



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1501

Date Filmed 3-9-83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Internal advice memoranda

Duplicates

Internal Routing Slips

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

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

Signed

date

Michael D. Smith
1/31/83

FEC 9-21-77

83040380007



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 1983

William C. Oldaker, Esquire
Epstein, Becker et al.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1501
James C. Wright and
Majority Congress Committee

Dear Mr. Oldaker:

The Commission notified you of a complaint dated October 27, 1982, alleging that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 5, 1983, determined that on the basis of the information in the complaint and information provided by your clients there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross - by [Signature]

BY: Kenneth A. Gross
Associate General Counsel

33040580005



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 7, 1983

Richard Lodge, Esquire
Willis & Knight
215 2nd Ave., N.
Nashville, Tennessee 37201

RE: MUR 1501
Jim Cooper For Congress
Committee

Dear Mr. Lodge:

The Commission notified you of a complaint dated October 27, 1982, alleging that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January 5, 1983, determined that on the basis of the information in the complaint and information provided by your client there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross - by SET

BY: Kenneth A. Gross
Associate General Counsel

33040380093



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 7, 1983

Mr. R. Gregory Lamb
Washington Legal Foundation
Texas Division
5031 McKinney Avenue
Dallas, Texas 75205

RE: MUR 1501

Dear Mr. Lamb:

The Federal Election Commission has reviewed the allegations of your complaint dated October 27, 1982 and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

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 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

Kenneth A. Gross by BT

BY: Kenneth A. Gross
Associate General Counsel

33040380100

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Rep. James Wright) MUR 1501
Majority Congress Committee)
Jim Cooper for Congress Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 5, 1983, the Commission decided by a vote of 6-0 to take the following actions in MUR 1501:

1. Find no reason to believe that Representative James C. Wright, Jr. violated the Act.
2. Find no reason to believe that the Majority Congress Committee violated the Act.
3. Find no reason to believe that the Jim Cooper for Congress Committee violated the Act.
4. Close the file in this matter.
5. Approve and authorize the sending of the notification letter as attached to the First General Counsel's Report dated December 21, 1982.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

Jan. 5, 1983
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

12-21-82, 2:22
12-22-82, 11:00

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

RECEIVED
OFFICE OF THE
COMMISSIONER

82 DEC 21 P 2: 22

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 12-21-82

MUR # 1501
DATE COMPLAINT RECIEVED
BY OGC October 28, 1982

SENSITIVE

DATE OF NOTIFICATION
TO RESPONDENT 11/3/82

STAFF MEMBER
Michael Dymersky

COMPLAINANT'S NAME: Washington Legal Foundation

RESPONDENTS' NAMES: Rep. James Wright
Majority Congress Committee
Jim Cooper for Congress Committee

RELEVANT STATUTE: 2 U.S.C. §§ 441a(a)(8), 441f, 434, 432(b)
and 432(c)

INTERNAL REPORTS CHECKED: N/A

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

The complaint filed by the Washington Legal Foundation --
Texas Division centers around a \$500 contribution from
Congressman Wright's PAC, the Majority Congress Committee, to
candidate Jim Cooper's principal campaign committee, Jim Cooper
for Congress Committee.

The complaint alleges that the \$500 contribution is actually
from a Washington based group which was concerned about being
identified as a contributor to Mr. Cooper and that the

contribution was "legally" laundered through Mr. Wright's PAC. The newspaper article reporting the allegation was submitted with the complaint. Thus, the complainant alleges a violation of 2 U.S.C. § 441a(a)(8) which requires that such earmarked contributions be reported as having been derived from the actual contributor. Additionally, violations of 2 U.S.C. §§ 441f , 434 and 432(b) and (c) are alleged.

FACTUAL AND LEGAL ANALYSIS

The complaint arises out of a newspaper article dated Monday, October 4, 1982, in the Dallas Times Herald which reported that Congressman Wright gave a contribution to the Jim Cooper for Congress Committee, which originated with, "a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Senator Baker's daughter." The article continues by stating that, "[B]efore presenting it to the candidate, Wright had legally laundered the donation through his own PAC to prevent its being traced to the actual giver."

However, there are no documentable facts, identifiable in the article, or provided by the complainant, to support any of the allegations. Indeed, among other things, the article refers to a "legally laundered" donation, and complainant concedes that

the Majority Congress Committee and the Jim Cooper for Congress Committee reported the contributions as the Act requires. In the General Counsel's view then, the instant complaint lacks merit. Accordingly, it is recommended that the Commission find no reason to believe that respondents violated the Act.

RECOMMENDATION

1. Find no reason to believe that Representative James C. Wright, Jr. violated the Act;
2. Find no reason to believe that the Majority Congress Committee violated the Act;
3. Find no reason to believe that the Jim Cooper for Congress Committee violated the Act.
4. Close the file in this matter; and,
5. Approve and authorize the sending of attached notification letter.

