces of stationery	140.00
5,000	envelopes	105.00
5,000	sheets of press release paper	95.00
3	youth issue flyers (75,000 total)	2,511.00
	shipping	267.00
	graphics	350.00
	Materials subtotal	9,433.00

Staff-related expenses:

John Abernethy

	Salary	1,600.00
	Lodging (8 nights)	240.00 ~~(8 nights)~~
	Food (35 days)	420.00
	Rented car	1,300.00
	Gas & tolls	480.00
	Misc.	808.00
		4,848.00

Frank Cannon

	Salary	1,600.00
	Lodging	300.00
		1,900.00

Phil Linderman

	Salary	1,600.00
	Lodging (30 nights)	900.00
	Food (56 days)	672.00
	Rented car	703.20
	Gas & tolls	480.00
	Misc.	871.00
		5,226.20

Brad Peterson

	Salary	00.00
	Lodging (10 nights)	300.00
	Food (10 days)	120.00
	Travel (500 mi. @18¢)	90.00
	Misc.	101.00
		611.00

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John Smathers

Salary	1,600.00
Lodging (10 nights)	300.00
Food (44 days)	528.00
Rented car	886.00
Gas & tolls	480.00
Misc.	758.80
	4,552.80

Brian Tocco

Salary	1,600.00
Lodging (20 nights)	600.00
Food (49 days)	588.00
Rented car	900.00
Gas & Tolls	480.00
Misc.	833.60
	5,001.60

Dave Tyson

Salary	1,600.00
Lodging (25 nights)	750.00
Food (56 days)	672.00
Rented car	816.00
Gas & tolls	480.00
Misc.	863.60
	5,181.60

Staff-related expenses subtotal	27,321.20
Total Cost Students for Reagan	$39,958.10

Looking over the above figures, I can't help but conclude that Frank Cannon at $1,900.00 is a real bargain.

Frank Cannon

800007

Thompson & Associates, Inc.
7015 Old Keene Mill Road • Suite 203 • Springfield, Virginia 22150
(703) 451-6943

Michael W. Thompson, President

8304042162 7

September 5, 1980

MEMORANDUM

TO: Board of Directors
Fund for a Conservative Majority

FROM: Michael Thompson

RE: Review of Summer Fund Raising Program
Projections for the Fall Campaign Months

Since June 1, the direct mail fund raising program for FCM has continued to be successful, but to a lesser degree than we have anticipated based on spring returns.

The reasons for this smaller income, smaller margin of profit and less percentage return could be a combination of these factors:

(1) The downright rotten economy.

(2) The incredible amount of mail generated by the three Helm's Reagan projects: Americans for Reagan, Conservatives for Reagan and the Congressional Club.

(3) The incredible "margin of victory" indicated for Reagan over Carter during much of the summer.

Since June 1st, the following income figures have been raised by FCM:

	Monthly Income	Year-to-date Total
June	$137,023.45	$ 914,123.19
July	411,640.49	1,325,763.68
August	89,751.39	1,415,515.07

(additional corporate funds raised should be added to these figures. This amount should be over $100,000 for 1980)

F00392

By specific mailings, the income and cost figures have been (including final figures not available at the June meeting):

	QUANTITY (# return & %)	INCOME	COST	NET INCOME (LOSS)
May "Final Drive"	243,601 (3331-1.4%)	$77,897.63	$81,251.64	($3,354.01)
May Vice Presidential	386,790 (7215-1.9%)	139,159.39	110,546.52	28,612.87
June Anti-Carter	552,532 (6133-1.1%)	160,972.25	115,841.46	45,130.79
June Pre Convention July Convention	795,968 (11,090-1.4%)	307,195.00	244,763.88	62,431.12
Sub-Total June/July	1,507,286 (17,223-1.1%)	468,167.25	360,605.34	107,561.91
August Business	30,164	(not available)	9,305.05	
August Election #1	170,000	(not available)	-32,093.65	
August Election #2	264,422	(not available)		
Mailed in August:	464,586			

It should be noted that during the summer the return dropped to 1.1% (from a spring return of 2.1% but that average donation increased from a spring amount of $23.88 to a summer figure of $27.18.

Scheduled to be mailed in September and October of 1980:

September Anti-Carter	360,000
September Election #3	330,000
September Election #4	300,000
October Election #5	1,100,000
October Election #6	150,000
Total for Sept./Oct.	2,240,000

With the obvious "tight election" which is shaping up at this point, I would hope that the percent return on the scheduled mailings would again reach the spring total of 2% to 2.2% and that the average contribution would be at a $22.00 level.

If these fegures are realized, then a total income from the Sept/Oct. mailings will be $985,600 at an approximate cost of $672,000 or a projected profit of $313,600.

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F00381

If similar percent returns and dollars averages are realized from the August mailings (returns coming in now) then additional income will be $191,400; at a cost of $130,500; and net income of $60,900.

Thus if projections are accurate, FCM will raise an additional income of $1,177,000 at a cost of $802,500 and have available hard income of $374,500.

If the election really gets exciting and the returns increase to 3% and an average dollar return of $20 is realized, then a profit of $802,500 will be available.

Should the summer average of $27 per return continue, then total income will be $2,166,750 at a cost of $802,500 for a hard dollar profit of $1,364,250.

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HIGH DOLLAR PROSPECTUS:

The initial mailing of the High Dollar Prospectus made a profit but no where close to what we had expected.

Total income:	$20,000.00	(our estimate)
Total cost:	$14,675.56	
Profit:	$ 5,324.44	

The missing ingredient was the telephone follow-up calls (see attached memo) but I would have thought three or four times as much money would have been generated from the mails.

The following program is suggested, in order to continue this project:

A follow up letter from Bob be sent to all 2,500 original recipients -- I would suggest a personal letter like the attached Election #4 but asking for an investment of $1,000 right at the beginning.

Also, all $100 and over "Citizens for Reagan in '80" Donors are to receive a special letter from Bob with the color Reagan picture thanking them for past support and asking for another contribution. A prospectus will be included in this special package.

Ken and I have talked about sending the full prospectus to the 12,000 to 14,000 remaining high dollar donors we have at our office. Direction is awaited from this Board Meeting.

NON-REAGAN PROJECTS:

FCM's efforts over the summer to open up new avenues of fund raising, the Senate Control and Stop John Anderson projects, were not successful.

F003390

Senate Control mailed 133,000 pieces at a cost of $27,912.66 ($209/M) for an income of only $15,301.26 -- a loss of $12,611.40.

Stop John Anderson mailed 48,000 packages at a cost of $13,606 ($283/M) for an income of only $11,506 to date -- a loss of $2,100. More money is still coming in and hopefully will cover the outstanding costs.

POST ELECTION:

Reagan Wins: (First, we sober up by November 6th)

If Reagan wins, an immediate mailing is planned to 200,000 hailing the victory and urging them to join a special Honorary Inaugural Committee. A medallion of Reagan will be offered for $25.

A special Inaugural Event by FCM should be sponsored along with a Brunch on January 21, after Reagan is President.

Then we need to think hard about the future.

Reagan Loses: (First, we sober up by November 6th)

If Reagan loses, it means the FCM future without Reagan hits us immediately.

FCM should carve out a significant and unique position as has NCPAC in its negative campaign field.

FCM Offices:

Depending on some plans I am working on, if Reagan wins a new organization might be interested in taking over some of the space and keeping the present operation together.

MWT/tv

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Carter Hedge

File T.H.

FG006-22

MEMO/ Bob Heckman

THE NEW YORK TIMES, THURSDAY, SEPTEMBER 25, 1980

Conservative Group Turns Carter '76 Ads Against Him

WASHINGTON, Sept. 24 (UPI) — A conservative group that supports Ronald Reagan today unveiled a series of television commercials that it will use against President Carter. The commercials contain excerpts from advertisements Mr. Carter used in the 1976 campaign.

The Fund for a Conservative Majority said it would spend $1 million to $1.5 million to broadcast the advertisements, primarily in New York, Connecticut, Pennsylvania and Florida.

The advertisements begin with an announcer saying Mr. Carter promised to help reduce unemployment and they include an excerpt from a 1976 Carter advertisement saying just that. The announcer then says: "Jimmy Carter did do something about unemployment. Two million more people became unemployed this year alone."

Robert Heckman, chairman of the group, declined to say where his group obtained a copy of the Carter commercial, which was not copyrighted and therefore was in the public domain.

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REAGAN DIXIE VICTORY PROJECT PACKAGE

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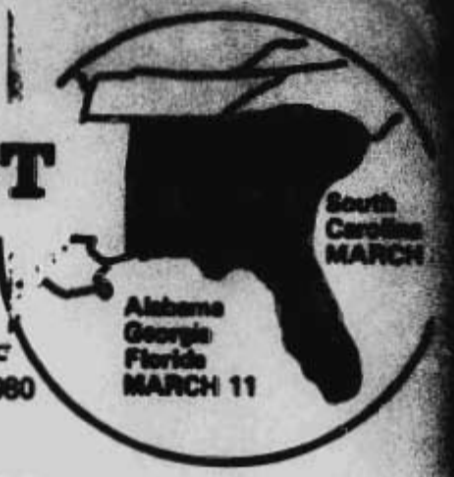
Reagan in '80

DIXIE VICTORY PROJECT



February 22, 1980

8304042163

Dear Friend:

America needs leadership. America needs Ronald Reagan!

And in just a few months Reagan can be nominated for President of the United States. This fall he can be elected!

In 1976 Ronald Reagan almost won the Republican nomination. His big turnaround came with a series of stunning victories in key southern primaries.

Today Ronald Reagan is faced with exactly the same situation! He must win in South Carolina on March 8, and in Florida, Georgia and Alabama on March 11, in order to firmly secure the "front runner" status in the Republican nominating process.

It is absolutely necessary for "Citizens for Reagan in '80" to play a major role in these critical primaries. If Reagan loses in these states, it will be much more difficult for him to secure the nomination prior to the Republican Convention in Detroit this summer.

"Citizens for Reagan in '80" is an independent effort by the highly respected Fund for a Conservative Majority. This special campaign on behalf of Reagan can make the difference between victory and defeat.

Primary victories in these four southern states will make Reagan the undisputed front runner for the Republican nomination.

With your assistance "Citizens for Reagan in '80" will achieve:

* victory in South Carolina over John Connally who must win this state to revitalize his sagging campaign;

* victory in Florida where George Bush has one of his strongest organizations;

* victory in Georgia to serve notice that even the President's own state is ready for a true conservative;

* victory in Alabama which will prove conclusively that the Deep South is united behind Ronald Reagan!

The Fund for a Conservative Majority, through its special project, "Citizens for Reagan in '80", has effectively used its funds to promote Ronald Reagan throughout these winter months.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

Once again, your help is urgently needed so that we can continue these activities into the fast approaching Southern primaries.

Your immediate contribution will allow us to flood these critically important states with radio and newspaper ads, special mailings, and FCM-sponsored vonlunteer workers. We simply can't do it without your support.

Reagan's opponents are doubling their efforts because they need to defeat Reagan in the South. These opponents and their allies in the liberal news media clearly know the significance of these four Southern primary elections. They realize that Reagan must be stopped early -- or not at all. That is why officers of the Liberal Republican Ripon Society have urged their members to vote for George Bush -- in order to stop Reagan.

With your help we won't let this happen.

In order for Reagan to win the presidency on November 4, 1980, he must first win the important Southern primaries in early March.

Ronald Reagan is the most qualified Republican candidate running for President. He is the only Republican candidate who has run a government. He was Governor of California for eight years and he brought it under control.

"Citizens for Reagan in '80" is an independent campaign and can accept contributions totalling as much as $5,000 from any one individual.

Remember, the upcoming primaries in South Carolina, Florida, Georgia, and Alabama are vitally important to the Reagan campaign.

Your maximum contribution right now -- today -- will help secure Reagan victories in Dixie in early March.

Your check for as much as possible -- whether $25, $100, $1,000 or $5,000 -- will be put to immediate and effective use.

Only with your help can we win the Southern primaries for Ronald Reagan.

Thank you.

Sincerely,

Bob Heckman

Robert Heckman
Chairman

P.S. We can wake up March 9, and again on March 12, and read about Ronald Reagan's important victories in the South. I'd like to know that you were a part of that victory. Please send your contribution today.

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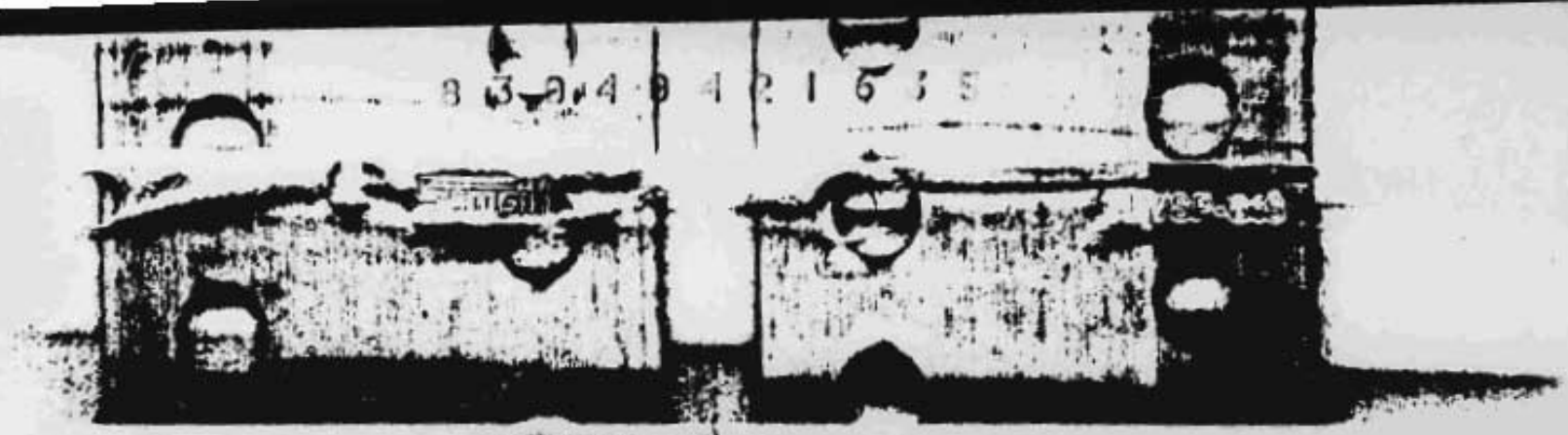


Tuesday, January 15, 1980 THE WASHINGTON POST

South Carolina Primary Seen as Crucial Battle By Reagan and C

This is the last of three articles on the early battlegrounds in the presidential campaign.

Reagan plan: score in South, wait for late Western surge

By Richard J. Cattani
Staff correspondent of The Christian Science Monitor
Monday, February 11, 1980

Ronald Reagan, in keeping with his Secret Service code name "Rawhide," is dropping the campaign wagons around the Republican camp convention Mr. Bush is the New England favorite, which likely means increased Bush momentum through the Feb. 26 New Hampshire and March 4 Massachusetts primaries. At that point, 15 percent of the delegates to the Republican National Convention will have been chosen. They will have won at least three of the four early battles the following week is out, Reagan people think. Then talk of taking South Carolina and Florida, and probably Alabama in Mr. Bush's backyard of the conservative

CITIZENS FOR REAGAN IN '80

TO: Bob Hackman, Chairman

FROM: Ralph Galliano Ralph

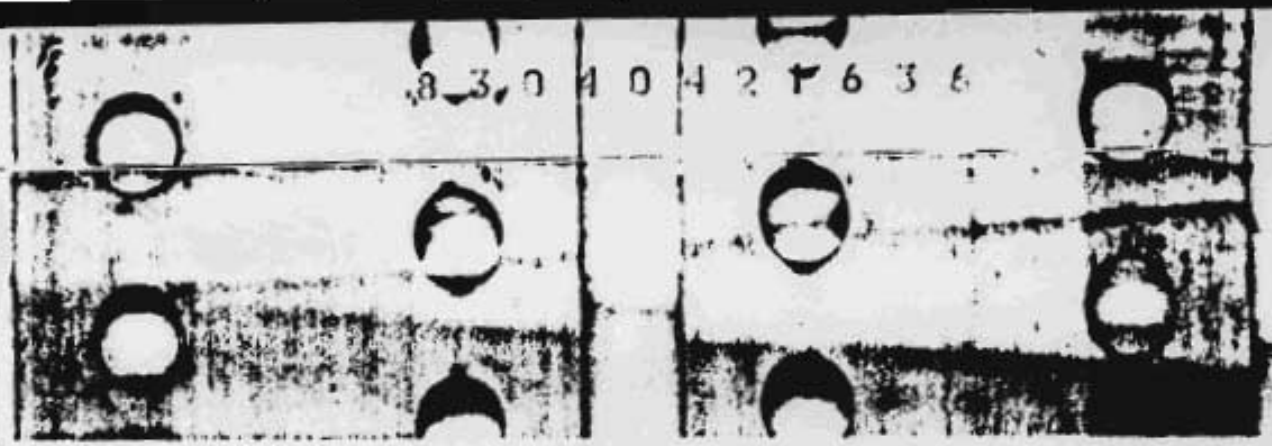
RE: Emergency Budget to Help Ronald Reagan Win the Critical Southern Primaries.

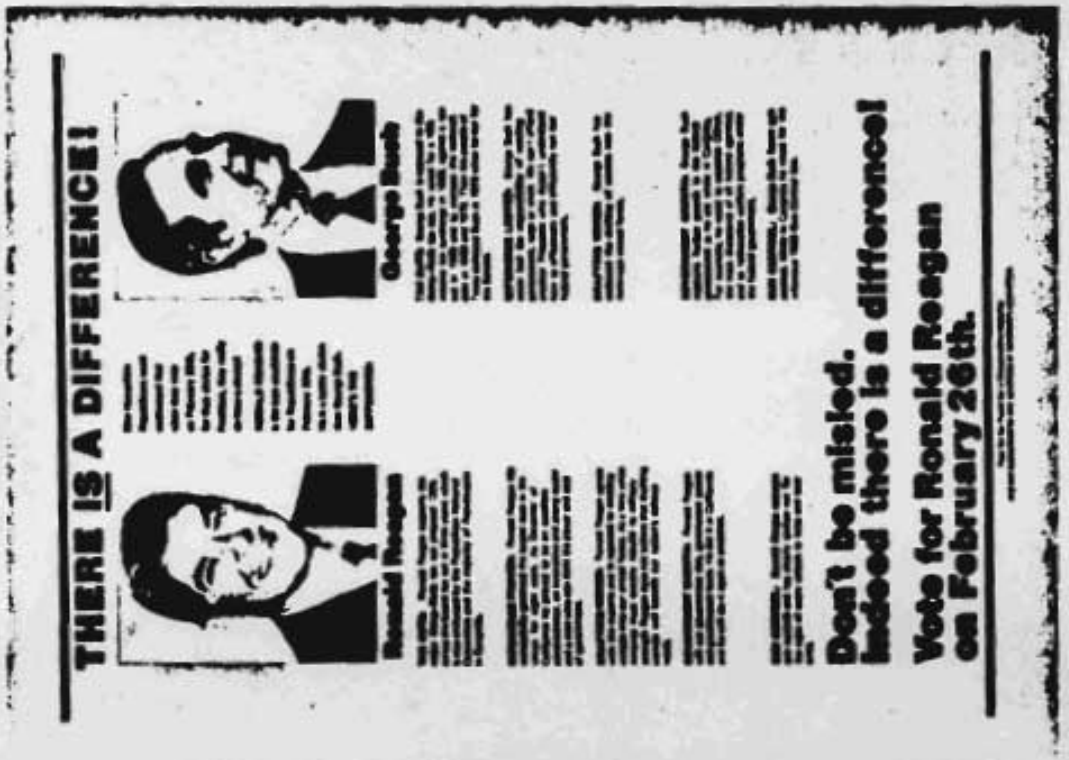
If our supporters will send Citizens for Reagan the needed money, here is the "bare-bones" Victory Budget for the South.

South Carolina	(March 8)	$22,480.14
Alabama	(March 11)	18,155.06
Georgia	(March 11)	20,265.32
Florida	(March 11)	41,637.46
Total Victory Budget:		$102,537.98

We can win in the South if our loyal supporters will only help us again.

Reagan vs Bush: There is a Difference -- See mailgrapher ad on the reverse side of this sheet.





With your help this full page ad will run in all major newspapers in the south before the critical primaries.

Reagan in '80

Dixie Victory Reply Memo

For:

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Dear Mr. Heckman:

I share your concern about the Southern Republican primaries and agree that Ronald Reagan must win in South Carolina, Florida, Georgia and Alabama.

To help win in these important states, I am enclosing my special "Dixie Victory Project" contribution in the amount of:

__ $25 __ $50 __ $100 __ $250

__ $500 __ $1,000 __ $5,000 __ Other

Make check payable to Fund for a Conservative Majority

Corporate Contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority – State Fund.
These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

All donors of $25 or more will receive this elegant lapel pin. It's guaranteed to be a collector's item within a few short years.

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

Reagan in '80
DIXIE VICTORY PROJECT

8 3 0 4 0 4 2 1 6 3 8

Reagan in '80
DIXIE VICTORY PROJECT

CITIZENS FOR REAGAN IN '80
A project of Fund for a Conservative Majority
927 Fifteenth Street NW
Washington DC 20005

2-V

RECEIVED
GENERAL COUNSEL
81 AUG 6 P4:43

REAGAN/VICE-PRESIDENTIAL SURVEY PACKAGE

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Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Thursday

Dear Friend:

Reagan as President and a Conservative Majority in the Senate is within our grasp!

National columnist Jack Anderson has referred to this possibility when he recently wrote:

> "... if a conservative Republican should win the presidency next year, his allies in the Senate could help him change the political direction of the country dramatically."

With your help we can nominate and elect Ronald Reagan as President! And we can control the Senate as well!

"Citizens for Reagan in 80" is a special project of the prominent multi-candidate political action committee -- Fund for a Conservative Majority. FCM is one of the oldest PAC's in the country and it's efforts have helped elect many of today's conservative leaders.

FCM is working to elect conservative candidates to federal office who will actively work to limit the size, price and control of government.

"Citizens for Reagan in '80" can be the deciding factor in nominating Ronald Reagan as President of the United States.

Please join "Citizens for Reagan in '80" today.

Tens of thousands of dollars in "independent money" must be raised if Reagan's campaign for President is to succeed.

The Eastern Establishment Liberals within the Republican Party are pouring hundreds of thousands of dollars into a "STOP Reagan Campaign."

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

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We must not allow them to succeed!

"Citizens for Reagan in '80" is an independent campaign working to nominate and elect Ronald Reagan President of the United States.

Citizens for Reagan will encourage our fellow citizens to vote for Ronald Reagan in 1980.

Citizens for Reagan is campaigning in all the important primary and convention states. However, the extent to which we campaign depends directly upon the amount of support received from patriotic Americans like you.

Citizens for Reagan budgeted a great deal of money for the important New Hampshire primary on February 26, and has now focussed its efforts on the later primaries in the South, in the Midwest and in Texas.

Radio and newspaper advertising, voter mailings, polling and literature distribution will be carried out by "Citizens for Reagan in '80".

The goal is simple: to nominate and elect Ronald Reagan President of the United States.

Ronald Reagan is a strong, articulate and experienced leader. He proved he was an effective executive while serving as Governor of California.

As a matter of fact, Reagan was the first major spokesman calling for a national "taxpayers revolt" by urging the citizens to join him in bringing government under control.

And Ronald Reagan has clearly understood the Soviet threat and has always called for a superior U.S. military force.

Once Reagan is nominated at the Republican convention, we will not stop our campaign -- no indeed. "Citizens for Reagan in '80" will continue to campaign right up to election day.

As an independent campaign, "Citizens for Reagan in '80" is not bound by the federal law to disband after Ronald Reagan's nomination. However, the only money Ronald Reagan will have after his nomination will be that which the Federal Election Commission gives him.

As an independent effort "Citizens for Reagan in '80" has no limit on expenditures before or after the nomination.

Ronald Reagan can win in 1980. But to win he needs your help today.

Many Republican candidates have entered the Presidential sweepstakes -- Bush, Baker, Connally, etc.

Why? Because Jimmy Carter can be defeated in 1980.

But the best man to challenge Jimmy Carter is Ronald Reagan. You and I both know this.

For instance, just imagine the Presidential Debates in the fall of 1980 between Reagan and Carter! Or against Ted Kennedy if he should take the nomination from President Carter. Ronald Reagan will so out-class and out-debate Carter or Kennedy that the American people will simply have to vote for our man!

Send your maximum contribution today to the Fund for a Conservative Majority and join "Citizens for Reagan in '80". Already the campaigns are gearing up and we need operational money to help nominate and elect Conservatives to the United States Senate and Ronald Reagan as President of the United States.

And with your participation we can also help decide who Reagan's Vice President will be.

Please join in the national "Reagan's Running Mate Survey" which is enclosed.

Who should Reagan ask to run with him? You can help make this decision by sending us the enclosed survey as soon as you complete it.

The results of this survey will be periodically released to the news media right up to the Republican National Convention.

Please take these three important steps to help insure Ronald Reagan's nomination and election as President of the United States:

(1) Be sure you and your Reagan friends are registered to vote.

(2) Fill out the enclosed "Reagan's Running Mate Survey" and send it to us today.

(3) Please enclose a maximum contribution with your survey. Make your check payable to Fund for a Conservative Majority.

Don't let the liberal news media and the Eastern Establishment Republicans keep us from nominating and electing Ronald Reagan!

Join "Citizens for Reagan in '80" today. Send your maximum contribution just as soon as possible to the Fund for a Conservative Majority.

On November 4, 1980 Ronald Reagan can be elected President of the United States.

On January 20, 1981 Ronald Reagan can be sworn in as the 40th President of the United States!

On January 21, 1981 President Reagan will begin to bring government under control; he will take action to decrease the rate of inflation; and he will begin to build an effective military defense for our country and our allies.

All this can actually happen! But to make sure it does you must first join "Citizens for Reagan in '80" today.

I am anxiously awaiting your reply.

Sincerely,

Bob Heckman

Robert Heckman, Chairman
Fund for a Conservative Majority

P.S. Tens of thousands of dollars must be raised quickly to allow "Citizens for Reagan in '80" to continue to organize in the key primary states and to promote Ronald Reagan at State Republican conventions around the country.

Please join "Citizens for Reagan in '80" today!
Send your completed survey and your contribution to the Fund for a Conservative Majority.

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BUSINESS LETTER PACKAGE

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Thursday

Dear Business Executive:

With your help, and that of tens of thousands of other concerned and patriotic Americans, Ronald Reagan can be elected President of the United States!

To "top off" our victory on election night, as many as ten or twelve Big Spending Liberal Democratic Senators can be replaced with responsible conservative Republicans! Many powerful Democratic Congressmen can also be defeated.

The national opinion polls show this can be done! But the campaign has just started.

Ronald Reagan must be elected. President Carter simply has not been the strong, creative and effective leader our country and the Free World so desperately needs in these difficult times.

Jimmy Carter has failed as President.

His domestic policies have produced economic chaos for our people.

Carter's foreign policy failures have shaken the Free World.

Carter must be defeated.

As a businessman, I have to meet payroll every two weeks, pay increasing social security taxes, try to manage under government-created inflation, and then I try to make a reasonable profit!

But thanks to Jimmy Carter my job has become much more difficult.

Today's inflation rate of 12% is frightening. During the first three months of this year inflation was soaring ahead at 18%! This is over three times the inflation rate as when Carter was elected in 1976.

Government spending is projected to be over $615 billion in the next federal budget! This is almost three times the budget of 1972 and over $200 billion more than President Ford's budget in his last year as President.

You and I worked until mid-May this year just to pay our taxes! And taxes take about 40% of the nation's overall earnings.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

This year the average American family will pay over $7,000 in federal taxes!

Most of us pay more in taxes than for our combined costs for food, clothing and shelter.

And in our international dealings with friends and enemies, Carter has also been a terrible failure.

Our military has severely deteriorated under the guidance of Jimmy Carter.

The Russians have brazenly invaded Afghanistan and supported Cuban backed revolutions throughout Central America and Africa. Carter's appointments have supported these communist forces as "stabilizing influences"!

President Carter has managed to destroy our political alliance with Iran and today our American compatriots remain hostages to fanatic terrorists in Iran.

Communist China finally got from Jimmy Carter what no other American President would even seriously consider giving it -- the de-recognition of a loyal ally (The Republic of China on Taiwan) and the help of the U.S. in building up the economic and military strength of this communist giant.

And our Free World allies shake their heads in disbelief as they watch America -- only a few short years ago the strong leader of the non-communist world -- quickly becoming a second rate world influence behind the Soviet Union.

<u>But right now you can join with tens of thousands of your fellow Americans to change the direction of our country</u> -- to rebuild our military strength; to begin to dismantle the over-sized federal government; to give each of us and our businesses a large tax cut; and to bring proven, responsible and strong leadership to the Presidency of the United States.

<u>You can join with "Citizens for Reagan in '80" and help elect Ronald Reagan as our next President.</u>

"Citizens for Reagan in '80" is an independent campaign effort sponsored by the highly respected and nationally recognized Fund for a Conservative Majority. It has been working for over a year to elect Ronald Reagan our next President. FCM is well-known as a cost-efficient and professionally run organization.

"Citizens for Reagan in '80" was a key factor in the Governor's primary victories earlier this year.

FCM is also using its expertise and resources to help elect a conservative majority in the Senate. Its "Conservative Senate Control" campaign has already had a significant impact this year and the Liberal Democrats are scared.

But FCM knows that Ronald Reagan will be running against more than just Jimmy Carter this fall.

Of course, both men will receive their limited campaign budgets from the federal government.

But as the incumbent President, Carter will use the White House and federal spending to the maximum to try to buy the election.

Just watch as Carter stages important news events close to the election. Large federal programs will be announced... new appointments will be made from "swing states"... Carter will desperately try to force some sort of international "success"... Presidential press conferences and urgent national messages requiring full network coverage will suddenly become more frequent.

The Big Union Bosses will "pull out all the stops" to defeat Ronald Reagan. Since the Democratic Congress has given the unions special election advantages, you can expect these powerful men to spend millions of dollars in 1980 to stop Ronald Reagan from becoming President.

And the various left-wing, consumer, anti-defense and pro-abortion groups will be supporting Carter and attacking Reagan. Millions of dollars will be spent by these left-wing organizations to secure the jobs of their government friends and to continue the discredited policies of the Carter Administration.

Finally there is the news media. The men and women who "report" the news will try to destroy Governor Reagan. The reports will show Reagan in the worst possible light. Tens of millions of dollars in "news time" will be spent by the media to stop Ronald Reagan from becoming President.

Only you can help offset these built-in disadvantages faced by Ronald Reagan. And you can help defeat Jimmy Carter.

Your support of FCM's "Citizens for Reagan in '80" campaign will directly help elect Ronald Reagan our next President.

Because of the way the federal campaign law is written, this independent effort for Ronald Reagan can spend as much money as can be raised from people like you.

"Citizens for Reagan in '80" hopes to spend at least $3,000,000 this fall -- maybe as much as $10,000,000 -- to help elect Ronald Reagan our next President. This critically important money must be raised from citizens like you.

To help meet this goal, "Citizens for Reagan in '80" has established a special Honorary Business Advisory Council and plans to enlist the support of at least 10,000 business leaders. I am honored to serve on this Honorary Business Advisory Council.

For as little as $25 (the maximum allowed contribution is $5,000) you can join this very important campaign committee. "Citizens for

Reagan in '80" hopes to raise between $1,000,000 and $3,000,000 from the American business community to help elect Ronald Reagan our next President.

The campaign plans are simple: to carefully and professionally spend as much money as can be raised to reach the American people with good, strong and effective television advertising, with creative radio and newspaper ads and by sending voter mailings to as many voters as possible in key states.

The money you give to "Citizens for Reagan in '80" will be spent effectively and professionally to help elect Ronald Reagan.

Send your maximum contribution today and join with tens of thousands of other Americans in support of "Citizens for Reagan in '80".

Your contribution can range up to $5,000.

Remember, you will not be able to contribute to the official Reagan for President organization after Ronald Reagan is nominated. Federal law prohibits it.

But you can help elect Ronald Reagan President by sending your contribution today to the Fund for a Conservative Majority.

After receiving your contributon of at least $25 you will be sent a beautifully designed and individually personalized Membership Certificate. You will be proud to hang this document on your wall.

You will also be sent timely updates on the election and asked for help and advice as Election Day draws near.

