



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 1404

Date Filmed 3-15-83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 25, 1983

Mr. Robert Blaemire
President
Committee for American Principles
2000 N Street, NW
Suite 105
Washington, D.C. 20036

Re: MUR 1404

Dear Mr. Blaemire:

The Federal Election Commission has reviewed the allegations contained in your complaint dated December 15, 1981. The Commission considered your complaint on February 1, 1983, but was equally divided on the question of whether to take further action in this matter.

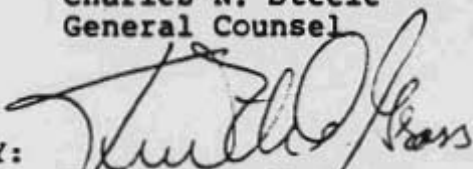
Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should further information come to your attention which you believe establishes a violation of the Act, please contact Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 25, 1983

Marion Harrison, Esquire
1627 K Street, NW
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

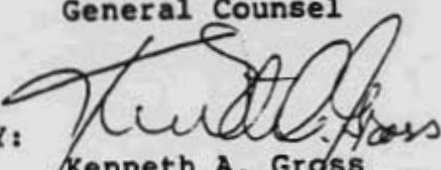
On December 16, 1981, the Commission notified you of a complaint alleging that your client, Committee for the Survival of a Free Congress violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on February 1, 1983, considered the complaint but was equally divided on the question of whether to enforce the subpoena issued to your client. Consequently, on February 23, 1983, and by a vote of 4-2 the Commission voted to close the file. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

33040383913

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Survival of)
a Free Congress)

MUR 1404

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on February 23, 1983, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1404:

1. Close the file.
2. Approve the letters attached to the General Counsel's report dated February 14, 1983.

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

Attest:

2/23/83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

33040383910



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: FEBRUARY 17, 1983
SUBJECT: OBJECTIONS - MUR 1404 General Counsel's
Report signed February 14, 1983

The above-named document was circulated to the
Commission on February 15, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u></u>
Commissioner Harris	<u>X</u>
Commissioner McDonald	<u></u>
Commissioner McGarry	<u></u>
Commissioner Reiche	<u></u>

This matter will be placed on the Executive Session
agenda for Wednesday, February 23, 1983.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JAN SAVAGE
DATE: FEBRUARY 16, 1983
SUBJECT: OBJECTION - MUR 1404 General Counsel's
Report signed February 14, 1983

The above-named document was circulated to the
Commission on Tuesday, February 15, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____X_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Wednesday, February 23, 1983.

February 15, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1404

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis as a sensitive matter. Thank you.

Attachment

cc: Brown

33040-03916

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of
Committee for the Survival
of a Free Congress

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83 FEB 15 All: 26
MUR 1404

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 16, 1981, the Commission received a complaint alleging that the Committee for the Survival of a Free Congress ("the respondent") violated 2 U.S.C. § 434(b)(4)(H)(iii) for not reporting expenditures as independent expenditures. On March 23, 1982, the Commission decided by a vote of 5-0 to find reason to believe that the respondent violated 2 U.S.C. § 434(b)(4)(H)(iii).

On July 27, 1982, the Commission pursuant to its investigation of the possible violation issued a subpoena for the production of documents to the Committee for the Survival of a Free Congress. The subpoena directed the Committee's treasurer to produce documents and sworn statements in connection with the Commission's investigation. The subpoena was received by the respondent on July 29, 1982.

On September 10, 1982, a motion by the respondent to quash the subpoena was received by the Commission. On November 30, 1982, the Commission denied respondent's Motion to Quash inasmuch as the respondent failed to show that the investigation was not within the authority of the Commission or that the information sought was not reasonably relevant. Furthermore, respondents' motion to quash was filed out of time. Additionally, the Commission directed the Office of General Counsel to send a

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letter notifying the respondent that the Motion to Quash had been denied. The date scheduled for respondent to produce the subpoenaed information was December 23, 1982. Since the deadline passed and the subpoenaed information had not been received, the Office of General Counsel recommended that the Commission institute enforcement proceedings in an effort to achieve compliance with the Commission subpoena.

On February 1, the Commission considered the recommendation to enforce the subpoena but was equally divided on whether to institute suit to achieve compliance with its subpoena. Without the information requested in the Commission's subpoena, the Office of General Counsel is unable to determine the amount of expenditures which may have been misreported. Without that information we have evidence of apparent misreported expenditures of only \$466.71. Thus, without further information indicating whether the possible violation entailed a more widespread practice, we recommend that the file in this matter be closed.

II. RECOMMENDATIONS:

1. Close the file.
2. Approve attached letters

Date

February 14, 1983

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

1. Letter to Complainant
2. Letter to Respondent



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Marion Harrison, Esquire
1627 K Street, NW
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On December 16, 1981, the Commission notified you of a complaint alleging that your client, Committee for the Survival of a Free Congress violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on February 1, 1983, considered the complaint but was equally divided on the question of whether to enforce the subpoena issued to your client. Consequently, on February , 1983, and by a vote of the Commission voted to close the file. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Robert Blaemire
President
Committee for American Principles
2000 N Street, NW
Suite 105
Washington, D.C. 20036

Re: MUR 1404

Dear Mr. Blaemire:

The Federal Election Commission has reviewed the allegations contained in your complaint dated December 15, 1981. The Commission considered your complaint on February 1, 1983, but was equally divided on the question of whether to take further action in this matter.

Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should further information come to your attention which you believe establishes a violation of the Act, please contact Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Survival of)
a Free Congress)

MUR 1404

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission Executive Session on February 1, 1983, do hereby certify that the Commission failed in a vote of 3-3 to pass a motion to grant authorization to institute enforcement proceedings pursuant to 2 U.S.C. §437d(b) in the above-captioned matter.

Commissioners Harris, McDonald, and McGarry voted affirmatively for the motion; Commissioners Aikens, Elliott, and Reiche dissented.

Attest:

2/4/83

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

33040583921



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: JANUARY 27, 1983
SUBJECT: OBJECTIONS - MUR 1404 General Counsel's
Report signed January 25, 1983

The above-named document was circulated to the
Commission on Tuesday, January 25, 1983.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u>X</u>
Commissioner Harris	<u> </u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Reiche	<u> </u>

This matter will be placed on the Executive Session
agenda for Tuesday, February 1, 1983.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS *EMMONS* JODY C. RANSOM *JCR*
DATE: JANUARY 26, 1983
SUBJECT: OBJECTION - MUR 1404 General Counsel's
Report signed January 25, 1983

The above-named document was circulated to the
Commission on Tuesday, January 25, 1983 at 4:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session
agenda for Tuesday, February 1, 1983.

33040693910

January 25, 1983

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1404

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis as a sensitive matter. Thank you.

Attachment

cc: Brown

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 JAN 25 All: 14

In the Matter of)
)
Committee for the Survival of)
a Free Congress)

MUR 1404

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On July 27, 1982, the Commission pursuant to its investigation of possible violations of 2 U.S.C. § 434(b)(4)(A)(iii) issued a subpoena for the production of documents to the Committee for the Survival of a Free Congress ("the Respondent"). The subpoena directed the Committee's treasurer to produce documents and sworn statements in connection with the Commission's investigation. The subpoena was received by the respondent on July 29, 1982.

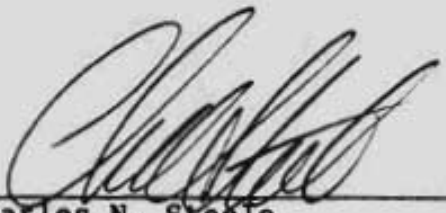
On September 10, 1982, a motion by the respondent to quash the subpoena was received by the Commission. On November 30, 1982, the Commission denied respondent's Motion to Quash inasmuch as the respondent failed to show that the investigation was not within the authority of the Commission or that the information sought was not reasonably relevant. Additionally, the Commission directed the Office of General Counsel to send a letter notifying the respondent that the Motion to Quash had been denied. The date scheduled for respondent to produce the subpoenaed information was December 23, 1982.

As of this date, respondent has failed to reply to the Commission's notification. Accordingly, the Office of General Counsel recommends that the Commission authorize this office to institute enforcement proceedings in the U.S. District Court pursuant to 2 U.S.C. § 437d(b) in an effort to achieve compliance with the Commission subpoena.

II. RECOMMENDATION

The Office of General Counsel recommends that the Commission grant authorization to institute enforcement proceedings pursuant to 2 U.S.C. § 437d(b).

25 January 1983
Date


Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 6, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion E. Harrison
Barnett and Alagia
9th Floor
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On November 30, 1982, the Commission voted to deny the Committee for the Survival of a Free Congress's Motion to Quash the Commission subpoena issued to the Committee on July 29, 1982, and the Commission has directed the Office of General Counsel to proceed with attaining compliance with the subpoena. (See enclosed Commission Order.) Therefore, the date for the production of information and documents originally scheduled for August 7, 1982, has been rescheduled for December 23, 1982. For your information, a typographical error exists in interrogatory #3. The correct date should be January 1, 1981 to present. A copy of the corrected interrogatories are attached.

Should you have any questions, please contact Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee for the Survival
of a Free Congress

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MUR 1404

COMMISSION ORDER

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The application of the Committee for the Survival of a Free Congress to quash the Commission subpoena issued on July 27, 1982, and received by respondent on July 29, 1982, is in all respects denied. Movant has failed to show that the investigation is not within the authority of the Commission or that the information sought is not reasonably relevant.

12-3-82
Date

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

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

CHARLES A. MOSER

Please answer each of the following questions.

Where requested, submit documentation to substantiate each response. Answers to each question must be submitted under oath.

1. The Report of Receipts and Disbursements filed by The Committee for the Survival of a Free Congress for the period September 1, 1981 through September 30, 1981 lists on its Schedule B, pages 3 and 4, disbursements for, "advertising" and "display advertising." Please provide a copy of each ad referred to on pages 3 and 4 used for, "advertising" and "display advertising."

2. For each ad referred to in question 1, please specify the name of the periodical(s), in which the ad was run, the date(s) on which the ad was run, the cost of the ad and who paid for and authorized them.

3. Attached are three ads which were paid for by The Committee for the Survival of a Free Congress and attached to the complaint. For the period January 1, 1981 to present, please provide all ads which are similar to those attached and which made reference to finding a challenger to a candidate. In addition, please provide the date on which these ads were run, the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for and authorized them.

4. Please provide each date on which the three attached ads were run. Additionally, provide the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for them.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

LLG 12/6/82

Marion E. Harrison
Barnett and Alagia
9th Floor
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On November 30, 1982, the Commission voted to deny the Committee for the Survival of a Free Congress's Motion to Quash the Commission subpoena issued to the Committee on July 29, 1982, and the Commission has directed the Office of General Counsel to proceed with attaining compliance with the subpoena. (See enclosed Commission Order.) Therefore, the date for the production of information and documents originally scheduled for August 7, 1982, has been rescheduled for December 23, 1982. For your information, a typographical error exists in interrogatory #3. The correct date should be January 1, 1981 to present. A copy of the corrected interrogatories are attached.

Should you have any questions, please contact Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8304083930

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Survival of) MUR 1404
a Free Congress)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on November 30, 1982, do hereby certify that the Commission took the following actions with respect to the above-captioned matter:

1. Failed in a vote of 1-4 to pass a motion to grant the Motion to Quash of Committee for the Survival of a Free Congress.

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

2. Decided by a vote of 5-0 to -

- a) deny the Motion to Quash of Committee for the Survival of a Free Congress; and
b) direct the Office of General Counsel to send an appropriate letter so notifying the respondent.

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

Attest:

12/2/82
Date

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

33040383931



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: NOVEMBER 24, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1404
General Counsel's Report in Opposition
to Motion to Quash Commission Subpoena,
signed November 19, 1982

030401000933

You were previously notified of an objection to the
above-captioned matter by Commissioner Elliott.

Commissioner Aikens submitted an additional objection
at 12:21, November 23, 1982.

This matter will be discussed in Executive Session
on Tuesday, November 30, 1982.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JAN SAVAGE JS

DATE: NOVEMBER 24, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1404
General Counsel's Report in Opposition
to Motion to Quash Commission Subpoena,
signed November 19, 1982

You were notified previously of an objection by
Commissioners Aikens and Elliott.

Commissioner Reiche submitted an additional objection
to this matter on November 24, 1982 at 1:42.

This matter will be discussed in executive session
on Tuesday, November 30, 1982.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY RANSOM *JR*
DATE: NOVEMBER 22, 1982
SUBJECT: OBJECTION - MUR 1404 General Counsel's Report
in Opposition to Motion to Quash Commission
Subpoena, signed November 19, 1982

The above-named document was circulated to the Commission on
November 22, 1982 at 11:00.

Commissioner Elliott submitted an objection to this matter
at 3:38, November 22, 1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, November 30, 1982.

03040333934

November 19, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1404

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

Attachment

cc: Brown

830403339

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 NOV 19 P 5: 03

In the Matter of)

Committee for the Survival)
of a Free Congress)

MUR 1404

**GENERAL COUNSEL'S REPORT IN
OPPOSITION TO MOTION TO QUASH
COMMISSION SUBPOENA**

I. Summary of Proceedings

On July 27, 1982, the Commission pursuant to its investigation of a possible violation of 2 U.S.C. § 434(b)(4)(H)(iii) issued a subpoena for the production of documents to the Committee for the Survival of a Free Congress ("the Respondent"). The subpoena directed the Committee's treasurer to produce documents and sworn statements in connection with the Commission's investigation. The subpoena was received on July 29, 1982.

On September 10, 1982, a motion by the respondent to quash the subpoena was received by the Commission (Attachment I).

In most respects, the motion to quash reflects the original position of the Committee as found in its response to the initial complaint (Attachment II) and in its response to the Commission's RTB finding (Attachment III). Counsel asserts in support of his motion that the entire proceeding manifests harassment by Complainant, that the Subpoena and Order continue that harassment and that certain interrogatories are patently burdensome. In

addition, counsel asserts that certain Commission interrogatories are superfluous and irrelevant.

For the reasons set forth hereinafter, we believe counsel's arguments are without merit. Accordingly, we recommend that the motion to quash be denied.

II. Legal Analysis

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The Respondent's Motion to Quash the subpoena should be denied. As required, the Commission's inquiry is within the scope of the agency's authority, compliance with the subpoena is not unduly burdensome, and the information sought is reasonably relevant to the objectives of the investigation. United States v. Morton Salt Co., 338 U.S. 632 (1950); Oklahoma Press Publishing Co., v. Walling, 327 U.S. 186 (1946). The Commission clearly has the statutory authority to subpoena the respondent's records pertaining to advertisements and disbursements for advertisements made by it. The Commission is charged with administering, enforcing and interpreting the Federal Election Campaign Act of 1971, as amended. The Commission has exclusive primary jurisdiction with respect to the civil enforcement of these provisions, 2 U.S.C. § 437c(b), and has the power to require by subpoena the production of all documentary evidence.

A. Relevance

The respondent objects to this subpoena as seeking information and documents which are not relevant to the scope of

the investigation as defined by the FEC. This objection should be rejected. In fact, the information sought pertains only to the previous year and a half and more specifically for the period in which the three incumbents named in the advertisements were determined to be candidates for federal office. */ Therefore, the information the Commission is seeking is reasonably relevant to the objectives of its investigation into the question as to whether additional advertisements with the same or similar language were used in respect to the incumbents named in the advertisements or other candidates and the extent of their use. It is relevant to inquire as to the breadth of a violation especially when, as here, the violation is not obvious or apparent simply from a review of respondents reports.

B. Burdensomeness

The respondent also objects to the subpoena as being patently burdensome, however, respondent makes no attempt to show in fact that his client is being made to produce an unreasonable number of documents or that the production of the documents would be unreasonably costly. The burden of proof lies with the

*/ Respondent's objection is partially based on an error in question 3 of the subpoena which requested respondent to provide all advertisements similar to the ones submitted with the complaint for the period January 1, 1971 to the present. Respondent is notified of this correction in the Commission's response to respondent's Motion to Quash (Attachment IV). The correct time period should have been from January 1, 1981 to present. Respondent also objects that the subpoena is burdensome because the information sought is contained in respondent's reports on file with the FEC and respondent should not be required to locate the requested advertisements.

respondent and a bare assertion of being overburdened on its part is not a sufficient showing. The standard that the courts utilize in determining whether compliance with an administrative subpoena is burdensome is spelled out in FTC v. Texaco, 555 F.2d 862 (D.C. Cir.) en banc, cert. denied, 431 U.S. 974 (1977).

Some burden on subpoenaed parties is to be expected and is necessary in furtherance of the agency's legitimate inquiry and the public interest. The burden of showing that the request is unreasonable is on the subpoenaed party. Further, that burden is not easily met where, as here, the agency inquiry is pursuant to a lawful purpose and the requested documents are relevant to that purpose.

Counsel further implies that the information sought "is contained within Respondent's reports to FEC" and thus need not be produced by the respondent. Such is not the case. Although respondent reports its expenditures, it is not possible from a review of the reports to determine whether an expenditure was made for an advertisement similar to those submitted with the complaint. Thus, the subpoena requests copies of such advertisements and information pertaining to the advertisements which cannot be gleaned from a review of respondents reports.

Miscellaneous Arguments

Counsel argues that the matter should be dismissed by criticizing the novelty of the complainant organization, its

Finally, counsel argues that, "upon information and belief" none of the named incumbents about whom the advertisements were run were candidates in September 1981. This statement is totally false. Each of the three incumbents are considered to have been candidates even before the September 1981 advertisements since each had "received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000" in pursuit of the 1982 election (2 U.S.C. § 431(2)).