Charles N. Steele
General Counsel

December 21, 1982
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

- 1) copy of complaint with attachments
- 2) copy of the response from the Jim Cooper for Congress Committee
- 3) copy of the response from Rep. James Wright and the Majority Congress Committee
- 4) Proposed notification letters

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

October 27, 1982

82 OCT 29 P 3: 19

82 OCT 28 P 3: 14

1

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

Dear Commissioners:

830408004008
The Washington Legal Foundation-Texas Division, complainant herein, files this complaint against JAMES H. COOPER, THE JIM COOPER FOR CONGRESS COMMITTEE, THE MAJORITY CONGRESS COMMITTEE, and CONGRESSMAN JAMES C. WRIGHT, JR., respondents, pursuant to 2 U.S.C. Sec. 437 g(a)(1). The complaint arises out of a newspaper article dated Monday, October 4, 1982 in the Dallas Times Herald which reported that Congressman Wright of Texas gave a contribution to Jim Cooper, a candidate for the 4th Congressional District in Tennessee. The article is attached hereto as Exhibit "A" and is incorporated herein. The article further states the contribution was "from a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Senator Baker's daughter. Before presenting it to the candidate, Wright had legally laundered the donation through his own PAC to prevent its being traced to the actual giver."

FEC records indicate that the Majority Congress Committee disbursed a \$500.00 contribution on September 23, 1982 to the Jim Cooper for Congress Committee and such committee reported receiving that contribution on September 25, 1982. The records are attached hereto as Exhibits "B" and "C", respectively.

Such earmarking of a contribution without full disclosure to the

Attachment I - (1)

2

Federal Election Commission of the original source of the funds is prohibited. 2 U.S.C. Sec. 441 a(a)(8). The indirect passing of funds prevents the contribution from being counted toward the hidden contributor's limit for that candidate.

Based upon the article, respondents have violated 2 U.S.C. Sec. 441 f by making, permitting or accepting contributions in the name of another. Additionally, both committees have violated the reporting requirement of 2 U.S.C. Sec. 434 and possibly the accounting and record keeping requirements of 2 U.S.C. Sec. 432 (b) and (c).

Respectfully submitted,

WASHINGTON LEGAL FOUNDATION-TEXAS DIVISION

R. Gregory Lamb

R. Gregory Lamb, Counsel
Washington Legal Foundation-Texas Division
5031 McKinney Ave.
Dallas, Texas 75205
214/559-0930

B 3 0 4 0 3 3 0 1 0 6

Attachment I-(2)

3

STATE OF TEXAS X
 X
COUNTY OF DALLAS X

Before me, the undersigned authority personally appeared,
R. GREGORY LAMB, known to me to be the person whose name is
subscribed below, and who, being first sworn by me, stated
his oath that he is authorized to make this complaint on behalf
of the Washington Legal Foundation and that he has read the
foregoing Complaint and that it is true and accurate information
and belief.

R. Gregory Lamb
R. GREGORY LAMB for
Washington Legal Foundation

Subscribed and sworn to before me, the undersigned authority
on this 26th day of October, 1982 to certify which witness my
hand and seal of office.

Carol A. Haffington
Notary Public in and for the
State of Texas

My Commission Expires:

3-15-86

Haffington I - (3)

03040580107

MONDAY, OCTOBER 4, 1982

The Wright stuff

Congressman runs tirelessly in race for House speaker

by PAUL WEST

Washington Bureau

HURRICANE MILLS, Tenn. — He refrain echoing over a pasture singer Loretta Lynn's ranch was sweet music to Jim Wright's ears. "Jim Wright," a candidate for Congress was telling supporters, "is gonna be our next speaker of the House. And Bob Clement's gonna be for him to be the next speaker of the House."

"Let me just make you a promise," Wright responded. "Send us Bob Clement and I guarantee you we'll get him on a major committee from which he can do the maximum good for the people of Tennessee."

They may not have known it, but the hundred or so Democrats cheering this exchange at an outdoor rally had just witnessed a classic scene from one of the longest running, and least noticed, national campaigns in America.

For the past six years, while serving as a congressman from Fort Worth, House Majority Leader James C. Wright Jr. has quietly been pursuing higher office. He has traveled to cities and towns across the country, where he often delivers the same promise he made here.

Already the second-ranking man in the House, Wright would like very much to occupy the speaker's chair, currently held by Rep. Thomas P. O'Neill, D-Mass.

When that might be, is saying, Wright admits. O'Neill have talked about declines to discuss details.

Many in Congress think will step down in 1984 at throwing his job open to a crowd include, in addition to Reps. Dan Rostenkowski, Tom Foley, D-Wash. Jim J. Orlowski and others.

See WRIGHT on Page 2

Texan works hard to become

WRIGHT — From Page One

Wright is convinced he has the support to win.

"I don't have any doubt about it," he said in an interview. "If it's anytime soon." How long is soon? "Two years."

His position as majority leader has strengthened his influence with those who have the only votes that count in the speaker's race — his House colleagues.

"Leader," as Wright's Democratic friends call him, regulates the flow of bills to the House floor and, with the fate of other congressmen's projects. Small wonder that every majority leader who sought to become speaker in the past half-century has succeeded.

Not that Wright is politicking overtly for O'Neill's job. His candidacy for the speakership is unannounced, and he has no intention, he says, of challenging his friend.

What Wright is doing to further his own ambitions is making sure

majority party organizes Congress and chooses its leaders. That means working hard at election time for his House Democratic colleagues and for Democrats seeking seats held by Republicans.

His political toils, as much as anything else, have helped solidify Wright's hold on the leadership position he won by a single vote in 1976 and made him the odds-on favorite to replace O'Neill.

Since 1976, Wright has personally raised more than \$700,000 in campaign cash through his Majority Congress Committee, a political action committee created by O'Neill when he was majority leader.

Wright doles out this money to Democratic candidates for Congress in contributions of \$250 to \$5,000. He makes additional donations from excess funds in two accounts intended mainly for his own re-election.