Please send your contribution today. Help elect Ronald Reagan President of the United States.

I am counting on you. Reagan's election as President could well be determined by the support you give today.

Sincerely,

Jeffrey Kane
Director
Honorary Business Advisory Council

P.S. Jimmy Carter has simply failed as President. Our economy is in turmoil and our military strength is dangerously weak.

Help turn our country around! Join "Citizens for Reagan in '80" today. With your help Ronald Reagan can be elected our next President.

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TUESDAY, JUNE 24, 1980

THE WALL STREET JOURNAL

Business Leaders Rate Reagan Most Capable

By Roger B. May
Staff Reporter of The Wall Street Journal

Chief executives of U.S. business overwhelmingly believe Ronald Reagan is better able to handle the economy than President Carter or John Anderson. Even so, they mostly have only a fair amount of confidence in his ability as opposed to a great amount.

The executives expect Mr. Reagan to get the chance to test his talents. Sixty-six percent of chief executive officers at large and medium-sized companies think Mr. Reagan will win the presidential election next fall. Slightly over 20% pick Mr. Carter. Among small-company executives, 58% expect a Reagan victory; 23% think Mr. Carter will be re-elected. At present, it is almost impossible to find any corporate chief executive who believes Mr. Anderson will be the next President.

A WSJ/Gallup Survey

According to the Wall Street Journal/Gallup survey of business opinion, conducted jointly by the Journal and the Gallup Organization, better than eight in 10 chief executives of large companies believe Mr. Reagan is better able to deal with the economy than is either Mr. Carter or Mr. Anderson. Though a somewhat smaller proportion of medium-sized and small-company chief executives thinks so, their sentiment in favor of Mr. Reagan is still substantial—70% of medium-sized company executives and 61% of small-company executives say he is the best man of the three for the job.

Carter Does Poorly

Only 5% of large-company chief executives and 7% of medium-sized company chief executives think Mr. Carter is the best choice to deal with the economy. His support comes mostly from small-company executives. Still, only 14% of them put the President ahead of Mr. Reagan or Mr. Anderson.

For Mr. Anderson, 4% of large-company executives, 9% of those at medium-sized companies and 10% of small-company executives think he would handle the economy best.

How chief executives rate the three candidates among each other closely follows the amount of confidence they have in each man's ability to deal with the economy. Eighteen percent of large-company executives place a great deal of confidence in Mr. Reagan's ability; 61% express a fair amount of confidence. Among medium-sized and small-company executives, the feeling is roughly similar.

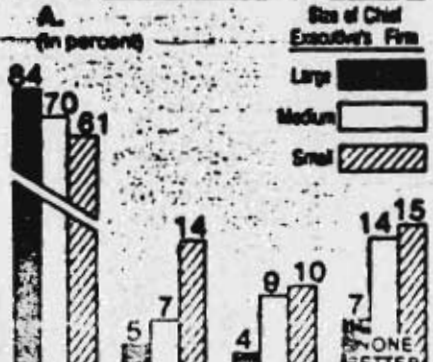
Few chief executives are comfortable with Mr. Carter's abilities. More than 80% of large and medium-sized company executives and more than 70% of small-company executives say they have little or no confidence in his capability to cope with the economy. Only 13% of large-company officials, 21% of those at medium-sized companies and 26% of small-company executives say they have a fair amount or great deal of confidence in him.

Anderson an Enigma

Executives feel much the same way about Mr. Anderson. His problem is partly that many chief executives don't know that much about him. Among large-company executives, 73% have little or no confidence in Mr. Anderson's ability to handle the economy; 13% don't have an opinion. Forty-five percent of small-company executives have little or no confidence in him; 24% can't say.

Chief executives think it is important to the economy who wins the election in November. Seventy-three percent of those at large companies say it will make a difference.

Q. *Who do you feel would do the best job of handling the economy: Ronald Reagan, Jimmy Carter or John Anderson?*



Sixty-nine percent of medium-sized company executives say it matters who wins as do 59% of small-company executives. In general, the greater the dissatisfaction with the economy or the President's handling of it, the more likely a chief executive thinks the election outcome will make a difference.

For this survey, the Gallup Organization interviewed 348 chief executive officers of companies drawn from Forbes magazine's listings of 1,000 large companies during the period from June 1 to June 16. Also interviewed were 311 chief executives from medium-sized companies and 324 from small companies drawn from a commercial listing of about 2.5 million companies. The margin of sampling error is from plus or minus six percentage points for responses from large and medium-sized companies to plus or minus seven percentage points for small companies.

Join the Honorary Business Advisory Council of the nationally recognized "Citizens for Reagan in '80." Your help today will help elect Ronald Reagan our next President!

Monday, July 28, 1980

THE WALL STREET JOURNAL

INTERNATIONAL

Reagan Presidency, Stronger Economy Should Give Dollar a Lift, Analysts Say

By John M. Lague
Staff Reporter of The Wall Street Journal

Candidate Ronald Reagan says he wants a stronger dollar. President Ronald Reagan would almost certainly have one.

Foreign-exchange specialists cite three overriding reasons:

—Mr. Reagan is a conservative Republican, and "a conservative statesman is always more favored by the monetary markets than a liberal, as I consider President Carter to be," said Hubert Baschnagel, executive vice president of Zurich-based Swiss Bank Corp.

—The market apparently believes that practically anybody, but especially Mr. Reagan, would be better for the economy and the dollar than Mr. Carter, "a man whose "economic policies from the beginning have been an unmitigated mess," said Rimmer de Vries, chief international economist a Jmorgan Guaranty Trust Co.

—No matter who is elected—and some polls currently predict that Mr. Reagan could win handily—the next President will be the beneficiary of what some analysts predict will be a stronger economy, and thus a stronger dollar, by Inauguration Day next Jan. 20. Some believe American interest rates will rise, making the dollar more attractive to hold, and the nation next year will have a surplus in its current international payments account, which includes trade and unilateral transfers.

While the state of the economy next January will be of exceptional importance for the dollar, the market's more immediate concern is the Carter-Reagan race, which Dennis R. LeJeune, vice president and head of Harris Trust of Savings Bank's international money market division, believes "will probably be the most important election in terms of the dollar in a long time" because of economic issues.

"There's no doubt a Reagan victory would be positive for the dollar," said a New York bank foreign-exchange economist. "He'll be surrounded by more quality economic advice. In fact some of the people around Reagan could be very good indeed."

Among the Reagan advisers mentioned favorably by the foreign-exchange specialists are former Treasury Secretaries George Shultz and William Simon and economist Arthur Laffer.

"I have a feeling that you'll get a better coordinated economic policy under Reagan," said Mr. de Vries. "They've got a team and they're working." He added that a Reagan presidency probably would place more emphasis on the use of monetary policy and would be less likely than the Carter administration to intervene directly in the market.

"The foreign-exchange market thinks that the more right-wing a government, the more likely it is to pursue 'correct' fiscal policies," said a New York-based British banker. "Reagan is looked upon as right-wing and therefore in favor of more fiscal discipline. The market looks upon Carter as left-wing and more likely to pursue permissive social philosophies with all the implications for budget deficits."

On economic policy, Mr. Carter "is seen as vacillating and terribly uncertain," one banker said. "Carter is so utterly discredited and there's an incredible fear of four more years of wandering all over the economic landscape."

Mr. Baschnagel of Swiss Bank said that "Europeans don't consider him a good statesman" and that they feel "anyone is better than Carter."

Some analysts said that many market operators are hoping that a Reagan presidency will draw upon the experience of what one analyst termed the "conservative experiment" in Britain under Prime Minister Margaret Thatcher, whose restrictive monetary and conservative fiscal policies have produced, among other things, the pound's strongest level against the dollar in more than five years.

In addition, some said that proposals for a return to the gold standard, advocated by some Reagan advisers, would serve to strengthen the dollar because "it would mean more fiscal and monetary discipline," one banker said. "It would be good for the dollar, good for inflation and good for the soul."

However, most analysts said they doubt a link between gold and the dollar would be reestablished because, one said, "It's questionable we could go back after eight or nine years of floating exchange rates."

Also, some analysts suggested that a Reagan presidency might not bring immediate changes in American economic policy.

"It's apparent that a President can't, in the short run, influence spending programs and social attitudes of the country," said Mr. LaJeune of Harris Bank. "The momentum is still on the side of bigger government." He said that for Mr. Reagan to have a significant impact, the Republican nominee would need a large electoral mandate, which he said probably wouldn't come until the 1982 congressional elections.

In any event, the foreign-exchange market at this point seems to believe that the election of Mr. Reagan would be a definite plus for the dollar.

CURRENCY RATES

	New York Noon Buying Rate	Mon. Noon Buying Rate	New York Close
	In U.S. dollars		
British pound	2.2945	2.2935	2.2940
Canadian dollar	0.8537	0.8537	0.8541
	In foreign units to U.S. dollars		
French franc	4.8540	4.8570	4.8565
Japanese yen	226.35	226.50	226.45
Swiss franc	1.7255	1.7255	1.7240
West German mark	1.7320	1.7320	1.7317

Based on average of bid and asked rates.
Other markets: London, Toronto, Paris, Tokyo, Zurich and Frankfurt.

GOLD PRICES

	(In U.S. dollars per fine ounce)		
Comex	London PM	London AM	Comex
Oct.	Oct.	Oct.	Thurs.
$$$.$$	$$$.75	$$$.$$	$$$.$$

Comex based on settlement prices for spot for delivery in current month on Commodity Exchange in New York. London based on morning and afternoon prices fixings of five major dealers.

America's economy will be stronger if Ronald Reagan is elected President —

Join Citizens for Reagan's Business Advisory Council!

Dear Mr. Kane:

I am most happy to join you in support of **Ronald Reagan for President in 1980.** I am firmly committed to the defeat of Jimmy Carter this year.

Ronald Reagan is the best man to be President!

Enclosed is my contribution. I understand that an official **"Citizens for Reagan in '80" Honorary Advisory Board Certificate** will be sent to everyone who sends in at least $25.

__$25 __$50 __$100 __$250 __$500

__$1,000 __$2,500 __$5,000 $ ___ Other

(Make check payable to Fund for a Conservative Majority or FCM)

Corporate contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority — State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/City/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

8304216511

Honorary Business Advisory Board

Presented to

SAMPLE

for active participation in the national campaign to elect
Ronald Reagan President of the United States in 1980.

The Officers and Directors of "Citizens for Reagan in '80"
thank you for your generous support of
Ronald Reagan during the 1980 presidential campaign.
"Citizens for Reagan in '80" is an independent campaign
sponsored by the nationally-recognized political action committee,
Fund for a Conservative Majority.

Robert C. Heckman, Chairman

ELECTION # 1 PACKAGE

8304042165 2

August 15, 1980

Dear Reagan Supporter:

Our campaign to elect Ronald Reagan President has now entered it final stage.

In just three months the election will be over! Either Ronald Reagan or Jimmy Carter will be President.

And you can help decide who will win this fall.

Most political observers expect the Carter campaign to be a nasty, even vicious, anti-Reagan effort.

Jimmy Carter has the active support of dozens of left wing, ultra-environmental and disarmament groups.

The nation's labor czars have already committed millions of dollars to help re-elect Jimmy Carter.

And the news media will soon attack Ronald Reagan in an effort to reduce his current and commanding lead over Jimmy Carter.

Your help is needed today!

"Citizens for Reagan in '80" is the oldest and most effective independent campaign helping to elect Ronald Reagan our next President. It is sponsored by the Fund for a Conservative Majority -- a highly competent and professional political action committee which is also working to elect conservatives to the Senate and the House.

"Citizens for Reagan in '80" has drafted a professional campaign plan to help elect Ronald Reagan. It is a strong, positive plan -- and it is ready to go into effect today!

But your help is needed if our campaign is to succeed and Jimmy Carter is to be defeated.

"Citizens for Reagan in '80" must raise another $275,000 just as fast as possible.

* Radio ads are prepared.
* TV commercials are complete.
* Newspaper ads are ready to be placed.
* Voter mailings are being written now for special voting blocs.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

To buy initial advertising on TV, radio and in newspapers and to begin to contact the key voters in "swing states", $275,000 must be raised within the next three weeks.

Volunteer efforts are also need to elect Ronald Reagan.

Please send the enclosed post card to Ronald Reagan and pledge not only your personal support, but also promise to find at least 10 more citizens who will vote for Reagan on election day. These votes will be absolutely critical in electing Ronald Reagan President of the United States.

"Citizens for Reagan in '80" needs your active support today.

Send the enclosed post card to Ronald Reagan at his National Headquarters right outside Washington, D.C. Pledge your vote and also the votes of 10 other citizens you will personally recruit for Ronald Reagan.

With you financial help we can find one million people who will pledge to vote for Ronald Reagan and who will also pledge to find 10 more Reagan voters.

If we succeed we can promise to deliver 11 million votes for Ronald Reagan on election day -- a healthy percentage of the total votes needed to win.

Send Ronald Reagan your voter pledge card and send your maximum contribution today to FCM's "Citizens for Reagan in '80".

Only with your help can we win!

Sincerely,

Bob Heckman

Robert C. Heckman

P.S. Continued support of Ronald Reagan by patriotic Americans like you is critical. With that help Ronald Reagan will be elected President in three short months -- on November 4th!

Citizens for Reagan in '80!

A project of FUND FOR A CONSERVATIVE MAJORITY

8304024651

I support
RONALD REAGAN

Dear Mr. Heckman:

I support Ronald Reagan for President and will do all I can to help elect him this fall.

☐ I have sent my post card to Governor Reagan pledging my vote and agreeing to find at least 10 more people who will vote for him on November 4.

☐ Enclosed is my contribution to help FCM in its independent campaign, "Citizens for Reagan in '80."

__$25	__$50	__$100	__$250
__$500	__$1,000	__$5,000	__Other

(Make check payable to Fund for a Conservative Majority or FCM.)

Corporate contributions are to be accepted.
They should be issued to the order of The Fund for a Conservative Majority—Ronn Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

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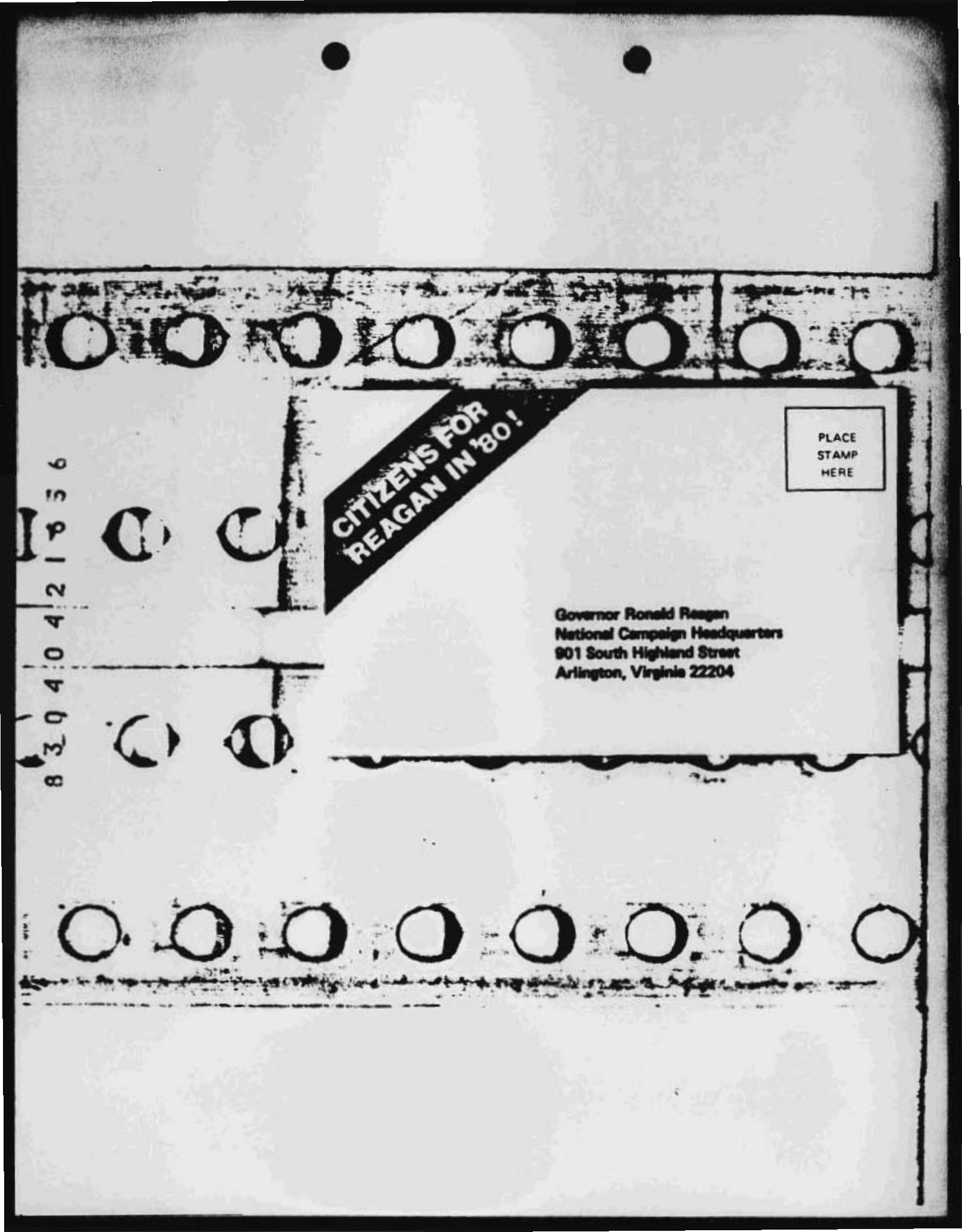
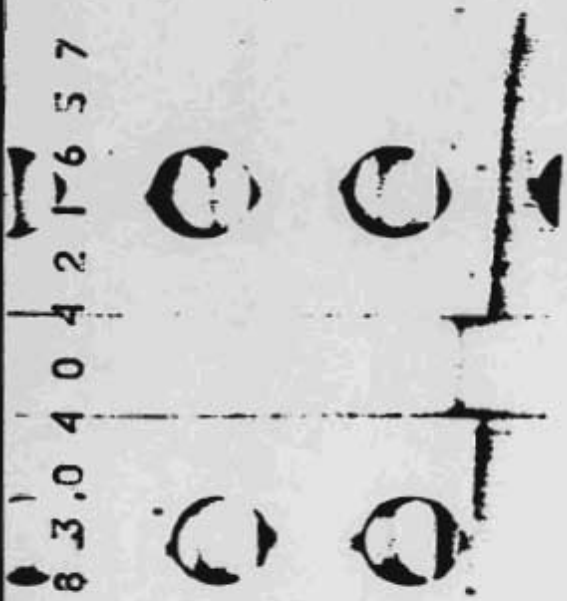

CITIZENS FOR REAGAN IN '80!
PLACE STAMP HERE
Governor Ronald Reagan
National Campaign Headquarters
901 South Highland Street
Arlington, Virginia 22204



Dear Governor Reagan:

I pledge that I will vote for you for President on November 4th.

I will also find at least 10 more voters who will support you. On election day I will take the responsibility to make sure they go to the polls and vote for you.

Name _____

Address _____

City/State/Zip _____

Election #2 Package

8304042165 8

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

August 25, 1980
(74 days to election)

Dear Friend of Governor Reagan:

Ronald Reagan can be elected President of the United States!

But only with your help and that of tens of thousands of other concerned and patriotic Americans will President Carter be defeated.

To "top off" our victory on election night, as many as ten or twelve Big Spending Liberal Democratic Senators can be replaced with responsible conservative Republicans! Many powerful Democratic Congressmen can also be defeated.

All this can happen in just a few short months -- on November 4th, National Election Day.

Ronald Reagan must be elected. President Carter simply has not been the strong, creative and effective leader our country and the Free World so desperately needs in these difficult times.

Jimmy Carter has failed as President.

His domestic policies have produced economic chaos for our people.

Carter's foreign policy failures have shaken the Free World.

Carter must be defeated.

Today's inflation rate is running at over 18% -- over three times the inflation rate as when Carter was elected in 1976.

Government spending is projected to be over $615 billion in the next federal budget! This is almost three times the budget of 1972 and over $200 billion more than President Ford's budget in his last year as President.

You and I worked until mid-May this year just to pay our taxes! And taxes take about 40% of the nation's overall earnings.

This year the average American family will pay over $7,000 in federal taxes!

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

Most of us pay more in taxes than for our combined costs for food, clothing and shelter.

And in our international dealings with friends and enemies, Carter has also been a terrible failure.

Our military has severely deteriorated under the guidance of Jimmy Carter.

The Russians have brazenly invaded Afghanistan and supported Cuban backed revolutions throughout Central America and Africa. Carter's appointments have supported these communist forces as "stabilizing influences"!

President Carter has managed to destroy our political alliance with Iran and today our American compatriots remain hostages to fanatic terrorists in Iran.

Communist China finally got from Jimmy Carter what no other American President would even seriously consider giving it -- the de-recognition of a loyal ally (The Republic of China on Taiwan) and the help of the U.S. in building up the economic and military strength of this communist giant.

And our Free World allies shake their heads in disbelief as they watch America -- only a few short years ago the strong leader of the non-communist world -- quickly becoming a second rate world influence behind the Soviet Union.

But right now you can join with tens of thousands of your fellow Americans to change the direction of our country -- to rebuild our military strength; to begin to dismantle the over-sized federal government; to give each of us and our businesses a large tax cut; and to bring proven, responsible and strong leadership to the Presidency of the United States.

You can join with "Citizens for Reagan in '80" and help elect Ronald Reagan as our next President.

"Citizens for Reagan in '80" is an independent campaign effort sponsored by the highly respected and nationally recognized Fund for a Conservative Majority.

FCM is also using its expertise and resources to help elect a conservative majority in the Senate. Its "Conservative Senate Control" campaign has already had a significant impact this year and the Liberal Democrats are scared.

This fall Ronald Reagan will be running against Jimmy Carter. Both men will receive their limited campaign budgets from the federal government.

But FCM knows that Ronald Reagan will be running against more than just Jimmy Carter.

The incumbent President will use the White House and federal spending to the maximum to try to buy the election.

Just watch as Carter stages important news events close to the election. Large federal programs will be announced... new appointments will be made from "swing states"... Carter will desperately try to force some sort of international "success"... Presidential press conferences and urgent national messages requiring full network coverage will suddenly become more frequent.

The Big Union Bosses will "pull out all the stops" to defeat Ronald Reagan. Since the Democratic Congress has given the unions special election advantages, you can expect these powerful men to spend millions of dollars in 1980 to stop Ronald Reagan from becoming President.

And the various left-wing, consumer, anti-defense and pro-abortion groups will be supporting Carter and attacking Reagan. Millions of dollars will be spent by these left-wing organizations to secure the jobs of their government friends and to continue the discredited policies of the Carter Administration.

Finally there is the news media. The men and women who "report" the news will try to destroy Governor Reagan. The reports will show Reagan in the worst possible light. Tens of millions of dollars in "news time" will be spent by the media to stop Ronald Reagan from becoming President.

Only you can help offset these built-in disadvantages faced by Ronald Reagan. And you can help defeat Jimmy Carter.

Your support of FCM's "Citizens for Reagan in '80" campaign will directly help elect Ronald Reagan our next President.

Because of the way the federal campaign law is written, this independent effort for Ronald Reagan can spend as much money as can be raised from people like you.

"Citizens for Reagan in '80" hopes to spend at least $3,000,000 this fall to help elect Ronald Reagan and also to elect a conservative Senate to work with Reagan in turning our country around.

But to meet this goal "Citizens for Reagan in '80" must find 120,000 people to give at least $25 each to this terribly important campaign effort.

The campaign plans are simple: to carefully and professionally spend as much money as can be raised to reach the American people with

good, strong and effective television advertising, with creative radio and newspaper ads and by sending voter mailings to as many voters as possible in key states.

"Citizens for Reagan in '80" has been working for over a year to nominate and elect Ronald Reagan. The sponsoring political action committee -- Fund for a Conservative Majority -- is well-known as a cost-efficient and professionally run organization. "Citizens for Reagan in '80" was a key factor in the Governor's primary victories earlier this year.

The money you give to "Citizens for Reagan in '80" will be spent effectively and professionally to help elect Ronald Reagan.

Send your maximum contribution today and join with tens of thousands of other Americans in support of "Citizens for Reagan in '80".

Your contribution can range up to $5,000.

Remember, you are not able to contribute to the official Reagan for President organization now that Ronald Reagan is the nominee. Federal law prohibits it.

But you can help elect Ronald Reagan President by sending your contribution today to the Fund for a Conservative Majority.

Your contributon of at least $25 could well be the most important donation you make in your lifetime. It can truly help elect Ronald Reagan -- a victory which can change the future of our country and the Free World.

Please send your contribution today. Help elect Ronald Reagan President of the United States.

I am counting on you. Reagan's election as President could well be determined by the support you give today.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Jimmy Carter has simply failed as President. Our economy is in turmoil and our military strength is dangerously weak.

Help turn our country around! Support "Citizens for Reagan in '80" today. With your help Ronald Reagan can be elected our next President.

8 3 0 4 0 4 2 1 6 6 3

Reagan Can and Must Win

Dear Bob:

The election between Jimmy Carter and Ronald Reagan will be hard fought. Carter has clearly shown that his campaign will be nasty and aimed at misrepresenting Governor Reagan's positions and his character.

Enclosed is my important campaign contribution of

_____$25 _____$50 _____$100 _____$500

_____$1000 _____$5000 _____other

(Make check payable to Fund for a Conservative Majority or FCM.)

Corporate contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority — State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

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THE POLLS

Carter Cuts Reagan Lead In New Poll

Surge in Ratings Linked to Convention

NEW YORK (AP) — With the boost of the Democratic convention and the endorsement of Sen. Edward M. Kennedy, President Carter has dramatically cut into Ronald Reagan's lead as the general election campaign prepares to start, an Associated Press-NBC News poll shows.

In early August, Reagan's margin over Carter was 25 percentage points. But in the poll taken Friday and Saturday, his lead was only seven percentage points among likely voters.

Most of Carter's gain can be traced to the Democratic National Convention, as Carter won his party's nomination amid intense media coverage. Such coverage usually boosts a candidate's standing.

Kennedy's endorsement of Carter did not have a massive effect, but gave Carter help where he needed it most, among liberals and Democrats.

The poll had bad news for independent candidate John Anderson. He drew the support of only 13 percent of the likely voters. That could put his participation in the televised debates sponsored by the League of Women Voters in jeopardy, because the league has said a candidate must have 15 percent support to be invited to the first debate next month.

The news was not all good for Carter either: the public's estimate of his work as president is essentially unchanged.

The latest AP-NBC News poll says Reagan is the choice of 39 percent of the likely voters questioned. Carter is the pick of 32 percent and Anderson was mentioned by 13 percent.

About 1 percent mentioned Citizens Party candidate Barry Commoner, with fewer than 1 percent naming Libertarian Party candidate Ed Clark. Two percent named others and 13 percent were not sure.

In the AP-NBC News poll taken Aug. 5 through Aug. 7, Reagan was the choice of 47 percent, Carter 22 percent and Anderson 15 percent.

Carter drew only 26 percent support among blue-collar workers in early August, compared to 44 percent for Reagan. Carter now gets 40 percent of their votes to Reagan's 35 percent.

While Carter trailed Reagan in the South by a 50-27 margin in the previous poll, the race in Carter's home region now stands at 40 percent for Carter and 39 percent for Reagan, a dead heat. In the West, Reagan's home area, Carter has closed the gap from 47-18 in early August to a 41-30 deficit now.

Likely voters from 18 to 34 years old now split 35-34 between Carter and Reagan, a change from the 15-point edge Reagan enjoyed earlier. Among those older than 65, Carter is now the choice of 40 percent to 37 percent for Reagan, a shift from the 26-point margin Reagan had less than two weeks ago.

Among those 35 to 64 years old, Reagan leads Carter 42-29, down from the 48-22 edge of the earlier poll.

Before the convention, Carter split the liberal vote with Reagan, with the president getting 30 percent to Reagan's 26 percent. Anderson had 28 percent. Now 44 percent backed Carter, 17 percent Reagan and 23 percent Anderson.

Among Democrats, Carter holds a 54-17 edge over Reagan, up from the 44-23 margin earlier. And among independent voters, Reagan remains the choice. He has 36 percent to Carter's 29 percent and Anderson's 19 percent.

Earlier this month, Reagan took 50 percent of the independents, Anderson 22 percent and Carter only 14 percent.

Asked if Kennedy's endorsement affected their vote, most of those polled said it made no difference.

Americans' judgment of Carter's job performance remains low, with only 23 percent rating his work excellent or good. That's about the same as the 21 percent in early August.

The results of polls can vary from opinions of all Americans because of chance variations. For polls of this size — about 1,100 likely voters were interviewed — the results should vary no more than four percentage points either way because of chance variations.

Ronald Reagan's 25 point lead has been cut to only seven points!

The election will not be easily won!

Reagan supporters must join together now to overcome the power of the White House, big labor and the Liberal media!

Carter must be stopped — and you can make the difference. Your contribution will go directly into winning key states — Join "Citizens for Reagan" now!!

8304042165

CITIZENS FOR REAGAN IN '80
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

"Carter Cuts Reagan Lead in New Poll"
REAGAN NEEDS YOUR SUPPORT!

This communication and all endorsements are paid for by Fund for a Conservative Majority

THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

This communication and all endorsements are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee

Election # 3 Package

8304042166 6

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

Dear Friend:

Our country can no longer afford Jimmy Carter and his destructive Liberal policies.

We must elect Ronald Reagan President of the United States!

In less than 4 years, Carter has done more to harm the security of our country and to destroy our standard of living than any president in history.

Just look at the results of the Carter Presidency:

(1) A weakening of our military strength leaving us vulnerable and almost helpless as the Russians continue to strengthen their own military.

(2) A gutless American foreign policy.

(3) Double digit inflation and double digit interest rates -- robbing our people of their savings and making investments for the future impossible.

(4) Unemployment at an incredibly high 8 million people.

(5) Huge federal budget deficits which will lead to even higher inflation.

(6) A federal budget for the fiscal year beginning October 1, that will be 33% higher than last fiscal year.

(7) A business climate that is one of the worst in years.

And of course, Jimmy Carter is now trying to deny this sorry history of failure. He hopes that we Americans will somehow forget and re-elect him to continue four more years of these same disastrous policies.

Carter knows he can't run on his record. So he and his political allies are viciously attacking Ronald Reagan.

Carter's Secretary of Health and Human Resources (formerly HEW), Patricia Harris, attacked Ronald Reagan's Republican platform as being similar to one which could be written by the Ku Klux Klan.

Secretary of State Ed Muskie (the former ultra-liberal, anti-defense Senator) has used that non-political post as a forum to attack Governor Reagan's realistic anti-communist foreign policy as being "dangerous".

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

Jimmy Carter has attacked Reagan's call for across the board tax cuts for all Americans as "sugar-coated poison".

Carter is counting on his friendly Big Union Bosses to force their members into line. A huge and very expensive anti-Reagan campaign has already been launched by Big Labor in order to cut Reagan's vast support among the blue collar voters.

And the liberal news media has joined forces with Carter in trying to portray Ronald Reagan as incapable of winning.

All of this negative, anti-Reagan campaigning must be countered by you and me -- the friends of Ronald Reagan.

If we don't all join in this important campaign to elect Ronald Reagan our next President, we could be faced with another disastrous four years of Jimmy Carter.

"Citizens for Reagan in '80" is the most successful independent campaign effort for Ronald Reagan.

"Citizens for Reagan in '80", sponsored by the highly respected Fund for a Conservative Majority, was instrumental in several of Reagan's primary victories last spring. The plans for this fall are creative and sophisticated.

"Citizens for Reagan" has targeted four key states for the fall -- these states will elect Ronald Reagan our next President.

Florida: This important southern state must be won by Governor Reagan if he is to be our next President. "Citizens for Reagan in '80" will concentrate on the anti-communist Cuban-Americans in Miami, the heavily conservative oriented voters in central Florida and the large retired community in this crucial state.

New York: Ronald Reagan can carry New York if the blue collar workers and the right to life believers vote for Reagan. "Citizens for Reagan in '80" will campaign for these votes throughout New York.

Pennsylvania: Ronald Reagan will carry this key industrial state if the blue collar voters and those with Eastern European backgrounds vote our way. "Citizens for Reagan in '80" has planned a professional campaign aimed at these particular voters.