Counsel concludes by arguing that if the FEC is disposed to pursue the case further, the issue is solely one of law, i.e. whether the cost of the advertisements should have been listed as independent expenditures or as general expenditures as they now are listed. It is our firm belief that the cost of the advertisements should have been listed as independent expenditures on line 22 of the Respondents Reports of Receipts and Expenditures since the ads do expressly advocate the defeat of clearly identified candidates.

III. Conclusion

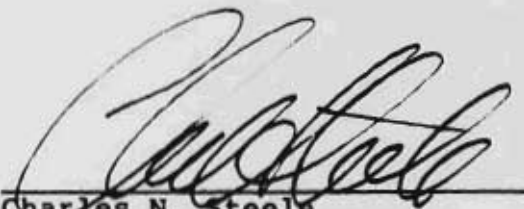
The motion to quash the subpoena filed by the respondents should in all respects be denied. Staff should so notify the respondents and advise it to comply on newly scheduled dates with the subpoena. Should the respondent fail to comply with the subpoena, we request authorization to institute a civil action pursuant to 2 U.S.C. § 437d(b) to achieve compliance.

IV. Recommendation

It is recommended that the Commission:

1. deny the Motion to Quash of Committee for the Survival of a Free Congress and authorize the Office of General Counsel to institute enforcement proceedings in the United States District Court, pursuant to 2 U.S.C. § 437d(b), if necessary to achieve compliance with the Commission subpoena; and
2. approve and authorize the sending of the attached letter.

19 November 1982
Date


Charles N. Steele
General Counsel

Attachments

- I. Motion to Quash
- II. Respondent's Reply to Complaint
- III. Respondent's Reply to RTB Finding
- IV. Order
- V. Letter to Marion Harrison

Brown

ATTACHMENT I

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
COMMITTEE FOR THE SURVIVAL
OF A FREE CONGRESS

MUR 1404

RESPONDENT'S MOTION TO QUASH ORDER AND SUBPOENA

Respondent moves the Federal Election Commission to quash the Subpoena to Produce Documents and Order to Submit Written Answers bearing date of July 28, 1982.

Respondent attaches its Memorandum of Points and Authorities.

Marion Edwyn Harrison

MARION EDWYN HARRISON
Barnett & Alagia
Ninth Floor
1627 K Street, N.W.
Washington, D. C. 20006
Counsel for Respondent

September 10, 1982

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
COMMITTEE FOR THE SURVIVAL
OF A FREE CONGRESS

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MUR 1404

MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF RESPONDENT'S MOTION
TO QUASH ORDER AND SUBPOENA

1. Posture of the Pleadings

Respondent is a large, successful and well known political action committee with substantial annual revenues, tens of thousands of contributors and a publicized program, which has reported to the Federal Election Commission ("FEC") over the years.

Complainant Committee for American Principles is a political action committee which first filed with FEC on June 1, 1981. Its revenues are limited; its contributors are few in number; and it is operated by one Mr. Robert A. Blaemire, a "self-employed consultant", who originally lent Complainant the sum of \$5,000.00

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as its major initial funding. Originally operating out of a small suite at 2000 N Street, N.W., Complainant more recently moved to two rooms off the lobby of the Embassy Row Hotel, evidently temporarily.

Complainant's limited revenues appear to derive principally from a few individuals and from certain labor union and union-oriented organizations.

Complainant appears to exist for the purpose of filing complaints against organizations with which the said Mr. Blaemire disagrees. Since November 2, 1981 Complainant has filed approximately eleven complaints with FEC.

Unlike most political action committees reporting to FEC, Complainant does not appear to exist for the purpose of contributing to political candidacies.

Under date of December 15, 1981, Complainant wrote a conclusory two-page complaint to FEC, photocopy attached as Attachment One, alleging that Respondent reported seven disbursements in the aggregate amount of \$466.71 as advertising

rather than as independent expenditures. Upon that pecuniarily and qualitatively insignificant basis, Complainant alleged that Respondent violated the provisions of 11 CFR §109.1(a).

Complainant attaches pertinent excerpts from Respondent's FEC reports together with photocopies of three newspaper advertisements run by Respondent.

Under date of December 21, 1981 FEC wrote Respondent the usual FEC letter, numbering the matter MUR 1404 and transmitting the Complaint.^{1/}

Under date of January 14, 1982, Respondent, by counsel and by hand, responded to FEC's letter, photocopy of Respondent's counsel's letter of January 14, 1982 attached. Attachment Two.

Under date of March 31, 1982 FEC issued its usual "reason to believe" letter, pertinently contending that Respondent may have violated provisions of 2 USC §434(b)(4)(H)(iii) in that the advertisements of which Complainant complained "... do expressly advocate the defeat of clearly identified candidates

^{1/} FEC wrote directly to Respondent, notwithstanding the fact that Respondent at all times material had, and has, as attorney of record with FEC this law firm. 5 USC §500(f).

and, therefore, should have been reported as an independent expenditure" rather than as itemized disbursements.

Certain informal discussions between FEC counsel and Respondent's counsel followed.

The Subpoena and Order the subject of this Motion followed.

2. Argument

The entire proceeding manifests harassment by Complainant, a nominal political action committee apparently existing for the principal, if not the sole, purpose of harassing entities with the politics of which Mr. Blaemire does not agree.

The instant Subpoena and Order continue that harassment.

Interrogatory 1 requests copies of seven advertisements payments for which are itemized in Respondent's reports, three of which FEC already has (Complainant having provided them) and four of which pertain to no action pending before FEC.

Thus, Interrogatory 1 is superfluous as to three of its requests and irrelevant as to the other four.

Interrogatory 2 requests the name of each periodical in which each ad was run, the date it was run, the cost of the ad and the identification of the payee. Respondent's report provides all the foregoing information except the precise date one of the three advertisements was run. As long as the date is within the reporting period, a point not challenged, the precise date is irrelevant to a determination of the Complaint upon its merits. Thus, Interrogatory 2 is superfluous as to all information sought except one precise publication date, and irrelevant as to that.

Interrogatory 3 seeks copies of ". . . all ads [sic] which are similar to those [provided by Complainant to FEC] and which made reference to finding a challenger to a candidate . . ." for the past almost 12 years. Interrogatory 3 further seeks the information as to each advertisement demanded by Interrogatory 2.

Interrogatory 3 is patently burdensome. It would require Respondent to attempt to locate each such advertisement, if any, and to investigate to answer the subsidiary questions. Interrogatory 3 reaches not only beyond the subject matter of MUR 1404

but also beyond the statute of limitations. In addition, except for one or more precise publication dates, all the information sought is contained within Respondent's reports to FEC. Hence, FEC already has the irrelevant and outdated information it seeks.

Interrogatory 4 merely replicates in part Interrogatory 2.

There is no allegation that Respondent failed to list a disbursement.

The allegation is only that Respondent listed them under the wrong classification. Thus, neither FEC nor the public is deprived of the knowledge of Respondent's activities intended to be available to those seeking such knowledge. Complainant is not so deprived.

Each of the three advertisements reads substantially identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

"The term 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly

identified candidate . . . " 2 USCA §431(17); 11 CFR §109.1(a).
[Emphasis supplied.] If these expenditures are not independent
expenditures there is no violation of 2 USC §434(d)(4)(H)(iii) or
11 CFR §104.4.

It is clear that the advertisements in question do not
expressly advocate the election or defeat of anybody. Rather,
they seek an opponent to run against an incumbent. A candidate
cannot be defeated in the States of Arkansas, Oklahoma or South
Carolina without an opponent.

Further, upon information and belief, in September 1981,
when the advertisements were run, none of the named incumbents
was a candidate for re-election.

Thus, if FEC is disposed further to pursue the instant de
minimis Complaint, the issue is solely one of law - whether the
advertisements violate the provisions of 2 USC §431(17) and 11
CFR §109.1(a) by "expressly advocating the election or defeat of
a clearly identified candidate . . . "

The limited further information the Subpoena and Order would
require would be of no help in resolving the question. It makes

no difference upon what precise date during the Third Quarter 1981 the third advertisement was published or whether there were seven, three or some other number less than seven.

The statute is precise. Because it is a limitation upon Respondent's First Amendment rights, the statute must be construed narrowly, affording the maximum possible constitutional protection to Respondent.

The advertisements constitute nothing more than an effort to seek an opponent to named incumbents while arguably denigrating the performance of the incumbent.

Prayer

Premises considered, FEC forthwith should quash the instant Subpoena, withdraw the instant Order and dismiss MUR 1404 - the trivial product of a troublemaking Complainant, de minimis as to both sum and alleged reporting classification, violative of Respondent's First Amendment rights, responsive to no statute and unworthy of FEC's attention.

FEC further should direct FEC Staff (1) more carefully to scrutinize the complaints perennially emanating from harassing sources so that victims of such forays will not be chilled by unwarranted and unconscionable attacks upon their legitimate free speech and (2) not to abuse the right of process by issuing process for information FEC Staff already possesses.

Marion Edwyn Harrison

MARION EDWYN HARRISON
Barnett & Alagia
Ninth Floor
1627 K Street, N.W.
Washington, D. C. 20006
Counsel for Respondent

September 10, 1982

330403951

COMMITTEE
FOR
AMERICAN
PRINCIPLES

81 DEC 18 P2:2
-66-# 5930
2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
The Committee For The)
Survival Of A Free)
Congress)

MUR No. _____

COMPLAINT

1) The Committee For The Survival Of A Free Congress filed its Report of Receipts and Disbursements with the Commission for the period of September 1, 1981 through September 30, 1981 (see Exhibit A). On page 2, FEC Form 3X, said Committee reports that there were no independent expenditures during that period. On Schedule B of the same report, said Committee reports seven (7) disbursements for advertising in the aggregate amount of \$466.71.

2) The Commission's regulations define the term "independent expenditure" to mean "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." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec.437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: Robert Blaemire
Robert Blaemire, President

Date: 12/16/81

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL)

My Commission Expires February 14, 1982
My Commission Expires: _____

David S. Meyer
Notary Public 12

BARNETT & ALAGIA

1627 K STREET, N.W.
WASHINGTON, D.C. 20006

TELEPHONE & TELECOPIER

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CABLE ALBAR

TELEX 89-2445

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EDWARD ALAGIA, JR.
EDWARD H. BARNETT
BUDH SCOTT
MARION EDWYN HARRISON
H. DAVID HERMANSON
HERMAN E. TALMADGE
ALLAN S. SOLOMON
RICHARD M. TRAUTWEN
RUDY YERSEN
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RICHARD A. GLADSTONE
A. PAUL PROPPER
MICHAEL E. LANNON
RICHARD PROCK
SHADDER R. MILLER
ANDREW J. FUNDZAK
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ROBERT A. BLACKWOOD, JR.
STEVEN G. BOLTON
KAREN RAY ROSEMEYER
SYDNEY J. BUTLER
MAURICE A. BYRNE, JR.
KENNETH R. DABER
DARRYL W. DURHAM
JOHN E. EVANS
WM. CARL FUST
WILLIAM E. GLADING
C. KENNEDY HALL, JR.
JOSEPH L. HAMILTON
JOHN M. HIMMELBERG
RONALD E. JOHNSON
JOHN S. KECK
W. DAVID KISER
DENIS A. KLENFELD
JAMES R. KUTUPEN
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MARY CHERYL MATHEIS
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ASHLAND, KENTUCKY
JACKSON, MISSISSIPPI
ATLANTA, GEORGIA

ADMITTED ILLINOIS
ADMITTED OHIO

January 14, 1982

By Hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Committee for the Survival of a Free Congress
MUR 1404

Dear Mr. Steele:

As counsel of record for the Committee for the Survival of a Free Congress ("Respondent") we received on December 31, 1981 your letter of December 21, 1981 to Respondent.

As we have mentioned heretofore, when there is an attorney of record for an organization reporting to the Federal Election Commission ("FEC"), it ordinarily expedites matters if FEC communicates directly with that attorney. That is a portion of the wise rationale underlying 5 USC §500(f).

Charles N. Steele, Esquire
January 14, 1982
Page two

The Committee for American Principles, 2000 M Street, N.W., Suite 105, Washington, D.C. 20036, which is not listed in the May 1981 District of Columbia telephone directory and which is not registered with FEC, manifestly interested in trivia, complains under date of December 15, 1981 that Respondent on page 2 of FEC Form 3X does not list the sum of \$466.71 as independent expenditures, although the said sum represents independent expenditures inasmuch as it paid for advertisements seeking candidates to run for Congress against named incumbent Members of Congress.

In fact, Respondent does not list the said sum of \$466.71 on line 22, page 2, FEC Form 3X, where it ought to be listed if it were an independent expenditure. The Committee for American Principles asserts (without specificity) that there are seven disbursements on Schedule B to Form FEC 3X which in the aggregate add to the sum of \$466.71 and which purport to be for "advertising".

There are nine pages to said Schedule B. Page 1 reports nothing for "advertising"; page 2 reports nothing for "advertising"; page 3, items E, H and I, report \$70.24, \$70.00 and \$99.24 for "advertising"; page 4, items A and B, report \$43.08 and \$45.15 for "display advertising"; page 5 reports nothing for "advertising"; page 6 reports nothing for "advertising"; page 7 reports nothing for "advertising"; page 8 reports nothing for "advertising"; and page 9 reports nothing for "advertising"; a total "advertising" and "display advertising" report of \$327.71.

In fact, said sum does represent payment for the advertisements in question.

Each of the three advertisements reads substantively identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

14

Charles N. Steele, Esquire
January 14, 1982
Page three

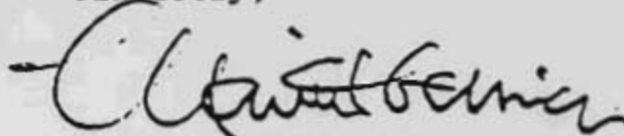
"The term -- 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate . . ." 2 USCA §431(17); 11 CFR §109.1(a).

It is perfectly clear that the advertisements in question do not so advocate. Rather, they seek an opponent. A candidate cannot be defeated in the States of Arkansas, Oklahoma or South Carolina without an opponent.

Accordingly, the Complaint should be dismissed. It is factually inaccurate and nonresponsive to the law.

Further, as a matter of policy, FEC should screen complaints filed by unknown nonlawyers to reduce the waste of taxpayers' money and that of legitimate respondents in addressing such trivial and legally indefensible complaints as that at issue herein. Even were there a violation, inasmuch as Respondent reports the small disbursements at issue, the de minimis rule would be applicable.

Sincerely,



MARION EDWYN HARRISON

MEH:jb

6304033

LAW OFFICES

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CABLE ALBAR

TELEX 89-2445

ATTACHMENT II

666 6074
Brown

WILLIAM A. CAREY
D. PAUL ALAGIA, JR.
BERNARD H. BARNETT
HUGH SCOTT
MARION EDWYN HARRISON
H. DAVID HERMANSDORFER
HERMAN E. TALMADGE
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ATLANTA, GEORGIA

ADMITTED ILLINOIS
ADMITTED OHIO

January 14, 1982

By Hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Committee for the Survival of a Free Congress
MUR 1404

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Charles N. Steele, Esquire
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Charles N. Steele, Esquire
January 14, 1982
Page three

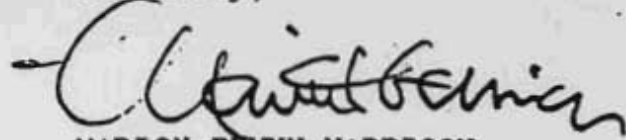
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Sincerely,



MARION EDWYN HARRISON

MEH:jb

TELEX 89-2445

ATTACHMENT II

C. PAUL ALABRA, JR.
 HERMAN H. BARRETT
 HUGH BOOTH
 HERMAN B. TALMADGE
 WILLIAM A. CAREY
 MARION EDITH MARSHALL
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 RICHARD M. TRAUTWEN
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OFFICES IN:
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NASHVILLE, TENNESSEE
ASHLAND, KENTUCKY
JACKSON, MISSISSIPPI
ATLANTA, GEORGIA
NEW ALBANY, INDIANA

NOT ADMITTED DISTRICT OF COLUMBIA*

May 7, 1982

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR #1404

Dear Ken:

After our last discussion I again reviewed the file herein.

The Federal Election Commission in our judgment would not prevail in court in the face of the restrictive language of the statute.

Perhaps more significantly, we do not understand why anybody in the Federal Election Commission would want to pursue such a de minimis case - \$466.71, clearly reported, but not reported as an independent expenditure, which it is alleged to be but is not - and all at a time when the Federal Election Commission is telling the House Appropriations Committee that ". . . the Commission will run out of money before the end of the fiscal year . . ." if it does not receive a supplemental, photocopy of FEC April 21, 1982 press release attached.

To compound the absurdity, the complainant is a neophyte political action committee, recently organized, of limited substance, and temporarily operating out of a small suite in a

3. 11.12 P3: 39

19

Kenneth A. Gross, Esquire
May 7, 1982
Page two

hotel, evidently the creature of the man who runs it, who describes himself as a "consultant".

By any reasonable or objective standard it does not appear that taxpayer funds ought to be spent pursuing this kind of case, even assuming there were a technical violation.