During the last campaign, he gave to at least 289 House candidates nationwide. Of these, 214 were elected, making Wright a contributor to almost every Democrat now serving in the House.

Direct giving is only the start of his political work for his colleagues, however. Considered by many the finest orator in the House, Wright finds his talents in demand today as never before.

For the 59-year-old Texan, the route to the top is a year-round endurance contest of fund-raising events and after-dinner speeches, campaign endorsements and appearances on behalf of fellow Democrats, congressmen and congresswomen-to-be.

He appears frequently, perhaps several nights a week, at their cocktail fund-raising parties in Washington. He lends his name to many as a sponsor to boost ticket sales.

He speaks regularly before groups of their constituents flown to Washington for a first-hand look at government. These are often his colleagues' potential contributors, who may be impressed that their representative can command the presence of an important member of Congress like Wright. *Attachment I - (4)*

Finally, he campaigns in congress-

So far this year to at least 17 state Democratic candidates. day, he will have more (plus Texas token Republican own in November.

Two weekends unusually heavy Washington, a sore Wright flew assist three Democratic with a of hopefuls with capture two of the incumbents around both parties say year's elections.

The trip would, except that Wright was to Cary Baker, a Republican for Congress and daughter of Sen. Howard Baker.

The political mission was illu encounter in the bank building on

203405
LAW OFFICES

WILLIS & KNIGHT

TWO FIFTEEN SECOND AVENUE, NORTH

NASHVILLE, TENNESSEE 37201

WILLIAM R. WILLIS, JR.
ALFRED H. KNIGHT
FRANK GRACE, JR.
RICHARD LODGE
MARION F. HARRISON
ROBERT L. DELANEY
AUGUST C. WINTER

November 19, 1982

82 NOV 22

6048989
P2: 47
16

TELEPHONE
AREA 615-259-9600

2 NOV 22 P 3: 53

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

Attention: Michael Dymersky

Re: MUR 1501.

Dear Mr. Dymersky:

This is the response of James H. Cooper and Jim Cooper for Congress Committee to the complaint filed by Washington Legal Foundation - Texas Division and forwarded to Mr. Cooper and the Committee by letter dated October 29, 1982. The statement of designation of counsel is attached.

The position of respondents is that the contribution in question was a lawful contribution to the Cooper Committee from a duly-created and registered committee. The contribution was, as the complaint concedes, properly reported by the Committee.

The provisions of 2 U.S.C. 41a(a)(8) are not applicable, that section clearly applying to non-registered entities, e.g. individuals. Where a registered committee is involved, it will always, to some extent, be a conduit, receiving money lawfully from contributors and itself contributing lawfully to others. The same rationale is applicable to the charge under 2 U.S.C. 441f. The contribution was from a lawful source and was reported. Nothing more is required by law. It would be unreasonable, indeed perhaps unlawful, to require the recipient of a committee contribution to investigate and ascertain the initial source of the funds. In most cases, such a task would be impossible.

Finally, there is no evidence to support the complaint. Essentially, the complaint states only that the complainant has read the newspaper clipping which is attached to the letter. The complainant has no personal knowledge of the

Attachment II - (1)

(7)

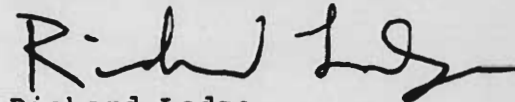
Charles N. Steele
Federal Election Commission
November 19, 1982
Page Two

facts of which he complains. The complaint fails to meet the requirements of 11 C.F.R. § 111.4(2). Were the matter before a court on a preliminary hearing, as it is essentially before the Office of General Counsel, there would be no evidence on which to base a finding of probable cause. The case would have to be dismissed. This complaint must be dismissed, also. To allow a complaint to proceed based on nothing more than a newspaper story would jeopardize the complaint process which has been established by the Commission. The essence of the process is personal knowledge of the complainant in order to allow the Commission to determine, at the initial phase, the probability of a violation. That determination cannot be made based on this complaint.

For these reasons, it is submitted that the Commission should take no action in this matter.

Sincerely,

WILLIS & KNIGHT


Richard Lodge

RL:sn

Attachment II - (2)

600# 9021
(8)

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW

1140 19TH STREET, N.W.
WASHINGTON, D. C. 20036
(202) 861-0900

JEFFREY H. BECKER
ROBERT P. BORSODY
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WILLIAM A. CARMELL*
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STUART M. GERSON
GILBERT J. GINSBURG
RONALD M. GREEN
KENNETH HARFENIST*
WILLIAM A. HELVESTINE*
GREGORY K. HIESTAND*
ROBERT L. JAUVTIS*
WILLIAM G. KOPIT
FRANK C. MORRIS, JR.
JOSEPH P. PARKER**
SUSAN SCHENKEL-SAVITT*
FRANKLIN R. SEARS**
RICHARD G. VERNON

BRIAN A. BANNON
AMY J. BEECH*
PHILIP M. BERKOWITZ*
CAROL S. BERNHEIM*
DALE E. CALLENDER*
HARRY P. COHEN*
KAREN BONNIE EATON
JACK A. EIFERMAN*
THOMAS M. FARAH