Connecticut: This small important key state is the one state which could vote for John Anderson and thus, in a close election, throw the selection of President into the Democrat controlled House of Representatives. "Citizens for Reagan in '80" has designed a campaign to stop John Anderson and carry Connecticut for Ronald Reagan.

And the Fund for a Conservative Majority, the sponsor of "Citizens for Reagan in '80", is also campaigning hard to elect at least 10 more Republican Senators this fall.

"Citizens for Reagan" has voter mailings designed. Newspaper ads are prepared. Radio spots are ready to be placed.

The professional campaign is ready to go. "Citizens for Reagan in '80" can be instrumental in these four extremely important states for Ronald Reagan.

These states total 94 electoral votes out of the needed 270 -- or fully 35% of the needed total for Ronald Reagan to win this fall.

But this program is expensive and a great deal of money must be raised and raised in a hurry if we are to successfully execute this important campaign plan.

The Bosses of Big Labor will spend between $10 to $20 million dollars to defeat Ronald Reagan.

Lane Kirkland, successor to George Meany at the powerful AFL-CIO, has flatly said that Big Labor will do all it can, and will spend huge amounts of money, to re-elect Jimmy Carter. To do this a well-funded nationwide campaign has already begun to smear Ronald Reagan.

The various radical, liberal, fanatic environmentalist and women's lib groups will spend additional millions to attack Reagan and elect Carter.

The liberal news media will play up Carter and attack Reagan every chance it gets. This is already becoming obvious.

Only you can help Ronald Reagan. Only you can help "Citizens for Reagan in '80" raise the money necessary to counter the "anti-Reagan" campaign which promises to be the most vicious since the anti-Goldwater campaign of 1964.

"Citizens for Reagan in '80" must raise $2 million dollars before election day to finance a pro-Reagan/anti-Carter campaign in these four key states: Florida, New York, Pennsylvania and Connecticut.

This is a lot of money but only a fraction of what Ronald Reagan's enemies will spend in their efforts to keep him out of the White House.

Your contribution to "Citizens for Reagan in '80" could be your most important political contribution in your lifetime.

That's right. With your help, this year could mark a dramatic turn-around in America's political history -- a turn away from Big Government and weak foreign policy toward individual freedom and a strong, realistic national defense.

Your contribution to this appeal could make the difference between Ronald Reagan winning or losing. Just as your vote on election day is extremely important, so is your individual contribution.

Send your maximum donation today to "Citizens for Reagan in '80".

Over 50,000 Americans have already contributed to this national crusade.

If you've already contributed, please try to send another donation.

Ronald Reagan needs as much help as he can get from friends like you.

We can help elect Ronald Reagan our next President if the campaign funds can be raised.

If possible, please send at least $25 or $50 today. I know this is a large sum of money. But imagine the consequences if Ronald Reagan loses and Jimmy Carter is re-elected.

Our country simply cannot afford another four years of Jimmy Carter.

Our country desperately needs Ronald Reagan.

Please send your maximum contribution today.

Thank you for supporting Ronald Reagan.

Sincerely,

Bob Heckman

Robert C. Heckman, Chairman
Fund for a Conservative Majority

P.S. The anti-Reagan forces will spend over $30 million to defeat our candidate. Big Labor alone will spend between $10 and $20 million to destroy Ronald Reagan in the eyes of America's workers.

"Citizens for Reagan in '80" must count on you to join our efforts to elect Ronald Reagan our next President.

"Anti-Reagan" Campaign has Begun!

CAMPAIGN

AFL-CIO Trying to Stem Worker Drift to Reagan

his support for the Equal Rights Amendment, gun control and federal funding for abortion for the poor.

" The 13.6 million member federation (AFL-CIO) will mount a heavy anti-Reagan, rather than a pro-Carter, campaign this fall."

The Washington Post
August 24, 1980

Patrick Buchanan

Democrats adopt politics of fear

NEW YORK—Some months ago, when it seemed certain the Republicans would confer their nomination upon Ronald Reagan, President Jimmy Carter publicly cautioned the country about a coming campaign of "demagoguery." Time has proven the warning prophetic.

Within two weeks Patricia

...be a simplistic conservative, but he is also a man of conviction, compassion, and excellent instinct. No one here thinks Ronald Reagan's White House will be an official enemies list.

For their part, the Carter

...ing comparisons with

...idiary comba

...had been wr

...press as C

But t

Carter Calls GOP Tax Plan 'Poison'

By Edward Walsh
Washington Post Staff Writer

NEW YORK, Aug. 6—President ...er today assailed a Republican ... plan supported by Ronald ... "sugar-co... poison" for ... rich a... and that be ...mic re... ...ions

...ministration proposal would be wa... relied around Labor Day, the tradi... tional start of the fall presidential election campaign, and that it will "contrast greatly" with the GOP call for a substantial federal ... cut to stimulate the ... Carter campaign ... make ... the ... wa...

...to the rich, and fierce inflation and ...deprivation for other Americans who ...are particularly vulnerable."

..."It substitutes a fantasy of ... gratification instead of a realis... ...sion of a better future," he s... ...ge, than a free ... ...poison."

...his pr...

REVIEW & OUTLOOK

The Carter Tax Increase

To add a bit of perspective to the economic policy the President officially unveiled yesterday, let's start by citing a few statistics:

Federal spending in the fiscal year that begins a month from now is estimated at $633 billion, a full one-third higher than last fiscal year and rising;

The federal deficit in the current fiscal year is already near $80 billion, 60% over the January predictions;

The rising burden of inflation and taxation has made it necessary for a family of four to earn just over $20,000 this year to equal the purchasing power of $10,000 in 1970;

Worker productivity, which rose steadily during the years the U.S. was making significant gains in living standards, has been going downhill since the end of 1978.

After the anemic tax reductions proposed yesterday by Mr. Carter, the federal tax burden will rise yet another $80 billion next year.

Mr. Carter's latest economic policy, his seventh try at this in three and a half years, displays no real awareness of any of these stark numbers. Is the country being strangled by taxes? Too bad. Is federal spending racing out of control? Then we need more money spent on what Teddy Kennedy dignifies with the description "jobs programs."

About the only thing of merit in the tax cuts Mr. Carter has proposed is a liberalization of depreciation allowances for business, which will make some new equipment purchases more attractive. This, however, is overshadowed by the futility of a piddling tax credit to offset part of the sharp increase in the Social Security wage tax due next year. Mr. Carter apparently still has not learned why the $50 tax rebate he first proposed and then dropped in 1977 was of no economic value. And the idea of shipping cash, in the form of an investment credit, to money-losing companies is, at worst, a stimulant to inefficiency, and, at best a Band-Aid for the wounds this administration has inflicted on business profits. The same goes for the grab-bag of "community help" programs.

Other problems of this economy are to be dealt with by convening an "Economic Revitalization Board" made up of government, industry and public representatives. Will this committee come up with a lot of new ideas for restoring competition and efficiency? Or will it come up with ideas for protecting existing corporations, labor unions and government bureaus from threats to their present security? Give yourself a correct score if you chose answer number two.

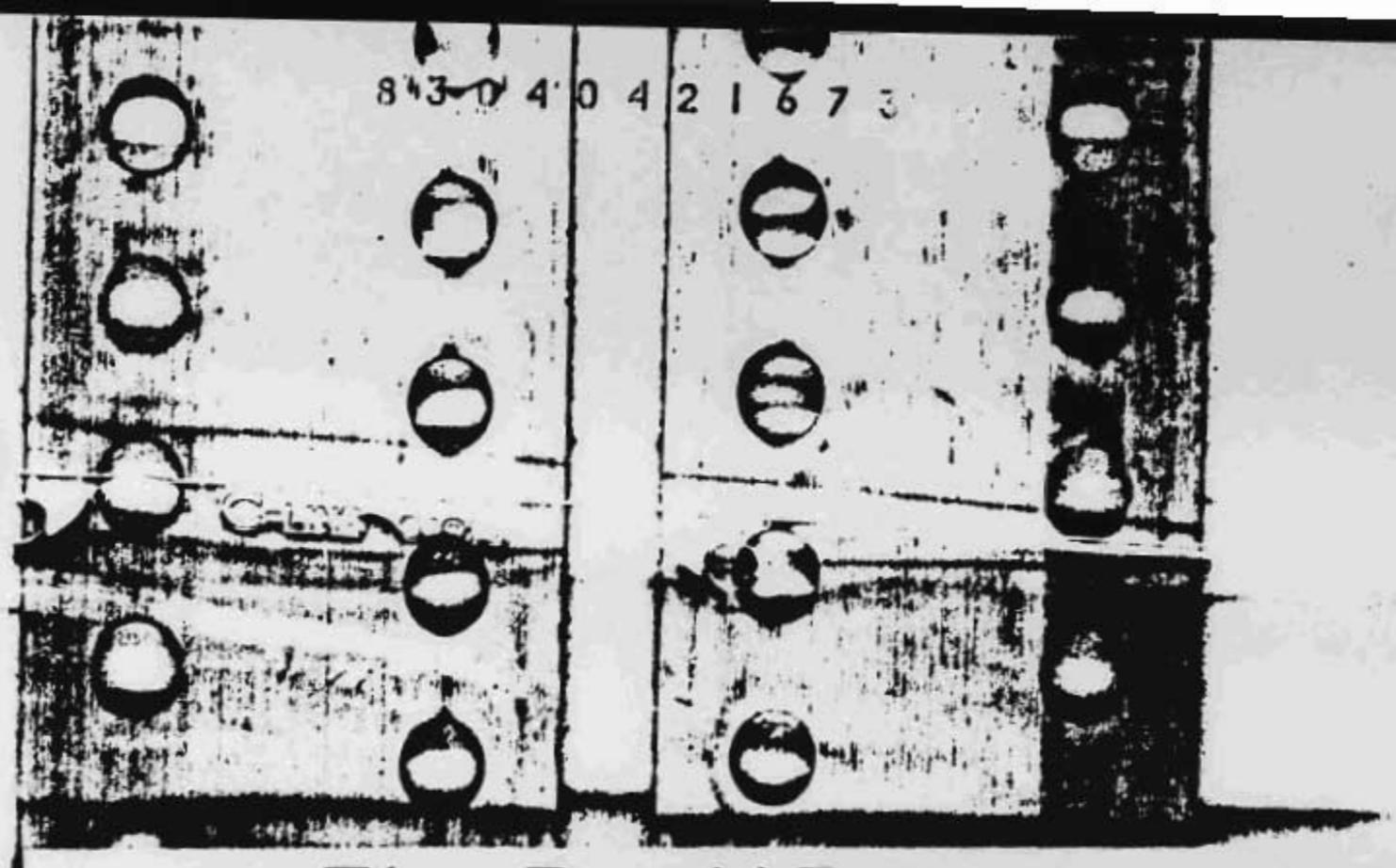
Mr. Carter's reason for doing so little to reverse economic stagnation is that any genuine measure to slow the federal spending-taxing rise might exacerbate inflation. Or, as everybody knows, you cure inflation by trying to balance the budget, even if the spending keeps outrunning the revenues while you are trying to do all that, and the inflation keeps getting worse.

In fact, you do not cure inflation by raising taxes. If that were the case it is unlikely the inflation rate could have tripled over the last three years at a time when federal tax receipts were rising 50%. Inflation can be cured by sound central bank money growth control coupled with federal policies that do not discourage production and efficient use of resources. It is not necessary to be absolutist about the Laffer curve or supply-side economics to argue that on the record of the last three years, arresting the tax rise, particularly as it affects investment and work incentives, is more likely to reduce inflation than the continued piling on of additional tax. And certainly federal spending must be brought under control.

The fact that the Carter administration refuses to accept this suggests to us that the problem goes deeper than a mere misreading of economic trend lines. There is every reason to believe that we are faced here with a government that has been taken over by the inmates and that its only dynamic comes from men and women in power centers who are busily designing new forms of activism to pour into Stu Eisenstat's hopper. When it all comes out we don't get programs that address economic problems but yet another wish list reflecting all the things Carter administration functionaries would like to busy themselves doing.

Can this process be reversed? That may well be the most important economic issue we face.

THESE ARE THE FACTS WHICH CITIZENS FOR REAGAN WILL DISTRIBUTE TO MILLIONS OF VOTERS IF YOU SEND YOUR CONTRIBUTION TODAY.



Elect Ronald Reagan!

Dear Bob:

Ronald Reagan must defeat Jimmy Carter!

Enclosed is my maximum contribution to help off-set the tremendous amount of money (up to $30 million) which will be spent in a massive "anti-Reagan" campaign by Big Labor and various radical, liberal and fanatic environmentalists and "women's lib" groups.

——$25 ——$50 ——$100 ——$500 ——$1,000 ——$5,000 ——other

Make check payable to the Fund for a Conservative Majority or FCM.

Corporate contributions can be accepted. They should be issued to the order of The Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

This communication and all enclosures are paid for by the Fund for a Conservative Majority and are not authorized by any candidate or candidate's committee.

8304042157

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

Our Country can
no longer afford
Jimmy Carter!

Thanks for
helping
us with
postage

I Support
Ronald Reagan

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

This communication and all enclosures are paid for by Fund for a Conservative

ELECTION #4

8304042167 5

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

September 25, 1980
(Only 40 days before the election)

Dear Friend:

Won't you invest $25 to help elect Ronald Reagan our next President?

That is what it will take from you and many other Americans in the next four weeks to defeat Jimmy Carter and elect Ronald Reagan.

Already thousands of concerned and patriotic Americans have contributed to "Citizens for Reagan in '80". We need your immediate support if we are to succeed in countering the "anti-Reagan campaign" being waged by the Carter White House, the Labor Bosses and the Liberal news media.

By now you are fully aware of the problems Jimmy Carter has brought to our country:

* Double digit inflation eating away at our salaries.
* Double digit interest rates stopping our ability to improve our lives.
* A huge federal bureaucracy.
* Unemployment reaching 8 million people.
* A deep recession (indeed, to 8 million unemployed, a Carter depression) hanging over all our futures.
* A weakened national defense and an even weaker foreign policy.

Jimmy Carter must be defeated!

But Ronald Reagan's election or defeat could well be decided by your response to this letter.

I've just returned from an Executive Campaign meeting of "Citizens for Reagan" and we have made the decision to immediately "pull out all the stops" for Ronald Reagan. We will significantly increase our already aggressive independent campaign to help elect Ronald Reagan and defeat Jimmy Carter.

We are counting on you for support.

Everyday Carter's campaign is becoming more and more vicious. And Ronald Reagan needs all our help if he is to be elected our next President.

"Citizens for Reagan in '80" must raise an additional $2 million in the next month if Ronald Reagan is to be elected President.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

8304042167 6

This money will be used for targeted mailings to blue collar workers, right to life believers and anti-communist Americans from Eastern Europe and other countries now under communist domination.

It is these Americans -- former Democratic voters who are fed up with Jimmy Carter -- who must vote for Ronald Reagan if he is to win. Newspaper and radio ads are ready to run in key areas to reach these critical voters.

These voters hold the key to Reagan's election. And you hold the key to these voters.

Your contribution of at least $25 will help a great deal. If you can possibly afford $50, $100 or more it will be effectively and efficiently used to help elect Ronald Reagan.

Maybe you can't send the full amount I am asking, but please try to send as much as you possibly can.

I know this is a lot to ask. But the election of Ronald Reagan deserves our financial support and sacrifice.

Reagan's election will mean a stronger and more sound economy. Our dollars will be worth more and our taxes will be less.

With Reagan as President, the current double digit inflation rate and double digit interest rates will end.

And America will again stand tall and proud in world affairs. Our military will be rebuilt to become the best in the world.

If you don't send a major contribution, Jimmy Carter could well be re-elected. And that would indeed be a tragedy for our country.

"Citizens for Reagan in '80" is sponsored by the highly respected Fund for a Conservative Majority. FCM is also working to help elect Senators and Congressmen.

Jimmy Carter, his friends in Big Labor and in various left-wing groups are spending tens of millions of dollars in an unprecedented "anti-Reagan" campaign.

Your help to "Citizens for Reagan in '80" can make the ference between Reagan winning and losing.

Please send your contribution today.

We must defeat Jimmy Carter.

We need Ronald Reagan in the White House!

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Your contribution today of at least $25 can truly make the difference between Reagan winning or losing this fall. I am counting on you.

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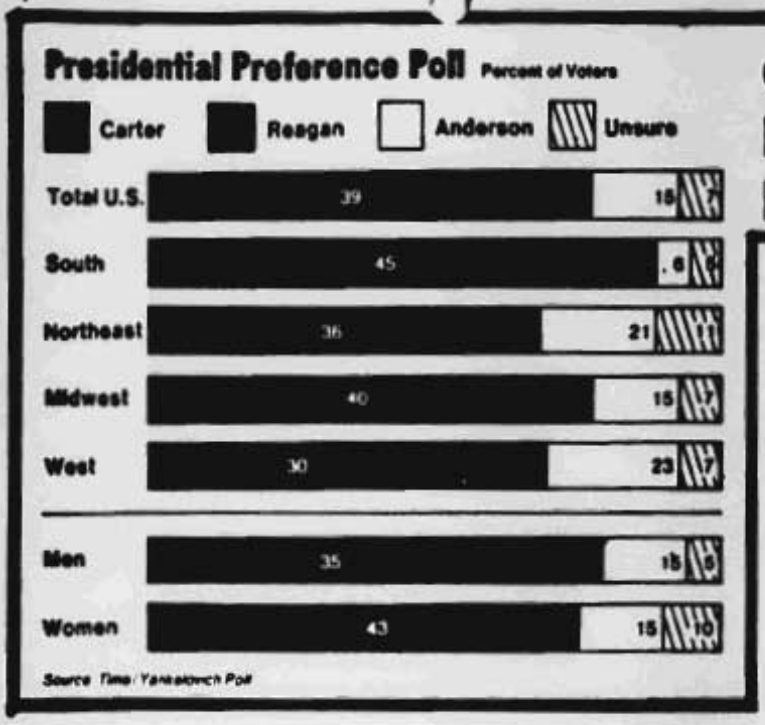
F08882

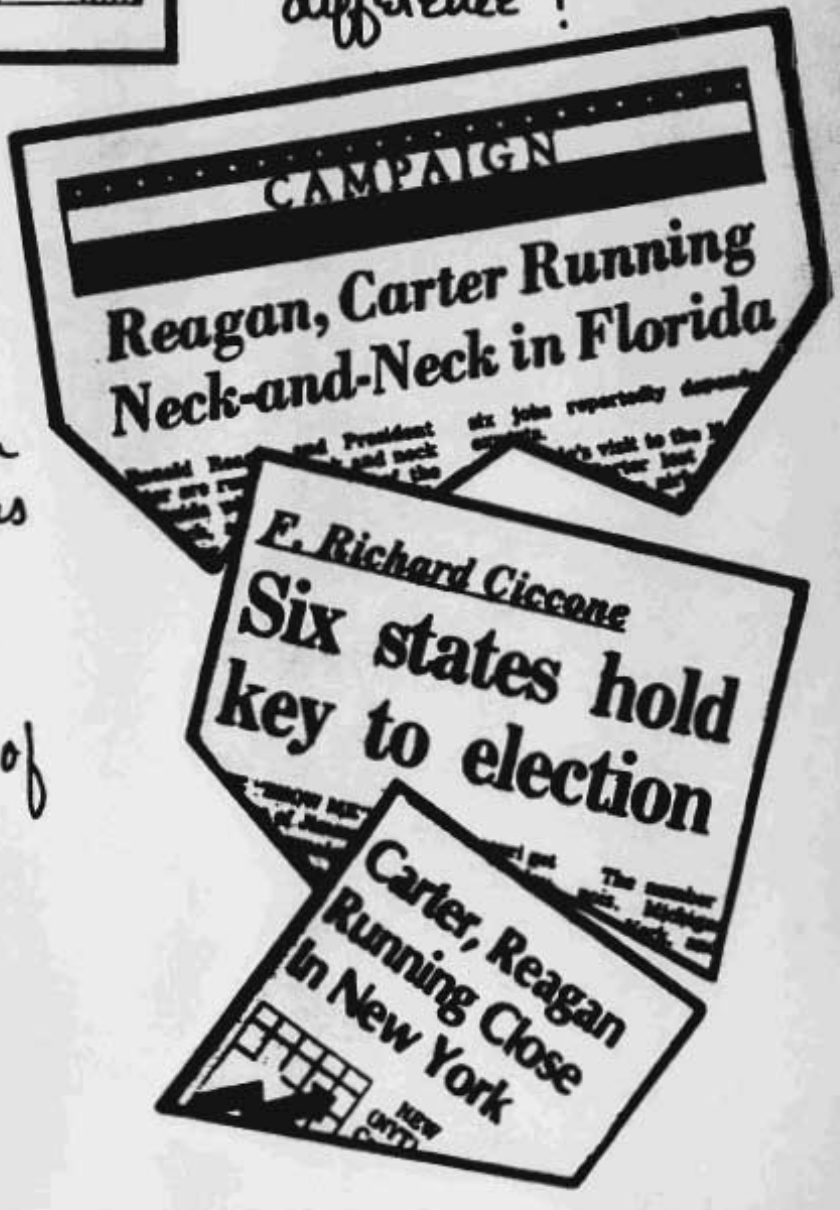


Carter, Reagan Exactly Even In Voter Poll

The race is neck and neck. Your support for the Reagan campaign will make the difference!

Carter's anti-Reagan campaign must be offset by the positive pro-Reagan campaign being run by "Citizens for Reagan in '80".

Help defeat the Democrat's politics of fear with Reagan's politics of hope!



Ronald Reagan

Leadership for a change

"I cannot and will not stand by and see this great country destroy itself. [illegible]

"I believe the nation hungers for a spiritual revival. [illegible]

"Jimmy Carter risks our national security by our obsession with [illegible] Soviet Union. The crisis of confidence which pervades the administration is the result of a permanent reality of our day-to-day life.

"I believe America is at a great crossroads in our history. The [illegible] U.S. and put it back on the right track [illegible]

Be part of the solution
Support
RONALD REAGAN.

Count me on the Reagan Team for 1980! I am most happy to join

CITIZENS FOR REAGAN IN '80

and to work to elect Ronald Reagan President of the United States.

_ $15 _ $25 _ $50 _ $100

_ $500 _ $1,000 _ $2,500 _ Other

Make checks payable to Conservative Majority for PCM

Name

Address

City State Zip

Occupation

Name of employer Self-employed

This is one of the ads which "Citizens for Reagan in '80" is running this fall.

Help Ronald Reagan by helping to place this and other ads in key states.

Your contribution now will make the critical difference in this close election!

830421680

008807

INTRA OFFICE MEMORANDUM

CITIZENS FOR REAGAN

September 24, 1980

SEND THIS TO OUR loyal DONORS and others INTERESTED IN HELPING TO ELECT RONALD REAGAN. Ralph

TO: Ralph Galliano
Executive Director
Citizens for Reagan

FROM: Bob Heckman, Chairman
Citizens for Reagan

As a follow up to yesterday's Executive Campaign meeting, I am instructing you to:

(1) Cut all office overhead expense by 25% effective immediately.

(2) Increase the campaign budget immediately by 40% -- to $2 millions.

We have an obligation to our country and to our contributors to do all we can to defeat Jimmy Carter and elect Ronald Reagan President of the United States.

Our campaign plan is professional and it can make the difference in this critically important election.

I am absolutely confident that our friends will send us the necessary funds to elect Ronald Reagan President.

F00379

I Want to Help Elect Ronald Reagan!

Enclosed is my contribution to help elect Ronald Reagan our next President.

Jimmy Carter must be defeated. Four more years of his Administration would be a national tragedy!

My contribution to Fund for a Conservative Majority is:

____$25 ____$50 ____$100 ____$500 ____$1,000 ____ $5,000 ____ other

☐ I have sent at least $100 and would like to be listed as a member of the "Citizens for Reagan in '80" Honorary National Finance Committee.

(Make check payable to Fund for a Conservative Majority or FCM)

Corporate contributions can be accepted.
They should be issued to the order of the Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/state/zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer? _____ Self-Employed? _____

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CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

You Can Help Elect Ronald Reagan Our Next President. Please Read Letter Enclosed.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

REAGAN FOR PRESIDENT IN 1980

Thanks for helping us pay postage

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

20037 81

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Reagan VICTORY Drive

File FCM

NOV. 4 1980

October 10, 1980
(25 days before the election)

Dear Fellow American:

America is at a crossroads.

In just 3 1/2 weeks we will know if Ronald Reagan or Jimmy Carter will be our next President.

Will we continue to rely on Big Government to solve our problems or will we begin to once again trust the American people to solve their own problems?

Will government-inspired inflation continue to destroy our futures?

Will we continue a foreign policy based on appeasement, conciliation and retreat or will we rebuild America's honor and military strength?

These are the questions facing of us when we vote on November 4.

The polls show a close race and no one knows what the outcome will be.

You and I know that Ronald Reagan must win if America's military and economic strength are to be rebuilt.

We also know that America simply can't afford another four years of Jimmy Carter's Administration.

Jimmy Carter has proven to each and every one of us that he can't handle the job of President.

Our economy is being destroyed.

Our allies and the rest of the world shake their heads over Carter's weakness in dealing with the Russians.

Our military strength has dangerously declined under the guidance of Jimmy Carter.

Our purchasing power has decreased by at least 10% since Carter became President.

Each of us knows that we are worse off economically than we were just four short years ago.

This year we simply must elect Ronald Reagan.

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8304042165

888007

"Citizens for Reagan in '80" has campaigned long and hard to help Ronald Reagan.

This independent campaign is sponsored by the highly respected Fund for a Conservative Majority. FCM is also working to elect new Senators and Congressmen who will help Ronald Reagan turn this country away from disaster.

Your immediate help is needed if Ronald Reagan is to defeat Jimmy Carter.

I need you to do two things today.

(1) Mark your calendar so you won't forget to vote on November 4, and line up at least 10 friends to call on election day. Remind them to vote also.

(2) Send your maximum contribution to "Citizens for Reagan" today. Much more needs to be done to help Ronald Reagan. Try to send $25. Send more if you can afford it.

Whatever you send will be of great help to us.

"Citizens for Reagan in '80" is concentrating its television and radio ads in New York, Pennsylvania, Florida and Connecticut -- important and critical states that Reagan must carry if he is to defeat Jimmy Carter.

Newspaper ads are running in key cities urging Americans to vote for Ronald Reagan.

Voter appeals have been mailed and hundreds of thousands of additional voter mailings are ready to go if the basic costs can be raised.

Please help "Citizens for Reagan in '80" in this last big campaign push -- to elect Ronald Reagan the next President of the United States.

Send your maximum contribution today. There is still time to help defeat Jimmy Carter and elect Ronald Reagan.

We must hear from you soon. Don't delay.

Your campaign contribution is absolutely crucial to our chances for victory.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Ronald Reagan can defeat Jimmy Carter. These closing days of the campaign are critical if we are to win.

Please send your contribution today.

8304216840

F00387

REAGAN IS MY CHOICE FOR PRESIDENT!

Dear Bob:

I agree that America is at a cross roads.

The 1980 Presidential election will determine if America will be rebuilt into the strongest country — economically and militarily — in the world.

My maximum contribution is enclosed:

_____$25 _____$50 _____$100 _____$250 _____$500 _____$1,000

_____$5,000 _____other

(Make check payable to Fund for a Conservative Majority or FCM.)

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Name _____

Address _____

City/State/Zip _____

I WANT TO HELP DEFEAT JIMMY CARTER!

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

8304216

8 3 0 4 0 4 2 1 6 8 [illegible]

One of these headlines will greet us the morning after the election. The choice is yours. Help us elect Ronald Reagan!

Daily Express

November 5, 1980 — Wednesday Morning

REAGAN WINS!

Today's News

National

World

State

Local

Carter Concedes Defeat As Southern Base Crumbles

Plains, GA

Today's Weather

Sunny & Clear

Forecast

Good Weather

Liberalism Dead - Goldwater

Phoenix, AZ

Russia Assures Pull Back of Troops in Afghanistan

Republicans Gain Senate Control

Reagan Carries New York, Pennsylvania, Florida and West

Washington, D.C.

Reagan Announces Plan to Nominate Conservative Supreme Court Justices

Daily Express

November 5, 1980 — Wednesday Morning

CARTER RE-ELECTED!

Today's News

National

World

State

Local

Reagan Concedes Defeat

Today's Weather

Rain & Cold

Forecast

Gloomy

Carter Pledges Massive Government Spending

President Barely Wins

Smallest Margin Since 1960

New York Goes to Carter [illegible] Votes Win

Mondale: "Liberals Proved Correct"

Kennedy Planning to Run For President in 1984

F003852

My Choice is Ronald Reagan!

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

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ELECTION # 5

Reagan VICTORY Drive

NOV. 4 1980

October 10, 1980
(25 days before the election)

Dear Fellow American:

America is at a crossroads.

In just 3 1/2 weeks we will know if Ronald Reagan or Jimmy Carter will be our next President.

Will we continue to rely on Big Government to solve our problems or will we begin to once again trust the American people to solve their own problems?

Will government-inspired inflation continue to destroy our futures?

Will we continue a foreign policy based on appeasement, conciliation and retreat or will we rebuild America's honor and military strength?

These are the questions facing of us when we vote on November 4.

The polls show a close race and no one knows what the outcome will be.

You and I know that Ronald Reagan must win if America's military and economic strength are to be rebuilt.

We also know that America simply can't afford another four years of Jimmy Carter's Administration.

Jimmy Carter has proven to each and every one of us that he can't handle the job of President.

Our economy is being destroyed.

Our allies and the rest of the world shake their heads over Carter's weakness in dealing with the Russians.

Our military strength has dangerously declined under the guidance of Jimmy Carter.

Our purchasing power has decreased by at least 10% since Carter became President.

Each of us knows that we are worse off economically than we were just four short years ago.

This year we simply must elect Ronald Reagan.

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"Citizens for Reagan in '80" has campaigned long and hard to help Ronald Reagan.

This independent campaign is sponsored by the highly respected Fund for a Conservative Majority. FCM is also working to elect new Senators and Congressmen who will help Ronald Reagan turn this country away from disaster.

Your immediate help is needed if Ronald Reagan is to defeat Jimmy Carter.

I need you to do two things today.

(1) Mark your calendar so you won't forget to vote on November 4, and line up at least 10 friends to call on election day. Remind them to vote also.

(2) Send your maximum contribution to "Citizens for Reagan" today. Much more needs to be done to help Ronald Reagan. Try to send $25. Send more if you can afford it.

Whatever you send will be of great help to us.

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Voter appeals have been mailed and hundreds of thousands of additional voter mailings are ready to go if the basic costs can be raised.

Please help "Citizens for Reagan in '80" in this last big campaign push -- to elect Ronald Reagan the next President of the United States.

Send your maximum contribution today. There is still time to help defeat Jimmy Carter and elect Ronald Reagan.

We must hear from you soon. Don't delay.

Your campaign contribution is absolutely crucial to our chances for victory.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Ronald Reagan can defeat Jimmy Carter. These closing days of the campaign are critical if we are to win.

Please send your contribution today.

8304247690

One of these headlines will greet us the morning after the election. The choice is yours. Help us elect Ronald Reagan!

Daily Express

November 5, 1980 — Wednesday Morning

REAGAN WINS!

Today's News

National

World

State

Local

Carter Concedes Defeat As Southern Base Crumbles

Plains, GA

Today's Weather

Sunny & Clear

Forecast

"Liberalism Dead" Goldwater

Phoenix, AZ

Reagan Carries New York, Pennsylvania, Florida and West

Washington, D.C.

Reagan Announces Plan to Nominate Conservative Supreme Court Justices

Russia Assures Pull Back of Troops in Afghanistan

Republicans Gain Senate Control

Daily Express

November 5, 1980 — Wednesday Morning

CARTER RE-ELECTED!

Today's News

National

World

State

Local

Reagan Concedes Defeat

Today's Weather

Rain & Cold

Forecast

Cloudy

Carter Pledges Massive Government Spending

Mondale: "Liberals Proved Correct"

President Barely Wins

Smallest Margin Since 1960

New York Goes to Carter by 7200 Votes — Insures Win

Kennedy Planning to Run For President in 1984

REAGAN IS MY CHOICE FOR PRESIDENT!

Dear Bob:

I agree that America is at a cross roads.

The 1980 Presidential election will determine if America will be rebuilt into the strongest country — economically and militarily — in the world.

My maximum contribution is enclosed:

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_____$5,000 _____other

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They should be issued to the order of The Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

I WANT TO HELP DEFEAT JIMMY CARTER!

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93040421692

CITIZENS FOR REAGAN IN '80!
A project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

The Choice Is Yours!