In the face of that, what argument does one have to make to our client that the client ought to enter into some kind of agreement? Might not the same complainant, or some other equally insubstantial troublemaker, file another complaint tomorrow? And the next day?

I appreciate your interest in attempting to evolve some kind of compromise yet I don't know what there is to compromise. If you have an idea, I would be glad to discuss it - I always appreciate your courtesy - and absent that I guess we'll just have to let events take their course. It seems the client is correct in saying that if it is pushed to the wall on this kind of unsupportable trivia, it will be pushed to the wall again and again on other trivia of which the same or other professional troublemakers complain.

This case probably is a good example of the need for normal administrative procedures within the Federal Election Commission. This type of thing, one would expect, would not get by normal briefing and oral argument, meeting Administrative Procedure Act requirements.

Sincerely,



MARION EDWYN HARRISON

MEH:kg
Enc

FEDERAL ELECTION COMMISSION

Press Office
1325 K Street, N.W., Washington, D.C. 20463
Phone: Local 523-4065 Toll Free 800-434-9530



FOR IMMEDIATE RELEASE
APRIL 21, 1982

CONTACT: FRED KILNO
SEARON SNIDER



WASHINGTON — Funding that would permit the Federal Election Commission to carry out its responsibilities during the 1982 elections and to prepare for the 1984 presidential elections, and supplemental funds to avert a possible furlough of the entire FEC staff this fall, were requested today in a hearing before the House Committee on Appropriations' Subcommittee on Treasury, Postal Service and General Government.

FEC Chairman Frank P. Reiche, Vice Chairman Darryl L. McDonald and Commissioner Joan D. Aikens told the Committee, "The Reagan Administration agreed that more resources were needed by the Commission and submitted a request for \$9,880,000 as part of the President's FY 1983 Budget." This is a \$666,000 reduction from the previous request.

In support of the FEC request for \$184,000 in supplemental FY 1982 funding, Commissioner McDonald said, "If a pay supplemental is not provided, the Commission will run out of money before the end of the fiscal year and will face the prospect of furloughing the entire staff at a time when we should be increasing our activity to deal with the 1982 Congressional primaries and general election."

In order to scrape by so far with funds under a continuing resolution, he described a hiring freeze which reduced the permanent staff to 231 from 258 in FY 1979. A recent reduction-in-force cut the FEC Audit Division by another 16 positions, half the division. Other spending cuts have been made in contracts administered by the National Clearinghouse on Election Administration, in travel, and in outreach programs to educate potential candidates as well as political committees.

With current dollars adjusted for inflation, he said this year's budget request, with which the Commission is able to "meaningfully enforce

-more-

the laws and assure complete public disclosure of information," is about the same as the \$4.7 million devoted to administer the election laws in 1973 when there was little disclosure, no regulations or advisory opinions and enforcement was almost totally lacking.

"Cost to the Federal Government for administering public financing of presidential elections as well as for disclosing, monitoring and providing guidance with respect to all federal elections in 1979-80 was less than one percent of reported campaign finance activity," Commissioner McDonald said. This includes some \$100 million in public funds for financing presidential primary and general election campaigns and the major party conventions as well as more than \$800 million spent in 1979-80 campaigns according to reports filed with the Commission.

The breadth of Commission activity in the 1982 and 1984 elections will depend in large part on what happens this fiscal year, Commissioner McDonald testified. Since the 1982 general election falls in the first month of the 1983 fiscal year, Commission attention will focus on activities incidental to contests for nearly 500 House and Senate seats.

Later that fiscal year, increased activity will be directed toward the 1984 elections because presidential candidates will be eligible in 1983 to submit matching fund requests for certification to ensure receipt of public funds early in the election year.

● ATTACHMENT II ●

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

**Committee for the Survival
of a Free Congress**

)
)
)
)

MUR 1404

COMMISSION ORDER

The application of the Committee for the Survival of a Free Congress to quash the Commission subpoena issued on July 27, 1982, and received by respondent on July 29, 1982, is in all respects denied. Movant has failed to show that the investigation is not within the authority of the Commission or that the information sought is not reasonably relevant. The staff of the Office of General Counsel is directed to take all necessary steps to insure that the requests contained in the subpoena are fully complied with.

Date _____

**Frank P. Reiche, Chairman
Federal Election Commission**

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

ATTACHMENT V



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion E. Harrison
Barnett and Alagia
9th Floor
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On November , 1982, the Commission voted to deny the Committee for the Survival of a Free Congress's Motion to Quash the Commission subpoena issued to the Committee on July 29, 1982, and the Commission has directed the Office of General Counsel to proceed with attaining compliance with the subpoena. (See enclosed Commission Order.) Therefore, the date for the production of information and documents originally scheduled for August 7, 1982, has been rescheduled for November 17, 1982. For your information, a typographical error exists in interrogatory #3. The correct date should be January 1, 1981 to present. A copy of the corrected interrogatories are attached.

Should you have any questions, please contact Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

CHARLES A. MOSER

Please answer each of the following questions.

Where requested, submit documentation to substantiate each response. Answers to each question must be submitted under oath.

1. The Report of Receipts and Disbursements filed by The Committee for the Survival of a Free Congress for the period September 1, 1981 through September 30, 1981 lists on its Schedule B, pages 3 and 4, disbursements for, "advertising" and "display advertising." Please provide a copy of each ad referred to on pages 3 and 4 used for, "advertising" and "display advertising."

2. For each ad referred to in question 1, please specify the name of the periodical(s), in which the ad was run, the date(s) on which the ad was run, the cost of the ad and who paid for and authorized them.

3. Attached are three ads which were paid for by The Committee for the Survival of a Free Congress and attached to the complaint. For the period January 1, 1981 to present, please provide all ads which are similar to those attached and which made reference to finding a challenger to a candidate. In addition, please provide the date on which these ads were run, the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for and authorized them.

4. Please provide each date on which the three attached ads were run. Additionally, provide the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for them.

FEDERAL ELECTION COMMISSION



Press Office
1325 K Street, N.W., Washington, D.C. 20463
Phone: Local 523-4065 Toll Free 800-424-9530

FOR IMMEDIATE RELEASE
APRIL 21, 1982

CONTACT: FRED EILAND
SHARON SNYDER



WASHINGTON — Funding that would permit the Federal Election Commission to carry out its responsibilities during the 1982 elections and to prepare for the 1984 presidential elections, and supplemental funds to avert a possible furlough of the entire FEC staff this fall, were requested today in a hearing before the House Committee on Appropriations' Subcommittee on Treasury, Postal Service and General Government.

FEC Chairman Frank P. Reiche, Vice Chairman Danny L. McDonald and Commissioner Joan D. Aikens told the Committee, "The Reagan Administration agreed that more resources were needed by the Commission and submitted a request for \$9,880,000 as part of the President's FY 1983 Budget." This is a \$666,000 reduction from the previous request.

In support of the FEC request for \$184,000 in supplemental FY 1982 funding, Commissioner McDonald said, "If a pay supplemental is not provided, the Commission will run out of money before the end of the fiscal year and will face the prospect of furloughing the entire staff at a time when we should be increasing our activity to deal with the 1982 Congressional primaries and general election."

In order to scrape by so far with funds under a continuing resolution, he described a hiring freeze which reduced the permanent staff to 231 from 258 in FY 1979. A recent reduction-in-force cut the FEC Audit Division by another 16 positions, half the division. Other spending cuts have been made in contracts administered by the National Clearinghouse on Election Administration, in travel, and in outreach programs to educate potential candidates as well as political committees.

With current dollars adjusted for inflation, he said this year's budget request, with which the Commission is able to "meaningfully enforce

-more-

the laws and assure complete public disclosure of information," is about the same as the \$4.7 million devoted to administer the election laws in 1973 when there was little disclosure, no regulations or advisory opinions and enforcement was almost totally lacking.

"Cost to the Federal Government for administering public financing of presidential elections as well as for disclosing, monitoring and providing guidance with respect to all federal elections in 1979-80 was less than one percent of reported campaign finance activity," Commissioner McDonald said. This includes some \$100 million in public funds for financing presidential primary and general election campaigns and the major party conventions as well as more than \$800 million spent in 1979-80 campaigns according to reports filed with the Commission.

The breadth of Commission activity in the 1982 and 1984 elections will depend in large part on what happens this fiscal year, Commissioner McDonald testified. Since the 1982 general election falls in the first month of the 1983 fiscal year, Commission attention will focus on activities incidental to contests for nearly 500 House and Senate seats.

Later that fiscal year, increased activity will be directed toward the 1984 elections because presidential candidates will be eligible in 1983 to submit matching fund requests for certification to ensure receipt of public funds early in the election year.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JODY C. RANSOM

DATE:

DECEMBER 3, 1982

SUBJECT:

ORDER RE: MUR 1404

The attached order has been signed and sealed this
date.

Attachment

33040383939

23040583970

NON

**RESPONDENT'S MOTION
TO QUASH ORDER AND SUBPOENA**

Respondent moves the Federal Election Commission to quash the Subpoena to Produce Documents and Order to Submit Written Answers bearing date of July 28, 1982.

Respondent attaches its Memorandum of Points and Authorities.

Church family

MARION EDWYN HARRISON
Barnett & Alagia
Ninth Floor
1627 K Street, N.W.
Washington, D. C. 20006
Counsel for Respondent

September 10, 1982

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
COMMITTEE FOR THE SURVIVAL
OF A FREE CONGRESS

]
]
]
]

MUR 1404

MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF RESPONDENT'S MOTION
TO QUASH ORDER AND SUBPOENA

1. Posture of the Pleadings

Respondent is a large, successful and well known political action committee with substantial annual revenues, tens of thousands of contributors and a publicized program, which has reported to the Federal Election Commission ("FEC") over the years.

Complainant Committee for American Principles is a political action committee which first filed with FEC on June 1, 1981. Its revenues are limited; its contributors are few in number; and it is operated by one Mr. Robert A. Blaemire, a "self-employed consultant", who originally lent Complainant the sum of \$5,000.00

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as its major initial funding. Originally operating out of a small suite at 2000 N Street, N.W., Complainant more recently moved to two rooms off the lobby of the Embassy Row Hotel, evidently temporarily.

Complainant's limited revenues appear to derive principally from a few individuals and from certain labor union and union-oriented organizations.

Complainant appears to exist for the purpose of filing complaints against organizations with which the said Mr. Blaemire disagrees. Since November 2, 1981 Complainant has filed approximately eleven complaints with FEC.

Unlike most political action committees reporting to FEC, Complainant does not appear to exist for the purpose of contributing to political candidacies.

Under date of December 15, 1981, Complainant wrote a conclusory two-page complaint to FEC, photocopy attached as Attachment One, alleging that Respondent reported seven disbursements in the aggregate amount of \$466.71 as advertising

rather than as independent expenditures. Upon that pecuniarily and qualitatively insignificant basis, Complainant alleged that Respondent violated the provisions of 11 CFR §109.1(a).

Complainant attaches pertinent excerpts from Respondent's FEC reports together with photocopies of three newspaper advertisements run by Respondent.

Under date of December 21, 1981 FEC wrote Respondent the usual FEC letter, numbering the matter MUR 1404 and transmitting the Complaint.^{1/}

Under date of January 14, 1982, Respondent, by counsel and by hand, responded to FEC's letter, photocopy of Respondent's counsel's letter of January 14, 1982 attached. Attachment Two.

Under date of March 31, 1982 FEC issued its usual "reason to believe" letter, pertinently contending that Respondent may have violated provisions of 2 USC §434(b)(4)(H)(iii) in that the advertisements of which Complainant complained "... do expressly advocate the defeat of clearly identified candidates

^{1/} FEC wrote directly to Respondent, notwithstanding the fact that Respondent at all times material had, and has, as attorney of record with FEC this law firm. 5 USC §500(f).

and, therefore, should have been reported as an independent expenditure" rather than as itemized disbursements.

Certain informal discussions between FEC counsel and Respondent's counsel followed.

The Subpoena and Order the subject of this Motion followed.

2. Argument

The entire proceeding manifests harassment by Complainant, a nominal political action committee apparently existing for the principal, if not the sole, purpose of harassing entities with the politics of which Mr. Blaemire does not agree.

The instant Subpoena and Order continue that harassment.

Interrogatory 1 requests copies of seven advertisements payments for which are itemized in Respondent's reports, three of which FEC already has (Complainant having provided them) and four of which pertain to no action pending before FEC.

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Thus, Interrogatory 1 is superfluous as to three of its requests and irrelevant as to the other four.

Interrogatory 2 requests the name of each periodical in which each ad was run, the date it was run, the cost of the ad and the identification of the payee. Respondent's report provides all the foregoing information except the precise date one of the three advertisements was run. As long as the date is within the reporting period, a point not challenged, the precise date is irrelevant to a determination of the Complaint upon its merits. Thus, Interrogatory 2 is superfluous as to all information sought except one precise publication date, and irrelevant as to that.

Interrogatory 3 seeks copies of "... all ads [sic] which are similar to those [provided by Complainant to FEC] and which made reference to finding a challenger to a candidate ..." for the past almost 12 years. Interrogatory 3 further seeks the information as to each advertisement demanded by Interrogatory 2.

Interrogatory 3 is patently burdensome. It would require Respondent to attempt to locate each such advertisement, if any, and to investigate to answer the subsidiary questions. Interrogatory 3 reaches not only beyond the subject matter of MUR 1404

but also beyond the statute of limitations. In addition, except for one or more precise publication dates, all the information sought is contained within Respondent's reports to FEC. Hence, FEC already has the irrelevant and outdated information it seeks.

Interrogatory 4 merely replicates in part Interrogatory 2.

There is no allegation that Respondent failed to list a disbursement.

The allegation is only that Respondent listed them under the wrong classification. Thus, neither FEC nor the public is deprived of the knowledge of Respondent's activities intended to be available to those seeking such knowledge. Complainant is not so deprived.

Each of the three advertisements reads substantially identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

"The term 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly

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identified candidate . . ." 2 USCA §431(17); 11 CFR §109.1(a).
[Emphasis supplied.] If these expenditures are not independent
expenditures there is no violation of 2 USC §434(d)(4)(H)(iii) or
11 CFR §104.4.

It is clear that the advertisements in question do not
expressly advocate the election or defeat of anybody. Rather,
they seek an opponent to run against an incumbent. A candidate
cannot be defeated in the States of Arkansas, Oklahoma or South
Carolina without an opponent.

Further, upon information and belief, in September 1981,
when the advertisements were run, none of the named incumbents
was a candidate for re-election.

Thus, if FEC is disposed further to pursue the instant de
minimis Complaint, the issue is solely one of law - whether the
advertisements violate the provisions of 2 USC §431(17) and 11
CFR §109.1(a) by "expressly advocating the election or defeat of
a clearly identified candidate . . ."

The limited further information the Subpoena and Order would
require would be of no help in resolving the question. It makes

no difference upon what precise date during the Third Quarter 1981 the third advertisement was published or whether there were seven, three or some other number less than seven.

The statute is precise. Because it is a limitation upon Respondent's First Amendment rights, the statute must be construed narrowly, affording the maximum possible constitutional protection to Respondent.

The advertisements constitute nothing more than an effort to seek an opponent to named incumbents while arguably denigrating the performance of the incumbent.

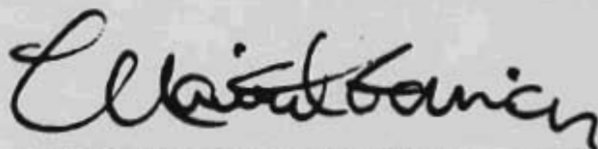
Prayer

Premises considered, FEC forthwith should quash the instant Subpoena, withdraw the instant Order and dismiss MUR 1404 - the trivial product of a troublemaking Complainant, de minimis as to both sum and alleged reporting classification, violative of Respondent's First Amendment rights, responsive to no statute and unworthy of FEC's attention.

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FEC further should direct FEC Staff (1) more carefully to scrutinize the complaints perennially emanating from harassing sources so that victims of such forays will not be chilled by unwarranted and unconscionable attacks upon their legitimate free speech and (2) not to abuse the right of process by issuing process for information FEC Staff already possesses.



MARION EDWYN HARRISON
Barnett & Alagia
Ninth Floor
1627 K Street, N.W.
Washington, D. C. 20006
Counsel for Respondent

September 10, 1982

COMMITTEE
FOR
AMERICAN
PRINCIPLES

81 DEC 18 P2:2

Case # 5930

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
The Committee For The)
Survival Of A Free)
Congress)

MUR No. _____

COMPLAINT

1) The Committee For The Survival Of A Free Congress filed its Report of Receipts and Disbursements with the Commission for the period of September 1, 1981 through September 30, 1981 (see Exhibit A). On page 2, FEC Form 3X, said Committee reports that there were no independent expenditures during that period. On Schedule B of the same report, said Committee reports seven (7) disbursements for advertising in the aggregate amount of \$466.71.