LAURENCE W. FUTTERMAN*
JEAN M. GALLOWAY
PHILIP M. GASSER*
PETER S. GRAY
DOUGLAS A. HASTINGS
LISA B. HOROWITZ
WAYNE A. KEUP*
LISLE E. KING
SANDRA R. KING
DENNIS A. LALLI*
JUDAH LIPSCHITZ
KATHLEEN C. LITTLE
DAVID C. MAIN, JR.
STEPHEN R. MILLS*
ROBERT J. MOSES
JOY D. OBERMAN*
DONALD S. PICARD
INA A. PLOTSKY*
KATHERINE MCBROOM-REDWINE
RICHARD J. REISSTEIN*
ROBERT D. REIF
LYNN E. SHAPIRO
RICHARD L. STEER*
LINDA V. TIANO*
KENNETH S. WECKSTEIN
RANDALL G. WELLS*
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

MALICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102*
(817) 334-0701

235 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104*
(415) 398-5565

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067*
(213) 556-8861

STEVEN M. CARSEY**
EDWIN N. EPSTEIN
JAMES P. MULREEN
WILLIAM C. OLDAKER
DONALD PARTLAND*
OF COUNSEL

November 30, 1982

*NOT ADMITTED WASHINGTON
**ADMITTED TEXAS ONLY

2 NOV 1982
P 5:14
T.P.C. NEW YORK AND
WASHINGTON, D.C. ONLY

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Gross:

This letter is the response of Congressman James C. Wright and the Majority Congress Committee ("the Committee") to the complaint filed by the Washington Legal Foundation-Texas Division, on October 27, 1982.

With regard to Congressman Wright, the complaint should be dismissed because it contains allegations regarding actions of the Committee only, and such actions cannot be attributed to Mr. Wright. The newspaper story merely indicates that Mr. Wright handed Mr. Cooper an envelope. Congressman Wright is not and never has been an officer of the Committee. As the complaint only concerns allegations regarding actions of the Committee, it should be dismissed as to Congressman Wright without further consideration.

With regard to the Committee, it is the Committee's view that the document submitted by the Washington Legal Foundation should not be treated as a bona fide complaint because it obviously was filed as a political device in connection with the November 2 election. The timing of the complaint, so close to the election yet over three weeks

Handwritten III-(1)

Kenneth A. Gross, Esquire
November 30, 1982
Page Two

9

after the appearance of the newspaper article cited, and the fact that its filing was accompanied by a politically motivated press conference demonstrate the political, as opposed to the substantive, nature of the complaint.

Further, the complaint should be dismissed because it is based on a statement in a newspaper story that is utterly without substantiation and, in any case, alleges no wrongdoing. The newspaper story provides no hint of the source of information nor any explanation of what is actually meant by the statement that "Wright had legally laundered the donation through his own PAC"

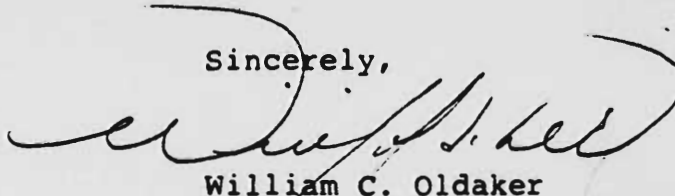
It should be noted that the only allegation of wrongdoing is contained in the complaint by the Washington Legal Foundation, not in the newspaper article. The Commission historically has taken the position that in order to find "Reason To Believe" that the allegation contained in a complaint, if proven, would be a violation of the FECA.

In a case such as this where the allegations in the complaint are merely derivative from a newspaper article, the Commission must look to the newspaper article to see if any allegation of wrongdoing is contained within the four corners of the article. Clearly, it is not alleged in the article that either Congressman Wright or Mr. Cooper said anything to lend support to the statement, or that the Committee or anyone else engaged in any activities contrary to the Federal Election Campaign Act.

Therefore, all the Commission currently has is a politically motivated complaint based on a newspaper article which alleges no wrongdoing and therefore, under the test set out above is clearly insufficient to open an investigation.

It is the position of Congressman Wright and the Committee that all contributions to and donations from the Committee were legally obtained and properly reported. The Committee was established in 1977 and has a long record of timely and accurate reporting of its activities under the Federal Election Campaign Act. A totally unsupported, off-hand statement tucked away in a single newspaper article should not be considered a sufficient basis to launch an investigation, especially in the absence of any allegation of wrongdoing.

Sincerely,



William C. Oldaker

WCO:klb

Attachment III - (2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Richard Lodge, Esquire
Willis & Knight
215 2nd Ave., N.
Nashville, Tennessee 37201

RE: MUR 1501
Jim Cooper For Congress
Committee

Dear Mr. Lodge:

On January , 1983, the Commission notified you of a complaint alleging that your client had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January , 1983, determined that on the basis of the information in the complaint information provided by your client there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. 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

Attachment IV - (1)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker et al.
1140 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 1501
James C. Wright and
Majority Congress Committee

Dear Mr. Oldaker:

On January , 1983, the Commission notified you of a complaint alleging that your clients had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on January , 1983, determined that on the basis of the information in the complaint and information provided by your clients there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. 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

Attachment TV - (2)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. R. Gregory Lamb
Washington Legal Foundation
Texas Division
5031 McKinney Avenue
Dallas, Texas 75205

RE: MUR 1501

Dear Mr. Lamb:

3
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The Federal Election Commission has reviewed the allegations of your complaint dated October 27, 1982 and determined that on the basis of the information provided in your complaint and information provided by the Respondent there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed.