...l Reagan.

My Choice is Ronald Reagan!

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

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8304042169

FCM Media Package

(1600 fill-ins; 90 completely personalized)

Citizens for Reagan in 80!

A project of **FUND FOR A CONSERVATIVE MAJORITY**

October 15, 1980

Mr. Gene Barth, President
Bonifide Oil Company
11789 Natural Bridge Road
St. Louis, Missouri

Dear Mr. Barth:

We're down to the last month of the Presidential campaign and the pressure is building.

Because of your dedication and that of other patriotic Americans, Ronald Reagan has a real chance to be elected our next President.

The Carter forces are scared. They know they could lose. And the decision has been made in the White House -- by the President himself -- to attack Ronald Reagan in the most vicious, dirty campaign this nation has seen in at least sixteen years.

Ronald Reagan is up against the Big Lie. And this Big Lie is coming from the Carter-Mondale campaign, the Carter Administration political appointments, the AFL-CIO and the many liberal, radical and welfare rights type groups which are supporting Jimmy Carter.

And Ronald Reagan is counting on his good friends to support him.

But frankly this won't be enough. This is why "Citizens for Reagan in '80" is sponsoring a multi-media campaign to help elect Ronald Reagan.

Full page newspaper ads along with radio and television "spots" have been produced. This professionally produced Reagan Media Program can make the difference between victory and defeat on November 4.

I have enclosed for you a set of the newspaper ads we have produced for the Reagan Media Project. These ads will make a significant impact on those voters who are still undecided or who are today only mildly supporting Jimmy Carter.

"Citizens for Reagan in '80", sponsored by the highly respected Fund for a Conservative Majority, is the original most successful independent

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8304042169 5

expenditure campaign helping to elect Ronald Reagan. FCM is also working to elect creative and responsible conservative candidates to the Senate and the House.

Your maximum contribution is needed today if "Citizens for Reagan" is to raise the needed budget to fully utilize the professional Reagan Media Program.

Please send at least $1,000 to FCM's "Citizens for Reagan in '80" project. Our records indicate you have already invested at least that much in this campaign. Federal law limits individual contributions to our efforts to $5,000.

If you will send at least $1,000 today to "Citizens for Reagan" you can help Ronald Reagan defeat Jimmy Carter and become our next President!

Your continued help at this particular time is critically important.

Thank you for your past support and for your continued help in Ronald Reagan's election.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Jimmy Carter would have been defeated in 1976 with a change of only 20,000 votes in three key states.

This year's election could be that close again.

We must not leave any stone unturned in our efforts to defeat Jimmy Carter this year.

8304042169 6

"TOGETHER WE CAN RENEW
THE GREATNESS OF AMERICA"

The Fund for a Conservative Majority is one of Ronald Reagan's oldest allies.

Since the first day of Reagan's presidential candidacy FCM's special project, "Citizen's for Reagan in '80", has been working hard on his behalf.

Under the federal campaign law, Ronald Reagan is not permitted to receive individual contributions to his campaign now that he is nominated. But independent campaign efforts such as "Citizens for Reagan in '80" allow individuals to contribute to the candidate of their choice.

"Citizens for Reagan in '80" was the first and only major independent effort working on Reagan's behalf throughout the primaries. Their efforts in the key states of New Hampshire, Florida, South Carolina, Connecticut, Illinois, Pennsylvania, Texas, Tennessee, Ohio, California, and New Jersey played an important role in Reagan's nomination.

"Citizens for Reagan in '80" plans to continue its effective multi-media ad campaign to the final election day, November 4. They can do so only with your help.

THE FUND FOR A CONSERVATIVE MAJORITY

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The Fund for a Conservative Majority is dedicated to the goal of creating a conservative majority in the Congress and of electing a conservative President.

THE FUND FOR A CONSERVATIVE MAJORITY
1022 Wilson Boulevard, Suite 401
Arlington, Virginia 22209

THE BUCK STOPS HERE

Ronald Reagan

Leadership for a change

REAGAN MEDIA PROGRAM

CITIZENS FOR REAGAN IN '80

A Project of Fund For A Conservative Majority

ONE OF THE FINEST POLITICAL AD CAMPAIGNS EVER

TELEVISION

TELEVISION: "Citizens for Reagan in '80" has produced some of the most creative TV spots of the campaign.

1976 Jimmy Carter ads have been used to clearly show that Carter has failed.

Political commentators have remarked that these TV spots are among the best they have seen.

A maximum budget of $400,000 is needed to run these ads in key media markets.

RADIO

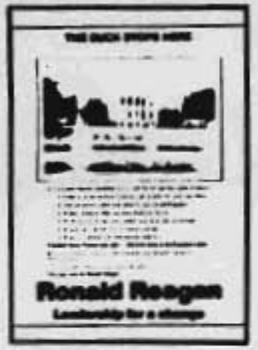
RADIO: Hardhitting radio ads have been produced by "Citizens for Reagan in '80".

Radio is one of the most effective methods of reaching the voters. Specific "time slots" can be purchased to run the ads during "drive time" and the "evening news".

The radio scripts produced by "Citizens for Reagan in '80" clearly show the listener that voting for Ronald Reagan is the only way to help our nation rebuild its economic and military strength.

The radio budget for maximum effectiveness is $250,000.

NEWSPAPER

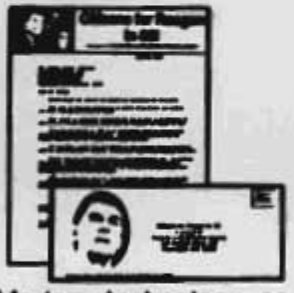


NEWSPAPERS: One of the best ways of reaching prospective voters is through full page newspaper ads.

"Citizens for Reagan in '80" has produced a series of five full page ads clearly showing that Ronald Reagan must be elected our next President.

These newspaper ads are an important part of the overall Reagan Media Program and will reach those most likely to vote: people who read the newspapers.

VOTER MAILINGS



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Voter mailings will be sent to blue collar working families, conservative Democrats, ethnic groups and middle class independents.

To reach 1.6 million swing voters with these hard-hitting and yet creative mailings will cost $200,000.

3 C 9 1 2 4 0 4 0 3 8

"CITIZENS FOR REAGAN IN '80"

MEDIA PROGRAM BUDGET

Television Time	$400,000
Radio Time	$250,000
Newspaper Spots	$150,000
Voter Mailings	$200,000
TOTAL	$1,000,000

"Citizens for Reagan in '80" has produced one of the most positive and creative multi-media advertising campaigns in this year's presidential elections.

The million-dollar advertising budget is small compared to the millions pumped into anti-Reagan campaigns by labor unions, environmentalists, federal officials, and liberal interest groups.

But the efficiency and effectiveness of the "Citizens for Reagan in '80" effort is more than off-setting the anti-Reagan negativism.

The million-dollar budget has not yet been reached, but it must be if Ronald Reagan is to be elected on November 4.

Send your contribution today. These ads will make the difference!

REAGAN MEDIA PROGRAM
RESPONSE MEMORANDUM

Dear Bob Heckman:

I agree that Citizens for Reagan in '80 and its Reagan Media Program will be a key element in the ultimate victory of Ronald Reagan.

Enclosed is my maximum contribution to the critically important Reagan Media Program.

_____$5,000 _____$2,500 _____$1,000 _____$500 _____$100 _____Other

(Make check payable to Fund for a Conservative Majority
Corporate contributions can be accepted

They should be issued to the order of the Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

Federal law requires that we ask

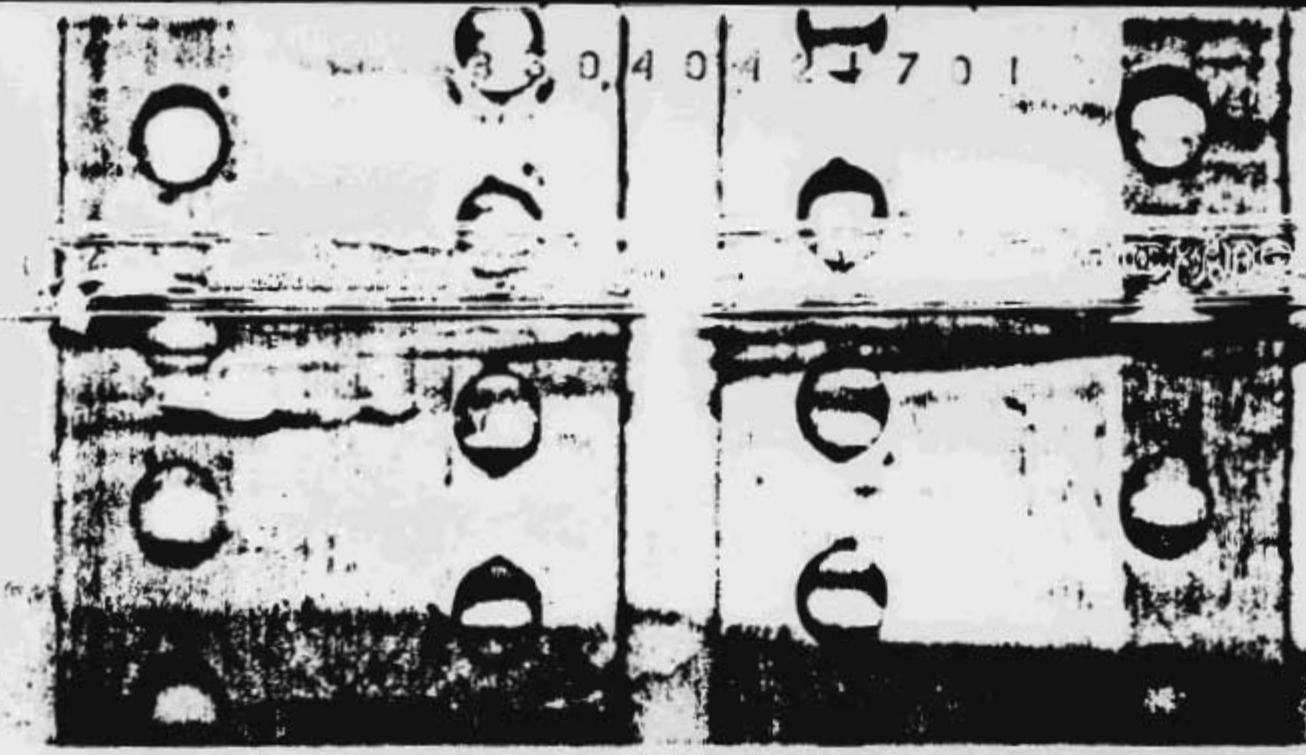
Occupation _____

Name of Employer _____

Self-Employed _____

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

THE PRESIDENT OF THE UNITED STATES



THANKS FOR HELPING US PAY POSTAGE

Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

Citizens for Reagan in '80!
A project of Fund for a Conservative Majority
1022 Wilson Boulevard, Suite 1401
Arlington, Virginia 22209

To:

Mr. Gene Barth, President
Bonifide Oil Company
11789 Natural Bridge Road
St. Louis, Missouri

DO NOT BEND

Official and Confidential Correspondence
Enclosed for Addressee Only

3304042170

ELECTION #6

8304042170

CITIZENS FOR REAGAN IN '80

EMERGENCY ELECTION APPEAL

HELP RONALD REAGAN DEFEAT JIMMY CARTER

October 17, 1980
(2 1/2 weeks before the election)

Dear Reagan Supporter:

This is your final chance to help elect Ronald Reagan! Please don't let Reagan lose this election!

In just two weeks the voters will decide between Jimmy Carter and his policies of failure or the new creative leadership of Ronald Reagan.

Sponsored by Fund for a Conservative Majority, "Citizens for Reagan in '80" is the first and most successful independent campaign for Ronald Reagan.

I have written you before about this essential campaign effort to help Governor Reagan. Thanks to you and thousands of other supporters, we have the unique opportunity to turn this country around: To elect Ronald Reagan and to defeat many of the ultra-liberal leaders in the Senate and the House.

"Citizens for Reagan" can still buy advertising time on TV and radio. Newspaper ads can still be run. Voter mailings can still be mailed.

I have enclosed a brochure fully outlining for you the Reagan Media Program.

There is still time to execute this important campaign project if you send a contribution today!

Voters must be convinced that Reagan is the best choice for President!

Send one last contribution today. And make it as large as possible!

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

This is the big one. We have but one chance to elect Ronald Reagan -- and that chance is only two weeks away!

Your response to this letter can make the difference between victory and defeat.

Jimmy Carter and the Union Bosses hope you won't respond to this final request for help.

But I know you support Ronald Reagan and I know you will respond.

Your final investment in this campaign will be paid back many times over if Ronald Reagan wins.

God bless you for your help.

Sincerely,

Bob Heckman

Robert C. Heckman
Chairman

P.S. Jimmy Carter won in 1976 by less than 20,000 votes in 3 key states. Your final contributon today to "Citizens for Reagan in '80" will help make sure that doesn't happen again.

8 0 4 0 4 2 1 7 0 5

URGENT MEMORANDUM! VERY IMPORTANT!

I have just reviewed new public opinion surveys and Ronald Reagan can win!

But Reagan's lead over Jimmy Carter in 6 major states is so slim — so tenuous — that Carter's negative campaign against Reagan could change the outcome.

New York, Pennsylvania, Ohio, Florida, Illinois and Texas are too close to call.

Reagan's victory or defeat will be decided in these major states.

Your contribution today to "Citizens for Reagan in '80" can help Ronald Reagan win these key states and become our next President!

I am counting on you. So is Ronald Reagan.

Bob Heckman

Robert C. Heckman
Chairman

RONALD REAGAN MUST DEFEAT JIMMY CARTER!

Here are a few reasons to vote for Ronald Reagan. Please use them to convince 10 friends, associates and relatives to vote for Ronald Reagan.

1) Inflation is running at an annual rate of 13%. When Carter became President inflation was at only 4.8%.

2) House mortgage rates are at 14% to 15%. When Carter became President these mortgage rates were at 8% to 9%.

3) Unemployment is running at almost 8%.

4) The Federal Budget has gone up by over $200 Billion since Carter became President.

5) U.S. military strength has drastically declined under Jimmy Carter.

6) Jimmy Carter simply is not a strong President.

Ronald Reagan will bring to government the advisors and leaders who have proven their ability to bring government and inflation under control and who can rebuild our military strength.

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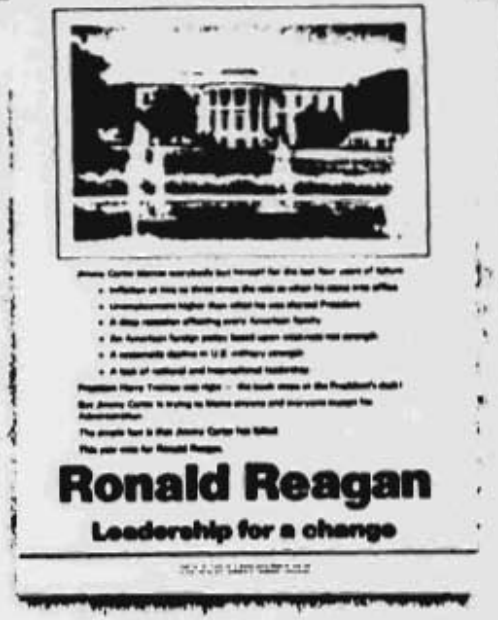

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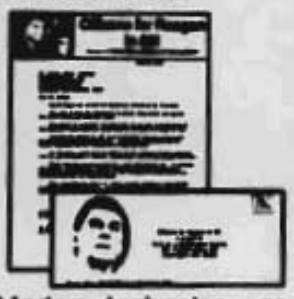

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"CITIZENS FOR REAGAN IN '80"

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Send your contribution today. These ads will make the difference!

8 3 0 4 0 4 2 1 7 6

RONALD REAGAN VICTORY REPLY

Dear Mr. Heckman:

Ronald Reagan must defeat Jimmy Carter!

Our country needs the strong and effective leadership of Ronald Reagan.

Enclosed is my final and maximum contribution to "Citizens for Reagan in '80". Please use it to help finance the creative Reagan Media Program.

_____ $25 _____ $50 _____ $100 _____ $500 _____ $1,000 _____ $5,000 _____ other

(Make check payable to Fund for a Conservative Majority or FCM)

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They should be issued to the order of the Fund for a Conservative Majority—State Fund. These contributions will be utilized only in connection with state and local races where corporate contributions are permitted.

Name _____

Address _____

City/State/Zip _____

Federal law requires that we ask:

Occupation _____

Name of Employer _____

Self-Employed _____

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Citizens for Reagan in '80
A project of:
Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

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Citizens for Reagan in '80!
A Project of Fund for a Conservative Majority
927 Fifteenth Street, NW
Washington, D.C. 20005

DON'T LET RONALD REAGAN LOSE THIS ELECTION!

This communication and all enclosures are paid for by Fund for a Conservative Majority and not by any candidate or candidate's committee.

8304042|712

PCH POST ELECTION PACKAGE 11/28/80

FCM

THE FUND FOR A CONSERVATIVE MAJORITY

Dear Friend:

On October 27, I left an important meeting of political experts who had gathered for one final strategy meeting before the national elections.

At that time few really believed that the Republicans could take control of the Senate this year. But I did.

Two years ago the Fund for a Conservative Majority launched its "Conservative Senate Control in '80" program. We knew conservative control was possible if the resources were available and if the "conservative tide" ran strong in 1980.

With one week to go before the election I made an agonizing but critical decision. I decided FCM should give last minute help to several key Senatorial candidates.

I knew FCM could count on its friends to help pay for these victories, but I didn't have time to ask you for additional financial help.

So we postponed paying other bills in order to help such candidates as Paula Hawkins -- our new conservative Senator from Florida; John East -- our new conservative Senator from North Carolina; Dan Nichols -- our new conservative Senator from Oklahoma.

These races were very close and these candidates needed our support if they were to have the chance to win.

And on election night FCM's two year campaign for "Conservative Senate Control in '80" became reality.

Fund for a Conservative Majority • 927 Fifteenth Street, NW • Washington, D.C. 20005

"By authority of the Fund for a Conservative Majority. A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463."

FCM was victorious in 8 of the 10 Senate races in which it had participated. FCM helped these winners:

Paula Hawkins in Florida	Steve Symms in Idaho
Mack Mattingly in Georgia	John East in North Carolina
Dan Nichols in Oklahoma	Chuck Grassley in Iowa
Jim Abnor in South Dakota	Al D'Amato in New York

And many of the new conservative Republican Congressmen elected on November 4 were also helped by the expertise and resources of the Fund for a Conservative Majority.

This year, FCM also sponsored the highly successful independent campaign, "Citizens for Reagan in '80".

This national grassroots effort was instrumental in helping to secure the Republican nomination for Ronald Reagan.

And the fall campaign by "Citizens for Reagan in '80" was especially successful in the key eastern states of Pennsylvania, New York and Connecticut.

During the last two weeks of the election, "Citizens for Reagan in '80" poured thousands of dollars into its campaign efforts. Governor Reagan needed help, and we all knew it.

Thanks to you and thousands of other patriotic Americans, FCM played an instrumental part in electing Ronald Reagan our new President and in bringing about "conservative control" in the Senate.

I felt, in the closing days of the campaign, that the polls were simply too close in the Presidential race and in many of the Senate races not to make one final push toward victory.

I knew FCM could make the critical difference in swing states. And we did.

As I said earlier, I decided on October 27 to increase our efforts even though we would have to go into debt.

I believe it was worth it. We won.

I pray you will agree with my decision.

Our victory on November 4 was overwhelming. And we all can take some credit for participating in this exciting and historic election.

8304042714

But now FCM is in debt. We simply must raise $50,000 to clear the slate and begin our efforts to "firm up" our 1980 successes. We must prepare early to support Ronald Reagan and to defeat the liberals again in the important 1982 national elections.

Please send as large a contribution as possible -- at least $25 if you can -- to the Fund for a Conservative Majority.

Your support for "Citizens for Reagan in '80" and the "Conservative Senate Control in '80" certainly helped make the difference. And I sincerely thank you.

Because of support from people like you we have seen the beginning of a "political revolution" in this country. But it's only the beginning.

The Fund for a Conservative Majority needs your contribution to get back on its feet and to continue its successful programs of candidate recruitment and campaign services. Our future victories depend on your loyal and generous support.

Please don't let us down now.

I know I can count on you.

Sincerely,

Bob Heckman

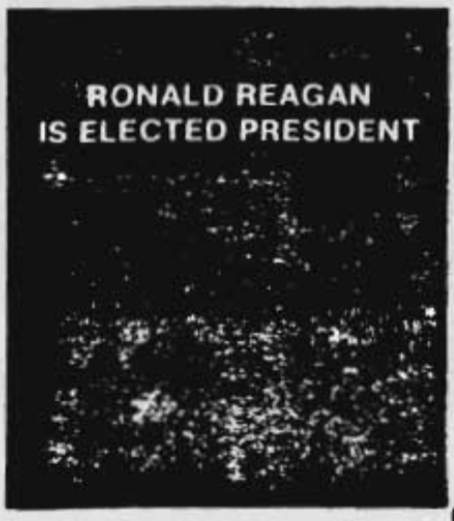
Bob Heckman
Chairman

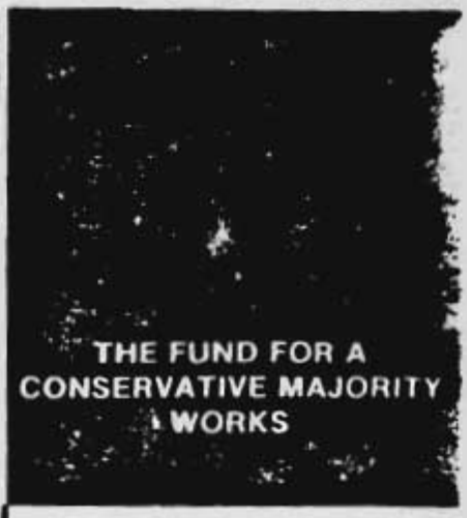
P.S. The Liberals hope we will now "go to sleep", ending our efforts to bring about a truly conservative re-direction of our government at the national and state levels.

We must not stop now! Please continue your support for the Fund for a Conservative Majority.

Our victory this year will be only the beginning if we continue to work together.

★ THE CONSERVATIVE SUCCESS STORY OF 1980 ★





CITIZENS FOR REAGAN IN '80

FCM is one of Ronald Reagan's oldest allies. It's "Citizens for Reagan in '80" project was the first independent expenditure effort to work on behalf of Reagan's candidacy.

"Citizens for Reagan in '80" began working a year and a half before the national elections, even before Reagan had officially announced.

"Citizens for Reagan in '80" raised over $2.5 million from Americans who shared in a strong belief in the Reagan message. These contributions made possible FCM's advertising campaign in key primary and general election states.

WHEN OTHERS WERE SAYING REAGAN COULD NEVER EVEN GET PAST THE PRIMARIES, FCM WAS WORKING TO ACHIEVE SUCCESS.

CONSERVATIVE SENATE CONTROL IN '80

FCM began its "Conservative Senate Control in '80" project nearly two years ago. At the time, FCM was virtually alone in the belief that a conservative Senate could be achieved through targeted backing of several crucial races.

Many scoffed when FCM suggested that the conservative Strom Thurmond could replace the liberal Ted Kennedy as head of the Senate Judiciary Committee. Or that conservatives could defeat such powerhouse liberals as Frank Church, George McGovern, or Birch Bayh.

The contributions raised by FCM provided critical financial support in ten key races, resulting in 8 important conservative victories. Conservative Senate control is now a reality.

The experts said that conservative control by 1980 was impossible, but FCM worked to achieve victory.

FCM AND THE CONSERVATIVE ERA

The hopes and dreams for America are well-founded in the victories of Ronald Reagan and the new conservative Senate. FCM shares these hopes.

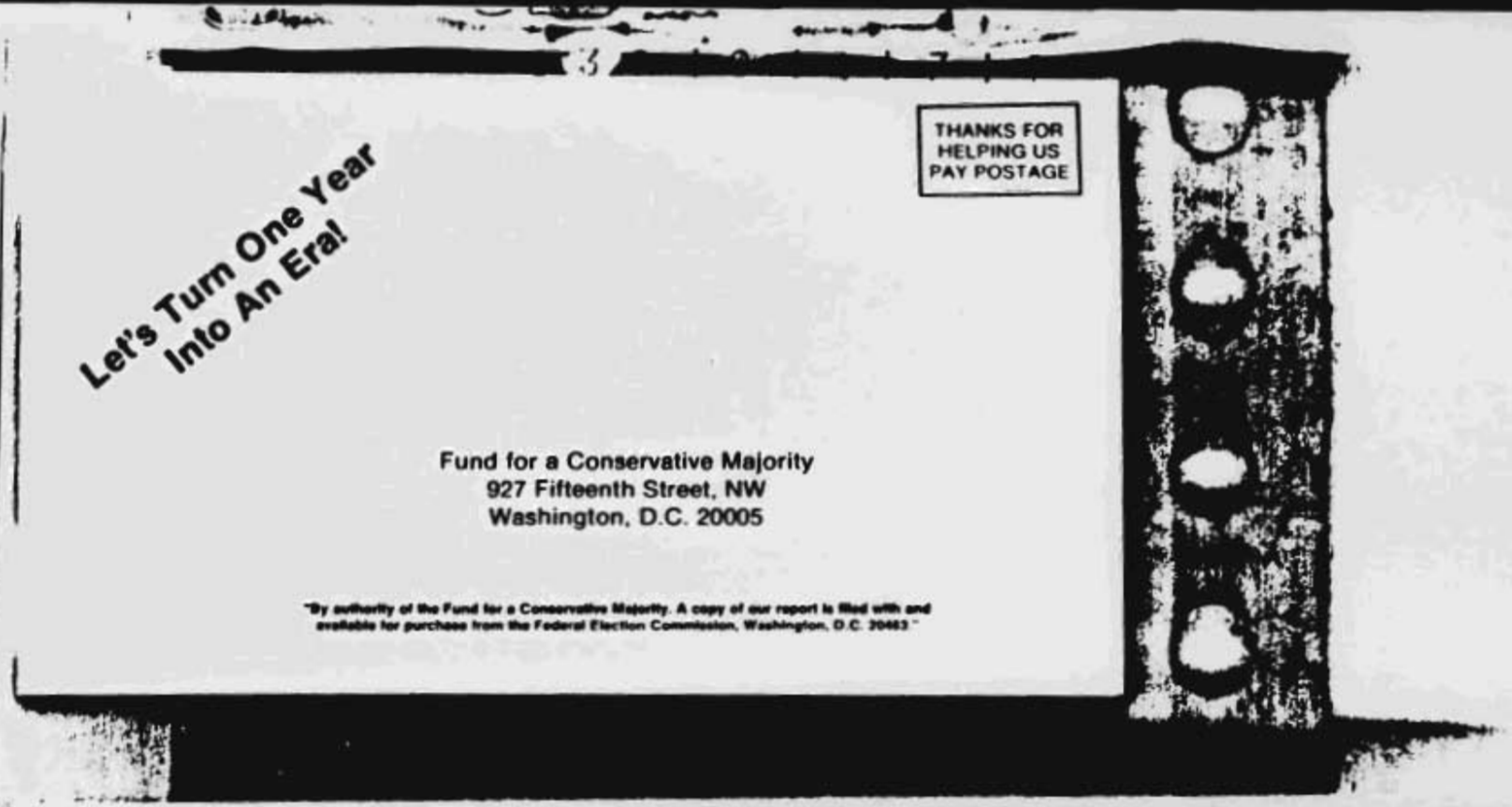
BUT THERE IS MUCH WORK LEFT TO BE DONE.

FCM believes that conservative control of the House of Representatives is possible by 1982. A national project will soon be initiated to achieve this goal.

FCM knows that the defeated Liberals will try to regain control of the government by 1984. The work to maintain the current conservative strength must continue. FCM will be there to do it.

YOUR HELP IS NEEDED IF THE SUCCESSES OF 1980 ARE TO TURN INTO A "NEW CONSERVATIVE ERA" FOR AMERICA.

HELP FCM TURN A YEAR INTO AN ERA!



Fund for a Conservative Majority
927 Fifteenth Street, N.W.
Washington, D.C. 20005

The Conservative Success Story of 1980!
Important Details Inside

AMERICA'S "NEW CONSERVATIVE ERA" IS HERE...

...and more needs to be done!

Dear Mr. Heckman:

I am glad FCM worked hard to bring about our 1980 victories. It was well worth the effort!

FCM's two projects, "Conservative Senate Control in '80" and "Citizens for Reagan in '80," were both a great success.

Now it is time to pay off the debts and work to turn the successes of 1980 into a "new Conservative Era" for America.

Our victory this year is only the beginning. We must secure our 1980 successes and prepare for the important 1982 national elections.

You can count on me. Enclosed is my contribution of:

_____ $25 _____ $50 _____ $100 _____ $500 _____ $1,000 _____ $5,000 _____ other

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"By authority of the Fund for a Conservative Majority. A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463."

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 3, 1981

Robert R. Sparks, Jr., Esquire
Counsel, Fund for a Conservative
Majority and National Conservative
Political Action Committee
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Sparks:

Your letter of January 14, 1981, concerning the effect of the Commission's merger of MUR's 1252 and 1299 has been received.

The merger of the above two matters, which this Office recommended to the Commission at your request, was carried out in order to avoid duplicative efforts on the parts of both the Commission and the respondents. It is important to note that once a complaint has been filed, any investigation of possible violations of the Federal Election Campaign Act of 1971, as amended, and/or Chapters 95 and 96 of Title 26, U.S. Code, is controlled by the Commission and not by the complaint which triggered such an investigation. In the present instance, a single investigation is being carried out with regard to two complaints which involve the same respondents, the same allegations of fact, and the same evidence.

Your attention is drawn to the letter from this Office to Mr. Curtis Herge dated December 19, 1980, which dealt with this same issue.

Sincerely,

Charles N. Steele
General Counsel

8304042179

911823 GCC 2791

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

(703) 821-1000

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

TWX/TELEX: 710-831-0886
CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE

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

January 15, 1981

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

Re: MUR ~~1262~~ 1252/Fund For A Conservative Majority

Dear Ms. Weissenborn:

I enclose the sworn Answers to Interrogatories in the referenced matter of Robert C. Heckman, Chairman of Fund for a Conservative Majority, in accordance with the Commission's order of December 19, 1980 in this matter.

Please feel free to contact me if you have any questions in this matter.

Sincerely,

Robert R. Sparks, Jr.

enclosure

8304042172O

81 JAN 22 P1:52

GENERAL COUNSEL
RECEIVED

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al.,	)	
Complainants,	)	
-against-	)	MUR 1252
FUND FOR A CONSERVATIVE MAJORITY, et al.	)	
Defendants.	)	

ANSWERS TO INTERROGATORIES

COMES NOW, Fund For A Conservative Majority ("FCM"), by its Chairman, Robert C. Heckman, and in response to the written Interrogatories of the Federal Election Commission to FCM in this matter, answers as follows, in paragraphs lettered to correspond to the lettered paragraphs of the Interrogatories:

B. The Chairman of FCM is Mr. Robert C. Heckman; and, the Treasurer of FCM is Mr. Kenneth F. Boehm. The members of the Board of Directors of FCM are Mr. Robert C. Heckman, Mr. Kenneth F. Boehm and Mr. Jeffrey D. Kane. The Executive Director of FCM from September, 1979 to January 5, 1981 was Mr. Ralph J. Galliano. The current Executive Director of FCM is Mr. Paul G. Dietrich. All staff members of FCM work under the direction of the Executive Director.

Attached hereto is a list of, to the best of your affiant's knowledge, all the people who served on the staff of FCM as an employee, consultant or other agent from September, 1979, to the present.

The following three firms were authorized to make media time buys in behalf of FCM: Thompson and Associates; Edmunds and Associates; and, H.M.L., Inc.

A variety of volunteers worked in or with FCM's "Citizens for Reagan in '80" project. FCM maintained no record of the names of those volunteers.

(1) Expenditures by FCM could only be authorized by a vote of the FCM Board of Directors or by the express direction of the FCM Treasurer and, with his authority, the FCM Executive Director. Fund raising and time buying consultants, such as Mr. Mike Thompson, Mr. Tom Edmunds, H.M.L. Inc., and others, were also authorized to approve expenditures when they were working on projects previously authorized by FCM's Treasurer or Executive Director.

(2) Upon information and belief, the following individuals participated in the production of documents and materials by FCM which related to FCM's "Citizens for Reagan in '80" project: Mr. Ralph Galliano, Mr. Frank Cannon, Mr. Ken Boehm, Mr. John Gizzi, Mr. Robert Heckman, J. Curtis Herge, esq., and Mr. Mike Thompson.