2) The Commission's regulations define the term "independent expenditure" to mean "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." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec. 437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: Robert Blaemire
Robert Blaemire, President

Date: 12/16/81

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL)

My Commission Expires February 14, 1982
My Commission Expires: _____

David G. Meyer
Notary Public

2304033931

LAW OFFICES

BARNETT & ALAGIA

3627 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE & TELECOPIER

(202) 785-0500

CABLE ALBAR

TELEX 89-2445

WILLIAM A. CAREY
 PAUL ALAGIA, JR.
 EDWARD H. BARNETT
 NEDD SCOTT
 MARION EDWIN HARRISON
 H. DAVID NEWMAN-DOUGHER
 HERMAN E. TALMADGE
 ALLAN S. SOLOMON
 RICHARD M. TRAUTWEN
 RUDY YERGEN
 JOSEPH M. DAY
 ST. JOHN BARNETT
 RICHARD A. GLADSTONE
 A. PAUL PROSPER
 MICHAEL E. LANNON
 RICHARD PROCKT
 BRADLEY R. MILLER
 ANDREW J. FUNDEAK
 MORTON HOLLANDER
 CHARLES W. CHAPMAN
 THOMAS B. HINDENBLOT
 RONALD L. GAPPNEY
 JAMES L. COORSEN
 DONALD F. MONTAGLE
 L. ARNOLD PYLE
 WILLIAM A. PYLE
 M. KATHLEEN CARPENTER
 CHARLES DAWSON BARNETT

LESTER L. ADAMS, JR.
 MARIE J. ALAGIA
 KENNETH J. BAKER
 RAYMOND S. BARNON
 ROBERT W. BISHOP
 W. GARY BLACKBURN
 ROBERT A. BLACKWOOD, JR.
 STEVEN C. BOLTON
 KAREN RAY BOBBMEYER
 SYDNEY J. BUTLER
 MALBRUCE A. BYRNE, JR.
 KENNETH R. DUNN
 DARRYL W. DURHAM
 JOHN E. EVANS
 WM. CARL FLIST
 WILLIAM S. GLADING
 G. KENNEDY HALL, JR.
 JOSEPH L. HAMILTON
 JOHN M. HENNINGBERG
 RONALD E. JOHNSON
 JOHN S. KICK
 W. DAVID KISER
 DENIS A. KLENFELD
 JAMES R. KOFFEN
 HUGH MACMILLAN, JR.
 MARY CHERYL MATHEIS
 MARSHALL L. MATZ
 PATRICK H. MOLLOY
 ALEXANDER J. PRUE, JR.

PAUL RANFELL
 WYN H. BORN, JR.
 JAMES S. EYER
 JAMES C. EMMETT
 JOHN P. SHALLOCK, JR.
 THURMAN L. SHRY
 JOHN L. SMITH
 MORA FRANCES STONE
 JOHN R. WHITE
 WILLIAM C. WELLOCK, JR.

RUFUS E. WILSON
 OF COUNSEL

LOUISVILLE, KENTUCKY
 PALM BEACH, FLORIDA
 FRANKFORT, KENTUCKY
 NASHVILLE, TENNESSEE
 ASHLAND, KENTUCKY
 JACKSON, MISSISSIPPI
 ATLANTA, GEORGIA

ADMITTED ILLINOIS
 ADMITTED OHIO

January 14, 1982

By Hand

Charles N. Steele, Esquire
 General Counsel
 Federal Election Commission
 Washington, D.C. 20463

Re: Committee for the Survival of a Free Congress
MUR 1404

Dear Mr. Steele:

As counsel of record for the Committee for the Survival of a Free Congress ("Respondent") we received on December 31, 1981 your letter of December 21, 1981 to Respondent.

As we have mentioned heretofore, when there is an attorney of record for an organization reporting to the Federal Election Commission ("FEC"), it ordinarily expedites matters if FEC communicates directly with that attorney. That is a portion of the wise rationale underlying 5 USC §500(f).

Charles N. Steele, Esquire
January 14, 1982
Page two

The Committee for American Principles, 2000 M Street, N.W., Suite 105, Washington, D.C. 20036, which is not listed in the May 1981 District of Columbia telephone directory and which is not registered with FEC, manifestly interested in trivia, complains under date of December 15, 1981 that Respondent on page 2 of FEC Form 3X does not list the sum of \$466.71 as independent expenditures, although the said sum represents independent expenditures inasmuch as it paid for advertisements seeking candidates to run for Congress against named incumbent Members of Congress.

In fact, Respondent does not list the said sum of \$466.71 on line 22, page 2, FEC Form 3X, where it ought to be listed if it were an independent expenditure. The Committee for American Principles asserts (without specificity) that there are seven disbursements on Schedule B to Form FEC 3X which in the aggregate add to the sum of \$466.71 and which purport to be for "advertising".

There are nine pages to said Schedule B. Page 1 reports nothing for "advertising"; page 2 reports nothing for "advertising"; page 3, items E, H and I, report \$70.24, \$70.00 and \$99.24 for "advertising"; page 4, items A and B, report \$43.08 and \$45.15 for "display advertising"; page 5 reports nothing for "advertising"; page 6 reports nothing for "advertising"; page 7 reports nothing for "advertising"; page 8 reports nothing for "advertising"; and page 9 reports nothing for "advertising"; a total "advertising" and "display advertising" report of \$327.71.

In fact, said sum does represent payment for the advertisements in question.

Each of the three advertisements reads substantively identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

Charles N. Steele, Esquire

January 14, 1982

Page three

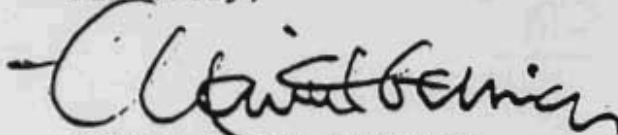
"The term 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate . . ." 2 USCA §431(17); 11 CFR §109.1(a).

It is perfectly clear that the advertisements in question do not so advocate. Rather, they seek an opponent. A candidate cannot be defeated in the States of Arkansas, Oklahoma or South Carolina without an opponent.

Accordingly, the Complaint should be dismissed. It is factually inaccurate and nonresponsive to the law.

Further, as a matter of policy, FEC should screen complaints filed by unknown nonlawyers to reduce the waste of taxpayers' money and that of legitimate respondents in addressing such trivial and legally indefensible complaints as that at issue herein. Even were there a violation, inasmuch as Respondent reports the small disbursements at issue, the de minimis rule would be applicable.

Sincerely,



MARION EDWYN HARRISON

MEH:jb

8304033

LAW OFFICES
BARNETT & ALAGIA

1627 K STREET, N. W.
WASHINGTON, D. C. 20006

To

BY HAND

Duane A. Brown, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

LAW OFFICES

BARNETT & ALAGIA

1627 K STREET, N. W.

WASHINGTON, D. C. 20006

To

BY HAND

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

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A. PAUL PROPPER
CHARLES DAWSON BARNETT
WILLIAM A. FELL
WILLIAM E. MILLER
MORTON HOLLANDER
CHARLES W. CHAPMAN
THOMAS E. HENDERSON
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ROBERT W. BERRY
W. GARY BLACKBURN
ROBERT A. BLACKWOOD, III
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W. DAVID KIRBY
JAMES R. KIRBY
MARY CHERYL MATTHEW
MARSHALL L. MATZ
PATRICK H. MOLLOY
ALEXANDER J. PERES, JR.
PAUL RAMPALL

NAOMI L. K...
ROBERT E. K...
ROBERT A. K...
JAMES C. K...
JOHN F. K...
THURMAN L. K...
JOHN L. K...
HORA FRANCIS STONE
ROBERT L. TEMPLETON
JOHN S. WHITE
WILLIAM C. WILLOCK, JR.

RUFUS E. WILSON
OF COUNSEL

OFFICES IN:
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PALM BEACH, FLORIDA
FRANKFORT, KENTUCKY
NASHVILLE, TENNESSEE
ASHELAND, KENTUCKY
JACKSON, MISSISSIPPI
ATLANTA, GEORGIA
NEW ALBANY, INDIANA

NOT ADMITTED DIRECTOR OF COLUMBIA

August 2, 1982

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR #1404

Dear Mr. Gross:

In Mr. Harrison's absence we acknowledge receipt of your letter of July 28, 1982, with attachments.

Mr. Harrison is in California and will return to Washington on August 23.

As you may know, he serves in the American Bar Association House of Delegates and has been named to the Board of Governors. The Annual Meeting is out there. He also is combining some business and a short vacation.

Sincerely,

Kay E. Gilbert

(Mrs.) Kay E. Gilbert
Secretary to Mr. Harrison

kg
cc Duane A. Brown, Esquire

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1115:5
P33:5H

BARNETT & ALAGIA

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

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RECEIVED
OCT 25 1955

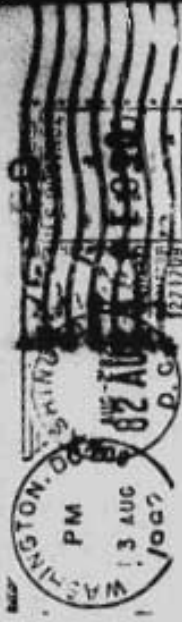
cc Duane A. Brown, Esquire

8 3 0 4 3 3 3 0

BARNETT & ALAGIA

1627 K STREET, N.W.

WASHINGTON, D.C. 20006



Duane A. Brown, Esquire
Office of the General Counsel
Federal Election Commission
Washington, D. C. 20463

33040583971

7/20

PS Form 3811, Jan. 1978

SENDER: Complete items 1, 2, and 3.
Add your address to the "RETURN TO" space below.

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:
Maurice E. Harrison
627 K St N W
Crown Hill 20006

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	cc135h	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Kate O'Brien

4. DATE OF DELIVERY	POSTMARK
	7/24/81
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CARRIER'S RETURN

1464 O'Brien

☆GPO : 1979-0-250-000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 28, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion E. Harrison, Esquire
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On March 25, 1982, you received notification that the Commission had found reason to believe that your client had violated 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4 of the Federal Election Campaign Act of 1971, as amended. 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 and order which requires you to provide information which will assist it 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.

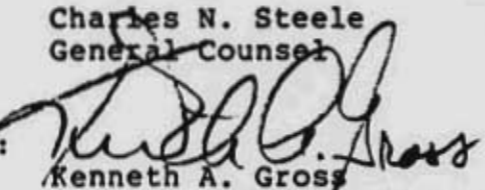
It is required that your client submit the information under oath and within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Duane A. Brown, the attorney handling this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Enclosures
Subpoena & Order
Questions
Ads

33040083992



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion E. Harrison, Esquire
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On March 25, 1982, you received notification that the Commission had found reason to believe that your client had violated 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4 of the Federal Election Campaign Act of 1971, as amended. 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 and order which requires you to provide information which will assist it 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.

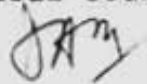
It is required that your client submit the information under oath and within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Duane A. Brown, the attorney handling this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Enclosures
Subpoena & Order
Questions
Ads

8304030397

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Committee for the Survival
of a Free Congress

)
)
)
)
MUR 1404

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

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

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on July 28, 1982.

Frank P. Reiche
Frank P. Reiche
Chairman

ATTEST:

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

830403397

CHARLES A. MOSER

Please answer each of the following questions.

Where requested, submit documentation to substantiate each response. Answers to each question must be submitted under oath.

1. The Report of Receipts and Disbursements filed by The Committee for the Survival of a Free Congress for the period September 1, 1981 through September 30, 1981 lists on its Schedule B, pages 3 and 4, disbursements for, "advertising" and "display advertising." Please provide a copy of each ad referred to on pages 3 and 4 used for, "advertising" and "display advertising."

2. For each ad referred to in question 1, please specify the name of the periodical(s), in which the ad was run, the date(s) on which the ad was run, the cost of the ad and who paid for them.

3. Attached are three ads which were paid for by The Committee for the Survival of a Free Congress and attached to the complaint. For the period January 1, 1981 to present, please provide all ads which are similar to those attached and which made reference to finding a challenger to a candidate. In addition, please provide the date on which these ads were run, the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for them.

4. Please provide each date on which the three attached ads were run. Additionally, provide the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for them.

83040383975

WANTED

A Conservative Democratic challenge
Congressman Ken Holland, (who acts as a
rubber stamp to Tip O'Neill and the Eastern
Liberal establishment).

OBJECT

Restoration of common sense
representation to this Congressional District

If interested, contact Bob McAdam, 721 2nd
Street, N.E., Washington, D.C. 20002

Paid for by: Committee for the Survival of a Free Congress

(B)

Jonesboro (Ark.) Sun.

15B.

Wednesday, September 23, 1981.

WANTED

A Conservative Democrat
to challenge

Congressman
Bill Alexander

who acts as a rubber stamp
to Tip O'Neill and the
Eastern Liberal establishment

OBJECT

... Restoration of common
sense representation to
this Congressional District

If interested, contact

Bob McAdam
721 2nd Street, N.E.
Washington, D.C.
20002

Political ad paid for by: Committee for the Survival of a Free
Congress, Bob McAdam

8304033977

Handwritten notes and signatures on the right margin, including "D", "M", "J", "H", and "R" with lines pointing to the text.

service, said a shift from Oklahoma's normally dominant high pressure summer weather pattern was responsible for the turnabout from last year's blistering heat wave. The low pressure system that prevailed most of the summer.

Rainfall was also more abundant: 17.55 inches in Oklahoma City since June 21, compared with 3.54 inches last year.

WANTED

A Conservative Democrat to challenge Congressman Jim Jones, who acts as a rubber stamp to Tip O'Neill and the Eastern Liberal establishment

OBJECT

Restoration of common sense representation to the Congressional District

If Interested, contact Bob McAdam
721 2nd Street, N.E.
Washington, D.C. 20002

Paid for by: Committee for the Survival of a Free Congress



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: JULY 28, 1982

SUBJECT: SUBPOENA RE: MUR 1404

03040300999

The attached subpoena in MUR 1404, which was approved in Executive Session on July 27, 1982 by a vote of 4-2, has been signed and sealed this date.

Attachment:
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Survival)
of a Free Congress)

MUR 1404

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on July 27, 1982, do hereby certify that the Commission decided by a vote of 4-2 to authorize the subpoena/order and cover letter to respondent's counsel, Marion E. Harrison, as submitted with the General Counsel's July 19, 1982 report on MUR 1404.

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

Attest:

7-27-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040394000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY RANSOM *JR*
DATE: JULY 21, 1982
SUBJECT: OBJECTIONS - MUR 1404 - Memorandum to the
Commission dated July 19, 1982; Received
in OCS, 7-19-82, 9:52

The above-named document was circulated to the Commission on
July 19, 1982 at 4:00.

Commissioners Aikens and Elliott submitted objections on
July 20, 1982 at 3:33 and 3:38, respectively.

This matter will be placed on the agenda for the Executive
Session of Tuesday, July 27, 1982.

83040384001

July 19, 1982

MEMORANDUM TO: Marjorie Emmons
FROM: Steven Barndollar
SUBJECT: MUR 1424

Please have the attached Memo to the Commission
distributed to the Commission on a 48 hour basis.
Thank you.

Attachment

8304038400

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 JUL 19 4 9: 52

July 19, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: Authorization to Issue a Subpoena
in Connection with MUR 1404

BACKGROUND

Robert Blaemire, President of the Committee for American Principles ("complainant") alleges that the Committee for the Survival of a Free Congress ("respondent") failed to correctly list certain expenditures found in the respondent's Report of Receipts and Disbursements for the period of September 1 - 30, 1981. The complainant alleges that the respondent financed three communications which "expressly advocate the defeat of three Congressmen." The complainant argues that since the communications expressly advocate the defeat of clearly identified candidates, the expenditures for the communications should have been listed on line 22 of the respondent's Report of Receipts and Disbursements as independent expenditures.

Since the total cost of the advertising reported for the period September 1 - 30, 1981 is equivalent to only \$466.71, the Office of General Counsel recommends that the Commission issue the attached subpoena in an effort to determine the total extent to which these ads were used. In addition, our intent is to determine whether additional ads with the same or similar language were used in respect to other candidates and the extent of their use.

Memorandum to the Commission
Re: MUR 1404
Page Two

RECOMMENDATION

The General Counsel recommends that the Commission authorize the attached subpoena/order and cover letter to respondent's counsel, Marion E. Harrison.

Attachments

1. Subpoena/Order
2. Letter to Marion Harrison

3304058400

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1404
Committee for the Survival)
of a Free Congress)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

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

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on July , 1982.

Frank P. Reiche
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

33040084000

CHARLES A. MOSER

Please answer each of the following questions.
Where requested, submit documentation to substantiate each response. Answers to each question must be submitted under oath.

1. The Report of Receipts and Disbursements filed by The Committee for the Survival of a Free Congress for the period September 1, 1981 through September 30, 1981 lists on its Schedule B, pages 3 and 4, disbursements for, "advertising" and "display advertising." Please provide a copy of each ad referred to on pages 3 and 4 used for, "advertising" and "display advertising."

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4. Please provide each date on which the three attached ads were run. Additionally, provide the name(s) of the periodical(s) in which the ads were run, the cost of the ads and who paid for them.

33040134009

(B)

(3)

Jonesboro (Ark.) Sun.

ISB.

Wednesday, September 23, 1981.

WANTED

A Conservative Democrat
to challenge

Congressman
Bill Alexander

who acts as a rubber stamp
to Tip O'Neill and the
Eastern Liberal establishment

OBJECT

... Restoration of common
sense representation to
this Congressional District

If interested, contact

Bob McAdam
721 2nd Street, N.E.
Washington, D.C.
20002

Political ad paid for by: Committee for the Survival of a Free
Congress, Bob McAdam

33040304007

DD
BM
JT
VS
AR
RT

83040384038

WANTED

A Conservative Democrat to challenge
Congressman Ken Holland, (who acts as a
rubber stamp to Tip O'Neill and the Eastern
Liberal Establishment).