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 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

Attachment TV - (3)

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW

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OF COUNSEL

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SANDRA R. KING
DENNIS A. LALLI*
JUDAH LIFSCHITZ
KATHLEEN C. LITTLE
DAVID C. MAIN, JR.
STEPHEN R. MILLS*
ROBERT J. MOSES
JOY D. OBERMAN*
DONALD S. PICARD
INA A. PLOTSKY*
KATHERINE MCBROOM-REDWINE
RICHARD J. REIBSTEIN*
ROBERT D. REIF
LYNN E. SHAPIRO
RICHARD L. STEER*
LINDA V. TIANO*
KENNETH S. WECKSTEIN
RANDALL G. WELLS*
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

November 30, 1982

*P.C. NEW YORK AND
WASHINGTON, D.C. ONLY

*NOT ADMITTED WASHINGTON
**ADMITTED TEXAS ONLY

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Gross:

This letter is the response of Congressman James C. Wright and the Majority Congress Committee ("the Committee") to the complaint filed by the Washington Legal Foundation-Texas Division, on October 27, 1982.

With regard to Congressman Wright, the complaint should be dismissed because it contains allegations regarding actions of the Committee only, and such actions cannot be attributed to Mr. Wright. The newspaper story merely indicates that Mr. Wright handed Mr. Cooper an envelope. Congressman Wright is not and never has been an officer of the Committee. As the complaint only concerns allegations regarding actions of the Committee, it should be dismissed as to Congressman Wright without further consideration.

With regard to the Committee, it is the Committee's view that the document submitted by the Washington Legal Foundation should not be treated as a bona fide complaint because it obviously was filed as a political device in connection with the November 2 election. The timing of the complaint, so close to the election yet over three weeks

Kenneth A. Gross, Esquire
November 30, 1982
Page Two

after the appearance of the newspaper article cited, and the fact that its filing was accompanied by a politically motivated press conference demonstrate the political, as opposed to the substantive, nature of the complaint.

Further, the complaint should be dismissed because it is based on a statement in a newspaper story that is utterly without substantiation and, in any case, alleges no wrongdoing. The newspaper story provides no hint of the source of information nor any explanation of what is actually meant by the statement that "Wright had legally laundered the donation through his own PAC"

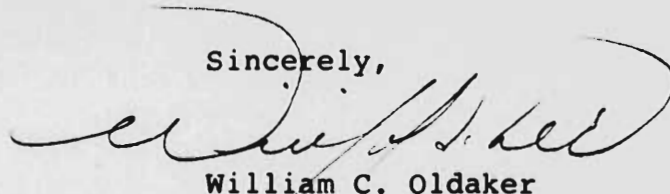
It should be noted that the only allegation of wrongdoing is contained in the complaint by the Washington Legal Foundation, not in the newspaper article. The Commission historically has taken the position that in order to find "Reason To Believe" that the allegation contained in a complaint, if proven, would be a violation of the FECA.

In a case such as this where the allegations in the complaint are merely derivative from a newspaper article, the Commission must look to the newspaper article to see if any allegation of wrongdoing is contained within the four corners of the article. Clearly, it is not alleged in the article that either Congressman Wright or Mr. Cooper said anything to lend support to the statement, or that the Committee or anyone else engaged in any activities contrary to the Federal Election Campaign Act.

Therefore, all the Commission currently has is a politically motivated complaint based on a newspaper article which alleges no wrongdoing and therefore, under the test set out above is clearly insufficient to open an investigation.

It is the position of Congressman Wright and the Committee that all contributions to and donations from the Committee were legally obtained and properly reported. The Committee was established in 1977 and has a long record of timely and accurate reporting of its activities under the Federal Election Campaign Act. A totally unsupported, off-hand statement tucked away in a single newspaper article should not be considered a sufficient basis to launch an investigation, especially in the absence of any allegation of wrongdoing.

Sincerely,



William C. Oldaker

EPSTEIN BECKER BORSODY & GREEN, P.C.

1140 19TH STREET, N.W.

WASHINGTON, D.C. 20036

Mr. Michael A. Dymersky
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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82 NOV 22 P 2: 47

LAW OFFICES

WILLIS & KNIGHT

TWO FIFTEEN SECOND AVENUE, NORTH

NASHVILLE, TENNESSEE 37201

WILLIAM R. WILLIS, JR.
ALFRED H. KNIGHT
FRANK GRACE, JR.
RICHARD LODGE
MARIAN F. HARRISON
ROBERT L. DELANEY
AUGUST C. WINTER

2 NOV 22 P 3: 53

TELEPHONE
AREA 615-259-9600

November 19, 1982

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

Attention: Michael Dymersky

Re: MUR 1501.

Dear Mr. Dymersky:

This is the response of James H. Cooper and Jim Cooper for Congress Committee to the complaint filed by Washington Legal Foundation - Texas Division and forwarded to Mr. Cooper and the Committee by letter dated October 29, 1982. The statement of designation of counsel is attached.

The position of respondents is that the contribution in question was a lawful contribution to the Cooper Committee from a duly-created and registered committee. The contribution was, as the complaint concedes, properly reported by the Committee.

The provisions of 2 U.S.C. 41a(a)(3) are not applicable, that section clearly applying to non-registered entities, e.g. individuals. Where a registered committee is involved, it will always, to some extent, be a conduit, receiving money lawfully from contributors and itself contributing lawfully to others. The same rationale is applicable to the charge under 2 U.S.C. 441f. The contribution was from a lawful source and was reported. Nothing more is required by law. It would be unreasonable, indeed perhaps unlawful, to require the recipient of a committee contribution to investigate and ascertain the initial source of the funds. In most cases, such a task would be impossible.