(3) The following individuals participated in the planning, organization and formation of FCM's "Citizens for Reagan in '80" project: Mr. Robert Heckman, Mr. Kenneth Boehm, Mr. Jeffrey Kane, Mr. Ralph Galliano, J. Curtis Herge, Esq., and Mr. Mike Thompson.

C. The current telephone number for FCM is (703) 524-4400. No extension numbers were assigned to any individual person listed in response to Interrogatory B. According to the records of FCM, the following additional phone numbers were used by FCM: (703) 524-4400, (703) 525-1304, and (615) 521-6216.

D. Between January, 1980 and the present, neither FCM nor FCM's "Citizens for Reagan in '80" project held any fundraisers or fundraising events.

E. There is no way for FCM to know whether each of the individuals identified in Interrogatory B has any

relationship (past or present) with the groups and associations listed in Interrogatory E. Such information is not requested or required upon their employment with FCM, and such records are not kept by FCM, subject, however, to the following:

(1) All employees of FCM had the opportunity to participate in FCM's "Citizens for Reagan in '80" project. By reason of the fact that "Citizens for Reagan in '80" was a project of FCM and was administered as such, "Citizens for Reagan in '80" had no separate legal identity. Therefore, the officers, directors and employees of FCM were the operational and administrative authorities of "Citizens for Reagan in '80."

(2) So far as known to the undersigned affiant, from September, 1979 to November 4, 1980, no individual identified in Interrogatory B had any association with the Reagan for President Committee.

(3) Arthur J. Finkelstein and Associates was commissioned in the past to do work for FCM under the direction of Mr. Ralph J. Galliano.

(4) Mr. Ralph J. Galliano is a former employee of the National Conservative Political Action Committee.

(5) Many of the employees of FCM are registered Republicans.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

Robert C. Heckman

ROBERT HECKMAN

SUBSCRIBED and sworn to before me this 15th day of January, 1981.

Cynthia D. McCarty

Notary Public

My commission expires: December 5, 1982

8304217 24

ABERNETHY, JOHN J.
ACEVEDO, LISA ANN
Allen, Edward H.
Amburgey, Clavin T.
Amundson, Steve Bruce
Anderson, David P.
Anglari, Maroverite M.
Athanson, Deborah J.
Bake, Maroaret L.
Ballentine, Brian T.
Barnes, Mindy
Barnett, Florence A.
Baxter, Bruce E.
Beaty, Kyle B.
Beeler, Richard
Bennett, Thomas D.
Boehm, Ken
Boynton, Robert A.
Brewer, Gregory J.
Brill, Wallace J. Jr.
Bruce, Jodell
Burgess, James E.
Burlingame, Becki C.
Canfield, Mark C.
Cannon, Francis P.
Carlson, Juan M.
Carpey, Daniel M.
Carter, Helen C.
Cerna, Olga J.
Chambers, Bill
Champagne, Bernard J.
Clay, M.E.
Cliff, Dianee
Coker, David
Cournan, Mary Ann
Cox, Earl G. Jr.
Crenshaw, Judy
Cross, Carol L.
Curtis, Carla J.
Daugherty, Lloyd
Dawson, Hazel J.
Delaney, Serena A.
Dickinson, Diana L.
Dickson, Diana L.
Dikeman, Carroll H.
Dolan, Bob
Dudley, Michael R.
Dunlop, James R.
Eggers, Mary
Eidlin, Richard J.
Elmore, Patricia
Evans, Catherine D.
Falkenberg, Elaine K.
Field, Mel H.

Fitzgerald, Daniel W.
Fitzgerald, Kevin
Fitzgerald, Megan A.
Gaaserud, Karin
Galliano, Ralph J.
Gavin, Roberta S.
Ghanipour, Maryann
Giampietro, Martha T.
Gizzi, John
Graine, Robin L.
Grasso, Kenneth L.
Haines, Lisa Alice
Hansen, Doris P.
Hansen, Marta
Hansen, Willard
Harding, Mark
Harmon, Arthur
Heckman, Robert C.
Heise, Eric
Henderson, Cheryl
Higgins, Vera Clay
Hightower, Carol
Hines, Susan
Holcomb, Shannon W.
Horness, Jacqueline
Horowityz. Daryl
Howell, David V.
Hughes, Aleighta L.
Hyatt, Susan
Jakaitis, John A.
Jones, Jean P.
Kampolla, Karen M.
Kaplan, William E.
Karlson, Courtney
Keating, Bill
Kelly, Ida
Kelly, John B.
Kelly, Peter B.
Key, Beatrice
Key, Mary A.
Kleiman, Gil
Knight, Willard O.
Kupersmith, Charles D.
Laniguera, Daniel W.
Lambert, Wayne A.
Lamountain, Rick
Lampe, Scott A.
Linderman, Phillip
Lodergan, Hope
Londino, Joe
Longyard, William H.
Lopaz, James A.
Marishi, Sachie
Mann, Michael
Manzelli, Peter
McKee, Eileen
Meder, Cecil
Mills, Kim
Miri, Giso

8304217

Mottola, Chris
Mullenhoff, Mark F.
Mullins, Kathy M.
Nagurney, Dave M.
O'Brien, William C.
O'Callaghan, James J.
Pair, Leona
Pana Gakos, Estelle
Parlier, Michele W.
Patton, Charles O.
Pelott, Robert O.
Pena, Costanza
Pencarski, Ed
Peterson, Brad
Phares, Tim
Pittman, Virginia Faye
Renfrow, Jeanne Marie
Richardson, Robert C.
Riley, Deborah A.
Riley, Sandy
Ringhausen, Kathryn Y.
Rodway, Allan C.
Roldan, Carlos E.
Roldan, Hernando J.
Sacharanski, John
Salman, Christopher M.
Sanders, David
Sexton, Lea Ann
Shearer, Danny L.
Siemon, Mark A.
Silverfield, Martin B.
Simon, Ken B.
Simonsen, William
Smathers, John
Smutko, Joan S.
Stoskus, Paul J.
Streeter, Linda D.
Strolhrek, John Stanley
Supka, Kevin P.
Switky, William R.
Switky, Ralph
Taylor, Emerson
Tocco, Brian
Tuggle, Linda J.
Tyson, David
Valls, Mary
Van Buskirk, Robert C.
Van Gales, Symarion
Vignare, Christopher
Vignare, Kim
Ward, Robert A.
Wibert, Alta M.
Wolf, Robin
Wood, William
Woodbury, Deborah S.
Zeavin, Jill R.

8304217 26

8304042727

FIRST CLASS

SEDAM & HERGE, P.C.
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
MCLEAN, VIRGINIA 22102

To:

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

FIRST CLASS MAIL

FIRST CLASS

911250

RECEIVED
NCC 3756
81 JAN 15 P2:25

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

(703) 821-1000

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

TWX/TELEX: 710-831-0896

CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE

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

January 14, 1981

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

81 JAN 15 P3:

Re: MUR 1252

Dear Mr. Steele:

By letter dated December 12, 1980, you notified the undersigned that the Federal Election Commission had voted to deny the motions of National Conservative Political Action Committee (NCPAC) and Fund For A Conservative Majority (FCM) to rescind the Commission's decision to merge Matters Under Review 1252 and 1299. The purpose of this letter is to raise certain questions concerning the effect of the Commission's merger of those Matters.

Section 437g(a)(8)(A) of the Federal Election Campaign Act of 1971 (the Act) permits a party aggrieved by an order of the Commission dismissing a complaint filed by such party, or by a failure of the Commission to act on such complaint during a specified period, to petition the United States District Court for the District of Columbia for relief from the action of the Commission. Section 437g(a)(2) of the Act and the regulations of the Commission require that, upon receipt of a complaint, the Commission must make a finding of reason to believe that a violation of a statute cognizable by the Commission has occurred or is about to occur, or it must dismiss the complaint. In the case of MUR 1299, the Commission has taken neither course of action mandated by statute and regulation. Has the Commission therefore failed to "act" on the complaint such that the complainant, Common Cause, may, after the 120-day period prescribed by Section 437g(a)(8)(A), petition a Federal

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court for relief? If not, what action, which is permitted by statute or regulation, has the Commission taken on MUR 1299?

As general counsel to the Commission, is it your opinion that MUR 1299 is an extant complaint? If not, has it been dismissed and has Common Cause been notified of that action? If it has not been dismissed, it must be assumed that the Commission has found reason to believe as to the complaint, since that is the only other action which the Commission can take on the complaint under the Act and regulations. The implicit suggestion of your letter is that such a finding has been made in MUR 1299, since you state that MUR 1299 has been "merged into one investigative endeavor" with MUR 1252, a matter in which reason to believe has been found. If that is the case, NCPAC and FCM have not been notified of such finding, as required by the Act.

In short, are NCPAC and FCM defending against two similar complaints, or only one complaint?

I look forward to your response.

Sincerely,

Robert R. Sparks, Jr.

8304042729

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7900 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

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RECEIVED

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

GCC
3723

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7900 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
KAREN LUBSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

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

TWX/TELEX: 710-821-0888

CABLE: SEDANHERGE

January 14, 1981

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

Re: MUR 1252/Fund For A Conservative Majority

Dear Ms. Weissenborn:

In compliance with the Commission's subpoena to produce documents, I enclose those documents within the control or possession of our client, Fund For A Conservative Majority (FCM), responsive to the Commission's requests Nos. 6, 7 and 10. FCM has previously produced those documents requested at Nos. 4 and 5 of the Commission's subpoena.

FCM is continuing its search of its records in an effort to locate and produce those other documents requested but not yet produced to the Commission under its subpoena. Those documents will be produced to the Commission as soon as practicable as and when they are located.

Please feel free to contact me should you have any questions in this matter.

Sincerely,

Robert R. Sparks, Jr.

enclosure

81 JAN 14 P2:28

GENERAL COUNSEL
RECEIVED

3040217 --

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7800 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

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RECEIVED

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

FEDERAL ELECTION COMMISSION

Account Numbers

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	X	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne R. Weissenborn

Date 6/9/83

FEC 9-21-77

8304042173

FUND FOR A CONSERVATIVE MAJORITY
1025 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

3099

Sept 23 1980

PAY FIFTEEN HUNDRED 00/100 DOLLARS $1500.00

TO THE ORDER OF
Finkelstein & Assoc.
117 Smith Ave.
Mt. Kisco, NY 10549

NOT NEGOTIABLE

⑈056001532⑆ ⑈3504⑆ 56

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - BRICK WYB-6 V-6

DATE	DESCRIPTION	AMOUNT
9/23/80	Limited Contribution to Al Ertel 13 (1)	# 1500.00

⑈3040⑆7 37

FUND FOR A CONSERVATIVE MAJORITY
2000 WILSON BLVD., SUITE 2402
ARLINGTON, VIRGINIA 22201

Central Fidelity Bank

733

Jan 4 1980

PAY One thousand one hundred 00/100 DOLLARS $ 1100.63

Wiland Associates, Inc.
814 East D... St.
Culpeper, VA 22701

Ralph I Colleans

NOT NEGOTIABLE

⑆056000532⑆ ⑈350436 0⑈

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - FORM WVC-3 V-8

DATE	DESCRIPTION	AMOUNT
1/4/80	12/80 Invoice #24681 I E	1100.63

8 3 5 0 4 3 6 2 4 1 7 3 0

#6

Wiland & Associates, Inc

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-81

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
23197,23199	16	Phone/Thompson	November 21, 1979	24681

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Smarr Mailing Alexandria, Virginia

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert Foreign Files				
Programming	.22 hrs.	25.00/hr	$ 5.50	
Computer Time for Assembly and Test	.09 hrs.	120.00/hr.	10.80	
Convert, Sort and Consolidate Three Foreign Files (input size)	40,150	8.13/M	326.42	
Split Foreign File by File Type Code				
Process input records	36,007	1.20/M	43.21	
Process output records - Reagan Donors	2,810	1.23/M	3.46	
Process output records - FCM 1977-1979	19,710	1.23/M	24.24	
Process output records - FCM 1976 + Prior	12,460	1.23/M	15.33	
Print Reagan Grams to:				
Reagan Donors	2,810	40.00/M	112.40	
FCM 1977-1979	19,710	40.00/M	788.40	
FCM 1976 + prior	12,460	40.00/M	498.40	
Virginia Sales Tax			72.47	

8304021734

TERMS: NET 30 DAYS

TOTAL $1,900.63

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
2000 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22300

Capital Fidelity Bank

1128

March 3 19 80

PAY TO THE ORDER OF: One thousand two hundred and one and 00/100 — DOLLARS $ 1201.00

Wiland & Assoc.
219 E. Davis St.
Culpeper, Va. 22701

Ralph J Colleran

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DETACH - FORM WVC-8 V-2

DATE	DESCRIPTION	$
3/3/80	Inv. # 25292 CFR 80 1E	#1201.00

830402173 7

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
24017	16	1323	January 9, 1980	25292

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #1 - January FCM/CIT				
Process input records - Mail Files	84,887	min.chg.	$ 700.00	
Process input records - Suppression Files	40,991	min.chg.	150.00	
Process output records - Cheshire Labels	73,677	min.chg.	300.00	
Virginia Sales Tax			51.00	

TERMS: NET 30 DAYS

TOTAL ▶ $1,201.00

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1603 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Riggs National Bank

1315

March 21 1980

PAY Four hundred fifty-nine and 17/100 DOLLARS $ 459.17

Wiland & Assoc., Inc.
219 East Davis St.
Culpeper, Virg. 22701

Robert J. Collier

NOT NEGOTIABLE

⑆056001532⑆ 830441 8⑈

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - FORM WVC-S V-2

DATE	DESCRIPTION	AMOUNT
3/21/80	Data processing to convert BA 80 CFR-1E	459.17

830402173

DBW Whatisthis for?

TARGOT Mtg.

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

CFR '80 IE

WORK ORDER NUMBER	ACCOUNT NO	CUSTOMER P.O.	DATE	INVOICE NO.
25309	16	1415	February 15, 1980	25688

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT CODE
Continuing Programming				
Modify existing program to convert FCM Files				
Programming	.50 hrs.	25.00/hr.	$ 12.50	
Computer Time for Assembly and Test	.13 hrs.	120.00/hr.	15.60	
Convert and Sort FCM 1977-1979 $5+ Donors				
Process input records	22,528	5.48/M	123.45	
Prpcess output records	22,204			
Convert and Sort FCM 1976 and Prior $10.00+ Donors				
Process input records	14,070	6.60/M	92.86	
Process output records	13,912			
Convert and Sort FCM CIT Reagan 1980 Donors				
Process input records	2,685	stp.chg.	67.50	
Process output records	2,681			
Print 4-up Cheshire labels to:				
$5.00+ Donors 1977-1979	22,204	2.85/M	63.28	
$10.00+ Donors 1976 and Prior	13,912	3.15/M	43.82	
1980 Reagan Donors	2,681	stp.chg.	22.50	
Virginia Sales Tax			17.66	

TERMS NET 30 DAYS TOTAL $459.17

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____ PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1155 15th STREET, N.W., SUITE 1001
WASHINGTON, D.C. 20005

Central Fidelity Bank

1851

VOIDED

May 27 1980

Pay THIRTEEN HUNDRED NINETY NINE DOLLARS 00 CTS Dollars $ 1,299.00

TO THE ORDER OF

Wiland & Associates, Inc.
219 East Davis Street
Culpeper, Va 22701

Ralph I. Callian

NOT NEGOTIABLE

:056001532: #350418 20

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-3 V-6

DATE	DESCRIPTION	AMOUNT
5/27	Invoice # 24012 Mail File CFR.25	$1299.00

8304042176

5/12

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-4100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
25349,25549	16	1424	March 12, 1980	26012

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #3 - FCM				
Process Mail File Input (including List Conversion and Duplicate Identification Processing)	289,020	$2.70/M	$ 780.35	
Process Mail File Output (including Splits, Key Assignment and Printing)	223,185	2.10/M	468.69	
Virginia Sales Tax			49.96	
			CTF 20	

TERMS: NET 30 DAYS

TOTAL $1,299.00

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND A CONSERVATIVE MAJORITY

[redacted]

Central Fidelity Bank

2085

VOIDED

PAY THE SUM 1269 DOLS 11 CTS DOLLARS $1,269.11

TO THE ORDER OF [illegible]

Ralph J. C. Adams

NOT NEGOTIABLE

[illegible]

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK VVS-6 V-6

DATE	DESCRIPTION	AMOUNT
6/24	[illegible]	$1,269.11

830402174

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
23979	16	1485	April 14, 1980	26441

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #4 - FMC March 1980 - Texas Package				
Process Mail File Input (including List Conversion and Duplicate Identification Processing)	213,906	$3.24/M	$ 693.06	
Process Mail File Output (including Splits, Key Assignments and Printing)	165,329	3.00/M	495.99	
Shipping and Handling to Return Magnetic Tapes	9 tapes	2.50/tp.	22.50	
Virginia Sales Tax			47.56	

TERMS NET 30 DAYS

TOTAL $1,259.11

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1025 WILSON BLVD., SUITE 2401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2364

July 12 19 82

Pay **Thirteen Thousand Seven Hundred Twenty Eight DOLS 50 CTS**

DOLLARS $ 13,728.50

TO THE ORDER OF

Wiland & Associates, Inc.
219 East Davis St
Culpeper, VA 22701

Ralph F. Galliani

NOT NEGOTIABLE

:056001538: #350416 6#

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK VVC-8 V-8

DATE	DESCRIPTION	AMOUNT
7/25	[illegible] # 26892 + 26910	1,500.83
		12,227.67
		13728.50
	CFR	50

:3040021745

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
24775,6107,92,419	16		May 19, 1980	26910

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

CFM 80

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Exclude California Records from CCM Master File				
Process input records	94,305	$ .75/M	$ 70.73	
Process output records	76,541	.60/M	45.92	
Print 4-up Cheshire Laser labels to CCM Less California	76,541	2.33/M	178.34	
Develop and Print Vice Presidential Letters to CCM Less California	76,541	15.00/M	1,148.12	
Virginia Sales Tax			57.72	

FCM

TERMS: NET 30 DAYS

TOTAL ▷ $1,500.83

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▷ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

[redacted] • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE [redacted]

			DATE	INVOICE NO.
24782,910,26125,126, 181	16	1520	May 19, 1980	26892

SOLD TO:	
Thompson & Associates 7815 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Bond Mailing Woodbridge, Virginia

INVOICE

DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #5 - FCH May 1980 VP Prospect and Continuations				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	422,656	$2.70/M	$1,141.17	
Process Suppression File Input (Including List Conversion and Duplicate Identification Processing)	46,485	min.chg.	150.00	
Process Mail File Output (Including Splits, Key Assignments and Printing 4-up Cheshire Labels)	310,830	2.22/M	690.04	
Merge/Purge #6 - FCH May 1980 Final Drive				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	295,665	2.70/M	798.30	
Process Mail File Output (Including Splits, Key Assignments and Printing 4-up Cheshire labels)	247,252	2.22/M	548.90	
Shipping and Handling Charges to Return Magnetic Tapes	24 tapes	2.50/tp.	60.00	
Print Vice President Inner Letters to: Merge/Purge #5 Label Set 1 Merge/Purge #5 Label Set 2	6,859 1,950	15.00/M 15.00/M	102.88 29.37	

TERMS: NET 30 DAYS

TOTAL $ [redacted] 035893

FOR [redacted]

PAY THIS AMOUNT $

ORIGINAL INVOICE

26893

24782,910,26125,126, 161	16	1520	May 19,

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Bond Mailing
Woodbridge, Vi

INVOICE

Merge/Purge #5 Label Set 3	3,864	15.00
Merge/Purge #5 Label Set 4	2,612	15.00
Merge/Purge #5 Label Set 5	98,798	15.00
Merge/Purge #5 Label Set 6	9,038	15.00
Merge/Purge #5 Label Set 7	34,337	15.00
Merge/Purge #5 Label Set 8	13,491	15.00
Merge/Purge #5 Label Set 9	18,492	15.00
Merge/Purge #5 Label Set 10	14,405	15.00
Merge/Purge #5 Label Set 11	20,832	15.00
Merge/Purge #5 Label Set 12	47,112	15.00
Merge/Purge #5 Label Set 13	39,032	15.00
Print "Final Drive" Laser Letters to:		
Merge/Purge #6 Label Set 1	82,786	15.00
Merge/Purge #6 Label Set 2	92,457	15.00
Merge/Purge #6 Label Set 3	13,911	15.00
Merge/Purge #6 Label Set 4	11,732	15.00
Merge/Purge #6 Label Set 5	5,701	15.00
Merge/Purge #6 Label Set 6	3,214	15.00
Merge/Purge #6 Label Set 7	3,214	15.00
Merge/Purge #6 Label Set 8	6,491	15.00
Merge/Purge #6 Label Set 9	9,968	15.00
Merge/Purge #6 Label Set 10	6,918	15.00
Virginia Sales Tax		

TERMS: NET 30 DAYS

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____ PAY THIS AMOUNT

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1020 WILSON BLVD., SUITE 2101
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2571

August 18 1982

PAY NINETY SEVEN DOLS 10 CTS DOLLARS $ 97.10

TO THE ORDER OF
Wiland & Associates
219 East Davis St
Culpeper, VA 22701

Ralph J. Gallin
NOT NEGOTIABLE

:056001532: #350416 8#

FUND FOR A CONSERVATIVE MAJORITY

DELUXE • SNEEK WVO-6 V-2

DATE	DESCRIPTION	AMOUNT
8/8	506B Invoice # 97.10 anti-cochon CFR II	$97.10

3 3 0 4 0 4 2 1 0 7 4 5

Wiland & Associates, INC.

[redacted] STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE [redacted]

26928	16	Late Lists	June 25, 1980	27312

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

Thompson & Associates
7015 Old Keene Mill Road
Suite 203
Springfield, Virginia 22150
Attention: Michael Thompson

INVOICE

DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge Late Lists - Anti-Carter				
I. Each List Involved	1	15.00/list	$ 15.00	
	2	10.00/list	20.00	
II. Mail File Processing (Convert, Sort and Print)				
Business Week	5,000	3.00/M	15.00	
Forecaster	10,000	2.50/M	25.00	
Conservative Business Contributors	5,000	2.50/M	12.50	
Shipping and Handling Charges to Return Magnetic Tapes	3 tapes	2.50/tape	7.50	
Virginia Sales Tax			2.10	

TERMS: NET 30 DAYS

TOTAL $ [redacted]

PAYMENT RECEIVED ON ACCOUNT $ n/a

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1052 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Continental Fidelity Bank

2688

Sept 2 1980

PAY ONE THOUSAND ONE HUNDRED TWENTY EIGHT DOLLARS 39 CTS DOLLARS $ 1128.39

TO THE ORDER OF
Willard + Assoc. Inc.
219 East Davis St.
Culpeper, Va. 22701

NOT NEGOTIABLE

⑆056001532⑆ #3504 16 6⑈

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-3 V-3

DATE	DESCRIPTION	AMOUNT
9/2/80	Inv. #27055 Senate Control Merge/purge #7	1128.39

⑈30404217⑈ 8

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26336	16	1570	June 2, 1980	27055

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED / DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #7 - TAI-FCM Senate Control				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	155,489	min.chg.	$ 700.00	
Process Mail File Output (Including Splits, Key Assignments and Printing Leger Labels)	132,798	2.70/M	358.55	
Shipping and Handling to Return Magnetic Tapes	11 tapes	2.50/tp.	27.50	
Virginia Sales Tax			42.34	

TERMS: NET 30 DAYS

TOTAL ▷ $1,128.39

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▷ N/A

ORIGINAL INVOICE

CONSERVATIVE MAJORITY
WILSON BLVD., SUITE 2401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2689

Sept 2 1980

PAY [illegible] 1835 DOLS 81 CTS DOLLARS $ 1835.81

TO THE ORDER OF

Wilard-Hasen. Inc.
219 East Davis St.
Culpeper, Va. 22701

NOT NEGOTIABLE

⑆056001532⑆ ⑈3504 16 6⑈

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WYO-6 V-6

DATE	DESCRIPTION	AMOUNT
9/25/80	Inv. #27261 C/R-1E V.P. Conventions	1835.81

⑈3040421⑈ 8

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26425	16	1610	June 24, 1980	27261

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 703 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #10 - FCM - V. P. Convention	Ant	Cost		
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	391,968	$2.70/M	$1,058.31	
Process Mail File Output (Including Splits, Key Assignments and ~~Proof~~ Printing)	278,514	2.40/M	668.43	
Shipping and Handling Charges to Return Magnetic Tapes	16 tapes	2.50/tp.	40.00	
Virginia Sales Tax			69.07	

TERMS: NET 30 DAYS

TOTAL ⇩ $1,835.81

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ⇩ N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1600 WILSON BLVD., SUITE 1460
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2724

Sept 2 1980

PAY ONE THOUSAND SEVEN HUNDRED TWENTY-EIGHT DOLLARS 32 CTS DOLLARS $ 1728.32

TO THE ORDER OF

Wilmot + Assoc., Inc.
219 East Davis St.
Culpeper, Va. 22701

NOT NEGOTIABLE

:056001532: #350410 6#

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - SHEDIR WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
9/2/80	Inv. # 27262 C-R IE	1728.32
	Merge/purge #9	

:304042107: 8

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26424	16	1611	June 24, 1980	27262

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Penny Rogers

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #9 - FCM - Anti-Carter				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	235,501	$3.60/M$	847.80	
Process Mail File Output (Including Key Assignments and Printing)	222,658	3.00/M	667.97	
Shipping and Handling Charges to Return Magnetic Tapes	42 tapes	2.50/tp.	105.00	
Airfreight Shipping and Handling Charges			46.92	
Virginia Sales Tax			60.63	

TERMS NET 30 DAYS

TOTAL $1,728.32

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1025 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2906

Sept. 9 19 80

PAY 3664 DOLS 66 CTS DOLLARS $ 3664.66

TO THE ORDER OF Wiland + Assoc., Inc.
219 East Davis St.
Culpeper, Va. 22701

NOT NEGOTIABLE

⑆056001532⑆ ⑈3504 66 6⑈

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-3 V-2

DATE	DESCRIPTION	AMOUNT
9/9/80	Inv # 27453 C/R 1E	3664.66

830402 057

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26799	16	1651	July 11, 1980	27453

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #10 - Thompson & Associates - On the White House				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	938,803	$2.46/M	$2,309.46	
Process Mail File Output (Including Splits, Key Assignments and Laser Labels)	637,187	1.80/M	1,146.94	
Shipping and Handling Charges to Return Magnetic Tapes	28 tapes	2.50/tp.	70.00	
Virginia Sales Tax			138.26	

TERMS: NET 30 DAYS

TOTAL $3,664.66

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1010 WILSON BLVD., SUITE 1412
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

3231

Oct 1 1980

Pay SEVEN 700 DOLS 51 CTS DOLLARS $ 700.51

TO THE ORDER OF
Wilard & Assoc. Inc.
219 East Davis St.
Culpeper, VA 22701

W. Epl. J. Ballan

NOT NEGOTIABLE

:056001532: #3501.10 A#

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK WVC-3 V-2

DATE	DESCRIPTION			AMOUNT
10/1/80			CFR	
	Inv. # 27732	640.51	80	700.51
	Inv. # 27707	60.00	1E	
		$700.51		

830402135

Wiland & Associates, Inc.

218 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-8100

CFR 80.1 f

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26926	16		July 31, 1980	27707

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22151 Attention: Michael Thompson	Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22151 Attention: Michael Thompson

INVOICE

FUNCTION PERFORMED / DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
8304021750				
repare Proof and Camera Copy of aser Letter (Later Cancelled)	2 pages	30.00/pg.	$60.00	
FCM				

TERMS: NET 30 DAYS

TOTAL ➧ $60.00

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ➧ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE [illegible]

FCM

CFR140 ID

YOUR ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
27662,63,64	16	1660,65,69,70	July 31, 1980	27732

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	1660 - Thompson & Associates, Springfield, Virginia; 1665 - Republican National Committee, Washington, D. C.; 1669 - Atlantic List Co. Wash, D.C. 1670 - American Spectator Bloomington, ID

INVOICE

QUANTITY	DESCRIPTION	UNIT PRICE	EXTENSION	ACCT. CODE
	1660 - Merge/Purge Late Lists			
1	List Conversion	15.00/list	$ 15.00	
106,060	Mail File Processing (Convert, Sort and Print) — CFR '76	3.00/M	318.18	
	Virginia Sales Tax		12.73	
15,000	1665 - Mag Tape Output of 15M Merged CCM Selected SCF's	4.30/M	64.50	
62,207	1669 - Mag tape output of Net ALEC Prospect Master File	2.55/M	158.63	
3,009	1670 - Keycoded Cheshire label output of M Republican High Donors	min.chg.	30.00	
2 tapes	Tape deposit to be refunded when tapes are returned	20.00/tp.	40.00	
	Shipping and Handling Charges		1.47	

Stock

TERMS NET 30 DAYS

TOTAL ▶ $640.51

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

Fund for a Conservative Majority
1023 Wilson Blvd., Suite 3401
Arlington, Virginia 22209

Capital Fidelity Bank

335

October 10 1980

Pay REGISTERED 47 DOLS 73 CTS Dollars $ 47.73

To the Order of
Roland T. Assoc. Inc.
PO Box 3445
Fredericksburg, VA
22401

Ralph T. Gallen
NOT NEGOTIABLE

⑆056001533⑆ #350416 09

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - SNEDE WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
10/10/80	INV. # 21262	#47.73
	For freight shipping / Handling	

⑈0 4 0 4 2 1 7 6 2⑈ 8 3 0 ⑈

Wiland & Associates, Inc.

9181 INTERNATIONAL PARKWAY • P. O. Box [illegible]

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
Airfreight	16		August 20, 1980	27910

SOLD TO:	SHIPPED TO:
Thompson & Associates 7015 Old Keene Mill Road Suite 203 Springfield, Virginia 22150 Attention: Michael Thompson	

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Charges for Airfreight Shipping and Handling of the following:				
Invoice # 27262, Invoice Date 6/24/80, Work Order # 26424			$47.73	

830403

TERMS NET 30 DAYS

TOTAL ▶ $47.73

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

FUND FOR A CONSERVATIVE MAJORITY
1023 WILSON BLVD., SUITE 1601
ARLINGTON, Virginia 22209

Central Fidelity Bank

15

"RECONSTRUED" →

April 15 '89

PAY THE SUM 602 DOLS 64 CTS

DOLLARS

TO THE ORDER OF

Telpet
[illegible]
[illegible]

NOT NEGOTIABLE

⑆056000532⑆ 3501.16 CR

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK VWD-3 V-2

DATE	DESCRIPTION	AMOUNT
C 4/15	Invoice # 688	$602

8304042175 C

FUND FOR A CONSERVATIVE MAJORITY
1629 WILSON BLVD., SUITE 1001
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

1541

"REGISTERED"

April 16 80

PAY THE SUM 750 DOLS 00 CTS DOLLARS $ 750.00

TO THE ORDER OF

Telepost
1700 Old Meadow Rd.
McLean, Va.

A. T. Spaltro

NOT NEGOTIABLE

⑆055000163⑆ ⑈3504⑈ ⑆

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK VVD-S V-3

DATE	DESCRIPTION	AMOUNT
11/16/80	Postage Primary	CTR 80 1C 750.00

⑈3040421736⑈

A subsidiary of Hadron, Inc.