OBJECT

Restoration of common sense
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Paid for by: Committee for the Survival of a Free Congress

service, said a shift from Oklahoma's normally dominant high pressure summer weather pattern was responsible for the turnabout from last year's blistering heat wave. The low pressure system that prevailed most of the sum-

5

Rainfall was also more abundant: 17.55 inches in Oklahoma City since June 21, compared with 3.54 inches last year.

WANTED

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OBJECT

Restoration of common sense representation to the Congressional District

If Interested, contact Bob McAdam
721 2nd Street, N.E.
Washington, D.C. 20002

Paid for by: Committee for the Survival of a Free Congress

Miller, 802 S. 24th



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marion E. Harrison, Esquire
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On March 25, 1982, you received notification that the Commission had found reason to believe that your client had violated 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4 of the Federal Election Campaign Act of 1971, as amended. 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 and order which requires you to provide information which will assist it 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.

It is required that your client submit the information under oath and within ten days of your receipt of this subpoena and order.

If you have any questions please direct them to Duane A. Brown, the attorney handling this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosures
Subpoena & Order
Questions
Ads

83040584010

6

LAW OFFICES

BARNETT & ALAGIA

1627 K STREET, N.W.
WASHINGTON, D.C. 20006

TELEPHONE & TELECOPIER

(202) 785-0500

CABLE ALBAR

TELEX 89-2445

D. PAUL ALAGIA, JR.
BERNARD H. BARNETT
NORM SCOTT
HERMAN E. TALMADGE
WILLIAM A. CASEY
MARION EDWYN HARRISON
ALLAN S. SOLOMON
RICHARD M. TRAUTWERN
RUDY YERGIN
L. ARNOLD FYLL
H. DAVID HIRSHMAN/DORNER
JOSEPH M. DAY
ST. JOHN BARNETT
RICHARD A. GLADSTONE
RONALD L. GARNETT
DONALD F. MINTHRE
JAMES L. COOKSHEN
RICHARD PROCKT
MICHAEL E. LANNON
A. PAUL PROCKT
CHARLES DAWSON BARNETT
WILLIAM A. PYLE
WILLIAM R. MILLER
ANDREW J. KUNDZAK
MORTON ROLLANDER
CHARLES W. CHAPMAN
THOMAS E. HINDENBLOT
M. KATHLEEN CASPENTER
LESTER I. ADAMS, JR.

MARIE J. ALAGIA
EDMUND J. BAKER
RAYMOND S. BARNON
ROBERT W. BISHOP
W. GARY BLACKBURN
ROBERT A. BLACKWOOD, III
STEVEN G. BOLTON
KAREN RAY BONNMAYER
SYDNEY J. BUTLER
MALCOLM A. STYNN, JR.
PAUL L. DAVIDSON
EDMUND S. DUBNER
DARRYL W. DURHAM
JOHN E. EVANS
WILLIAM S. GLADINO
O. KENNEDY HALL, JR.
JOSEPH L. HAMILTON
JOHN M. HIGGINS
RONALD E. JOHNSON
C. DAVID JOHNSON
JOHN S. KICK
W. DAVID KIRK
JAMES E. KIRBY
HUGH MACMILLAN, JR.
MARY CHRISTY MATHER
MARSHALL L. MATZ
PATRICK H. MOLLOY
ALEXANDER J. PEARL, JR.
PAUL RAMPALL

IVAN H. BICK, JR.
JAMES C. BISHOP
JOHN F. BISHOP, III
DAVIDMAN L. BISHOP
JOHN L. SMITH
NOLA FRANCES STONE
ROBERT L. TEMPLETON
JOHN R. WHITE
WILLIAM C. WILLOCK, JR.

RUPUS E. WILSON
OF COUNSEL

OFFICES IN:
LOUISVILLE, KENTUCKY
PALM BEACH, FLORIDA
FRANKFORT, KENTUCKY
NASHVILLE, TENNESSEE
ABILENE, KENTUCKY
JACKSON, MISSISSIPPI
ATLANTA, GEORGIA
NEW ALBANY, INDIANA

NOT ADMITTED DISTRICT OF COLUMBIA

May 7, 1982

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR #1404

Dear Ken:

After our last discussion I again reviewed the file herein.

The Federal Election Commission in our judgment would not prevail in court in the face of the restrictive language of the statute.

Perhaps more significantly, we do not understand why anybody in the Federal Election Commission would want to pursue such a de minimis case - \$466.71, clearly reported, but not reported as an independent expenditure, which it is alleged to be but is not - and all at a time when the Federal Election Commission is telling the House Appropriations Committee that "... the Commission will run out of money before the end of the fiscal year ..." if it does not receive a supplemental, photocopy of FEC April 21, 1982 press release attached.

To compound the absurdity, the complainant is a neophyte political action committee, recently organized, of limited substance, and temporarily operating out of a small suite in a

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3 MAY 12 P3:39

Kenneth A. Gross, Esquire
May 7, 1982
Page two

hotel, evidently the creature of the man who runs it, who describes himself as a "consultant".

By any reasonable or objective standard it does not appear that taxpayer funds ought to be spent pursuing this kind of case, even assuming there were a technical violation.

In the face of that, what argument does one have to make to our client that the client ought to enter into some kind of agreement? Might not the same complainant, or some other equally insubstantial troublemaker, file another complaint tomorrow? And the next day?

I appreciate your interest in attempting to evolve some kind of compromise yet I don't know what there is to compromise. If you have an idea, I would be glad to discuss it - I always appreciate your courtesy - and absent that I guess we'll just have to let events take their course. It seems the client is correct in saying that if it is pushed to the wall on this kind of unsupportable trivia, it will be pushed to the wall again and again on other trivia of which the same or other professional troublemakers complain.

This case probably is a good example of the need for normal administrative procedures within the Federal Election Commission. This type of thing, one would expect, would not get by normal briefing and oral argument, meeting Administrative Procedure Act requirements.

Sincerely,



MARION EDWYN HARRISON

MEH:kg
Enc

FEDERAL ELECTION COMMISSION

Press Office
1325 K Street, N.W., Washington, D.C. 20463
Phone: Local 523-4065 Toll Free 800-424-9530



FOR IMMEDIATE RELEASE
APRIL 21, 1982

CONTACT: FRED EILAND
SHARON SNYDER



WASHINGTON — Funding that would permit the Federal Election Commission to carry out its responsibilities during the 1982 elections and to prepare for the 1984 presidential elections, and supplemental funds to avert a possible furlough of the entire FEC staff this fall, were requested today in a hearing before the House Committee on Appropriations' Subcommittee on Treasury, Postal Service and General Government.

FEC Chairman Frank P. Reiche, Vice Chairman Danny L. McDonald and Commissioner Joan D. Aikens told the Committee, "The Reagan Administration agreed that more resources were needed by the Commission and submitted a request for \$9,880,000 as part of the President's FY 1983 Budget." This is a \$666,000 reduction from the previous request.

In support of the FEC request for \$184,000 in supplemental FY 1982 funding, Commissioner McDonald said, "If a pay supplemental is not provided, the Commission will run out of money before the end of the fiscal year and will face the prospect of furloughing the entire staff at a time when we should be increasing our activity to deal with the 1982 Congressional primaries and general election."

In order to scrape by so far with funds under a continuing resolution, he described a hiring freeze which reduced the permanent staff to 231 from 258 in FY 1979. A recent reduction-in-force cut the FEC Audit Division by another 16 positions, half the division. Other spending cuts have been made in contracts administered by the National Clearinghouse on Election Administration, in travel, and in outreach programs to educate potential candidates as well as political committees.

With current dollars adjusted for inflation, he said this year's budget request, with which the Commission is able to "meaningfully enforce

-more-

the laws and assure complete public disclosure of information," is about the same as the \$4.7 million devoted to administer the election laws in 1973 when there was little disclosure, no regulations or advisory opinions and enforcement was almost totally lacking.

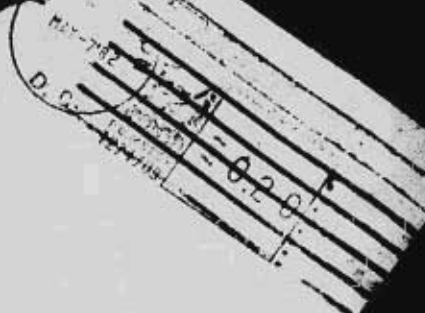
"Cost to the Federal Government for administering public financing of presidential elections as well as for disclosing, monitoring and providing guidance with respect to all federal elections in 1979-80 was less than one percent of reported campaign finance activity," Commissioner McDonald said. This includes some \$100 million in public funds for financing presidential primary and general election campaigns and the major party conventions as well as more than \$800 million spent in 1979-80 campaigns according to reports filed with the Commission.

The breadth of Commission activity in the 1982 and 1984 elections will depend in large part on what happens this fiscal year, Commissioner McDonald testified. Since the 1982 general election falls in the first month of the 1983 fiscal year, Commission attention will focus on activities incidental to contests for nearly 500 House and Senate seats.

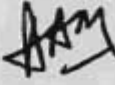
Later that fiscal year, increased activity will be directed toward the 1984 elections because presidential candidates will be eligible in 1983 to submit matching fund requests for certification to ensure receipt of public funds early in the election year.

BARNETT & ALAGIA
1627 K STREET, N.W.
WASHINGTON, D.C. 20006

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, D. C. 20463



March 26, 1982

MEMORANDUM TO: The File
FROM: Duane A. Brown 
Attorney
SUBJECT: Typo Correction MUR 1404

An incorrect date is cited in the First General Counsel's Report. On page 2, the second full paragraph, line 4, should read: "was received at the Commission on January 15, 1982 (Attachment II)."

8304050401



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 31, 1982

Marion E. Harrison, Esquire
Barnett & Alagia
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

The Federal Election Commission notified you on December 31, 1981 of a complaint which alleges that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission on March 23, 1982, determined that there is reason to believe that your client has violated 2 U.S.C. § 434(b)(4)(H)(iii), a provision of the Act. Specifically, it appears that the communications in question which were financed by the Committee for the Survival of a Free Congress, do expressly advocate the defeat of clearly identified candidates and, therefore, should have been reported as an independent expenditure.

You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your client, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

83040534017

Marion E. Harrison, Esquire
Page Two

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 Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

Enclosures
Procedures

83040384018



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Marion E. Harrison, Esquire
Barnett & Alagia
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

The Federal Election Commission notified you on December 31, 1981 of a complaint which alleges that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

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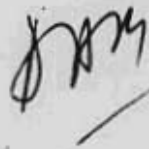
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Marion E. Harrison, Esquire
Page Two

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 Duane A. Brown, the attorney assigned this matter at 523-5071.

Sincerely,



Enclosures
Procedures

33040384010

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Survival of)
a Free Congress)

MUR 1404

CERTIFICATION

I, Marjorie W. Emons, Recording Secretary for the Federal Election Commission executive session on March 23, 1982, do hereby certify that the Commission decided by a vote of 5-0 to find reason to believe that the Committee for the Survival of a Free Congress is in violation of 2 U.S.C. §434(b)(4)(H)(iii) and 11 C.F.R. §104.4 for failure to correctly report certain expenditures and independent expenditures.

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

Attest:

3/24/82

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

33040334021



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
OFFICE OF THE SECRETARY TO THE COMMISSION
DATE: MARCH 18, 1982
SUBJECT: ADDITIONAL OBJECTION - MUR 1404 First General
Counsel's Report dated March 15, 1982; Received
in OCS, 3-15-82, 3:39

You were notified previously of an objection by
Commissioner Harris.

Commissioner Aikens submitted an additional objection
at close of business, March 17, 1982.

This matter will be discussed in executive session
on Tuesday, March 23, 1982.

33040-34013



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMETT / BODY CUSTER *gc*
DATE: MARCH 17, 1982
SUBJECT: OBJECTION - MUR 1404 - First General
Counsel's Report dated March 15, 1982

The above-named document was circulated to the Commission on
March 16, 1982 at 11:00.

Commissioner Harris submitted an objection at 11:43, March 17,
1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, March 23, 1982.

9304038403

March 15, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kyson
SUBJECT: MUR 1404

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

Attachment

cc: Brown

9304038402

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAR 15 P 3: 39

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION: 3-15-82

MUR 1404
DATE COMPLAINT RECEIVED
BY OGC: 12/16/81
DATE OF NOTIFICATION TO
RESPONDENT: 12/21/81
STAFF MEMBER: Duane A. Brown

COMPLAINANT'S NAME: Robert Blaemire - Committee for
American Principles

RESPONDENT'S NAME: Committee for the Survival of
a Free Congress

RELEVANT STATUTE: 2 U.S.C. § 434(b)(4)(H)(iii); 2 U.S.C.
§ 431(17); 11 C.F.R. § 109.1(a);
11 C.F.R. § 104.3(b)(3)(vii);
11 C.F.R. § 104.4

INTERNAL REPORTS CHECKED: Both Committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Robert Blaemire, President of the Committee for American Principles ("complainant") alleges that the Committee for the Survival of a Free Congress ("respondent") failed to list correctly certain expenditures found in the respondent's Report of Receipts and Disbursements for the period of September 1-30, 1981 (Attachment I). The complainant alleges that the respondent financed three communications which "expressly advocate the defeat of three Congressmen." The complaint argues that since

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the communications expressly advocate the defeat of clearly identified candidates, the expenditures for the communications should have been listed on line 22 of the respondent's Report of Receipts and Disbursements as independent expenditures.

FACTUAL AND LEGAL ANALYSIS

The three communications include wording in the form of a request for, "A Conservative Democrat to Challenge ..." individual Congressmen who, ostensibly, have not been performing to the likes of the respondent. The ad continues by stating that the object of the request is to restore, "common sense representation to the Congressional District." The complainant states that seven (7) disbursements were made for this type of advertising in the aggregate amount of \$466.71.

The Commission's notification of the complaint was received by the respondent on December 31, 1981. The respondent's letter in response to the complaint submitted by respondent's counsel was received at the Commission on January 15, 1981 (Attachment II).

Although counsel for the respondents concedes that the advertisements were those of his client, he disagrees as to the total sum spent for advertising. He further asserts that the advertisements do not expressly advocate the election or defeat of a clearly identified candidate, and therefore should not be reported as independent expenditures.

With regard to the amount spent for the advertisements, counsel argues that the report submitted by his client shows that

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only \$327.71 was spent. A review of the report submitted by respondent shows that the total of the seven disbursements for advertisement is \$466.71 as the complainant alleges. Counsel fails to include two disbursements, one for \$84 and the other for \$55 in his total.

The issue in this matter, however, is whether the cost for such advertisements should have been listed on line 22 of FEC Form 3X as independent expenditures (2 U.S.C.

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§ 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4). In defense of the way in which the respondent reported the expenditure for the advertisement, counsel argues that the advertisements do not advocate the election or defeat of a clearly identified candidate.^{1/} It appears, however, that the intent of the advertisements is to replace the Congressmen whose names were mentioned in the ads. Words such as the "Restoration of common sense representation ..." are used to denigrate the reputation of the incumbent and, as counsel for respondent concedes, "...seeks an arguably different object for representation."

Therefore, it appears that the communications in question do expressly advocate the defeat of three clearly identified candidates. However, as the respondent did report the expenditure, albeit incorrectly causing a technical

^{1/} Each of the three incumbents are considered candidates since each has ... "received contributions aggregating in excess of \$5,000 or has made expenditures aggregating in excess of \$5,000 ..." in pursuit of the 1982 election (2 U.S.C. § 431(2)).

violation of the Act, the Office of General Counsel recommends that the Commission take no action and close the file.

Finally, counsel for respondent notes in his letter, inter alia, that the complainant, Committee for American Principles, is not registered with the Commission. In fact, the complainant is registered with the Commission and has been since June 1, 1981.

RECOMMENDATION

The Office of General Counsel recommends that the Commission:

- 1) take no action against the Committee for the Survival of a Free Congress for failure to correctly report certain expenditures and independent expenditures in accordance with 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4;
- 2) approve the attached letters; and
- 3) close the file.

March 15, 1982
Date

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

ATTACHMENTS

1. Complaint
2. Respondent's Reply
3. Proposed Letters (2)

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COMMITTEE
FOR
AMERICAN
PRINCIPLES

102355

81 DEC 18 P2:2

CEL# 5936

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

ATTACHMENT I

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
The Committee For The)
Survival Of A Free)
Congress)

MUR No. _____

COMPLAINT

1) The Committee For The Survival Of A Free Congress filed its Report of Receipts and Disbursements with the Commission for the period of September 1, 1981 through September 30, 1981 (see Exhibit A). On page 2, FEC Form 3X, said Committee reports that there were no independent expenditures during that period. On Schedule B of the same report, said Committee reports seven (7) disbursements for advertising in the aggregate amount of \$466.71.

2) The Commission's regulations define the term "independent expenditure" to mean "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

2

authorized committee of such candidate." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec.437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: Robert Blaemire
Robert Blaemire, President

Date: 12/16/81

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL) . .