Finally, there is no evidence to support the complaint. Essentially, the complaint states only that the complainant has read the newspaper clipping which is attached to the letter. The complainant has no personal knowledge of the

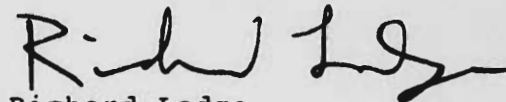
Charles N. Steele
Federal Election Commission
November 19, 1982
Page Two

facts of which he complains. The complaint fails to meet the requirements of 11 C.F.R. § 111.4(2). Were the matter before a court on a preliminary hearing, as it is essentially before the Office of General Counsel, there would be no evidence on which to base a finding of probable cause. The case would have to be dismissed. This complaint must be dismissed, also. To allow a complaint to proceed based on nothing more than a newspaper story would jeopardize the complaint process which has been established by the Commission. The essence of the process is personal knowledge of the complainant in order to allow the Commission to determine, at the initial phase, the probability of a violation. That determination cannot be made based on this complaint.

For these reasons, it is submitted that the Commission should take no action in this matter.

Sincerely,

WILLIS & KNIGHT



Richard Lodge

RL:sn

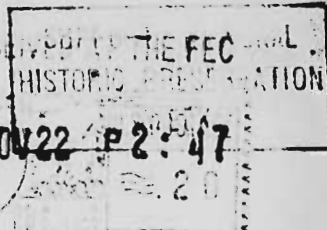
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LAW OFFICES

WILLIS & KNIGHT

TWO FIFTEEN SECOND AVENUE, NORTH

NASHVILLE, TENNESSEE 37201



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

ATTENTION: Michael Dymersky

6304038022

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: WILLIS & KNIGHT
Richard Lodge
ADDRESS: 215 Second Avenue, North
Nashville, Tennessee 37201
TELEPHONE: (615) 259-9600

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.

Nov. 16, 1982
Date

James H. Cooper
Signature

NAME: James H. Cooper -- Jim Cooper for Congress Committee
ADDRESS: 413 East Lane Street, Shelbyville, Tennessee 37169
HOME PHONE:
BUSINESS PHONE: (615) 684-1114

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600# 8912

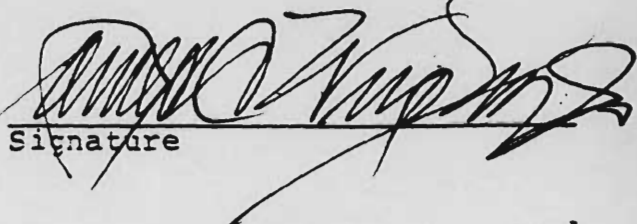
STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: *WILLIAM OLDAKER*
ADDRESS: *1140 19TH ST. NW, WASHINGTON, DC. 20036*
TELEPHONE: *202/861-0900*

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11:33:44

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.

Nov. 9, 1982
Date


Signature

NAME: *JAMES C. WRIGHT, JR.*
ADDRESS: *1236 LONGWORTH HOUSE OFFICE BLDG.*
WASHINGTON, DC. 20515
HOME PHONE: *536-9558*
BUSINESS PHONE: *225-5071*

33040380129

3 0 4 0 3 8 1
Congress of the United States

House of Representatives

OFFICE OF MAJORITY LEADER

WASHINGTON, D.C. 20515

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PERSONAL - POSTAGE PAID

Ms. Judith Thedford
Federal Election Commission
Washington, D.C. 20463



Wuph
M.C.

Ralph Bunche



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 OCT 29 P 3: 34

October 29, 1982

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: MUR 1501

The complaint filed by the Washington Legal Foundation - Texas Division centers around a \$500 contribution from Congressman Wright's PAC, the Majority Congress Committee, to candidate Jim Cooper's principal campaign committee, Jim Cooper for Congress Committee.

The complainant alleges that the \$500 contribution is actually from a Washington based group who feared of being identified as a contributor to Mr. Cooper and that the contribution was legally laundered through Wright's PAC. The newspaper article reporting the allegation was submitted with the complaint.

The complainant alleges violations of 2 U.S.C. § 441a(a)(8) as such earmarked contributions are required to be reported from the actual contributor and 2 U.S.C. § 441a as such contributions count towards the actual contributor's limit. Additionally, violations of 2 U.S.C. §§ 441f, 434, and 432(b) and (c) are alleged.

Before presenting a recommendation to the Commission, the respondents' answers to the complaint will be reviewed and analyzed.

203171

#1501

ca# 8795

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

October 27, 1982

82 OCT 29 P 3: 19

203171
P 3: 14Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Commissioners:

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The Washington Legal Foundation-Texas Division, complainant herein, files this complaint against JAMES H. COOPER, THE JIM COOPER FOR CONGRESS COMMITTEE, THE MAJORITY CONGRESS COMMITTEE, and CONGRESSMAN JAMES C. WRIGHT, JR., respondents, pursuant to 2 U.S.C. Sec. 437 g(a)(1). The complaint arises out of a newspaper article dated Monday, October 4, 1982 in the Dallas Times Herald which reported that Congressman Wright of Texas gave a contribution to Jim Cooper, a candidate for the 4th Congressional District in Tennessee. The article is attached hereto as Exhibit "A" and is incorporated herein. The article further states the contribution was "from a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Senator Baker's daughter. Before presenting it to the candidate, Wright had legally laundered the donation through his own PAC to prevent its being traced to the actual giver."