I.E
CFA'80

TELEPOST

4/29

February 29, 1980
Invoice No. 688

Mr. J. Londino
Thompson & Associates, Inc.
7015 Old Keene Mill Road, Suite 203
Springfield, VA 22150

INVOICE

2,232 TELEPOST Letters generated on February 27, 1980
with BRE insertions @ 42¢ each = $937.44

Check for postage received = $334.80

TOTAL DUE: $602.64

TERMS: Net 10 days

Jonathan
Dixie Little Piper

FCM

8304042176 6

FUND FOR A CONSERVATIVE MAJORITY
1025 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Federal Fidelity Bank

4031

VOID

DATE 4-21-85

PAY THE SUM ONE HUNDRED 00 CTS DOLLARS $ 100.00

TO THE ORDER OF

Ralph S Colton

NOT NEGOTIABLE

⑆056001538⑆ 3501 15 ⑈

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVO-8 V-8

DATE	DESCRIPTION	AMOUNT
3		
0		
4		
0		
2		
1		
7		
8		

Telecommunications Industries, Inc.
A subsidiary of Hadron, Inc.
[illegible] Boulevard
[illegible]
22182
(703) 821-8200

TELEPOST

April 18, 1980
Invoice No. 739

Mr. Kenneth Boehm
Fund for a Conservative Majority
1022 Wilson Boulevard, Suite 1401
Arlington, VA

INVOICE

5,000 TELEPOST Letters generated on April 16, 1980 = $1,850.00

Payment Received: $750.00

TOTAL DUE: $1,100.00

TERMS: Net 10 days

8304042176

FUND FOR A CONSERVATIVE MAJORITY
1050 N. [illegible] BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Colonial Fidelity Bank

3288

Oct 6 80 EP

PAY Four Hundred Eighty DOLS 00 CTS DOLLARS $ 480.00

TO THE ORDER OF

Telepost
17060 Old Meadow Rd.
McLean, Va. 22102

Ralph J Gallion

NOT NEGOTIABLE

⑆056001532⑆ 3504 16 6⑈

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - SHEDIK WVO-3 V-2

DATE	DESCRIPTION	AMOUNT
10/6/80	Postage CFM 1st	480.00

⑈3304 0 0 2 2 6 5⑈

FUND FOR A CONSERVATIVE MAJORITY
[illegible] BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

2092

June 24 19 82

PAY TO THE ORDER OF The Sun 2989 DOLLARS 53 CTS

$2989.53

Ralph J. Calder

NOT NEGOTIABLE

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK WVD6 V4

DATE	DESCRIPTION	AMOUNT
6/24/82	[illegible]	2989.53

8 30 40 42 72 0

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1975

DATE April 25, 1980

TO:

Fund for a Conservative
Majority
c/o Thompson & Associates
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

Wiland & Assoc.

CFR 180

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/24/80	1693 / 10599	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
205 M	Computer forms, with 3 color face and 1 color back.	13.69/M	2,806.45
	Authors Alterations:		
	Halftones reshot:		26.70
	Line shots:		5.40
	Labor: stripping:		36.00
			2,874.55
	4% Va. tax:		114.98
	TOTAL INVOICE:		$2,989.53

V Planning page 1-2 only.

8304042177 1

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

FUND FOR A CONSERVATIVE MAJORITY
1660 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Capital Fidelity Bank

2369

July 28, 19

Pay THE SUM 3078 DOLS 60 CTS DOLLARS $

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WIDE VIEW

DATE	DESCRIPTION	AMOUNT
7/28	Printing Services	$3078.60

Diversified Direct, Inc.

INVOICE A2937

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4606

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 10, 1980

TO:

Fund for a Conservative Majority
c/o Thompson & Assoc.
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

Bond Office Supply

CFR180

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	5/7/80	1756 / 10646	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
410 M	Letters, with 1 color face and 2 color back.	7.22/M	2960.20
	4% Va. tax:		118.40
	TOTAL INVOICE:		$3078.60

8304042177

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

FUND FOR A CONSERVATIVE MAJORITY
1022 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

0 8 3 0 4 0 4 2 1 7

Central Fidelity Bank

2372

July 28, 1980

PAY Twenty eight thousand five hundred dollars DOLLARS $ 28,500.00

TO THE ORDER OF
HAIL INC.
1100 [illegible]
[illegible], CA 91745

Ralph J. Cellini

NOT NEGOTIABLE

C0580015321: [illegible]

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-6 V-2

DATE	DESCRIPTION	AMOUNT
7/28/80	Tv IV production & creative fee #2,510 Thematic complete - 6 productions CFR '80 I.E.	#28,500.

Central Fidelity Bank
NORTHERN VIRGINIA

PAID NO. RD-1 JUL 29 1980 CENTRAL FIDELITY BANK

$1.00 fee

No 130706

29 July 1980

CUSTOMERS COPY

PAY TO THE ORDER OF ••••••HAIL, Inc••••••• $ **28,500.00**

-CENTRAL- FIDELITY BANK 2[illegible] DOLLARS

CASHIER'S CHECK

Fund For A Conservative Majority

NON-NEGOTIABLE

Louis C. Cubanino
AUTHORIZED SIGNATURE

TELLER Cynthia Agnew

C0580015321: [illegible]

#7

FUND FOR A CONSERVATIVE MAJORITY
1629 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

0 3 0 4 0 4 2 1 0 7 6

Central Fidelity Bank

2514

August 1 19 80

PAY AMWI50000 DOLS 00 CTS DOLLARS $ 50,000.00

TO THE ORDER OF

HMI, INC.
1100 S. Sepulveda
Suite 103
Los Angeles, CA 90025

Ralph J. Calloway

NOT NEGOTIABLE

⑆056001532⑆ #350416 6#

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
8/1		$50,000.00

FUND FOR A CONSERVATIVE MAJORITY
1922 WILSON BLVD., SUITE 310
ARLINGTON, VIRGINIA 22209

0 3 0 4 0 4 2 1 7 6

Central Fidelity Bank
NORTHERN VIRGINIA 2396

2539

Aug. 5 19 80

PAY AWM 50000 DOLS 00 CTS DOLLARS $ 50,000.00

TO THE ORDER OF
HML, Inc.
9100 S. Sepulveda
Suite 108
Los Angeles, CA 90045

NOT NEGOTIABLE

:0560015321: #350416 04

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVG-6 V-2

DATE	DESCRIPTION	AMOUNT
8/5/80	CFR '80 IE 570B Television time buys	50,000.00

TELLER Nilam Hunja

Central Fidelity Banks
NORTHERN VIRGINIA

№ 130728

August 5, 19 80

CUSTOMERS COPY

PAY TO THE ORDER OF • • • • HML INCORPORATED • • • • $ 50,000.00

—CENTRAL— FIDELITY BANK 50000&00 Cts DOLLARS

CASHIER'S CHECK

REMITTER Christopher Wilson For FCM

NON-NEGOTIABLE

LOUIS C. CABANISS
AUTHORIZED SIGNATURE

:0560015321: #071796 7#

FUND FOR A CONSERVATIVE MAJORITY
1522 WILSON BLVD., SUITE 1101
ARLINGTON, VIRGINIA 22209

⑆ 8 3 0 4 0 4 2 1 7 ⑆ 7 2555

Central Fidelity Bank

Aug. 6 1980

PAY TEN THOUSAND DOLS 00 CTS DOLLARS $10,000.00

TO THE ORDER OF
HML, Inc.
9100 S. Sepulveda Suite 108
Los Angeles, CA 90045

Robert J. Gallie
NOT NEGOTIABLE

⑈056001532⑈ ⑈350416 6⑈

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVB-3 V-2

DATE	DESCRIPTION	AMOUNT
8/6/80	CK 2801E Production - TV Buy	10,000.00

Central Fidelity Bank
NORTHERN VIRGINIA

№ 130734

06 August 1980

CUSTOMERS COPY

PAY TO THE ORDER OF ****Hml, Inc.***** $ **10,000.00**

-CENTRAL- FIDELITY BANK TEN THOUSAND DOLS 00 CTS DOLLARS

CASHIER'S CHECK

REMITTER Fund For A Conservative Majority

NON-NEGOTIABLE

AUTHORIZED SIGNATURE Louis C. Cabaniss

TELLER Cynthia Jones

⑆056001532⑆ ⑈071896 7⑈

FUND FOR A CONSERVATIVE MAJORITY
1023 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

0 3 0 4 0 4 2 1 7 6

Central Fidelity Bank

2590

Aug 12 1980

PAY AMWN28000 DOLS 00 CTS DOLLARS $28,000.00

TO THE ORDER OF HML, Inc.
9100 S. Sepulveda Suite 108
Los Angeles, CA 90045

Richard I Viguerie
NOT NEGOTIABLE

⑆056001532⑆ #3504 15 6#

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-8 V-8

DATE	DESCRIPTION	AMOUNT
8/12/80	CR80 25,000 - Balance for time buys IE 3,000 - Shipping & Travel	28,000.00

Nº 130748

Central Fidelity Bank
NORTHERN VIRGINIA

AUGUST 13, 1980

CUSTOMERS COPY

PAY TO THE ORDER OF • • • • HML INCORPORATED • • • • $28,000.00

CENTRAL FIDELITY BANK 28000dollars 00cts DOLLARS

CASHIER'S CHECK

FOR Richard Viguerie

REMITTER

NON-NEGOTIABLE

LOUIS C. CABANISS
AUTHORIZED SIGNATURE

TELLER

⑆056001532⑆ #071796 7#

FUND FOR A CONSERVATIVE MAJORITY
1022 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

Central Fidelity Bank

3087

Sept 22, 1980

PAY THREE THOUSAND DOLLARS 00 CTS DOLLARS $ 3000.00

TO THE ORDER OF
Edwards Assoc. Inc.
611 Commerce St.
Alexandria, VA
22314

Karl J. Callahan

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WVD-3 V-3

DATE	DESCRIPTION	AMOUNT
9/22/80	TV Commercial production EA 18-80, one half of the estimated prod. cost for series of anti carter spots.	#3000.00

A D V E R T I S I N G

INVOICE

September 22, 1980

Mr. Ken Boehm
Treasurer
Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, Virginia 22209

Creative/Service Fee
One-half of the Creative/Service Fee for production of the Citizens for Reagan in '80 television and radio commercials per contract signed 9/19/80. $ 1,250

Television Commercial Production, EA-18-80
One-half of the estimated production costs for series of 30 second anti-Carter ('76 campaign) television spots per broadcast production estimate dated 9/19/80. 3,000

Total This Invoice $ 4,250

FUND FOR A CONSERVATIVE MAJORITY
1022 WILSON BLVD., SUITE 150
ARLINGTON, VIRGINIA 22209

0 4 2

Central Fidelity Bank

3326

Oct. 7 1980

PAY AUTHORIZED 9023 DOLS 62 CTS DOLLARS $ 9,023.62

TO THE ORDER OF
Edmonds Assoc. Inc.
611 Cameron St.
Alexandria, VA 22314

NOT NEGOTIABLE

⑈056001532⑆ ⑈3504 16 6⑈

FUND FOR A
CONSERVATIVE MAJORITY

DELUXE - CHECK WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
10/7/80	T.V. commercial production and time buys. C+R IE	# 9,023.62

FUND FOR A CONSERVATIVE MAJORITY
1022 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

3529

Oct 28 19 80

PAY ***668 DOLS 00 CTS DOLLARS $ 668.00

TO THE ORDER OF Edmonds Assoc. Inc.
611 Cameron St.
Alexandria VA 22314

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DETACH - FORM WV3-3 V-2

DATE	DESCRIPTION		AMOUNT
10/28/80	TV-Spots	C1R 80 1E	668.00

October 28,1980

Mr. Ken Boehm,Treasurer
Fund For A Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, Virginia 22209

MEDIA:

WRCB-Television, Chattanooga, TN- seven thirty second spots.	$ 550.00
WTVC-Television, Chattanooga, TN- two thirty second spots.	70.00
sub-total media	$ 620.00

MISCELLANEOUS:

Two Federal Express envelopes to the stations listed above and long distance telephone charges to Chattanooga, TN	48.00
TOTAL THIS INVOICE	$ 668.00

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 684-6446

M A R K E T I N G

Edmonds Associates, Inc.

815 Cameron Street • Alexandria, Virginia 22314
(703) 683-6565

TV CONTRACT/SCHEDULE

T/027A

Date October 27, 1980

Advertiser Fund For A Conservative Majority Product Anti-Carter Div.

Market Chattanooga Station WTVC Representative Bert Caldwell

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Starting Date Oct. 31 Ending Date Nov. 3 No. Weeks 1 Rate Information

Target Audience Rating Source

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
[illegible]	7-9 a/	30	1	Within Good Morning America								$35		$35
Mon.	7-9a/	30	1	Within Good Morning America								$35		$35

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL	Gross	$70
										NET	59.50

*Agency is acting only as agent for the advertiser and does not accept final responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

TV CONTRACT/SCHEDULE

T1027

Date 10/27/80

Advertiser Fund For A Conservative Majority Product Anti-Carter Div. _____

Market Chattanooga Station WRCB-TV Representative Doug Short

Starting Date Oct. 29th Ending Date Nov. 2 No. Weeks 1 Rate Information _____

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Target Audience _____ Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Wed.	11:30-12:30	30"		Within Tonight Show								$50		$50
Thurs.	7-9 a.m.	30"		Within Today Show								$50		$50
Thurs.	7:30-8p.m.	30"		P.M. Magazine								$240		$240
Thurs.	11:30-12:30	30"		Within Tonight Show								$50		$50
Fri.	7-9a.m.	30"		Within Today Show								$50		$50
Fri.	11:30-12:30	30"		Within Tonight Show								$50	$50	
Sun.	12:30-1	30"		Meet The Press Adjacency								$60		$60

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL	Gross	$550
										NET	467.50

Agency to notify station in writing for the cancellation and does not accept first unconditional

EXPRESS

PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN ORANGE
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS

YOUR FEDERAL EXPRESS ACCOUNT NUMBER: 200-3611-6

DATE: 10/21/10

FROM (Your Name): Edward A... Inc

COMPANY: 611 C...

DEPARTMENT/FLOOR NO:

STREET ADDRESS: Alexandria VA 2231[illegible]

CITY: ... STATE:

TO (Recipient's Name): Brad H...

COMPANY: WTVC - T...

DEPARTMENT/FLOOR NO:

STREET ADDRESS (P.O. BOX NUMBERS ARE NOT DELIVERABLE): 910 ... St

CITY: Chattanooga STATE: TN

AIRBILL NO. 006936?135

YOUR NOTES/REFERENCE NUMBERS (FIRST 12 CHARACTERS WILL ALSO APPEAR ON INVOICE):

PAYMENT: ☑ Bill Shipper ☐ Bill Recipient's F.E.C. Acct ☐ Bill 3rd Party F.E.C. Acct ☐ Bill Credit Card
☐ Cash to Advance — Account Number/Credit Card Number:

SERVICES (CHECK ONLY ONE BOX)
PRIORITY ONE (P-1)
1 ☐ OVERNIGHT PAK 6 ☐
2 ☐ OVERNIGHT ENVELOPE 7 ☐
3 ☐ OVERNIGHT BOX 8 ☐
4 ☐ OVERNIGHT TUBE 9 ☐
STANDARD AIR
5 ☐ 2ND BUSINESS DAY
"OVERNIGHT" IS DEFINED AS NEXT BUSINESS DAY (MONDAY THROUGH FRIDAY). SEE SECTION HANDLING FOR SATURDAY DELIVERY

DELIVERY AND SPECIAL HANDLING (CHECK SERVICES REQUIRED)
1 ☐ HOLD FOR PICK UP AT FOLLOWING FEDERAL EXPRESS LOCATION SHOWN IN SERVICE GUIDE

PIECES	WEIGHT	DECLARED VALUE	O/S
1	2	100	
TOTAL 1	TOTAL 2	TOTAL 100	

RECEIVED AT: ☐ SHIPPER'S DOOR ☐ REGULAR STOP ☐ ON CALL STOP ☐ F.E.C. LOC
Federal Express Corporation Employee No: 1612
DATE/TIME For Federal Express Use: 10/21/10

IN TENDERING THIS SHIPMENT, SHIPPER AGREES THAT F.E.C. SHALL NOT BE LIABLE FOR SPECIAL, INDIRECT, TAX OR CONFIDENTIAL DAMAGES ARISING FROM CARRIAGE HEREOF. F.E.C. DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THIS SHIPMENT. THIS IS A NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS OF CONTRACT SET FORTH ON REVERSE OF SHIPPER'S COPY. UNLESS YOU WILL AND A HIGHER VALUE, THE LIABILITY OF FEDERAL EXPRESS FOR LOSS OR DAMAGE IS LIMITED TO $100.00

FEDERAL EXPRESS USE
FREIGHT CHARGES
DECLARED VALUE CHARGE
AGT/PKG
AGT/PKG
ADVANCE ORIGIN
ADVANCE DESTINATION
OTHER
TOTAL CHARGES

PART # 2041734049
REVISION DATE 5 15 88
PRINTED USA.

SHIPPER'S COPY

EXPRESS

AIRBILL NUMBER: 0069363125

PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN ORANGE
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS

YOUR FEDERAL EXPRESS ACCOUNT NUMBER: 200-2011-6

DATE: 10/21/10

FROM (Your Name): Edward A... Inc

COMPANY: 611 C...

DEPARTMENT/FLOOR NO:

STREET ADDRESS: Alexandria VA 2231[illegible]

CITY: ... STATE:

TO (Recipient's Name): Brad H...

COMPANY: WTVC - T...

DEPARTMENT/FLOOR NO:

STREET ADDRESS (P.O. BOX NUMBERS ARE NOT DELIVERABLE): 910 ... St

CITY: Chattanooga STATE: TN

AIRBILL NO. 006936?125

YOUR NOTES/REFERENCE NUMBERS (FIRST 12 CHARACTERS WILL ALSO APPEAR ON INVOICE):

PAYMENT: ☑ Bill Shipper ☐ Bill Recipient's F.E.C. Acct ☐ Bill 3rd Party F.E.C. Acct ☐ Bill Credit Card
☐ Cash to Advance — Account Number/Credit Card Number:

SERVICES (CHECK ONLY ONE BOX)
PRIORITY ONE (P-1)
1 ☐ OVERNIGHT PAK 6 ☐
2 ☐ OVERNIGHT ENVELOPE 7 ☐
3 ☐ OVERNIGHT BOX 8 ☐
4 ☐ OVERNIGHT TUBE 9 ☐
STANDARD AIR
5 ☐ 2ND BUSINESS DAY
"OVERNIGHT" IS DEFINED AS NEXT BUSINESS DAY (MONDAY THROUGH FRIDAY). SEE SECTION HANDLING FOR SATURDAY DELIVERY

DELIVERY AND SPECIAL HANDLING (CHECK SERVICES REQUIRED)
1 ☐ HOLD FOR PICK UP AT FOLLOWING FEDERAL EXPRESS LOCATION SHOWN IN SERVICE GUIDE

PIECES	WEIGHT	DECLARED VALUE	O/S
1	2	100	
TOTAL 1	TOTAL 2	TOTAL 100	

RECEIVED AT: ☐ SHIPPER'S DOOR ☐ REGULAR STOP ☐ ON CALL STOP ☐ F.E.C. LOC
Federal Express Corporation Employee No: 1612
DATE/TIME For Federal Express Use: 10/21/10

IN TENDERING THIS SHIPMENT, SHIPPER AGREES THAT F.E.C. SHALL NOT BE LIABLE FOR SPECIAL, INDIRECT, TAX OR CONFIDENTIAL DAMAGES ARISING FROM CARRIAGE HEREOF. F.E.C. DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THIS SHIPMENT. THIS IS A NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS OF CONTRACT SET FORTH ON REVERSE OF SHIPPER'S COPY. UNLESS YOU WILL AND A HIGHER VALUE, THE LIABILITY OF FEDERAL EXPRESS FOR LOSS OR DAMAGE IS LIMITED TO $100.00

FEDERAL EXPRESS USE
FREIGHT CHARGES
DECLARED VALUE CHARGE
AGT/PKG
AGT/PKG
ADVANCE ORIGIN
ADVANCE DESTINATION
OTHER
TOTAL CHARGES

PART # 2041734049
REVISION DATE 5 15 88
PRINTED USA.

SHIPPER'S COPY

October 27, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Dear Ken:

Thanks again for the Citizens for Reagan in '80 business.

Enclosed is a final statement and invoice excluding Tennessee. It should be self-explanatory, but if you have any questions please give me a call.

Stay in touch.

Sincerely,

Thomas N. Edmonds
President

TNE/lep

Enclosures

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6146

STATEMENT

October 27, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

September 22, 1980 Invoice		$ 4,250.00
Credit Check received 9/22/80		(3,000.00)
September 25, 1980 Invoice		4,023.62
October 6, 1980 Invoice		1,400.00
Media per attached		14,435.00
Credit against commission per contract 9/19/80 at ratio one dollar to each three earned (15% commission on $14,435 equals $2,165.25; 1/3 of $2,165.25 equals $721.75)		(721.75)
Less: Check dated 10/7/80		(19,023.62)
Production (dubs) per attached		474.83
	Final Due	$ 1,838.08

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

A D V 30404217 7 I N G

INVOICE

October 27, 1980

Mr. Ken Boehm
The Fund for a Conservative Majority
Citizens for Reagan in '80
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Media: Television

WTAE-TV (Pittsburgh)	
10/21/80 through 11/3/80	
12 30-second spots per attached	$ 6,100.00
WDKA-TV (Pittsburgh)	
10/21/80 through 11/3/80	
4 30-second spots per attached	3,400.00
WCKT-TV (Miami)	
10/21/80 through 11/3/80	
7 30-second spots per attached	4,935.00
Total Media	$ 14,435.00

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

8 3 0 4 0 4 8 1 7 8

COPY

TV CONTRACT/SCHEDULE

T

Date 10/15/80

Advertiser Fund for a Conservative Majority Product Anti-Carter Div.

Market Pittsburgh Station KDKA-TV (CBS) Representative Bob Kunath (212) 883-6100/6110

Starting Date 10/21/80 Ending Date 11/3/80 No. Weeks 2 Rate Information

Target Audience Rating Source

☐ This Replaces and Supersedes our Contract No. Dated

DAY	TIME	ANNCT. LGTH	ANNCT. #PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT	TOTAL COST
M-F		:30	1	Late News								$1500	2	$3000
Sun		:30	1	Face the Nation								$ 200	2	$ 400
												Total Schedule	4	$3400

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$2,890.00 Net

Agency is acting only as agent for the advertiser, and does not accept final responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

COPY

David Gudridge
Phil Gramm

TV CONTRACT/SCHEDULE

T

Date 10/15/80

Advertiser [illegible] for a Conservative Majority Product Anti-Carter Div. _____

Market Pittsburgh Station WTAE-TV Representative Bill Kelley (412) 244-4471

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Starting Date 10/[illegible]/80 Ending Date 10/3/80 No. Weeks 2 Rate Information _____

Target Audience _____ Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. SPEC NO.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
M-F	7-9a	:30	2	Good Morning America (8a.m. Break)								$ 175	4	$ 7
M-F	11:30-[illegible]	:30	1	Late Night								350	2	7
[illegible]		:30	1	Early News (6:00, 6:30, or 7:00 p.m. Break)								900	2	1[illegible]
[illegible]		:30	1	Late News (11:30 Break)								1300	2	2[illegible]
Sun	11:30a-1	:30	1	Issues & Answers								150	2	3
										Total Schedule			12	$6,[illegible]

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$5,185.00 Net

$ 8 4 1 2 M 0 4 0 2 8

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314 •
(703) 683-6446

COPY

TV CONTRACT/SCHEDULE

T

Date 10/15/80

Advertiser Fund foras Conservative Majorit Product Anti-Carter Div.

305/751-6692

Market Miami Station WCKT (NBC) Representative Steve Dickler

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Starting Date [illegible] Ending Date 11/3/80 No. Weeks 2 Rate Information

Target Audience Rating Source

DAY	TIME	ANNCT. LGTH	ANNCT. $ PER WK.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
M-F	7-9a	:30	.5	Today Show (3x over 2 weeks)								$ 185	3	$ 5
M-F	11:30-12:30	:30	.5	Tonight Show (1x over 2 weeks)								480	1	4
Fri	10-11p	:30	.5	NBC Magazine w/ David Brinkley Friday, October 31st								1500	1	15
Mon	8:30-11	:30	.5	Special: The Presidential Candidates Monday, November 3rd								2000	1	20
Sun	11:30-[illegible]	[illegible]	[illegible]	Campaign '80 (10/26 and 11/2)								200	2	4
			—											
								Total Schedule					8	$4,1

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL	$4,194.7[illegible]	Net

0 2 4 1 2 M 0 0 2 8

[illegible] the advertiser and does not accept final responsibility for payment.

HARRINGTON, RIGHTER & PARSONS, INC.

NEW YORK CHICAGO ATLANTA BOSTON DALLAS DETROIT LOS ANGELES MINNEAPOLIS PHILADELPHIA ST. LOUIS SAN FRANCISCO

TELEVISION ORDER CONFIRMATION

PAGE 1 OF

STATION #	ENTITLE #	PRODUCT #	AGENCY #	SALESMAN #
				90

DATE 10/20/80

Edmund Associates
611 Cameron
Alexandria, VA 22314

ADVERTISER: FUND FOR A	STATION/MARKET: WCKT-TV MIAMI
PRODUCT: CONSERVATIVE MAJORITY	SALESMAN/OFFICE: Miglino/Phila.
CONTRACT YEAR	CONTRACT: ☒ CONTRACT #: 01411
FOR CANCELLATION, RENEWAL AND RATE PROTECTION TERMS SEE STATION RATE CARD	MODIFICATION: ☐ MODIFICATION NO

SCHEDULE DATES START	SCHEDULE DATES END	BILLING WEEK	BILLING METHOD: AS EARNED	BILLING METHOD: BLANKET	STARTING RATE CARD	FUTURE RATE CARD: NO	FUTURE RATE CARD: EFFECTIVE
10/21	11/3/80	M-SUN	☒	☐			

SCHEDULE

SPOT #	CODE	DAYS	TIME FROM	TIME TO	TYPE (LENGTH)	EFFECTIVE DATES	CLASS	SEC (LIVE)	PREEMPTION PLAN	SPTS PER WK	EARNED RATE	UNITS	RATE CARD #
1.		TU-F	700	900AM	30"	10/21-10/24				1	$185		
2.		M-F	700	900AM	30"	10/27-10/31				2	$185 EA		
3.		TU-F	1130P	1230A	30"	10/21-10/24				1	$480		
4.		FRI	10	11PM	30"	10/31 OTO				1	$1500		
5.		MON	930	11PM	30"	11/3 OTO				1	$2000		
6.		SUN	1130P	12M	30"	10/26-11/2				1	$200		
						TTL ORDER: $4935							

TIMES LISTED REPRESENT PROGRAMMING AND OR ADJACENCIES AS DECLARED AT TIME OF SALE. AAA SPOT CONTRACT APPLIES EXCEPT AS NOTED IN STATION RATE CARD.

**CODES

A - ADDITION
C - CANCELLATION
S - SCHEDULE CHANGE
R - RATE CHANGE

REMARKS

JAN.		FEB.		MAR.		APR.		MAY		JUNE	
JLY		AUG.		SEP.		OCT.	865	NOV.	4070	DEC.	

A D V E R T I S I N G
8304042175

INVOICE

October 27, 1980

Mr. Ken Boehm
The Fund for a Conservative Majority
Citizens for Reagan in '80
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Production: Additional tapes ordered

10/8/80	4 High bands; 1 cassette	$ 131.00
10/14/80	3 cassettes at $25 each	75.00
10/14/80	1 High band	50.00
10/17/80	3/4" of Total Carter	161.78

Major delivery charges:

10/8/80	Express Mail Pittsburgh	7.90
10/8/80	Express Mail Pittsburgh	7.90
10/8/80	Express Mail New York City	7.90
10/10/80	Express Mail New York City	7.90
10/16/80	Express Mail Miami	6.45
10/16/80	Federal Express Florida	19.00
	Total Production	$ 474.83

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

FUND FOR A CONSERVATIVE MAJORITY
1628 WILSON BLVD., SUITE 1402
ARLINGTON, VIRGINIA 22209

3539

October 29th 80

PAY FOURTEEN 4402 DOLS 00 CTS DOLLARS $ 14402.00

Edmonds Assoc. Inc.
611 Cameron St.
Alexandria, VA 22314

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DELUXE • FORM VAVO-3 V-G

DATE	DESCRIPTION	AMOUNT
10/29/80	CFR '80 Anti-Carter TV spots	$14,402.—
	WNDC - $13,750.—	
	WNDO - 250.—	
	WOK - 1,100.—	
	[illegible]	
	[illegible] - 21.—	

330421

A D K T I S I N G

INVOICE

October 29, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

New York TV Media

WNBC 6 spots 10/31 through 11/2 (per attached)	$ 13,750.00
WNEW 1 spot David Susskind 11/2 (per attached)	250.00
WOR (New York City and on cable to 48 states) 2 spots 11/2 (per attached)	1,100.00
Total Media	$ 15,100.00
Less: Rebate 1/3 media commission per contract	(755.00)
Three Federal Express deliveries @ $19 each	57.00
Net Due	$ 14,402.00

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

8304021724

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

TV CONTRACT/SCHEDULE

T

Majority

Date October 29, 1980

Advertiser The Fund for a Conservative Product Anti-Carter Div.

Market New York City Station WNBC-TV Representative Judy Schwartz

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Starting Date 10/31/80 Ending Date 11/2/80 No. Weeks _____ Rate Information _____

Target Audience Adults Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Fri	11-12N	:30		Tonight Show (within)								$1750	1	$1750
Sun	10:30-11a	:30		Prime of Your Life								$ 250	1	$ 250
Sun	11-12N	:30		News Forum								$ 250	1	$ 250
Sun	1p on	:30		NFL Football Pregame								$4000	1	$4000
Sun	afternoon	:30		NFL Football								$6500	1	$6500
Sun	12M	:30		Decision '80								$1000	1	$1000
														$13,7

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$13,750

Agency is acting only as agent for the advertiser and does not accept final responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

B 3 0 4 0 4 2 1 7 9 6

TV-CONTRACT/SCHEDULE

T

Majority

Date October 29, 1980

Advertiser The Fund for a Conservative Product Anti-Carter Div.

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Market New York City Station WOR-TV Representative Joe Viele

Starting Date Nov. 1 Ending Date Nov. 1 No. Weeks 1 day Rate Information

Target Audience Adults Rating Source

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Sat	1-3p	:30		Movie - "Very Special Favor"								$500	1	$500
Sat	3-5p	:30		Movie - "Hunchback of Notre Dame"								$600	1	$600
														$1,100

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$1,100

Agency is acting only as agent for the advertiser and does not accept financial responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

TV CONTRACT/SCHEDULE

T

Date October 29, 1980

Majority

Advertiser The Fund for a Conservative Product Anti-Carter Div.

Market New York City Station WNEW Representative Ed Hardison

Starting Date Nov. 2 Ending Date Nov. 2 No. Weeks 1 day Rate Information

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Target Audience Adults Rating Source

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Sun	11:30-1:30	:30	1	Within David Susskind								$250	1	$250
	NOTE: PLEASE REVIEW TAPE IMMEDIATELY AND INFORM AGENCY AS TO WHETHER STATION CAN ACCEPT.													
														$250

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			April			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$250

Edmonds Associates, Inc.

617 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

TV CONTRACT/SCHEDULE

T

Majority

Date October 29, 1980

Advertiser The Fund for a Conservative Product Anti-Carter Div.

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Market New York City Station WNBC-TV Representative Judy Schwartz

Starting Date 10/31/80 Ending Date 11/2/80 No. Weeks _____ Rate Information _____

Target Audience Adults Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Fri	11-12N	:30		Tonight Show (within)								$1750	1	$1750
Sun	10:30-11a	:30		Prime of Your Life								$ 250	1	$ 250
Sun	11-12N	:30		News Forum								$ 250	1	$ 250
Sun	1p on	:30		NFL Football Pregame								$4000	1	$4000
Sun	afternoon	:30		NFL Football								$6500	1	$6500
Sun	12M	:30		Decision '80								$1000	1	$1000
														$13,75

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$13,750

Agency is acting only as agent for the advertiser, and does not accept financial responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

TV CONTRACT/SCHEDULE

T

Majority

Date October 29, 1980

Advertiser The Fund for a Conservative Product Anti-Carter Div.