My Commission Expires February 14, 1984
My Commission Expires: _____

Janet G. Meyers
Notary Public

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(A) ③

21. 53:42

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SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>9-1-81</u> Through <u>9-30-81</u>			
6. (a) Cash on Hand January 1, 19 <u>81</u>			\$ 62,115.14
(b) Cash on Hand at Beginning of Reporting Period	\$ 40,678.95		
(c) Total Receipts (from Line 18)	\$ 55,053.86	\$ 614,342.86	
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 95,732.81	\$ 676,458.00	
7. Total Disbursements (from Line 28)	\$ 55,858.04	\$ 636,583.23	
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 39,874.77	\$ 39,874.77	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 100,342.66		

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Date _____

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

FEC FORM 3X (3/70)

(4)

Statement of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full) The Committee For The Survival of a Free Congress		Report Covering the Period: From: 9-1-81 To: 9-30-81	
	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	55,015.20	606,579.53	
(Memo Entry Unitemized \$ 49,115.20)	-0-	-0-	
(b) Political Party Committees	-0-		
(c) Other Political Committees		1,000.00	
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	55,015.20	607,579.53	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	
13. ALL LOANS RECEIVED	-0-	-0-	
14. LOAN REPAYMENTS RECEIVED	-0-	5,000.00	
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	38.66	1,763.33	
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	55,053.86	614,342.86	
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	54,758.04	623,940.48	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,100.00	6,642.75	
22. INDEPENDENT EXPENDITURES (Use Schedule E)	-0-	-0-	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)	-0-	-0-	
24. LOAN REPAYMENTS MADE	-0-	-0-	
25. LOANS MADE	-0-	5,000.00	
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	1,000.00	
(b) Political Party Committees	-0-	-0-	
(c) Other Political Committees	-0-	-0-	
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	-0-	1,000.00	
27. OTHER DISBURSEMENTS	-0-	-0-	
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	55,858.04	636,583.23	
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	55,015.20	607,579.53	
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	-0-	1,000.00	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	55,015.20	606,579.53	
32. TOTAL OPERATING EXPENDITURES from Line 19	54,758.04	623,940.48	
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	38.66	1,763.33	
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	54,719.38	622,177.15	

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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)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jim Ellis 6929-124 Park Mesa Way San Diego, Ca. 9211	Various Campaign Audits Fee 125.00 Exp. 257.35		
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-22-81	382.35
B. Full Name, Mailing Address and ZIP Code Alex Young 2626 S. Troy St. Arlington, Va. 22206	Purpose of Disbursement Reimbursement-Petty Cash	Date (month, day, year)	Amount of Each Disbursement This Period
	" Auto Repairs " Petty Cash	9-03-81	41.04
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81 9-15-81	174.01 29.31
C. Full Name, Mailing Address and ZIP Code "	Purpose of Disbursement Reimbursement- Petty Cash Salary	Date (month, day, year)	Amount of Each Disbursement This Period
		9-29-81	27.79
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	391.90 391.90
D. Full Name, Mailing Address and ZIP Code D.C. Treasurer C/O Nat'l Bank of Washington Washington, D.C.	Purpose of Disbursement D.C. Withholding	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81	108.80
E. Full Name, Mailing Address and ZIP Code Va. Dept. of Taxation P.O. Box 1202 Richmond, Va. 23208	Purpose of Disbursement Va. Tax Withholding	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81	264.88
F. Full Name, Mailing Address and ZIP Code Group Hospitalization 550 12th St S.W. Washington, D.C. 20024	Purpose of Disbursement Employee Insurance	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81	182.00
G. Full Name, Mailing Address and ZIP Code Unionmutual Insurance, Co. Box 9395 Portland, Me. 04124	Purpose of Disbursement Employee Insurance	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81	105.41
H. Full Name, Mailing Address and ZIP Code Caging Corporation of Virginia 1200 S. Sterling Blvd. Sterling, Va. 22170	Purpose of Disbursement Counting & Caging	Date (month, day, year)	Amount of Each Disbursement This Period
	"	9-04-81	1,880.20
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81 9-24-81	776.45 260.80
I. Full Name, Mailing Address and ZIP Code Sani-Clean Co. P.O. Box 237 Bryantown, Md. 20617	Purpose of Disbursement Office Cleaning	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-04-81	312.00
SUBTOTAL of Disbursements This Page (continued)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 9
LINE NUMBER 19
(Use separate schedules for each category of the Detailed Summary Page)

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Leo Randall Rauling 4546 Eads St N.E. Washington, D.C. 20019	Rubbish Removal Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-04-81	70.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Stanford Paper Co. 3001 V St. N.E. Washington, D.C. 20018	Paper Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-04-81 9-15-81	257.85 75.15
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Brown, Younger, Wilhoit & Fadoul, P.C. 6845 Elm St. Suite 710 McLean, Va. 22101	Professional Service Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81	560.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Browning Ferris Ind. P.O. Box 15540 Baltimore, Md. 21263	Service Charge & Fuel Surcharge Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81	66.67
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
IBM Corporation 1801 K. St. N.W. Washington, D.C. 20006	Rent-Info Distributor Rent-Info Processor Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81 9-21-81 9-24-81	4,019.20 1,030.32 556.80
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cory Food Services 12264 Wilkins Ave. Rockville, Md. 20852	Coffee For Office Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81 9-10-81	81.68 63.50
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Central Delivery P.O. Box 780 Silver Spring, Md. 20901	Delivery Service Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81 9-24-81	33.06 7.84
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Benjamin Office Supply 11617 Beltsville Drive Beltsville, Md. 20705	Xerox Paper Office Supplies Binders Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81 9-15-81 9-21-81	228.96 325.79 15.74
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	Office Supplies Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-24-81 9-24-81 9-28-81	100.36 121.17 97.94

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 3 of 9 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 Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Lettercomm, Inc. 310 Swann Ave. Alexandria, Va. 22301	Printing, Mailing & Postage	9-10-81	139.00
		9-16-81	4,086.85
		9-16-81	3,077.96
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
"	"	9-24-81	1,306.75
		9-30-81	4,691.34
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
George Antone 309 H Street N.W. Washington, D.C. 20001	Office Supplies	9-10-81	618.96
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Travel Advisors 4130 Alby St. Alton, Ill. 62002	Travel-K. Moomaw	9-10-81	530.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Jonesboro Sun Troutt Brothers 518 Carson Jonesboro, Ar. 72401	Advertising	9-11-81	70.24
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Camden News P.O. Box 798 Camden, Ar. 71701	Display Advertising	9-11-81	55.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Goldsboro News Argus Wayne Printing Co. 310 N. Berkley Blvd. Goldsboro, N.C. 27530	Display Advertising	9-11-81	84.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Concord Tribune 125 Union Street S. Concord, N.C. 28025	Display Advertising	9-11-81	70.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Muskogee Phoenix & Times Democrat 214 Wall St. Muskogee, Ok. 74401	Display Advertising	9-11-81	99.24

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 4 of 9 for
LINE NUMBER 10
(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 Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code Shawnee News-Star 215 N. Bell Shawnee, Ok. 74801	Purpose of Disbursement Display Advertising Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 43.08
B. Full Name, Mailing Address and ZIP Code Camden Chronicle 1111 Broad St. Camden, S.C. 29020	Purpose of Disbursement Display Advertising Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 45.15
C. Full Name, Mailing Address and ZIP Code Sam J. Brown P.O. Box 34306 Houston, Tx. 77034	Purpose of Disbursement Sept. Rent Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 1,139.85
D. Full Name, Mailing Address and ZIP Code Free Congress Foundation 721 Second Street N.E. Washington, D.C. 20002	Purpose of Disbursement Rental of Furniture & Telephones Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 1,132.02
E. Full Name, Mailing Address and ZIP Code Tulsa Tribune 315 S. Boulder Tulsa, Ok. 74120	Purpose of Disbursement Copies of back issues of newspapers Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 1.50
F. Full Name, Mailing Address and ZIP Code Temporaries Inc. 1015 18th St. N.W. Suite 300 Washington, D.C. 20036	Purpose of Disbursement Part-time Employees Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-15-81	Amount of Each Disbursement This Period 324.81
G. Full Name, Mailing Address and ZIP Code Almanac of American Politics P.O. Box 32392 Washington, D.C. 20007	Purpose of Disbursement Almanac Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-15-81	Amount of Each Disbursement This Period 36.40
H. Full Name, Mailing Address and ZIP Code First American Bank of Va. P.O. Box 627 McLean, Va. 22101	Purpose of Disbursement Auto Loan Payment Service Charge Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-15-81 9-30-81	Amount of Each Disbursement This Period 358.18 10.19
I. Full Name, Mailing Address and ZIP Code R.C.-Nehi Bottling Co. 5330 Port Royal Road Springfield, Va. 22151	Purpose of Disbursement Office Beverages Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-15-81	Amount of Each Disbursement This Period 107.25
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 5 of 9 for
LINE NUMBER 30
(Use separate schedule(s) for each
category of the Detailed
Summary Page)

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cantrell/Cutter Printing Co. 499 S. Capitol St. S.W. Suite 402 Washington, D.C. 20003	Business Cards	9-18-81	25.37
	Memo Pads	9-10-81	241.99
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C&P Telephone -P.O. Box 2123 Washington, D.C. 20053	Telephone Usage	9-18-81	975.46
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U.S. Postmaster Washington, D.C. 20003	Postage	9-16-81	280.00
	"	9-25-81	1,550.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):	9-08-81	300.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	"	9-28-81	300.00
	"	9-03-81	300.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):	9-30-81	3,025.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Diners Club International P.O. Box 17067 Denver, Col. 80213	Incidental Expenses	9-17-81	35.50
	"	9-18-81	76.44
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Your Extra Storage Rt # 1 Box 149D Sterling, Va. 22170	Extra Storage	9-18-81	100.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pitney Bowes Credit Corp. PO Box 2600 Darien, CT 06820	Leasing of mailing system	9-21-81	74.45
	Property tax	9-21-81	43.11
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Barnett, Alagia, & Carey 1627 K Street N.W. Washington, D.C. 20006	Professional Services	9-21-81	658.90
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Michael T. Patrick & Company 1200 S. Sterling Blvd. Sterling, Va. 22170	Bookkeeping & Accounting	9-21-81	1,275.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert S. McAdams 309 Yoakum Parkway #903 Alexandria, Va. 22304	Reimbursement - Camera - Breakfast Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-22-81 9-28-81 9-15-81	134.62 49.76 706.27
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	706.27
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Washington Gas Light Co. P.O. Box 2432 Washington, D.C. 20081	Utilities Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-22-81	20.74
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hoke Communications Inc. 224 Seventh St. Garden City, Ny 11530	Subscription Renewal Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-25-81	27.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Conn. General Insurance Hartford, Conn. 06152	Insurance Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-25-81	205.58
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gulf Oil Corp. P.O. Box 51157 Atlanta, Ga. 30302	Auto Repair Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-25-81	27.83
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Unionmutual Stock Life, Ins. P.O. Box 9395 Portland, ME 04104	Insurance Premiums Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-28-81	111.79
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Crown Central Petroleum P.O. Box 105559 Atlanta, Ga. 03048	Fuel For Auto Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-29-81	186.20
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Brian Dorsett 2236 Kentucky Ave. S.E. Washington, D.C.	Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-03-81 9-15-81 9-15-81	163.33 22.23 96.45
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page the line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 7 of 9 for
LINE NUMBER 10
(Use separate schedule for each
category of the Detailed
Summary Page)

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Brian Dorsett 2236 Kentucky Ave. S.E. Washington, D.C.	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	189.84
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Paul M. Weyrich 7053 Lanier Place Annandale, Va. 20003	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	636.66 636.66
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Elaine Hartman 1225 Martha Custis Dr. Alexandria, Va. 22314	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	569.00 569.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Sheree Goldsborough 10114 Campus Way # 302 Largo, Md. 20772	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-29-81	384.47 384.47
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Thelma Jenkins 125 Quincey Place N.E. Washington, D.C. 20002	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	218.07 235.34
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Diana Weyrich 7053 Lanier Place Annandale, Va. 20003	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81	98.07
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Kurt Dorsett 24 Wade Ct. Gaithersburg, Md. 20760	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-30-81	40.32 35.92 18.37
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Emil Dorsett 24 Wade Ct. Gaithersburg, Md. 20760	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-30-81	40.32 35.92 16.84
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Sybil Bolden 1238 Franklin St., N.E. Washington, D.C. 20017	" Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-25-81	184.24 166.34 121.83

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Edith Shields 3909 Burns Pl S.E. Washington, D.C. 20010	Disbursement for: ☐ Primary ☐ General	9-15-81	202.03
	☐ Other (specify):	9-30-81	227.11
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Harrietta Gordon 700 Jefferson St. N.W. B5 Washington, D.C.	Disbursement for: ☐ Primary ☐ General	9-15-81	173.22
	☐ Other (specify):	9-30-81	136.74
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Helena Glover 5-46th St. S.E. #7 Washington, D.C. 20002	Disbursement for: ☐ Primary ☐ General	9-15-81	218.67
	☐ Other (specify):	9-30-81	229.61
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Jim Martin 2413 Porter Ave. Suitland, Md. 20023	Disbursement for: ☐ Primary ☐ General	9-15-81	85.48
	☐ Other (specify):	9-30-81	254.43
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Pamela McGuigan 313 S. Courthouse Rd. Arlington, Va. 22204	Disbursement for: ☐ Primary ☐ General	9-15-81	22.40
	☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Wanda Day 5406 Morning Glory Ct. Columbia, Md. 21044	Disbursement for: ☐ Primary ☐ General	9-15-81	88.36
	☐ Other (specify):	9-30-81	95.53
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Anne Wynne 3926 W St. N.W. Washington, D.C. 20007	Disbursement for: ☐ Primary ☐ General	9-15-81	34.91
	☐ Other (specify):	9-30-81	98.14
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Annette Richards 11703 Eden Rd. Silver Spring, Md. 20904	Disbursement for: ☐ Primary ☐ General	9-15-81	289.16
	☐ Other (specify):	9-30-81	289.16
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Salary		
Dawn Thoraness 2920 S. Buchannon C2 Arlington, Va. 22203	Disbursement for: ☐ Primary ☐ General	9-30-81	500.00
	☐ Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L.M. Collins & Associates, Inc. 2500 N. Van Dorn St. Alexandria, Va. 22302	Crystal Jars Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-18-81	774.80
B. Full Name, Mailing Address and ZIP Code C.S.F.C.-Special Projects 721 Second St. N.E. Washington, D.C. 20002	Transfer for campaign school Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-18-81	500.00
C. Full Name, Mailing Address and ZIP Code Preferred Lists 499 South Capitol St. S.W. Washington, DC 20003	List Rentals Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81	330.00
D. Full Name, Mailing Address and ZIP Code Tyco Data Processing 6216 Cherokee Ave. Alexandria, Va. 22312	Keypunching Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-17-81 9-23-81	246.29 1,092.39
E. Full Name, Mailing Address and ZIP Code Conservative Donors Guide PO Box 6387 Arlington, VA 22206	Purchase of publication Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-23-81	1,500.00
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 Period
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 Period
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 Period
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 Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period Last page (this line number only)			54,758.06

(B)

14

Jonesboro (Ark.) Sun.

15B.

Wednesday, September 23, 1981.

WANTED

A Conservative Democrat
to challenge

Congressman
Bill Alexander

who acts as a rubber stamp
to Tip O'Neill and the
Eastern Liberal establishment

OBJECT

... Restoration of common
sense representation to
this Congressional District

If interested, contact

Bob McAdam
721 2nd Street, N.E.
Washington, D.C.

20002

Political ad paid for by: Committee for the Survival of a Free
Congress, Bob McAdam

630403840412

CA
BM
J
LD
H
R

WANTED

A Conservative Democrat to challenge
Congressman Kent Holland (who acts as a
rubber stamp to Tip O'Neill and the Eastern
Liberal Establishment).

OBJECT

Restoration of common-sense
representation to this Congressional District

If interested, contact Bob McAdam, 721 2nd
Street, N.E., Washington, D.C. 20002

Paid for by: Committee for the Survival of a Free Congress

83040384013

service, said a shift from Oklahoma's normally dominant high pressure summer weather pattern was responsible for the turnabout from last year's blistering heat wave. The low pressure system that prevailed most of the sum-

.....
Rainfall was also more abundant: 17.55 inches in Oklahoma City since June 21, compared with 3.54 inches last year.

WANTED

A Conservative Democrat to challenge Congressman Jim Jones, who acts as a rubber stamp to Tip O'Neill and the Eastern Liberal establishment

OBJECT

Restoration of common sense representation to the Congressional District

If Interested, contact Bob McAdam
721 2nd Street, N.E.
Washington, D.C. 20002

Paid for by: Committee for the Survival of a Free Congress

ATTACHMENT II

CCC 6074
Brown (17)

LAW OFFICES

BARNETT & ALAGIA

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE & TELECOPIER

(202) 785-0500

CABLE ALBAR

TELEX 89-2445

WILLIAM A. CAREY
President Partner
D. PAUL ALAGIA, JR.*
BERNARD H. BARNETT
RICHARD H. SCOTT
MARION EDWYN HARRISON
H. DAVID HERMANSDORFER *****
HERMAN E. TALMADGE *****
ALLAN B. SOLOMON*
RICHARD M. TRAUTWEIN*
RUDY YESSIN*
JOSEPH M. DAY*
ST. JOHN BARNETT
RICHARD A. GLADSTONE
A. PAUL PROSPER*
MICHAEL E. LANNON*
RICHARD PROCKT*
SHRADER R. MILLER*
ANDREW J. PUNDZAK*
MORTON HOLLANDER
CHARLES W. CHAPMAN
THOMAS R. HENDERSHOT
RONALD L. GAFFNEY*
JAMES L. COORSSEN*
DONALD F. MINTMIRE *****
L. ARNOLD PYLE *****
WILLIAM A. PYLE *****
M. KATHLEEN CARPENTER
CHARLES DAWSON BARNETT**

LESTER I. ADAMS, JR.*
MARIE J. ALAGIA**
KENNETH J. BADER*
RAYMOND S. BARNON*
ROBERT W. BISHOP *****
W. GARY BLACKBURN *****
ROBERT A. BLACKWOOD, III *****
STEVEN G. BOLTON*
KAREN RAY BORNHAYR*
JENNIFER J. BUTLER*
MAURICE A. STEARNS*
KENNETH R. DUBNER *****
DAIRYL W. DURHAM*
JOHN E. EVANS*
WM. CARL FUST*
WILLIAM S. GLADING
G. KENNEDY HALL, JR.*
JOSEPH L. HAMILTON*
JOHN M. HEMMELING
RONALD E. JOHNSON*
JOHN S. KICK*
W. DAVID KOSER*
DENIS A. KLEINFELD *****
JAMES R. KNEPPEN *****
HUOH MACMILLAN, JR. **
MARY CHERYL MATHEIS
MARSHALL L. MATZ
PATRICK H. MOLLOY*
ALEXANDER J. PILES, JR.