FEC records indicate that the Majority Congress Committee disbursed a \$500.00 contribution on September 23, 1982 to the Jim Cooper for Congress Committee and such committee reported receiving that contribution on September 25, 1982. The records are attached hereto as Exhibits "B" and "C", respectively.

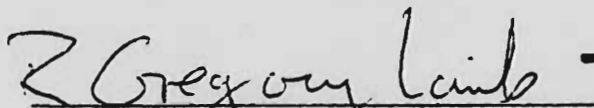
Such earmarking of a contribution without full disclosure to the

Federal Election Commission of the original source of the funds is prohibited. 2 U.S.C. Sec. 441 a(a)(8). The indirect passing of funds prevents the contribution from being counted toward the hidden contributor's limit for that candidate.

Based upon the article, respondents have violated 2 U.S.C. Sec. 441 f by making, permitting or accepting contributions in the name of another. Additionally, both committees have violated the reporting requirement of 2 U.S.C. Sec. 434 and possibly the accounting and record keeping requirements of 2 U.S.C. Sec. 432 (b) and (c).

Respectfully submitted,

WASHINGTON LEGAL FOUNDATION-TEXAS DIVISION


R. Gregory Lamb, Counsel
Washington Legal Foundation-Texas Division
5031 McKinney Ave.
Dallas, Texas 75205
214/559-0930

83040380119

STATE OF TEXAS
COUNTY OF DALLAS

X
X
X

Before me, the undersigned authority personally appeared,
R. GREGORY LAMB, known to me to be the person whose name is
subscribed below, and who, being first sworn by me, stated
his oath that he is authorized to make this complaint on behalf
of the Washington Legal Foundation and that he has read the
foregoing Complaint and that it is true and accurate information
and belief.

R. Gregory Lamb
R. GREGORY LAMB for
Washington Legal Foundation

Subscribed and sworn to before me, the undersigned authority
on this 26th day of October, 1982 to certify which witness my
hand and seal of office.

Carol H. Haffington
Notary Public in and for the
State of Texas

My Commission Expires:

3-15-86

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Dallas Times Herald

MONDAY, OCTOBER 4, 1982

The Wright stuff

Congressman runs tirelessly in race for House speaker

by PAUL WEST

Washington Bureau

HURRICANE MILLS, Tenn. — The refrain echoing over a pasture singer Loretta Lynn's ranch was sweet music to Jim Wright's ears. "Jim Wright," a candidate for speaker was telling supporters, "is gonna be our next speaker of the House. And Bob Clement's gonna be for him to be the next speaker of the House."

"Let me just make you a promise," Wright responded. "Send us Bob Clement and I guarantee you we'll get him on a major committee from which he can do the maximum good for the people of Tennessee."

They may not have known it, but the hundred or so Democrats cheering this exchange at an outdoor rally had just witnessed a classic scene from one of the longest running, and least noticed, national campaigns in America.

For the past six years, while serving as a congressman from Fort Worth, House Majority Leader James C. Wright Jr. has quietly been pursuing higher office. He has traveled to cities and towns across the country, where he often delivers the same promise he made here.

Already the second-ranking man in the House, Wright would like very much to occupy the speaker's chair, currently held by Rep. Thomas P. O'Neill, D-Mass.

When that might be, no saying. Wright admits he and O'Neill have talked about it but declines to discuss details.

Many in Congress think he will step down in 1984 at which time he is throwing his job open to a fight. He could include, in addition to himself, Reps. Dan Rostenkowski, Tom Foley, D-Wash. Jim Jones, D-Okla. and others.

See WRIGHT on Page 2

Texan works hard to become

WRIGHT — From Page One

Wright is convinced he has the support to win.

"I don't have any doubt about it," he said in an interview. "If it's anytime soon." How long is soon? "Two years."

His position as majority leader has strengthened his influence with those who have the only votes that count in the speaker's race — his House colleagues.

"Leader," as Wright's Democratic friends call him, regulates the flow of bills to the House floor and, with the fate of other congressmen's pet projects. Small wonder that every majority leader who sought to become speaker in the past half-century has succeeded.

Not that Wright is politicking overtly for O'Neill's job. His candidacy for the speakership is unannounced, and he has no intention, he says, of challenging his friend.

What Wright is doing to further his own ambitions is making sure that the House stays in Democratic

majority party organizes Congress and chooses its leaders. That means working hard at election time for his House Democratic colleagues and for Democrats seeking seats held by Republicans.

His political toils, as much as anything else, have helped solidify Wright's hold on the leadership position he won by a single vote in 1976 and made him the odds-on favorite to replace O'Neill.

Since 1976, Wright has personally raised more than \$700,000 in campaign cash through his Majority Congress Committee, a political action committee created by O'Neill when he was majority leader.

Wright doles out this money to Democratic candidates for Congress in contributions of \$250 to \$5,000. He makes additional donations from excess funds in two accounts intended mainly for his own re-election.

During the last campaign, he gave to at least 280 House candidates nationwide. Of these, 214 were elected, making Wright a contributor to almost every Democrat now serving in the House.

Direct giving is only the start of his political work for his colleagues. However, considered by many the finest orator in the House, Wright finds his talents in demand today as never before.

For the 59-year-old Texan, the route to the top is a year-round endurance contest of fund-raising events and after-dinner speeches, campaign endorsements and appearances on behalf of fellow Democrats, congressmen and congresswomen-to-be.