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Market New York City Station WNEW Representative Ed Hardison

Starting Date Nov. 2 Ending Date Nov. 2 No. Weeks 1 day Rate Information

Target Audience Adults Rating Source

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	[illegible]
Sun	11:30-1:30	:30	1	Within David Susskind								$250	1	$250
	NOTE: PLEASE REVIEW TAPE IMMEDIATELY AND INFORM AGENCY AS TO WHETHER STATION CAN ACCEPT.													
														$250

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.									Dec.		
									TOTAL		$250

Agency is [illegible] for the advertising [illegible] does not accept [illegible] liability for [illegible]

FUND FOR A CONSERVATIVE MAJORITY 10-76
1612 WILSON BLVD., SUITE 1401
ARLINGTON, VIRGINIA 22209

35

Oct. 31 1980

PAY TWO THOUSAND FOUR HUNDRED DOLS 08 CTS DOLLARS $2408.08

TO THE ORDER OF

Edmonds Assoc. Inc.
611 Cameron St.
Alexandria VA 22314

Ralph J. Gallagher

NOT NEGOTIABLE

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - FORM V-D3 V-3

DATE	DESCRIPTION	AMOUNT
10/31/80	T.V Spots. OFFICE '80	2408.08

330404218006

A D V E R T I S I N G

STATEMENT

October 31, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Balance Forward per October 27 invoice	$ 1,838.08
Current Due per enclosed invoice	570.00
Total Now Due	$ 2,408.08

8304218301

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 684-6446

M A R K E T I N G

A D V E R T I S I N G

INVOICE

October 31, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

8304042.130

Knoxville Television

WTVK-TV Three spots 11/1 through 11/3 per enclosed	$ 460.00
WATE-TV Two spots 11/3 and 11/4 per enclosed	120.00
Total Media	$ 580.00
Less: Rebate 1/3 media commission per contract	(29.00)
One Federal Express Delivery	19.00
Net Due	$ 570.00

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 684-6446

M A R K E T I N G

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

8 3 0 4 0 4 2 1 8 0 3

TV CONTRACT/SCHEDULE

T

Date October 30, 1980

dvertiser Fund For A Conservative Majority Product Anti-Carter Div. _____

arket Knoxville, Tennessee Station WATE Representative Pat Pickel

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

rting Date Nov. 3 Ending Date Nov. 4 No. Weeks 1 Rate Information $60 (per previous)

rget Audience Adults Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	[redacted]
Mon.	7-9a	30"		Good Morning America (Within)								$60	1	$60
Tues.	7-9a	30'		Good Morning America (Within)								$60	1	$60

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$120

Agency is acting only as agent for the advertiser, and does not accept final responsibility for payment.

Edmonds Associates, Inc.

611 Cameron Street • Alexandria, Virginia 22314
(703) 683-6446

8 3 0 4 0 4 2 1 8 0 4

TV CONTRACT/SCHEDULE

T

Date October 30, 1980

Advertiser Fund For A Conservative Majority Product Anti-Carter Div. _____

Market Knoxville, Tennessee Station WTVK Representative Debbie Cattlett

☐ This Replaces and Supersedes our Contract No. _____ Dated _____

Starting Date Nov. 1 Ending Date Nov. 3 No. Weeks 1 Rate Information _____

Target Audience Adults Rating Source _____

DAY	TIME	ANNCT. LGTH	ANNCT. # PER WK.	ADJACENCIES	RATING	HOMES (000)	HOMES CPM	(000)	CPM	(000)	CPM	COST PER ANNCT.	TOTAL ANNCT.	TOTAL COST
Sat.	11:30 p	30"		Within Saturday Night Live								$70	1	$70
Sun.	4-7p	30"		Within NFL Game								$300	1	$300
Mon.	7-8p	30"		Last possible break before Little House								$90		$90

MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH	MONTH	FREQUENCY	COST PER MONTH
Jan.			Apr.			July			Oct.		
Feb.			May			Aug.			Nov.		
Mar.			June			Sept.			Dec.		
									TOTAL		$460

Agency is acting only as agent for the advertiser, and does not accept final responsibility for payment.

A D V E R T I S I N G

MEMORANDUM

TO: KEN BOEHM, FCM
FROM: TOM EDMONDS
RE: SCHEDULE ON WOR-TV, NEW YORK. NEW YORK
DATE: OCTOBER 30, 1980

WOR-TV NEW YORK HAS REQUESTED THAT YOU SEND THEM A MAILGRAM TONIGHT STATING THAT F.C.M. DOES, INDEED. OWN THE RIGHTS TO ALL THE MATERIALS USED IN OUR COMMERCIALS. THE COMMERCIALS SHOULD BE MENTIONED BY NAME, UNEMPLOYMENT "A" REVISED, UNEMPLOYMENT "B", REVISED, INFLATION, REVISED, AND BIG GOVERNMENT, REVISED.

THE MAILGRAM SHOULD BE SENT TO THE ATTENTION OF:
MR. JOE VIELE, WOR-TV. RKO GENERAL, 1440 BROADWAY, NEW YORK, NEW YORK 10018.

THEIR LAWYERS HAVE ASKED FOR THIS DOCUMENTATION FROM YOU TO ALLEVIATE THE POSSIBILITY OF A POSSIBLE LAWSUIT. WE ASSURED HIM THAT YOU WOULD GET IT OUT TO THE STATION IMMEDIATELY.

8304021803

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

FUND FOR A CONSERVATIVE M... MAY 19...
1629 WILSON BLVD., SUITE 210
ARLINGTON, VIRGINIA 22209

3791

Nov 18 19 80

PAY ONE HUNDRED EIGHTY-TWO DOLLS 50 CTS DOLLARS $ 82.50

TO THE ORDER OF Edwards Assoc. Inc.
611 Cameron St.
Alexandria VA 22314

NOT NEGOTIABLE

⑆056001532⑆ 1504 16 04

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - FORM W-DJ V-3

DATE	DESCRIPTION	AMOUNT
11/18/80	T.V. Advertising C/K St. IE	82.50

⑈3.04042⑈ 1850⑈

A D V E R T I S I N G

November 5, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Dear Ken:

We neglected to include in our "final" invoice to The Fund for a Conservative Majority the union talent fees up charge for using the commercials in Pittsburgh and Miami. That small invoice is enclosed at our net cost.

I want to again thank you, Ralph, Bob, John, and everyone for allowing us to be a part of your 1980 "team."

It is more than just rhetoric when I say I hope we have the opportunity to work together on other campaigns. Please contact me when everything settles down.

Sincerely,

Thomas N. Edmonds
President

TNE/lep

Enclosure

8304042807

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

A D V E R T I S I N G

INVOICE

November 5, 1980

Mr. Ken Boehm
Treasurer
The Fund for a Conservative Majority
1022 Wilson Boulevard
Suite 1401
Arlington, VA 22209

Union Talent Fees to add Pittsburgh and Miami to schedule	$ 82.50 (Net)
Total Due	$ 82.50

8304042180E

EDMONDS ASSOCIATES, INC.
611 CAMERON STREET
ALEXANDRIA, VIRGINIA
22314
(703) 683-6446

M A R K E T I N G

Central Casting

Model & Talent Agency

Photography ■ Fashion ■ Television ■ Radio ■ Feature & Industrial Films ■ Complete Convention Services

Suite 804 1000 Connecticut Avenue, N.W., Washington, D.C. 20006 (202) 659-8272

Date October 29, 1980

STATEMENT

Date of Job		Services of following Models / Talent	Sub Total	Total
9/19/80		Gus Travers - Upgrade of 2 units (from 3 to 5) @ $7.15 per unit for Miami and Pittsburg usage.		
		4 Spots Upgraded @ $14.30/spot	$57.20	
		FICA	3.51	
		DCUC	1.54	
		Fed UC	1.94	
		P&W	5.15	
		Central Casting	5.72	
		Bookkeeping	5.72	
		Work Comp	1.72	
		TOTAL.....	.....	$82.50
		Payment due 11/10/80 Thank you very much!		

AGENCY SERVICE CHARGE 10%. ANY OVERTIME, OR ADDITIONAL FEES WILL BE ADDED TO BILL AT COMPLETION OF JOB. PAYMENT REQUESTED WITHIN EIGHT DAYS.

PLEASE RETAIN ORIGINAL FOR YOUR FILE

8304042180

PLEASE RETURN DUPLICATE COPY TO CENTRAL CASTING WITH REMITTANCE

THE UNDERSIGNED ACKNOWLEDGES AND ACCEPTS THIS ORDER UPON THE TERMS SPECIFIED BY CENTRAL CASTING.

COMPANY Edmonds Associates

ADDRESS 611 Car ron St.

CITY Alexandria STATE Va. 22314

AUTHORIZED SIGNATURE Attn: Sherry Lewis

DATE

12

[illegible] CONSERVATIVE FUND
2009 WILSON BLVD., SUITE [illegible]
ARLINGTON, VIRGINIA 22201

[illegible] Valley Bank

394

Jan 30 19 80

PAY One thousand Fifty-three and 69/100 DOLLARS $1053.69

TO THE ORDER OF
C & P Telephone Co. of Va.
O.D. Box 27272
Richmond, Va. 23272

[signature]

NOT NEGOTIABLE

[illegible]

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - FORM WVBG V-2

DATE	DESCRIPTION	AMOUNT
1/30/80	Nov. 2 thru Dec. 1 553.24	$1053.69
	Dec. 2 thru Jan. 1 500.45	
	$1053.69	
	$758.26 Still due.	

8304042188

#10

911776

RECEIVED
FEC
3704
81 JAN 8 P12:21

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
KAREN LUBSEN BLAIR
JOHN ROBERT CLARK III
J. STANLEY PAYNE, JR.

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

TWX/TELEX: 710-831-0866
CABLE: SEDAMHERGE

January 7, 1981

81 JAN 8 P1:42
FEC
GENERAL COUNSEL

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

Re: MUR 1252

Dear Ms. Weissenborn:

This will confirm your agreement today by telephone to extend until January 14, 1981 the date by which Fund For A Conservative Majority (FCM) may comply with the letter request of the General Counsel of the Commission to produce previously-requested documents in the control or possession of FCM.

This will also confirm that as counsel for both FCM and National Conservative Political Action Committee (NCPAC) in the referenced matter, this firm did not receive the Commission's Order directing production of documents by FCM and NCPAC until December 31, 1980.

Sincerely,

Robert R. Sparks, Jr.

9304021811

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Curtis Herge, Esquire
SEDAM & HERGE
7600 Old Springhouse Road
McLean, Virginia 22102

Re: MUR 1252

Dear Mr. Herge:

The Commission has received the Motions to Rescind the Commission's decision to merge Matters Under Review (MURs) 1252 and 1299 filed by you on behalf of your clients, Fund for a Conservative Majority ("FCM") and the National Conservative Political Action Committee ("NCPAC"). The Commission reviewed and considered the papers submitted on October 27, and 28, 1980 and on December 9, 1980, voted to deny FCM's and NCPAC's motions.

For the record, two points should be noted; 1) the Commission merger of these two matters was initially suggested by counsel for FCM and NCPAC, Robert Sparks, at a meeting in early October with Commission staff, and 2) as you were notified by letter dated September 25, 1980, the Commission found reason to believe, based on a complaint filed by the Carter-Mondale Reelection Committee, Inc., that your clients FCM and NCPAC had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and Chapter 95, Title 26 U.S. Code ("the Fund Act").

As your associate, Mr. Robert Sparks, has been told in the course of numerous conversations with the staff assigned to this case, the Commission did not make any additional finding of reason to believe with respect to your clients in connection with the complaint filed subsequently by Common Cause. A finding of reason to believe is a triggering mechanism for the initiation of an investigation of alleged violations of the law by the Federal Election Commission, a non-adjudicatory, investigatory agency. As Mr. Sparks was also informed, insofar as the complaint filed by Common Cause alleged the same violations of the Act, and Fund Act contribution and expenditure limitations by virtue of expenditures made by the same named respondents and relied upon virtually the same allegations of fact and pointed to the same evidence in support of their identical claims, the two matters were merged into one investigative endeavor, thus avoiding duplicative efforts on the part of both the Commission and the respondents.

8304042182

P.J.B.
12/10/80

As you are aware, FCM and NCPAC were provided an opportunity to demonstrate that no action should have been taken by the Commission prior to the Commission's finding of reason to believe. Moreover, you are of course free at anytime to bring forth whatever information you may deem relevant to the Commission's investigation of the alleged violations of the statute by your clients. In addition, should the General Counsel ultimately recommend to the Commission that it proceed to a consideration of a finding of probable cause to believe FCM and/or NCPAC violated the law, you will of course receive a copy of the General Counsel's brief and be able, pursuant to 2 U.S.C. § 437g(a)(3), to submit a brief stating the position of your client(s) on the legal and factual issues of the case and reply to the brief of the General Counsel.

I hope that this eliminates any questions you might have had regarding the Commission's merger of these two matters. However, should you have any additional questions or problems, please contact Ms. Marsha Gentner, the attorney assigned to this case at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8304042181

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: DECEMBER 19, 1980

SUBJECT: ORDERS IN RELATIONS TO MUR 1252

The attached orders in relation to MUR 1252 have been signed and sealed this date.

ATTACHMENTS:
Orders (2)
Americans for Change

8304042181

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The Fund for a Conservative Majority is required to answer all written questions submitted by the Commission on October 1, 1980. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

12-19-80
Date

JOHN WARREN McGARRY
Vice Chairman
Federal Election Commission

Attest:

Marjorie W. Emmons
Secretary to the Commission

8304042181 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans for Change,) MUR 1252
et al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 15, 1980, the Commission decided by a vote of 4-1 to take the following actions in the above-captioned matter:

1. Deny in all respects the motion to quash and the motion to modify the Commission subpoena made by respondent Fund for a Conservative Majority.

2. Require respondent to answer all written questions submitted.

3. Direct the Office of General Counsel to advise Fund for a Conservative Majority of the above action and redirect the respondent to appear in compliance with the subpoena and to file the written answers not yet provided.

4. Authorize the Office of General Counsel to institute a civil action pursuant to 2 U.S.C. §437d(b) should the Fund for a Conservative Majority fail to comply fully with the subpoena and the order to submit written answers.

Commissioners Harris, McGarry, Reiche, and Tiernan voted affirmatively for the above decision; Commissioner Friedersdorf dissented. Commissioners Aikens abstained on the vote.

Attest:

12-15-80
Date

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

8304042816

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: DECEMBER 9, 1980

SUBJECT: MUR 1252 - General Counsel's Report in Opposition to Motion of the FCM to Quash and Modify Subpoenas and in Response to Objections to Certain Written Questions, dated 12-4-80

The above-named document was circulated on a 48 hour vote basis at 2:00 on December 5, 1980.

Commissioner Friedersdorf filed an objection at 12:01 p.m. on December 9, 1980.

This matter will be placed on the Executive Session Agenda for December 16, 1980.

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December 5, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1252

Please have the attached General Counsel's Report (on FCM) distributed to the Commission on a 48 hour tally basis. Thankyyou.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change,)
et al.)

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 DEC 5 A10: 35

GENERAL COUNSEL'S REPORT IN OPPOSITION TO MOTION OF THE FUND FOR A CONSERVATIVE MAJORITY TO QUASH AND MODIFY SUBPOENAS AND IN RESPONSE TO OBJECTIONS TO CERTAIN WRITTEN QUESTIONS

I. Summary of Proceedings

On October 1, 1980, the Federal Election Commission mailed a subpoena to produce documents and materials and an order to answer written questions to counsel for the Fund for a Conservative Majority ("FCM"). The subpoena and order seek to ascertain facts concerning the relationship between FCM and Ronald Reagan and his authorized committees for purposes of determining whether FCM's expenditures on behalf of Mr. Reagan's candidacy for the office of President are independent of the candidate and his authorized committees. In addition, the subpoena and order seek information concerning the relationship between FCM and "Citizens for Reagan in '80" in order to ascertain whether the latter is an unauthorized committee using the name of the candidate in its name.

On October 14, 1980, FCM moved to quash or modify the subpoena and objected to certain of the written questions to which answers had been ordered.[1/] (See Attachments I and II). FCM's motion to quash or modify the subpoena and its objections to certain questions are based upon several arguments. First, FCM states that the subpoena and interrogatories are overbroad and inconsistent with the terms of the Commission's notification of reason to believe.

1/ NCPAC has submitted written answers to Section A of the interrogatories and has produced documents referred to in requests 4 and 5 (and not 5a) of the Commission's subpoena.

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It is asserted that pursuant to the requirements of 11 C.F.R. § 111.9(a) the Commission is required to notify the respondent of the section of the statute or regulations allegedly violated and of the factual basis allegedly supporting the finding, and that any inquiry pursued as a result of such finding is limited to the associations and activities constituting the facts which supported the Commission's determination. Respondent asserts that "the Commission may not inquire into others absent a finding of reason to believe that those activities or associations exist and that they violate statutes or regulations within the Commission's purview." (Motion to Quash, p. 3). In keeping with this position FCM has agreed to furnish documents which relate to the specific activities and associations set forth in the notification, but moves to quash or modify the remaining requests because "they are unsupported by any articulated finding of reason to believe that the questioned relationships or activities exist or, it they do exist, that they constitute a violation of any statute or regulation over which the Commission has jurisdiction". (Motion to Quash, p. 3).

Secondly, FCM argues that, even if some or all of the other relationships or activities included in the subpoena exist, the scope of questions is unreasonable. This alleged unreasonableness based upon the claim that the document search required would be unduly burdensome because "FCM would be compelled to review all of its records in order to produce those requested," and upon the determination that the time period granted by the Commission is unreasonable. Burdensomeness is also cited as a reason for objecting to certain interrogatories.

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Thirdly, FCM argues that the Commission is barred by the decision in Common Cause, et al. v. Schmitt, et al, 80-1609 and 80-1754 (consolidated)(D.D.C. September 30, 1980), from enforcing the provisions of 26 U.S.C. § 9012(f)).

For the reasons set forth below the Office of General Counsel believes that the above arguments are without merit and recommends that FCM's motion to quash or to modify the subpoena be denied and that the respondent be required to answer all interrogatories.

II. Analysis

1. The Commission's Subpoena and Order are Consistent with the Notification of Reason to Believe, Are Reasonably Related to Its Investigation, and Are Not Unduly Burdensome.

FCM's assertion that the subpoena and order are overbroad and inconsistent with the Commission's notification of reason to believe demonstrates a misunderstanding of the relationship between the facts presented as the basis for a finding of reason to believe a violation has occurred and that finding itself. The Commission finds reason to believe that a violation has taken place, not that particular facts exist. Allegations of fact are required as bases for a finding of reason to believe and the opening of an investigation, but those facts do not define the parameters of the investigation. They serve as a starting point, not as the sole focus. Therefore, no future reason to believe findings are necessary as new facts are revealed which are relevant to a previous finding with regard to a particular portion of the statute or regulations. The statement in the notification sent to FCM to the effect that the Office of General Counsel had limited the basis of its recommendation of a finding of reason to believe to those facts deemed relevant was meant to convey that this

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Office had not used all of the information supplied by the complainant. The statement was not intended to preclude future additions to the information initially used which support the finding of an apparent violation.[2/]

FCM also argues that the subpoena and order are unreasonable because they are "unduly burdensome". According to counsel, the subpoena would require FCM to review all of its records before it could produce the records requested. However, in FTC v. Texaco, 555 F.2d 862, 882 (D.C. Cir., 1977), the court stated that "[s]ome burden on subpoenaed parties is to be expected and is necessary in furtherance of the agency's legitimate inquiry and public interest." The subpoenaed party must show that the request is unreasonable. Otherwise, it is the duty of a subpoenaed party to undertake whatever search is necessary to produce documents required.

In the present instance the Commission has the authority to determine the independence or non-independence of political committees. The subpoena is designed to help the Commission obtain facts which would reveal the relationship between FCM and Ronald Reagan and his authorized committees, if any, as well as provide a foundation for examination of witnesses upon oral deposition. As such, the contents of the subpoena and order are reasonably relevant to the objective of the investigation and therefore should not be quashed. See United States v. Morton Salt Co., 338 U.S. 632 (1950); Federal Trade Commission v. Texaco, 555 F.2d 862, 877 (D.C. Cir., 1977)(wide range of investigation is necessary and appropriate where numerous factual allegations in support of legal contention have been made); FEC v.

2/ This explanation was given to FCM counsel at the meeting cited in counsel's letter; however, the misunderstanding apparently persists.

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FEC v. Machinists Non-Partisan Political League, Misc. Action No. 79-0291, (D.D.C., January 28, 1980)(findings of fact and conclusions of law); FEC v. Wisconsin Democrats for Change in 1980, No. 80-C-124, Opinion and Order at 5 (W.D. Wisc., April 24, 1980).

FCM's allegation that the time period granted by the Commission for production of documents is unreasonable is not supported by any statements explaining why FCM found itself unable to assemble the necessary documents within the stated period. FCM is an established committee with a professional staff and therefore, absent any showing to the contrary, should be able to gather the materials without undue effort.

FCM also asserts that the Commission is barred from enforcing 26 U.S.C. § 9012(f) by the recent decision of the three-judge District Court panel in Common Cause, et al. v. Schmitt, et al., that the provision is unconstitutional. The Commission is appealing the court's decision and therefore should not rescind or revoke its finding of reason to believe that § 9012(f) has been violated, but rather should take no further action regarding this violation at this time.

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III Recommendation

Both the motion to quash and the motion to modify the Commission subpoena made by respondent Fund for a Conservative Majority should be denied in all respects. In addition, respondent should be required to answer all written questions submitted. Staff would so advise FCM and redirect the respondent to appear in compliance with the subpoena and to file the written answers not yet provided.

Should FCM fail to comply fully with the subpoena and the order to submit written answers, we recommend authorization to institute a civil action pursuant to 2 U.S.C. § 437d(b).

4 December 1980
Date

Charles N. Steele
General Counsel

Attachments

1. Motion to Quash or Modify Subpoenas
2. Letter from FCM counsel re: written interrogatories
3. Answers and Objections to Interrogatories
4. Commission Orders (2)
5. Denial of Motion to Quash or Modify the Commission's Subpoena and Order
6. Requirement to Answer Written Interrogatories
7. Letter to FCM counsel

8304042182

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A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

AW

ATTACHMENT I

October 14, 1980

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

Re: MUR 1252/Motion To Quash or Modify Subpoena

Dear Sir:

Pursuant to Federal Election Commission Regulations, 11 C.F.R. §111.15(a), Fund for a Conservative Majority (FCM), by counsel, hereby moves to quash or modify the subpoena duces tecum issued by the Federal Election Commission ("the Commission") in this matter on September 29, 1980, on the ground that such subpoena is overbroad and inconsistent with the terms of the Commission's Notification and Reason To Believe Finding that FCM has violated certain provisions of the Federal Election Campaign Act (2 U.S.C. §431, et seq.) and the Presidential Election Campaign Fund Act (26 U.S.C. §9001, et seq.) ("the Acts").

By Notification dated September 25, 1980, the Commission informed FCM that it had found reason to believe that FCM had violated certain provisions of the Acts having to do with limitations on contributions and expenditures on behalf of Ronald Reagan, and with respect to the use of Mr. Reagan's name in the title of its project, "Citizens for Reagan in '80." The Commission's Regulations, 11 C.F.R. §111.9(a), require that in the event the Commission determines that there is reason to believe that a respondent has violated a statute or regulation over which the Commission has jurisdiction, it shall:

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> ...notify such respondent of the Commission's finding by letter, setting forth the sections of the statute or regulations alleged to have been violated and the alleged factual basis supporting the finding. (emphasis added).

Pursuant to that requirement, the Commission set forth in its Notification:

> ...only that evidence which the General Counsel's Office has found relevant to a determination of whether there is reason to believe that the expenditures by FCM are not "independent" expenditures, but rather in-kind contributions to Mr. Reagan. [Notification, at 3.]

The Commission then questioned certain specific activities with respect to expenditures made by FCM to certain vendors and others deemed to be "agents" of Ronald Reagan by virtue of their earlier use or employment by the Reagan Committee. In addition, the Commission noted that FCM may have violated 2 U.S.C. §432(e)(4) by using the name of a candidate in the title of its project, "Citizens for Reagan in '80." Notification at 4.

The Commission therefore found reason to believe that:

1. FCM had violated 2 U.S.C. §441a(a) and 26 U.S.C. §9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan.

2. That FCM had violated 26 U.S.C. §9012(f) by making excessive independent expenditures on behalf of Ronald Reagan.

3. That FCM had violated 2 U.S.C. §432(e)(4).

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As to the Commission's first finding, it is the position of FCM that the scope of the Commission's inquiry is limited by those activities and associations referred in Part A of the Notification. Having raised questions with regard to those activities and associations in support of its "reason to believe finding," the Commission may not inquire into others absent a finding of reason to believe that those activities or associations exist, and that they may violate statutes or regulations within the Commission's purview. In short, it is FCM's position that the Commission's regulation, which requires the Commission to particularize its findings and the factual basis in support of those findings, thereby necessarily limits the scope of its inquiry as to those findings.

Accordingly, in response to the Commission's subpoena, FCM will produce on or before the date specified therein those documents referred to in the requests numbered 4, 5, and 11. FCM hereby moves to quash or modify the subpoena as to the remaining requests on the ground that they are unsupported by any articulated finding of reason to believe that the questioned relationships or activities exist or, if they do exist, that they consititute a violation of any statute or regulation over which the Commission has jurisdiction.

Even if the Commission determines from evidence before it that there exist some or all of the other questioned relationships or activities, it is the position of FCM that even then the scope of questions relating thereto must be reasonable. As the document requests are now framed, they are unduly burdensome since, to comply with the Commission's requests, FCM would be compelled to review all of its records in order to produce those requested. Moreover, the short time period granted by the Commission in which to produce the volume and nature of the documents requested makes the Commission's request unreasonable.

As to the Commission's second finding, FCM asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause, et al. v. Schmidt, et al., (80-1609 and 80-1754 (consolidated),

September 30, 1980), to which both the Commission and FCM were parties, bars any attempt by the Commission to enforce 26 U.S.C. §9012(f) as it is written, or to inquire into expenditures by FCM on behalf of Ronald Reagan irrespective of the independence of FCM from Reagan or his authorized committees. Absent any finding by the Commission of reason to believe that FCM is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

At a meeting conducted at the offices of Lawrence M. Noble, Assistant General Counsel to the Commission, Mr. Noble informed the undersigned counsel that after a review of the Carter-Mondale/Democratic National Committee complaint which generated this action, only those items set out in the Notification were deemed worthy of consideration by the Commission. Thus, any future "reason to believe finding" by the Commission must be supported either by another, different complaint, or must be based upon an internally-generated recommendation.

Wherefore, FCM moves the Commission to quash or modify its subpoena as to the requests numbered 1-3, and 6-10 therein.

Sincerely,

Robert R. Sparks, Jr.

J. Curtis Herge

Counsel for Fund for a
Conservative Majority

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ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

ATTACHMENT

October 14, 1980

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

Re: MUR 1252

Dear Mr. Steele:

Submitted herewith are the sworn written answers of Mr. Kenneth F. Boehm, Treasurer of Fund for a Conservative Majority (FCM) to written Interrogatories propounded by the Commission to FCM on September 29, 1980, transmitted by the Commission to counsel for FCM on October 1, 1980, and received by counsel on October 2, 1980. Included therein are objections to certain of the Commission's questions, together with reasons in support of those objections.

Also enclosed is FCM's motion to quash or modify the subpoena duces tecum issued by the Commission, transmitted, and received with the Commission's Interrogatories. Reference is made to the letter of October 9, 1980, from Lawrence M. Noble, Assistant General Counsel, to counsel for FCM with respect to the timeliness of the filing of the motion to quash.

It is understood that this motion to quash or modify the Commission's subpoena will be submitted to the Commission for its determination and that counsel for FCM will be notified of the Commission's decision. Counsel has been informed that where the Commission denies an application to quash or modify a subpoena the office of general counsel customarily affords a respondent further opportunity to comply before seeking any enforcement remedies.

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I look forward to notification of the Commission's decision in this matter.

Sincerely,

Robert R. Sparks, Jr.

enclosures

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ATTACHMENT 3

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al.,	)	
Complainants,	)	
-against-	)	MUR 1252
FUND FOR A CONSERVATIVE MAJORITY, et al.	)	
Defendants.	)	

ANSWERS TO INTERROGATORIES

COMES NOW, Fund for a Conservative Majority ("FCM"), by its Treasurer, Kenneth F. Boehm, and in response to the written Interrogatories from the Federal Election Commission to FCM in this matter, answers as follows:

FCM

A. FCM is a multi-candidate political committee, a project of which is "Citizens for Reagan in '80." The purpose of that project is to aid in the election of Ronald Reagan to the office of President of the United States.

With regard to the specific questions raised by the Commission concerning the relationship between FCM and "Citizens for Reagan in '80" (CFR):

1) CFR does not maintain a bank account or an accounting of receipts and expenditures separate and apart from FCM.

2) CFR does not employ a staff separate and apart from that of FCM.

3) Solicitations or requests for contributions to CFR ask that checks be made payable to FCM.

4) Monies received from checks received by FCM which were made payable to FCM have been used by CFR.

5) The account into which funds contributed to or received for CFR are deposited in in the name of FCM.

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B-E. FCM objects to these questions as being overbroad and unreasonable in that they request information beyond the scope of the Commission's findings of reason to believe that FCM has violated statutes or regulations over which the Commission has jurisdiction. Moreover, to supply the information requested would require that FCM conduct a systematic search of all of its records, and to do so within the time period afforded by the Commission would place an undue burden on FCM and its personnel. In addition, certain of the Commission's requests cannot be answered as they relate to contacts between FCM and agents or employees of various entities, which parties are unknown to FCM.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

Kenneth F. Boehm
KENNETH F. BOEHM

SUBSCRIBED and sworn to before me this 14th day of October, 1980.

Winifred Roxy
Notary Public

My commission expires: 2/6/84

ATTACHMENT 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

COMMISSION ORDER

The Fund for a Conservative Majority is required to answer all written questions submitted by the Commission on October 1, 1980. The staff of the Office of General Counsel is directed to take all necessary and proper steps to insure compliance with the requests contained in the Order.

Date

Max Friedersdorf, Chairman
Federal Election Commission

Attest:

Marge W. Emmons
Secretary to the Commission

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ATTACHMENT 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DENIAL OF MOTION TO QUASH OR MODIFY THE COMMISSION'S SUBPOENA AND ORDER

The Federal Election Commission hereby denies the Motion of the Fund for a Conservative Majority to Quash or Modify the Commission's Order to Produce Documents and Materials and to Answer Questions.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

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ATTACHMENT 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

REQUIREMENT TO ANSWER
WRITTEN INTERROGATORIES

The Federal Election Commission hereby requires the Fund for a Conservative Majority to answer all written interrogatories.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 1252

Dear Mr. Sparks and Mr. Herge:

The Commission has received the Motion to Quash or Modify Subpoena filed by you on behalf of the Fund for a Conservative Majority ("FCM") and also sworn written answers by Mr. Kenneth F. Boehm to certain interrogatories, together with objections to other particular questions. The Commission has reviewed and considered the motion and the answers and objections to the written interrogatories, and on November , 1980, voted to deny FCM's motion and to require answers to all written questions submitted.

Accordingly, FCM is requested to produce for inspection and copying the documents previously described in the Commission's October 1, 1980, subpoena, and not yet produced, at Room 706, 1325 K Street, N.W., Washington, D.C., on November , 1980, and all subsequent business days thereafter required to complete inspection. Answers not yet provided to all written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

With respect to compliance with the Commission's previously issued subpoena and order, we direct your attention to the specific directions for proper compliance set out in the paragraph preceeding the document requests on page three of the subpoena sent to FCM.

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If you have any questions or problems, please contact Ms. Anne A. Weissenborn, the staff attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Commission Orders

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GCC# 3037

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J. CURTIS HERGE

BARBARA L. ABERNETHY
A. MARK CHRISTOPHER
MICHAEL D. HUGHES
ROBERT R. SPARKS, JR.

THOMAS M. DAVIS, III
OF COUNSEL

October 20, 1980

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

Attention: Marsha Gentner, Esq.

Re: MUR 1299

Dear Mr. Steele:

This letter is written in reply to your letter to Fund for a Conservative Majority, 1022 Wilson Boulevard, Arlington, Virginia 22209, dated October 2, 1980, in which you reported that Common Cause had filed a complaint with the Federal Election Commission (hereinafter referred to as "the Commission"), alleging that Fund for a Conservative Majority, together with certain other named Respondents, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter referred to as "the Act") and Chapters 95 and 96 of Title 26 of the United States Code. The Commission has numbered this matter MUR 1299.

Fund for a Conservative Majority (hereinafter referred to as "FCM") appreciates this opportunity, pursuant to 2 U.S.C. 437g(a)(1) and 11 CFR 111.6, to demonstrate that no action should be taken against FCM on the basis of the complaint and that the complaint should be dismissed as to FCM. In fact, we assert that the complaint fails to meet the technical requirements of 11 CFR 111.4, in that it fails to contain a clear and concise recitation of facts, or other evidence, which describe a violation by FCM of a statute or regulation over which the Commission has jurisdiction. See, 11 CFR 111.4(d)(3).

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As part of its activities, FCM makes independent expenditures expressly advocating the election of Governor Reagan to the office of President of the United States. As reported in paragraph 11 of the complaint, FCM's program in this regard is conducted under the name "Citizens for Reagan in '80, a project of Fund for a Conservative Majority." This program is conducted pursuant to, and in accordance with, the provisions of Section 431(17) of the Act and Part 109 of 11 CFR. The complaint filed by Common Cause fails to provide a modicum of creditable evidence to support a finding to the contrary.