PAUL RAMPALL**
IVAN H. RICK, JR.*
JEFFREY S. RUTTER*
JAMES C. SEPPERT*
JOHN F. SHERLOCK, III
THURMAN L. SNEY*
JOHN L. SMITH*
KORA FRANCES STONE *****
JOHN R. WYTHE *****
WILLIAM C. WILLOCK, JR.*

RUFUS E. WILSON
OF COUNSEL

LOUISVILLE, KENTUCKY*
PALM BEACH, FLORIDA**
FRANKFORT, KENTUCKY***
NASHVILLE, TENNESSEE *****
ASHLAND, KENTUCKY *****
JACKSON, MISSISSIPPI *****
ATLANTA, GEORGIA *****

ADMITTED ILLINOIS *****
ADMITTED OHIO *****

January 14, 1982

By Hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Committee for the Survival of a Free Congress
MUR 1404

Dear Mr. Steele:

As counsel of record for the Committee for the Survival of a Free Congress ("Respondent") we received on December 31, 1981 your letter of December 21, 1981 to Respondent.

As we have mentioned heretofore, when there is an attorney of record for an organization reporting to the Federal Election Commission ("FEC"), it ordinarily expedites matters if FEC communicates directly with that attorney. That is a portion of the wise rationale underlying 5 USC §500(f).

33040334013

JAN 15 ALL: 45

Charles N. Steele, Esquire
January 14, 1982
Page two

The Committee for American Principles, 2000 M Street, N.W., Suite 105, Washington, D.C. 20036, which is not listed in the May 1981 District of Columbia telephone directory and which is not registered with FEC, manifestly interested in trivia, complains under date of December 15, 1981 that Respondent on page 2 of FEC Form 3X does not list the sum of \$466.71 as independent expenditures, although the said sum represents independent expenditures inasmuch as it paid for advertisements seeking candidates to run for Congress against named incumbent Members of Congress.

In fact, Respondent does not list the said sum of \$466.71 on line 22, page 2, FEC Form 3X, where it ought to be listed if it were an independent expenditure. The Committee for American Principles asserts (without specificity) that there are seven disbursements on Schedule B to Form FEC 3X which in the aggregate add to the sum of \$466.71 and which purport to be for "advertising".

There are nine pages to said Schedule B. Page 1 reports nothing for "advertising"; page 2 reports nothing for "advertising"; page 3, items E, H and I, report \$70.24, \$70.00 and \$99.24 for "advertising"; page 4, items A and B, report \$43.08 and \$45.15 for "display advertising"; page 5 reports nothing for "advertising"; page 6 reports nothing for "advertising"; page 7 reports nothing for "advertising"; page 8 reports nothing for "advertising"; and page 9 reports nothing for "advertising"; a total "advertising" and "display advertising" report of \$327.71.

In fact, said sum does represent payment for the advertisements in question.

Each of the three advertisements reads substantively identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

Charles N. Steele, Esquire
January 14, 1982
Page three

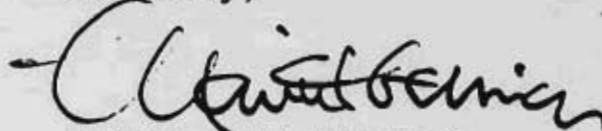
"The term 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate . . ." 2 USCA §431(17); 11 CFR §109.1(a).

It is perfectly clear that the advertisements in question do not so advocate. Rather, they seek an opponent. A candidate cannot be defeated in the States of Arkansas, Oklahoma or South Carolina without an opponent.

Accordingly, the Complaint should be dismissed. It is factually inaccurate and nonresponsive to the law.

Further, as a matter of policy, FEC should screen complaints filed by unknown nonlawyers to reduce the waste of taxpayers' money and that of legitimate respondents in addressing such trivial and legally indefensible complaints as that at issue herein. Even were there a violation, inasmuch as Respondent reports the small disbursements at issue, the de minimis rule would be applicable.

Sincerely,



MARION EDWYN HARRISON

MEH:jb

83040384017



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Robert Blaemire
President
Committee for American Principles
2000 N Street, N.W., Suite 105
Washington, D.C. 20036

Re: MUR 1404

Dear Mr. Blaemire:

33040384019
The Federal Election Commission has reviewed the allegations of your complaint dated December 15, 1981 and determined that the communications expressly advocate the defeat of the three incumbents as you alleged in your complaint. Accordingly, the expenditures for the communications should have been reported as independent expenditures in accordance with 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4. However, as the expenditures were reported, albeit incorrectly, the Commission determined to take no action and close the file. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Marion E. Harrison, Esquire
Barnett & Alagia
1627 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1404

Dear Mr. Harrison:

On December 21, 1981, the Commission notified you of a complaint alleging that your client, Committee for Survival of a Free Congress, had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March , 1982, determined that the communications cited by the complainant expressly advocate the defeat of a clearly identified candidate and, therefore, should have been reported as independent expenditures in accordance with 2 U.S.C. § 434(b)(4)(H)(iii) and 11 C.F.R. § 104.4. However, as the expenditures were reported, albeit incorrectly, the Commission determined to take no action and close the file.

It should also be noted that contrary to your letter of January 14, the Committee for American Principles is a registered committee and has been since June 1, 1981. Further, you indicate in your letter that the expenditures by your client for "advertising" and "display advertising" totalled \$327.71 and not the \$466.71 as the complaint alleged. A review of the report in question finds five (5) disbursements for "advertising" and "display advertising" on page 3 of the report and two (2) disbursements for "display advertising" on page 4 of the report. The total for these disbursements is as the complaint indicated, \$466.71.

33040384012

Marion E. Harrison, Esquire
Page Two

22

This matter will become a part of the public record within
30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

8304038403

LAW OFFICES

BARNETT & ALAGIA

1627 K STREET, N.W.
WASHINGTON, D.C. 20006

TELEPHONE & TELECOPIER

(202) 785-0500

CABLE ALBAR

TELEX 89-2445

WILLIAM A. CAREY
D. PAUL ALAGIA, JR.*
BERNARD H. BARNETT
HUGH SCOTT
MARION EDWYN HARRISON
H. DAVID HERMANSDOERFER*****
HERMAN E. TALMADGE*****
ALLAN B. SOLOMON*
RICHARD M. TRAUTWEIN*
RUDY YESSIN***
JOSEPH M. DAY*
ST. JOHN BARNETT
RICHARD A. GLADSTONE
A. PAUL PROSPEL**
MICHAEL E. LANNON*
RICHARD PROCKT*
SHRADER R. MILLER*
ANDREW J. PUNDZAK*
MORTON HOLLANDER
CHARLES W. CHAPMAN
THOMAS R. HENDERSHOT
RONALD L. GAFFNEY*
JAMES L. COORSEN*
DONALD F. MINTHIRE****
L. ARNOLD PYLE*****
WILLIAM A. PYLE*****
M. KATHLEEN CARPENTER
CHARLES DAWSON BARNETT**

LESTER I. ADAMS, JR.*
MARIE J. ALAGIA**
KENNETH J. BADER*
RAYMOND B. BARNON*
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W. GARY BLACKBURN*****
ROBERT A. BLACKWOOD, III*****
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SYDNEY J. BULLIN* 45
MAURICE A. STONE, JR.
KENNETH R. DREHER*****
DARRYL W. DURHAM*
JOHN E. EVANS*
WM. CARL FUST*
WILLIAM S. GLADINO
G. KENNEDY HALL, JR.*
JOSEPH L. HAMILTON*
JOHN M. HEMMELBERG
RONALD E. JOHNSON*
JOHN S. KICK*
W. DAVID KISER*
DENIS A. KLEINFELD*****
JAMES R. KNIPPEN****
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JEFFREY B. RITTER*
JAMES C. SEPPERT*
JOHN F. SHERLOCK, III
THURMAN L. SISNEY*
JOHN L. SMITH*
NORA FRANCES STONE*****
JOHN R. WHITE****
WILLIAM C. WILLOCK, JR.*

RUFUS E. WILSON
OF COUNSEL

LOUISVILLE, KENTUCKY*
PALM BEACH, FLORIDA**
FRANKFORT, KENTUCKY***
NASHVILLE, TENNESSEE****
ASHLAND, KENTUCKY*****
JACKSON, MISSISSIPPI*****
ATLANTA, GEORGIA*****

ADMITTED ILLINOIS*****
ADMITTED OHIO*****

January 14, 1982

By Hand

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Committee for the Survival of a Free Congress
MUR 1404

Dear Mr. Steele:

As counsel of record for the Committee for the Survival of a Free Congress ("Respondent") we received on December 31, 1981 your letter of December 21, 1981 to Respondent.

As we have mentioned heretofore, when there is an attorney of record for an organization reporting to the Federal Election Commission ("FEC"), it ordinarily expedites matters if FEC communicates directly with that attorney. That is a portion of the wise rationale underlying 5 USC §500(f).

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JAN 15 ALL: 45

Charles N. Steele, Esquire
January 14, 1982
Page two

The Committee for American Principles, 2000 M Street, N.W., Suite 105, Washington, D.C. 20036, which is not listed in the May 1981 District of Columbia telephone directory and which is not registered with FEC, manifestly interested in trivia, complains under date of December 15, 1981 that Respondent on page 2 of FEC Form 3X does not list the sum of \$466.71 as independent expenditures, although the said sum represents independent expenditures inasmuch as it paid for advertisements seeking candidates to run for Congress against named incumbent Members of Congress.

In fact, Respondent does not list the said sum of \$466.71 on line 22, page 2, FEC Form 3X, where it ought to be listed if it were an independent expenditure. The Committee for American Principles asserts (without specificity) that there are seven disbursements on Schedule B to Form FEC 3X which in the aggregate add to the sum of \$466.71 and which purport to be for "advertising".

There are nine pages to said Schedule B. Page 1 reports nothing for "advertising"; page 2 reports nothing for "advertising"; page 3, items E, H and I, report \$70.24, \$70.00 and \$99.24 for "advertising"; page 4, items A and B, report \$43.08 and \$45.15 for "display advertising"; page 5 reports nothing for "advertising"; page 6 reports nothing for "advertising"; page 7 reports nothing for "advertising"; page 8 reports nothing for "advertising"; and page 9 reports nothing for "advertising"; a total "advertising" and "display advertising" report of \$327.71.

In fact, said sum does represent payment for the advertisements in question.

Each of the three advertisements reads substantively identically. Each solicits an opponent to challenge a named incumbent, arguably denigrates the voting record of the named incumbent and seeks an arguably different object for representation.

Charles N. Steele, Esquire
January 14, 1982
Page three

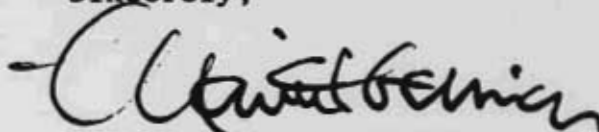
"The term 'independent expenditure' means an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate . . ." 2 USCA §431(17); 11 CFR §109.1(a).

It is perfectly clear that the advertisements in question do not so advocate. Rather, they seek an opponent. A candidate cannot be defeated in the States of Arkansas, Oklahoma or South Carolina without an opponent.

Accordingly, the Complaint should be dismissed. It is factually inaccurate and nonresponsive to the law.

Further, as a matter of policy, FEC should screen complaints filed by unknown nonlawyers to reduce the waste of taxpayers' money and that of legitimate respondents in addressing such trivial and legally indefensible complaints as that at issue herein. Even were there a violation, inasmuch as Respondent reports the small disbursements at issue, the de minimis rule would be applicable.

Sincerely,



MARION EDWYN HARRISON

MEH:jb

3304038403

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**The Committee
for the Survival of
a Free Congress**

721 Second Street, N.E.
Capitol Hill
Washington, D.C. 20002 (202) 546-3000

Mr. Duane Brown
Federal Election Commission
1325 K Street N.W.
Washington, DC 20463



81 DEC 31 P12: 46

BARNETT & ALAGIA

1627 K STREET, N.W.

WASHINGTON, D.C. 20006

63040384035

By hand

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

2 JUN 15 All: 45

RECEIVED

81 DEC 31 P2: 08

STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: Marion Harrison

ADDRESS: Barnett & Alagia, 1627 K St. N.W., Washington, DC 20006

TELEPHONE: 785-0500

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

December 30, 1981

Date

Signature

Charles A. Moser

NAME: Charles A. Moser

ADDRESS: Committee for the Survival of a Free Congress
721 Second St. N.E.
Washington, DC 20002

HOME PHONE: 703/534-1821

BUSINESS PHONE: 202/676-7082 or 202/546-3000

MUR #

1404

DATE

12-16-81

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

83040334033
Coman. for Sen. of 2 Free Cong

721 Second Street NE

DC 20002

Chas. Moser

Treas.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chas. Moser
Committee For The Survival of a Free Congress
721 Second Street, NE
Washington, D.C. 20002

Re: MUR 1404

Dear Mr. Moser

This letter is to notify you that on December 16, 1981 the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1404. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

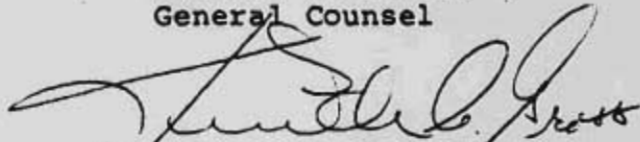
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

83040384038

If you have any questions, please contact Duane Brown, 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



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

83040384039



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 18, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert Blaemire
Committee For American Principles
2000 N Street, NW, Suite 105
Washington, D.C. 20036

Dear Mr Blaemire:

This letter is to acknowledge receipt of your complaint of December 15, 1981, against The Committee For The Survival Of A Free Congress which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents notification.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedurs for handling complaints.

Sincerely,

Elissa T. Garr

Elissa T. Garr
Docket Chief

Enclosures

33040334033

TO: MR. ROBERT BLAEMIRE, COMMITTEE FOR AMERICAN PRINCIPLES, 2000 N STREET, NW, SUITE 105, WASHINGTON, D.C. 20036	
FROM: ELISSA T. GARR, DOCKET CHIEF	
SUBJECT: COMPLAINT OF VIOLATION OF FEDERAL ELECTION CAMPAIGN LAWS	
DATE: DECEMBER 18, 1981	
RECEIVED: DECEMBER 18, 1981	
MAIL ROOM: 12-18-81	
FBI/DOJ	

COMMITTEE
FOR
AMERICAN
PRINCIPLES

102355

RECEIVED

81 DEC 18 P2:2

6cc# 5930

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
The Committee For The)
Survival Of A Free)
Congress)

MUR No. _____

COMPLAINT

1) The Committee For The Survival Of A Free Congress filed its Report of Receipts and Disbursements with the Commission for the period of September 1, 1981 through September 30, 1981 (see Exhibit A). On page 2, FEC Form 3X, said Committee reports that there were no independent expenditures during that period. On Schedule B of the same report, said Committee reports seven (7) disbursements for advertising in the aggregate amount of \$466.71.

2) The Commission's regulations define the term "independent expenditure" to mean "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." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec.437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: Robert Blaemire
Robert Blaemire, President

Date: 12/16/81

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL)

My Commission Expires February 14, 1984
My Commission Expires: _____

Robert G. Meyers
Notary Public

8304033405

(A)

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

AG: 42

(Summary Page)

1. Name of Committee (in Full) The Committee For The Survival of a Free Congress Address (Number and Street) 721 Second Street, N.E. City, State and ZIP Code Washington, D.C. 20002 ☐ Check if address is different than previously reported. 2. FEC Identification Number C-00019976 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)	4. TYPE OF REPORT (check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ July 15 Quarterly Report ☐ October 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-election Year Only) ☒ Monthly Report for <u>Sept., 81</u> ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
---	---

SUMMARY

	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period <u>9-1-81</u> Through <u>9-30-81</u>		
6. (a) Cash on Hand January 1, 19 <u>81</u>		\$ 62,115.14
(b) Cash on Hand at Beginning of Reporting Period	\$ 40,678.95	
(c) Total Receipts (from Line 18)	\$ 55,053.86	\$ 614,342.86
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	\$ 95,732.81	\$ 676,458.00
7. Total Disbursements (from Line 28)	\$ 55,858.04	\$ 636,583.23
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	\$ 39,874.77	\$ 39,874.77
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	\$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 100,342.66	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

Charles A. Moser

Type or Print Name of Treasurer

Charles A. Moser

October 20, 1981

Date

SIGNATURE OF TREASURER

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437c.

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

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FEC FORM 3X (3/80)

Statement of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full)	Report Covering the Period:	
The Committee For The Survival of a Free Congress	From: 9-1-81	To: 9-30-81
	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	55,015.20	606,579.53
(Memo Entry Unitemized \$ 49,115.20)	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees	-0-	1,000.00
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	55,015.20	607,579.53
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
13. ALL LOANS RECEIVED	-0-	-0-
14. LOAN REPAYMENTS RECEIVED	-0-	5,000.00
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	38.66	1,763.33
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	55,053.86	614,342.86
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	54,758.04	623,940.48
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	1,100.00	6,642.75
22. INDEPENDENT EXPENDITURES (Use Schedule E)	-0-	-0-
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)	-0-	-0-
24. LOAN REPAYMENTS MADE	-0-	-0-
25. LOANS MADE	-0-	5,000.00
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-0-	1,000.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)	-0-	1,000.00
27. OTHER DISBURSEMENTS	-0-	-0-
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)	55,858.04	636,583.23
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	55,015.20	607,579.53
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	-0-	1,000.00
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)	55,015.20	606,579.53
32. TOTAL OPERATING EXPENDITURES from Line 19	54,758.04	623,940.48
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	38.66	1,763.33
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)	54,719.38	622,177.15

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 9 for
 LINE NUMBER 19
 (Use appropriate 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 Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Jim Ellis 6929-124 Park Mesa Way San Diego, Ca. 9211	Various Campaign Audits Fee 125.00 Exp. 257.35	9-22-81	382.35
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Alex Young 2626 S. Troy St. Arlington, Va. 22206	Reimbursement-Petty Cash " Auto Repairs " Petty Cash	9-03-81 9-03-81 9-15-81	41.04 174.01 29.31
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
"	Reimbursement- Petty Cash Salary	9-29-81 9-15-81 9-10-81	27.79 391.90 191.90
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D.C. Treasurer C/O Nat'l Bank of Washington Washington, D.C.	D.C. Withholding	9-03-81	108.80
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Va. Dept. of Taxation P.O. Box 1202 Richmond, Va. 23208	Va. Tax Withholding	9-03-81	264.88
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Group Hospitalization 550 12th St S.W. Washington, D.C. 20024	Employee Insurance	9-03-81	182.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Unionmutual Insurance, Co. Box 9395 Portland, Me. 04124	Employee Insurance	9-03-81	105.41
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Caging Corporation of Virginia 1200 S. Sterling Blvd. Sterling, Va. 22170	Counting & Caging	9-04-81 9-10-81 9-24-81	1,880.20 776.45 260.80
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Sani-Clean Co. P.O. Box 237 Bryantown, Md. 20617	Office Cleaning	9-04-81	312.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

8 130330240008450

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 9 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 Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Leo Randall Hauling 4546 Eads St N.E. Washington, D.C. 20019	Rubbish Removal	9-04-81	70.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Stanford Paper Co. 3001 V St. N.E. Washington, D.C. 20018	Paper	9-04-81	257.85
	"	9-15-81	75.15
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Brown, Younger, Wilhoit & Fadoul, P.C. 6845 Elm St. Suite 710 McLean, Va. 22101	Professional Service	9-10-81	560.00
	"		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Browning Ferris Ind. P.O. Box 15540 Baltimore, Md. 21263	Service Charge & Fuel Surcharge	9-10-81	66.67
	"		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
IBM Corporation 1801 K. St. N.W. Washington, D.C. 20006	Rent-Info Distributor	9-10-81	4,019.20
	Rent-Info Processor	9-21-81	1,030.32
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Cory Food Services 12264 Wilkins Ave. Rockville, Md. 20852	Coffee For Office	9-10-81	81.68
	"	9-10-81	63.50
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Central Delivery P.O. Box 780 Silver Spring, Md. 20901	Delivery Service	9-10-81	33.06
	"	9-24-81	7.84
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
Benjamin Office Supply 11617 Beltsville Drive Beltsville, Md. 20705	Xerox Paper	9-10-81	228.96
	Office Supplies	9-15-81	325.79
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
"	Office Supplies	9-24-81	100.36
	"	9-24-81	121.17
"	"	9-28-81	97.94
	"		
SUBTOTAL of Disbursements This Page (optional)			+
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 3 of 9 for
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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code Lettercomm, Inc. 310 Swann Ave. Alexandria, Va. 22301	Purpose of Disbursement Printing, Mailing & Postage	Date (month, day, year) 9-10-81	Amount of Each Disbursement This Period 139.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-16-81	4,086.85
		9-16-81	3,077.96
B. Full Name, Mailing Address and ZIP Code "	Purpose of Disbursement "	Date (month, day, year) 9-24-81	Amount of Each Disbursement This Period 1,306.75
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	4,691.34
C. Full Name, Mailing Address and ZIP Code George Antone 309 H Street N.W. Washington, D.C. 20001	Purpose of Disbursement Office Supplies	Date (month, day, year) 9-10-81	Amount of Each Disbursement This Period 618.96
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code Travel Advisors 4130 Alby St. Alton, Ill. 62002	Purpose of Disbursement Travel-K. Moosaw	Date (month, day, year) 9-10-81	Amount of Each Disbursement This Period 530.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code Jonesboro Sun Troutt Brothers 518 Carson Jonesboro, Ar. 72401	Purpose of Disbursement Advertising	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 70.24
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code Camden News P.O. Box 798 Camden, Ar. 71701	Purpose of Disbursement Display Advertising	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 55.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code Goldsboro News Argus Wayne Printing Co. 310 N. Berkley Blvd. Goldsboro, N.C. 27530	Purpose of Disbursement Display Advertising	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 84.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code Concord Tribune 125 Union Street S. Concord, N.C. 28025	Purpose of Disbursement Display Advertising	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 70.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code Muskogee Phoenix & Times Democrat 214 Wall St. Muskogee, Ok. 74401	Purpose of Disbursement Display Advertising	Date (month, day, year) 9-11-81	Amount of Each Disbursement This Period 99.24
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

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ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
 The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Shawnee News-Star 215 N. Bell Shawnee, Ok. 74801	Display Advertising Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-11-81	43.08
Camden Chronicle 1111 Broad St. Camden, S.C. 29020	Display Advertising Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-11-81	45.15
Sam J. Brown P.O. Box 34306 Houston, Tx. 77034	Sept. Rent Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-11-81	1,139.85
Free Congress Foundation 721 Second Street N.E. Washington, D.C. 20002	Rental of Furniture & Telephones Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-11-81	1,132.02
Tulsa Tribune 315 S. Boulder Tulsa, Ok. 74120	Copies of back issues of newspapers Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-11-81	1.50
Temporaries Inc. 1015 18th St. N.W. Suite 300 Washington, D.C. 20036	Part-time Employees Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81	324.81
Almanac of American Politics P.O. Box 32392 Washington, D.C. 20007	Almanac Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81	36.40
First American Bank of Va. P.O. Box 627 McLean, Va. 22101	Auto Loan Payment Service Charge Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	358.18 10.19
R.C.-Nehi Bottling Co. 5330 Port Royal Road Springfield, Va. 22151	Office Beverages Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81	107.25
SUBTOTAL of Disbursements This Page (continued)			
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ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cantrell/Cutter Printing Co. 499 S. Capitol St. S.W. Suite 402 Washington, D.C. 20003	Business Cards Memo Pads	9-18-81 9-10-81	25.37 241.99
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C&P Telephone P.O. Box 2123 Washington, D.C. 20053	Telephone Usage	9-18-81	975.46
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U.S. Postmaster Washington, D.C. 20003	Postage	9-16-81 9-25-81 9-08-81	280.00 1,550.00 300.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	"	9-28-81 9-03-81 9-30-81	300.00 300.00 3,025.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Diners Club International P.O. Box 17067 Denver, Col. 80213	Incidental Expenses	9-17-81 9-18-81	35.50 76.44
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Your Extra Storage Rt # 1 Box 149D Sterling, Va. 22170	Extra Storage	9-18-81	100.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Pitney Bowes Credit Corp. PO Box 2602 Darien, CT 06820	Leasing of mailing system Property tax	9-21-81 9-21-81	74.45 43.11
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Barnett, Alagia, & Carey 1627 K Street N.W. Washington, D.C. 20006	Professional Services	9-21-81	658.90
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Michael T. Patrick & Company 1200 S. Sterling Blvd. Sterling, Va. 22170	Bookkeeping & Accounting	9-21-81	1,275.00

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TOTAL This Period (last page the line number only)

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert S. McAdams 309 Yoakum Parkway #903 Alexandria, Va. 22304	Reimbursement - Camera Salary " - Breakfast Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-22-81 9-28-81 9-15-81	134.62 49.76 704.37
B. Full Name, Mailing Address and ZIP Code "	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-30-81	Amount of Each Disbursement This Period 706.27
C. Full Name, Mailing Address and ZIP Code Washington Gas Light Co. P.O. Box 2432 Washington, D.C. 20081	Purpose of Disbursement Utilities Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-22-81	Amount of Each Disbursement This Period 20.74
D. Full Name, Mailing Address and ZIP Code Hoke Communications Inc. 224 Seventh St. Garden City, Ny 11530	Purpose of Disbursement Subscription Renewal Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-25-81	Amount of Each Disbursement This Period 27.00
E. Full Name, Mailing Address and ZIP Code Conn. General Insurance Hartford, Conn. 06152	Purpose of Disbursement Insurance Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-25-81	Amount of Each Disbursement This Period 205.58
F. Full Name, Mailing Address and ZIP Code Gulf Oil Corp. P.O. Box 51157 Atlanta, Ga. 30302	Purpose of Disbursement Auto Repair Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-25-81	Amount of Each Disbursement This Period 27.83
G. Full Name, Mailing Address and ZIP Code Unionmutual Stock Life, Ins. P.O. Box 9395 Portland, ME 04104	Purpose of Disbursement Insurance Premiums Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-28-81	Amount of Each Disbursement This Period 111.79
H. Full Name, Mailing Address and ZIP Code Crown Central Petroleum P.O. Box 105559 Atlanta, Ga. 03048	Purpose of Disbursement Fuel For Auto Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-29-81	Amount of Each Disbursement This Period 186.20
I. Full Name, Mailing Address and ZIP Code Brian Dorsett 2236 Kentucky Ave. S.E. Washington, D.C.	Purpose of Disbursement Salary Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 9-03-81 9-15-81 9-15-81	Amount of Each Disbursement This Period 163.33 22.23 96.45
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ITEMIZED DISBURSEMENTS

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The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Brian Dorsett 2236 Kentucky Ave. S.E. Washington, D.C.	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	189.84
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Paul M. Weyrich 7053 Lanier Place Annandale, Va. 20003	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	636.66 636.66
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Elaine Hartman 1225 Martha Custis Dr. Alexandria, Va. 22314	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	569.00 569.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Sheree Goldsborough 10114 Campus Way # 302 Largo, Md. 20772	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-29-81	384.47 384.47
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Thelma Jenkins 125 Quincey Place N.E. Washington, D.C. 20002	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-30-81	218.07 235.34
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Diana Weyrich 7053 Lanier Place Annandale, Va. 20003	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81	98.07
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Kurt Dorsett 24 Wade Ct. Gaithersburg, Md. 20760	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-30-81	40.32 35.92 18.37
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Emil Dorsett 24 Wade Ct. Gaithersburg, Md. 20760	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-30-81	40.32 35.92 16.84
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Salary	Date (month, day, year)	Amount of Each Disbursement This Period
Sybil Bolden 1238 Franklin St. N.E. Washington, D.C. 20017	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-15-81 9-15-81 9-25-81	184.24 166.34 121.83
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ITEMIZED DISBURSEMENTS

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The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Edith Shields 3909 Burns Pl S.E. Washington, D.C. 20010	Salary	9-15-81	202.03
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	227.11
B. Full Name, Mailing Address and ZIP Code Marrietta Gordon 700 Jefferson St. N.W. B5 Washington, D.C.	Purpose of Disbursement Salary	9-15-81	173.22
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	136.74
C. Full Name, Mailing Address and ZIP Code Helena Glover 5-46th St. S.E. #7 Washington, D.C. 20002	Purpose of Disbursement Salary	9-15-81	218.67
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	229.61
D. Full Name, Mailing Address and ZIP Code Jim Martin 2413 Porter Ave. Suitland, Md. 20023	Purpose of Disbursement Salary	9-15-81	85.48
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	254.43
E. Full Name, Mailing Address and ZIP Code Pamela McGuigan 313 S. Courthouse Rd. Arlington, Va. 22204	Purpose of Disbursement Salary	9-15-81	22.40
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code Wanda Day 5406 Morning Glory Ct. Columbia, Md. 21044	Purpose of Disbursement Salary	9-15-81	88.36
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	95.53
G. Full Name, Mailing Address and ZIP Code Anne Wynne 3926 W St. N.W. Washington, D.C. 20007	Purpose of Disbursement Salary	9-15-81	34.91
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	98.14
H. Full Name, Mailing Address and ZIP Code Annette Richards 11703 Eden Rd. Silver Spring, Md. 20904	Purpose of Disbursement Salary	9-15-81	289.16
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-30-81	289.16
I. Full Name, Mailing Address and ZIP Code Dawn Thorness 2920 S. Buchannon C2 Arlington, Va. 22203	Purpose of Disbursement Salary	9-30-81	500.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

The Committee For The Survival of a Free Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L.M. Collins & Associates, Inc. 2500 N. Van Dorn St. Alexandria, Va. 22302	Crystal Jars Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-18-81	774.80
B. Full Name, Mailing Address and ZIP Code C.S.F.C.-Special Projects 721 Second St. N.E. Washington, D.C. 20002	Transfer for campaign school Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-18-81	500.00
C. Full Name, Mailing Address and ZIP Code Preferred Lists 499 South Capitol St. S.W. Washington, DC 20003	List Rentals Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-10-81	330.00
D. Full Name, Mailing Address and ZIP Code Tyco Data Processing 6216 Cherokee Ave. Alexandria, Va. 22312	Key punching Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-17-81 9-23-81	246.29 1,092.39
E. Full Name, Mailing Address and ZIP Code Conservative Donors Guide PO Box 6387 Arlington, VA 22206	Purchase of publication Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	9-23-81	1,500.00
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 Period
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 Period
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 Period
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 Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			54,758.04

(B)
Jonesboro (Ark.) Sun.

ISB.

Wednesday, September 23, 1981.

WANTED

A Conservative Democrat
to challenge
Congressman
Bill Alexander
who acts as a rubber stamp
to Tip O'Neill and the
Eastern Liberal establishment

OBJECT

... Restoration of common
sense representation to
this Congressional District

If interested, contact

Bob McAdam
721 2nd Street, N.E.
Washington, D.C.
20002

Political ad paid for by: Committee for the Survival of a Free
Congress, Bob McAdam.

8304038407

8304000

WANTED

Conservative Democrats challenge
Congressman Ken Holland (who acts as a
rubber stamp to Tip O'Neill and the Eastern
Liberal establishment)

OBJECT

Restoration of common sense
representation to this Congressional District

If interested, contact Bob McAdam, 721 2nd
Street, N.E., Washington, D.C. 20002

Paid for by Committee for the Survival of a Free Congress

service, said a shift from Oklahoma's normally dominant high pressure summer weather pattern was responsible for the turnabout from last year's blistering heat wave. The low pressure system that prevailed most of the sum-

.....
Rainfall was also more abundant: 17.55 inches in Oklahoma City since June 21, compared with 3.54 inches last year.

WANTED

A Conservative Democrat to challenge Congressman Jim Jones, who acts as a rubber stamp to Tip O'Neill and the Eastern Liberal establishment

OBJECT

Restoration of common sense representation to the Congressional District

**If Interested, contact Bob McAdam
721 2nd Street, N.E.
Washington, D.C. 20002**

Paid for by: Committee for the Survival of a Free Congress

authorized committee of such candidate." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec.437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

Date: _____

By: _____
Robert Blaemire, President

Subscribed by and sworn to before me this _____ day of _____, 1981.

(SEAL)

My Commission Expires: _____

Notary Public

33040384078

COMMITTEE
FOR
AMERICAN
PRINCIPLES

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
The Committee For The)
Survival Of A Free)
Congress)

MUR No. _____

COMPLAINT

1) The Committee For The Survival Of A Free Congress filed its Report of Receipts and Disbursements with the Commission for the period of September 1, 1981 through September 30, 1981 (see Exhibit A). On page 2, FEC Form 3X, said Committee reports that there were no independent expenditures during that period. On Schedule B of the same report, said Committee reports seven (7) disbursements for advertising in the aggregate amount of \$466.71.

2) The Commission's regulations define the term "independent expenditure" to mean "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." (11CFR Sec. 109.1(a))

3) The attached advertisements (see Exhibit B) produced and paid for by said Committee constitute expenditures expressly advocating the defeat of three Congressmen. On information and belief, Complainant contends that these expenditures were in fact independent expenditures and, because there was no candidate or agent in existence to have authorized said expenditures, the expenditures could not have been direct or in-kind contributions and must be independent.

4) Thus, The Committee For The Survival Of A Free Congress violated the Act by failing to report the expenditures as independent as defined by 11CFR Sec. 109.1(a).

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec.437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

Date: _____

By: _____
Robert Blaemire, President

Subscribed by and sworn to before me this _____ day of _____, 1981.

(SEAL)

My Commission Expires: _____

Notary Public

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FEDERAL ELECTION COMMISSION

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

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