In that portion of the complaint entitled "Respondents' Violations", Common Cause fails to provide the Commission with any facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction. This failure is evident from a paragraph by paragraph analyses of the complainant's alleged violations.

Paragraph 14. Common Cause alleges that FCM is now violating 26 U.S.C. 9012(f)(1), whether or not FCM is independent of the official Reagan campaign. The allegation is a statement of a legal conclusion which, in fact, is inaccurate and misleading.

FCM asserts that the decision of the three-judge District Court for the District of Columbia in Common Cause et al. v. Schmidt, et al., (80-1609 and 80-1754 (consolidated), September 30, 1980), to which the Commission was a party, bars any attempt by the Commission to enforce 26 U.S.C. 9012(f) as it is written, or to inquire into expenditures by FCM on behalf of Ronald Reagan, irrespective of the independence of FCM from Reagan or his authorized committees. Absent any finding by the Commission of reason to believe that FCM is not independent of Ronald Reagan or his authorized committees, Section 9012(f) cannot serve as a vehicle for investigation or inquiry by the Commission.

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Paragraph 15. This paragraph fails to allege facts, or other evidence, which describe a violation by FCM of a statute or regulation over which the Commission has jurisdiction. To the contrary, the paragraph is a statement of a legal conclusion and FCM denies that it is not independent of the official Reagan campaign.

Paragraph 16. This paragraph fails to allege facts, or other evidence, which describe a violation by FCM of a statute or regulation over which the Commission has jurisdiction. To the contrary, the paragraph is a statement of a legal conclusion.

Paragraph 17. This paragraph is argumentative and it is not based on facts, or other evidence, placed before the Commission.

Paragraph 18. This paragraph is argumentative and a statement of legal conclusions.

Subparagraph (a) of paragraph 18 makes no reference to FCM, its current personnel, or activities.

Subparagraph (b) of paragraph 18 makes no reference to FCM, its current personnel, or activities.

Subparagraph (c) of paragraph 18 makes no reference to FCM, its current personnel, or activities.

Subparagraph (d) of paragraph 18 makes no reference to FCM, its current personnel, or activities.

The allegation in subparagraph (e) of paragraph 18, as it relates to FCM, is that Arthur J. Finkelstein and Associates "assisted" FCM and the official Reagan campaign. Attached is a copy of a letter from Arthur J. Finkelstein & Associates, which explains the nature of the services rendered by that firm to FCM. The engagement by FCM of Arthur J. Finkelstein & Associates under the circumstances does not constitute a violation of the Act. (See, Answer 3 in AO 1979-80.)

The allegation in subparagraph (f) of paragraph 18 makes no reference to FCM, its current personnel, or activities.

The allegation in subparagraph (g) of paragraph 18 is without merit. It fails to allege that the conduct of FCM violates applicable law. Instead, it suggests that Gov. Reagan or his staff have some duty, which does not exist in the law, to direct FCM not to use Gov. Reagan's name in its independent expenditure activities. If such a direction had been given and followed, such conduct would undoubtedly have been determined to have been improper coordination of activities. In any event, Gov. Reagan did request that FCM terminate its independent activities on his behalf. (See attached copy of a Mailgram to FCM from Ronald Reagan dated July 24, 1979.) FCM did not comply with Gov. Reagan's request and had no other communication with Gov. Reagan or his agents.

The allegation in subparagraph (h) of paragraph 18 fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction. Upon information and believe, the mailing list was rented through a list broker. In any event, the rental of a mailing list is not a proscribed activity. (See, Answer 6 in AO 1979-80.)

Paragraph 19. This paragraph is argumentative, it makes no reference to FCM, its personnel, or activities, and it is not based on facts, or other evidence, placed before the Commission.

Paragraph 20. This paragraph is argumentative, it makes no reference to FCM, its personnel, or activities, and it is not based on facts, or other evidence, placed before the Commission.

Paragraph 21. This paragraph is not applicable to FCM.

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in consultation with, or at the request or suggestion of Gov. Reagan or any agent or authorized committee of Gov. Reagan. Furthermore, FCM's activities in this regard have not been based upon information about the candidate's plans, projects, or needs provided to FCM by the candidate or his agents. FCM's knowledge of the Reagan campaign strategy is derived solely from public newspaper articles, as alleged by the complainant.

Paragraph 30. This paragraph repeats the allegation made in subparagraph (h) of paragraph 18, previously shown to be without merit. Furthermore, the balance of the paragraph fails to contain a clear and concise recitation of facts which describe a violation of a statute or regulation.

Paragraph 31. This paragraph is not applicable to FCM.

Paragraph 32. This paragraph is not applicable to FCM.

Paragraph 33. This paragraph is not applicable to FCM.

Paragraph 34. This paragraph is not applicable to FCM.

Paragraph 35. This paragraph is not applicable to FCM.

Paragraph 36. This paragraph is not applicable to FCM.

Paragraph 37. This paragraph is argumentative and FCM denies that the allegations "provide ample reason to believe that [FCM is] not independent of the official Reagan campaign ..." Subparagraphs a., b., c. and d. of paragraph 37 simply allege violations which are not supportable in fact.

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Paragraph 22. This paragraph is not applicable to FCM.

Paragraph 23. This paragraph is not applicable to FCM.

Paragraph 24. This paragraph is not applicable to FCM.

Paragraph 25. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 26. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 27. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 28. This paragraph is argumentative in that the quoted solicitation does not "more explicitly suggest" unlawful coordination between FCM and the official Reagan campaign, as alleged. In fact, the alleged facts, or evidence, fails to substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction.

Paragraph 29. This paragraph fails to allege facts, or other evidence, which would substantiate a finding of reason to believe that FCM may have violated a statute or regulation over which the Commission has jurisdiction. FCM has a campaign strategy, but that strategy was not developed, based upon, or implemented with the cooperation or with the prior consent of, or

Thus, with the possible exception of the allegation contained in subparagraph (e) of paragraph 18, an allegation which has been adequately addressed in this letter, the complaint fails to contain a clear and concise recitation of facts, or other evidence, which describe a violation by FCM of a statute or regulation over which the Commission has jurisdiction. Argumentative assertions and legal conclusions do not provide a foundation upon which the Commission may find reason to believe that a statute or regulation over which it has jurisdiction has been violated. Accordingly, it is submitted that the complaint should be dismissed as to FCM.

Sincerely,

J. Curtis Herge
Counsel to Fund for a
Conservative Majority

Attachment

8304042184

Arthur J. Finkelstein & Associates
117 South Avenue
Mount Kisco, N. Y. 10549
(914) 666-2750

October 16, 1980

Mr. Curtis Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Curtis:

The Fund For A Conservative Majority contracted with Arthur J. Finkelstein & Associates to do a statewide survey in the State of Wisconsin. The survey was conducted on March 15, and March 16, 1980.

The Fund For A Conservative Majority paid for and saw only the Wisconsin survey.

With regard to the Ronald Reagan For President Comm., A.J.F. & Associates did two surveys for them. Both of these surveys were conducted in Iowa during December, 1979. The Reagan For President Comm. paid for and saw only its surveys.

In every instance, no statements advocating either the election or the defeat of any candidate existed.

Arthur J. Finkelstein & Associates was a member of the National Republican Advisory Committee. His participation with this Committee was at best non-existent. He never went to meetings or got actively involved with other Advisory members concerning the Committee's business.

I hope this will answer all questions that you may have. If additional information is needed, please feel free to call.

Sincerely,

Ronald W. Finkelstein

RWF:dhd

RECEIVED
OCT 17 1980
SEDAM & HERGE

a3040218

REAGAN FOR PRESIDENT L SMITH
9841 AIRPORT BLVD SUI[redacted] 1430
LOS ANGELES CA 90045

4-06R427S205003 07/24/79 ICS IPMMTZZ CSP FCHA
2 3024280624 MGM TDMT YORKLYN DE 07-24 0642P EST

ROBERT HECKMAN CHAIRMAN FUND FOR A CONSERVATIVE MAJORITY
1022 WILSON BLVD
ARLINGTON VA 22209

THIS IS A CONFIRMATION COPY OF A PREVIOUSLY PHONE-DELIVERED TELEGRAM

IT HAS BEEN BROUGHT TO MY ATTENTION THAT YOU ARE RAISING FUNDS FOR AN INDEPENDENT AND UNAUTHORIZED COMMITTEE ON MY BEHALF. I ASK THAT YOU IMMEDIATELY STOP THIS EFFORT. I BELIEVE THAT YOU AND YOUR GROUP ARE HONEST SUPPORTERS, HOWEVER YOUR INDEPENDENT EFFORTS CAN ONLY HINDER THE CAMPAIGN EFFORTS OF REAGAN FOR PRESIDENT, MY ONLY AURTHORIZED COMMITTEE
RONALD REAGAN
9841 AIRPORT BLVD SUITE 1430
LOS ANGELES CA 90045

1844 EST

MGMCOMP MGM

TO REPLY BY MAILGRAM SEE REVERSE SIDE FOR WESTERN UNION'S

8 3 0 4 0 4 2 1 8 4 7

SEDAM & HERGE
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22012

To:

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

FIRST CLASS MAIL

910929
GCC #3154

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

(703) 821-1000

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

TWX/TELEX: 710-831-0866
CABLE: SEDAMHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE

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

80 OCT 29 P1:51

October 27, 1980

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
80 OCT 29 P4:29

Honorable Max L. Friedersdorf
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Re: MUR 1252 and MUR 1299

Dear Mr. Friedersdorf:

On September 25, 1980, the Federal Election Commission ("the Commission") notified the undersigned counsel for Fund For A Conservative Majority ("FCM") that with respect to that certain complaint filed with the Commission on July 2, 1980 by the Carter-Mondale Reelection Committee, Inc. (MUR 1252), the Commission had found reason to believe that FCM had violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and Chapter 95, Title 26, U.S. Code.

By letter dated October 2, 1980, Mr. Charles N. Steele, General Counsel to the Commission, notified FCM that Common Cause had also filed a complaint with the Commission, denominated MUR 1299 by the Commission, alleging that FCM, together with other named respondents, may have violated certain provisions of the Act, and Chapters 95 and 96 of Title 26, U.S. Code. On October 20, 1980, counsel for FCM filed with the Commission, pursuant to 2 U.S.C. §437g(a)(1) and 11 C.F.R. 111.6, FCM's response to the Common Cause complaint. In its response, FCM asserted that no action should be taken against FCM on the basis of the complaint, and that the complaint should be dismissed as to FCM, on the ground that the complaint failed to meet the technical requirements of 11 C.F.R. 111.4, in that it did not contain a clear and concise recitation of facts which describe a violation of a statute or regulation over which the Commission has jurisdiction.

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FCM has not been notified of any action by the Commission with respect to FCM's response to the Common Cause complaint. However, counsel for FCM has been notified by Mr. Steele, by letter dated October 23, 1980, that on October 15, 1980, the Commission voted to merge the complaint filed by Common Cause (MUR 1299) with the complaint of the Carter-Mondale Reelection Committee (MUR 1252), and to treat both as a single investigatory matter. From that decision FCM appeals, moves the Commission to reconsider its action and rescind its decision merging both complaints, and to consider each complaint on its own merits.

When it voted to merge MUR 1252 and MUR 1299, the Commission acted without having considered FCM's response to the Common Cause complaint and, in point of fact, before FCM had even responded to that complaint. The Commission's purported merger of the complaints is not only untimely and prejudicial to FCM, but is also beyond the scope of its authority. Further, it is FCM's position that the effect of the merger is to accelerate the investigatory process as to MUR 1299 to the same stage as MUR 1252. In short, by failing to consider FCM's response to the Common Cause complaint, and by merging the complaints, the Commission has omitted a step in the investigatory scheme set by Congress, and has instead taken a step unauthorized and unrecognized by either Congressional statute or Commission regulation.

Section 437g(a)(1) of the Act provides in part:

> Before the Commission conducts <u>any</u> vote on the complaint, other than a vote to dismiss, any person so notified [of the filing of a complaint] shall have the opportunity to demonstrate, in writing, to the Commission within 15 days after notification that no action should be taken against such person on the basis of the complaint. [Emphasis supplied.]

The Commission's regulations provide:

> The Commission <u>shall not taken any action</u>, or make any finding, against a respondent other than action dismissing the complaint, unless it has

considered such response or unless no such response has been served upon the Commission within the fifteen (15) day period specified in 11 C.F.R. 111.6(a). [11 C.F.R. 111.6(b)Emphasis supplied.]

The Commission could not take the action which it did in MUR 1299, because, on October 15, 1980, when it purported to merge MUR 1252 and MUR 1299, FCM had not yet been afforded the opportunity granted it by statute and regulation to respond to the Common Cause complaint. The Commission acted before the period within which FCM was required to respond, and before it had in fact responded to the complaint. The Commission was therefore absolutely barred by statute and its own regulation from taking <u>any action</u> when it did, other than action dismissing the complaint.

The Commission's purported merger of MUR 1299 with MUR 1252 is tantamount to a determination by the Commission of reason to believe that as to the Common Cause complaint (MUR 1299), FCM has violated a statute or regulation cognizable by the Commission. The merger has effectively accelerated the investigatory process as to MUR 1299, for the Commission has already found reason to believe as to MUR 1252. Therefore, the Commission's action in merging the complaints is to the detriment of respondent FCM; it is "action taken against a respondent," 11 C.F.R. 111.6(b), and is expressly prohibited by regulation. Even if the Commission does not agree that it has accelerated the investigatory process to the detriment of FCM, it has clearly violated the plain wording of §437g(a)(1) of the Act, which prohibits <u>any</u> vote on a complaint, other than a vote to dismiss, during the pendency of the period of response to that complaint.

Not only is the Commission's action untimely, but the action itself is unsanctioned, either by statute or regulation. There is no authorization for the Commission to merge one complaint with another, particularly in the absence of a request for such a merger from the complainant or any of the respondents. The procedure to be followed by the Commission in reviewing and investigating complaints, voting to take action thereon, dismissing complaints, making

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findings thereon, or seeking judicial relief with respect to any violation of any statute or regulation cognizable by the Commission, is expressly set out in the regulations of the Commission. The Commission's authority is a creature of statute and regulation and it cannot be expanded by custom, practice, or expediency. There is no statutory or regulatory provision which permits the Commission to merge one complaint with another, and its purported merger is therefore beyond its authority and without effect.

For the reasons advanced above, FCM contends that the Commission's purported merger of MUR 1252 and MUR 1299 is not permitted by law and operates to the detriment of respondent FCM. Accordingly, FCM requests the Commission to rescind its "merger" of the complaints, to consider each on its own merits, and to dismiss MUR 1299 as to FCM for the reasons stated in FCM's response thereto, filed with the Commission on October 20, 1980.

Please feel free to contact me if you have any questions on this matter.

Sincerely,

J. Curtis Herge

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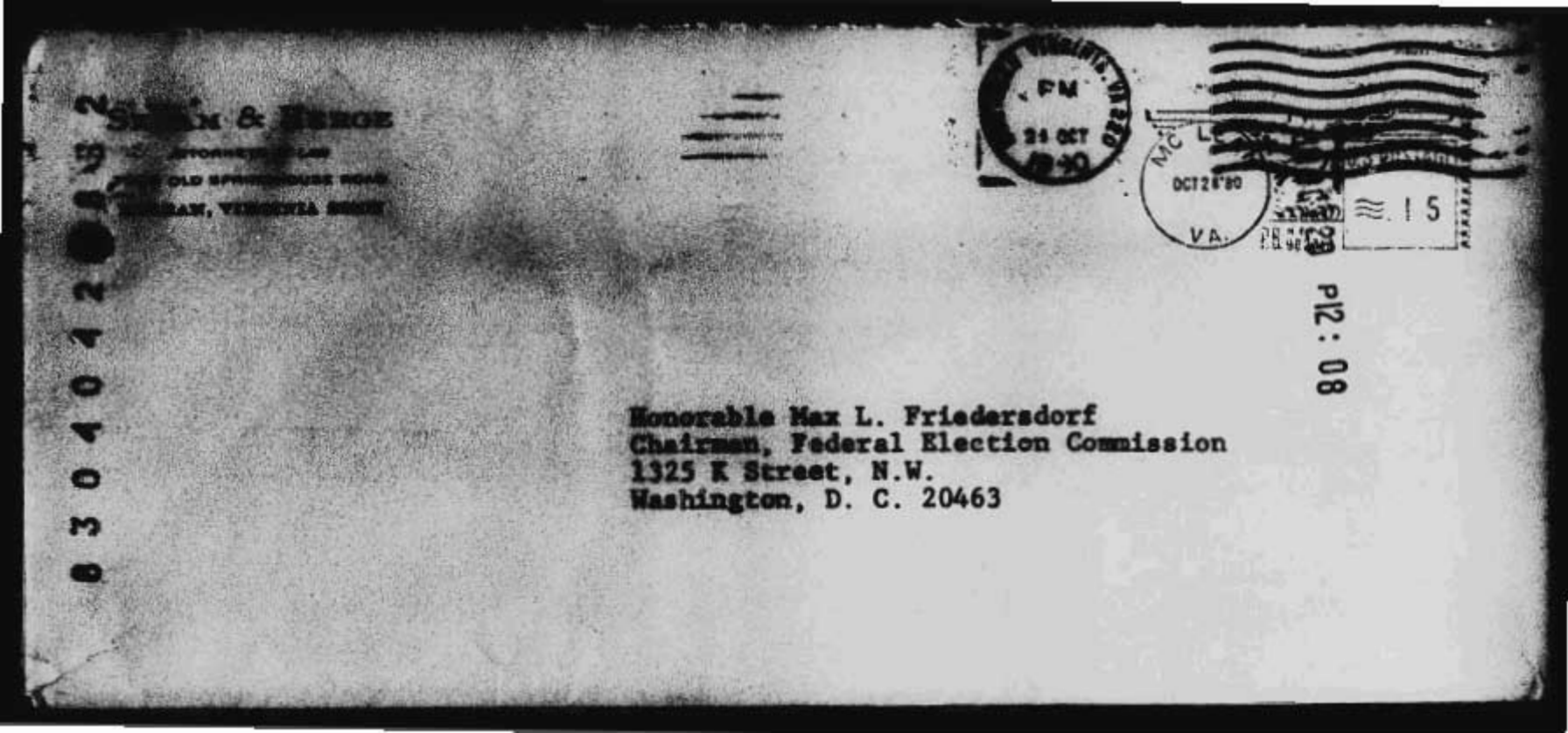


Honorable Max L. Friedersdorf
Chairman, Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Curtis Herge, Esquire
Sedam and Herge
7600 Old Springhouse Road
McLean, Virginia 22102

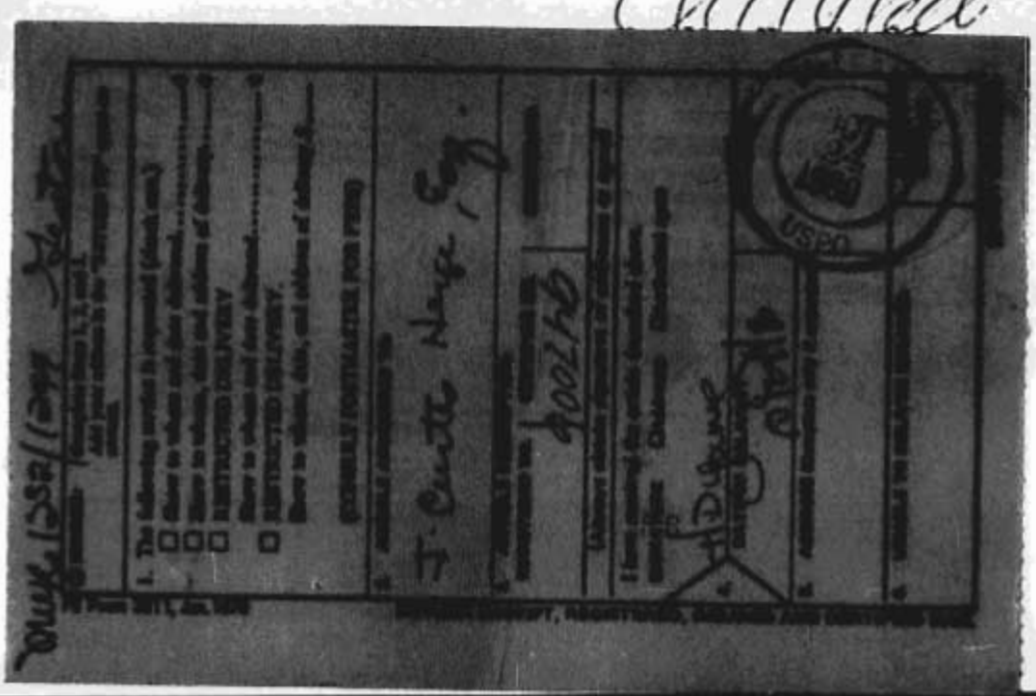
Re: MUR 1252 and MUR 1299

Dear Mr. Herge:

On September 25, 1980 you were notified of the Commission's findings concerning your client, Fund for a Conservative Majority (FCM), with respect to the complaint filed by the Carter-Mondale Reelection Committee and captioned MUR 1252. On September 29, 1980 the Commission received a complaint filed by Common Cause against your client, and a copy of that complaint was mailed to FCM. This letter is to further notify you that on October 15, 1980, the Commission voted to merge the complaint in MUR 1299 with MUR 1252, and to treat it as a single investigatory matter.

If you have any questions with respect to this or any other Commission action, please call Marsha G. Gentner, Anne A. Weissenborn, or Patricia F. Bak at (202) 523-5071.

Sincerely,



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GCC 3074

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

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

(703) 821-1000

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

TWX/TELEX: 710-831-0896

CABLE: SEDANHERGE

GLENN J. SEDAM, JR.
J. CURTIS HERGE

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

80 OCT 22 P3:57

October 22, 1980

Ms. Marsha G. Gentner
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252

Dear Ms. Gentner:

In accordance with your instructions to me by telephone this date, as counsel for Fund for a Conservative Majority (FCM), I deliver herewith those documents, or their equivalent, and explanations thereof, requested at numbers 4 and 5 (but not 5a) of the Commission's subpoena duces tecum issued in this matter on September 29, 1980. This will also confirm the assurance of Ms. Anne Weissenborn to me that delivery in this manner by close of business, October 22, 1980, will constitute compliance with the Commission's subpoena, except as to those requests as to which FCM has already filed a motion to quash or modify the subpoena.

There is enclosed the following:

1. Copies of FCM checks to Diversified Direct, Inc., dated May 27 and June 24, 1980, invoices of Diversified and samples of materials printed thereby for FCM by Diversified. Also enclosed are: (a) copies of the purchase orders of Thompson & Associates, FCM's agent, to Diversified, reflecting that art work for the printed materials was supplied to Diversified by Mr. Thompson and not produced by Diversified; and (b) a letter from Thompson in further explanation thereof.

2. Copies of FCM's check dated May 27, 1980 to Wiland & Associates, and the invoice of Wiland reflecting that with respect to the questioned expenditure, Wiland performed certain mailing list maintenance or purging services for FCM.

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3. Copies of FCM's check dated June 24, 1980 to Telepost, Telepost's invoice and description of printing services rendered, and a sample of the printed materials produced on Telepost's letterhead, with text prepared by Thompson and FCM.

4. Copies of FCM's check dated March 26, 1980, to Arthur Finkelstein & Associates, Finkelstein's statement for services rendered, and Finkelstein's further explanations of the polling services rendered to FCM, indicating that neither the poll nor its results inured to the benefit of Mr. Reagan, and were not "accepted" by him. The poll and the results thereof are withheld on the ground that their production would unduly burden FCM, as the poll itself runs to several hundred pages and would involve undue time and expense to produce herewith.

I trust you will find the documents produced by FCM herewith responsive to the Commission's needs. Please feel free to contact me if you have any questions on this matter.

Sincerely,

Robert R. Sparks, Jr.

Enclosures

8304042185

FUND FOR A CONSERVATIVE MAJORITY

General Fidelity Bank

1861

VOIDED

May 27, 80

Pay Two Hundred Twelve and 14/100

Dollars $ 212.14

Diversified Direct, Inc.
8936 Prosperity Ave
Fairfax, Va 22031

Rudyard J. Gallion

NOT NEGOTIABLE

:0560015321: #350416 64

FUND FOR A CONSERVATIVE MAJORITY

DELUXE - CHECK WITH VC

DATE	DESCRIPTION	AMOUNT
5/27	Invoice # 1983 Printing Services CFR "80"	$212.14

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1606

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1983

DATE April 25, 19

TO:

Fund for a Conservative
Majority
c/o Thompson & Assoc.
7015 Keene Mill Road
Springfield, Va. 22151

SHIPPED TO:

CFR 180

Wiland & Assoc.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 4/24/80	DDI JOB NO. / DDI P.O. NO. 1708 / DIVISIONAL JOB NO. 10609	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
133 M	Computer forms, with 3 color face and black back.	15.27/M	2,030.91
	4% Va. tax:		81.23
	TOTAL INVOICE:		$2,112.14

Final DRIVE

8304042183J7

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

E-4

PRINTING COORDINATION FORM

PRINTER DIVERSIFIED PRINTING PHONE#

CONTACT SANDY ENDERLE

A. Package Name: FINAL VICTORY DRIVE

B. Client: FUND FOR A CONSERVATIVE MAJORITY Phone#

C. Blue Line Date:

D. Mail Dates: 4/18

TOTAL DROPPED	DATE:			
261M	DAILY DROPS:			

E. Mail House: send to: Wiland & Associates Purchase Order#

F. Postage Type First Class Permit# Post Office

G. Package Elements:

261M 1. Letter:

a. Number of leaves 1 Printed sides 2
(1) Size 6 3/4 x 10 3/4
(2) Weight ?
b. Folded? NO
c. Color/Type white paper
d. Color of Ink PMS #185 red, Pantone yellow and black
e. Signature Bob Heckman
f. Disclaimer This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.
g. #Colors on each page 3 over 1

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_____ 2. Reply Memo/Questionnaire

a. Title
b. Size/Style
c. Folded?
d. Color/Type
e. Paper Weight
f. Color of Ink
g. Affix labels at mailhouse?
h. #Printed sides
i. #Colors: side 1 side 2

_____ 3. Business Reply Envelope

a. Address on envelpe
b. Size/Style
c. Ink color
d. BRE Permit # Post Office
e. Additional "Place Stamp Here" Envelopes

FINAL VICTORY DRIVE PACKAGE

8304042185 9

Citizens for Reagan in 80!

A project of FUND FOR A CONSERVATIVE MAJORITY

8304021865

May 16, 1980

Mr. P C Davis
PO Box 1063
Quincy, FL 32351

Dear Mr. Davis:

Reagan as President and a Conservative Majority in the Senate is truly within our grasp!

National columnist Jack Anderson has referred to this possibility when he recently wrote:

> "... if a conservative Republican should win the presidency next year, his allies in the Senate could help him change the political direction of the country."

<u>With your help we can soon nominate and elect Ronald Reagan as President! And we can control the Senate as well</u>!

"Citizens for Reagan in '80" is a special project of the prominent multi-candidate political action committee -- Fund for a Conservative Majority. FCM is one of the oldest PACs in the country and its efforts have helped elect many of today's conservative leaders.

FCM is seeking to elect conservative candidates to federal office who will actively work to limit the size, price and control of government.

"Citizens for Reagan in '80" can be the deciding factor in electing Ronald Reagan as President of the United States.

If we are to succeed, we need your help. Please join with "Citizens for Reagan in '80" today.

A significant amount of "independent money" has already been raised to help nominate and elect Reagan our next President.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

But more, much more, needs to be done.

The Eastern Establishment and the liberal news media hope to deny victory to Ronald Reagan.

We must not allow them to succeed! Reagan can win!

"Citizens for Reagan in '80" is an independent campaign working to nominate and elect Ronald Reagan President of the United States.

Citizens for Reagan will encourage our fellow citizens to vote for Ronald Reagan in 1980.

Citizens for Reagan is campaigning in all the important primary and convention states. However, the extent to which we campaign depends directly upon the amount of support received from you and other patriotic Americans.

Citizens for Reagan budgeted a great deal of money for the important primaries in New Hampshire, the South, Illinois, Connecticut, Pennsylvania and Texas. Now its efforts are focussed on the important final primaries in California, Ohio and New Jersey, on June 3rd.

Radio and newspaper advertising, voter mailings, polling and literature distribution is being carried out by "Citizens for Reagan in '80".

<u>The goal is simple: to nominate and elect Ronald Reagan President of the United States.</u>

Ronald Reagan is a strong, articulate and experienced leader. He proved he was an effective executive while serving as Governor of California.

As a matter of fact, Reagan was the first major spokesman calling for a national "taxpayers revolt" by urging the citizens to join him in bringing government under control.

And Ronald Reagan has clearly understood the Soviet threat and has always called for a superior U.S. military force.

Once Reagan is nominated at the Republican convention, we will not stop our campaign -- no indeed. "Citizens for Reagan in '80" will continue to campaign right up to election day.

As an independent campaign, "Citizens for Reagan in '80" is not bound by the federal law to disband after Ronald Rea-

Reagan Country — Final VICTORY Drive — JUNE 3 1980

June 3 Primaries

California
168 delegates

Mississippi
22 delegates

Montana
20 delegates

New Jersey
66 delegates

New Mexico
22 delegates

Ohio
77 delegates

Rhode Island
13 delegates

South Dakota
22 delegates

West Virginia
18 delegates

Total delegates at stake on June 3:
428

8304042186 2

May 15, 1980

Mr. Bruce R Johnson
340 E Madison Ave
Wheaton, IL 60187

Dear Mr. Johnson:

Now we must secure the final nomination victory for Ronald Reagan and prove that he can defeat President Carter this fall!

On June 3, nine important states hold Republican Primaries -- for your future reference, I have noted the list of states on the margin of this page.

Ronald Reagan must use these elections to build a strong base of support for winning in the fall.

"Citizens for Reagan in '80" has budgeted a large amount of money to build a base of support in these important states -- a base for defeating President Carter.

Blue collar workers, conservative Democrats and Independents, religious Americans and small businessmen are the "key voters" who will secure final victory for Ronald Reagan.

And with your help "Citizens for Reagan in '80" will reach these voters in the nine important states which hold primaries on June 3. Five of these nine states -- Mississippi, New Jersey, Ohio, Rhode Island and West Virginia went for Carter in 1976.

But Reagan can carry all of them in 1980! These states can be the margin of victory for Reagan in the fall.

The June 3 primary elections not only must be won by Reagan -- but he must convince conservative Democrats and Independents to vote for him in large numbers. And these new Reagan voters must then be put to work campaigning for Reagan's final victory in November.

This communication and all enclosures are paid for by Fund for a Conservative Majority and not authorized by any candidate or candidate's committee.

It is now clear! President Jimmy Carter can be defeated this fall by Ronald Reagan!

President Carter has admitted that Governor Reagan will be a tough opponent. The national public opinion surveys show Reagan and Carter running neck and neck.

Even the national media now admits that Ronald Reagan will be a strong and effective candidate for President.

Let's put the "icing on the cake". Let's win BIG on June 3, in all nine primary states.

With your help, Reagan can go to the Republican Convention in Detroit with these important nine states "in his camp".

Support "Citizens for Reagan in '80", the highly successful independent campaign sponsored by Fund for a Conservative Majority, a multi-candidate political action committee. FCM is also concentrating its political expertise on gaining "Conservative Senate Control" in 1980.

"Citizens for Reagan in '80" has been an important factor in the tremendous Reagan campaign successes this spring. The official Reagan for President organization is limited by federal law on how much it can spend. "Citizens for Reagan in '80" has no legal limits on its expenditures.

And the same is true this fall. "Citizens for Reagan in '80" will be able to spend as much as it can raise to help Ronald Reagan defeat Jimmy Carter on November 4.

Send your maximum contribution today.

Help Ronald Reagan win all nine primaries on June 3. Help build the base of support that will be so necessary for victory this fall.

I am looking forward to your support. Only with your help will Ronald Reagan be our next President.

Sincerely,

Bob Heckman

Robert C. Heckman, Chairman
Fund for a Conservative Majority

P.S. A Big Reagan win in these nine states on June 3 -- with large voter support from Democrats and Independents -- will prove Governor Reagan can defeat President Carter in the fall.

Please help FCM "wrap up the nomination" for Reagan on June 3, by sending your maximum contribution today.

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