He appears frequently, perhaps several nights a week, at their cocktail fund-raising parties in Washington. He lends his name to many as a sponsor to boost ticket sales.

He speaks regularly before groups of their constituents flown to Washington for a first-hand look at government. These are often his colleagues' potential contributors, who may be impressed that their representative can command the presence of an important member of Congress like Wright.

Finally, he campaigns in congressional districts throughout the country, helping Democrats attract votes.

So far this year to at least 17 states. Democratic candidate, he will have more (plus Texas, taken Republican own in November).

Two weekends of unusually heavy Washington, a week ago, Wright flew to assist three Democratic incumbents with a series of hopefuls with a chance to capture two of the incumbents around both parties say year's elections.

The trip would have been, except that Wright was to be met by Cissy Baker, a Republican for Congress and daughter of Sen. Howard Baker.

The political encounter in the bank building soon



House Majority Leader Jim Wright makes campaign appearance in Nashville late last month for Democrat Jim Cooper.

DALLAS TIMES HERALD, Monday, October 4, 1982

A-11

House speaker

Wright has been asked to campaign for candidates. By election have been in seven states, where he faces a strong opponent of his (er).
ago, following an arduous work week in Washington, weary and throaty, he flew off to Tennessee to meet with Democrats — one in particular — a safe seat and a pair of strong chances to the 58 seats without and the country that they are key to this

ould have been roundly defeated in one district in a campaign against a Republican candidate and the 26-year-old House Majority Leader

sensitivity of his illustrated by a brief in the hall of a Nashville hotel after his arrival.

Warmly greeting Miss Baker's Democratic opponent, a 26-year-old lawyer named Jim Cooper, Wright retreated into a corner, reached in his coat pocket and produced a sealed envelope. Inside was a contribution from a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Sen. Baker's daughter. Before presenting it to the candidate, Wright had legally laundered the donation through his own PAC to prevent its being traced to the actual giver.

As they headed outside to meet with reporters, Wright asked Cooper if there was anything special he should say.

"Well, my opponent is talking a lot about her clout in Washington," confided Cooper. "If you could just say something about that."

A few minutes later, at an outdoor press conference, Wright delivered a line that brought a giddy smile to the young candidate's face.

"As majority leader of the House, I have something to say about who gets appointed to what committees even more than a senator. I

might say," Wright announced. "I'll assure you that Jim Cooper is going to be assigned to a major committee and one from which he will be able to exercise clout for the people of Tennessee."

Many parts of his basic speech remain little changed from years past, though he is careful to keep abreast of current trends and always tailors a few words to the local area.

At a rally that night in tiny Tulsa, Okla., he is in top speaking

lengthy, somewhat melodramatic attack on the Reagan administration's

efforts to kill the American dream.

With his jaw jutting and arms waving, Wright's rich voice dips and soars. He shouts. He whispers. He lambasts. He implores.

"If we get just 15 more, no more, just 15 more, solid, dependable, bedrock, fundamental good Americans of the Democratic persuasion in Congress... we'd have America moving again," he says. "I tell you, I'm getting a little tired of being a majority leader with a minority to lead."

He winds up with a few words about clout and repeats his promise of a major committee assignment for Cooper.

The next day, he is off to a district in western Tennessee to endorse Democratic hopeful Clement at the barbecue held at Loretta Lynn's dude ranch, though the country music entertainer will not be present.

On the way, he answers Clement's questions about House committee assignments and informs him of something only congressional insiders know.

"Every member," Wright explains, "is entitled to one major committee assignment, if he wants it."

A few minutes later, of course, Wright will wow the audience at Loretta's place with the same information, in the form of a campaign promise he'll have no trouble keeping.

During his brief, 29-hour visit to the state, Wright has appeared at two rallies, two coffee receptions, one cocktail party, two group meetings with influential citizens and one press conference. He has endured three bumpy private plane rides, one helicopter trip and a lot of driving around by car.

For his efforts, he helped draw about \$50,000 for the local candidates, plus some free coverage for them in local newspapers and on TV and radio. In return, he may have helped himself by protecting his party's majority in the House and picking up personal IOUs from three likely members of the next Congress.

At the airport, the state party chairman gives him something for the flight home — a newspaper story predicting big gains for the Democrats in the House elections of 1982. Once in his seat, Wright begins reading, but even this good news can't stop him from falling into a sound slumber as the plane

At the airport, the state party chairman gives him something for the flight home — a newspaper story predicting big gains for the Democrats in the House elections of 1982. Once in his seat, Wright begins reading, but even this good news can't stop him from falling into a sound slumber as the plane

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MEMORANDUM TO: *M. Dymally*

FROM: Steve Barndollar
Docket Clerk

SUBJECT: Returned Letters

DATE: *10/12/82*

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The following letter MUR *1501* was
returned. Please write a memo to the file
and advise on what to do. If you wish to
resend the letter, please have the envelope(s)
and green card(s) made.

Thanks *[Signature]*

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

POSTAGE AND FEES PAID



Mr. Reeves
Mr. Robert N. Reeves, Treasurer
Majority Congress Committee
32 Courthouse Square
Rockville MD 20850

CERTIFIED

6138434

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Resend to

P.O. Box 231

32 Courthouse Square

Rockville MD 20850

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$300

RETURN
TO
SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

Expired
Mr. Robert N. Reeves, Treasurer
Majority Congress Committee
32 Courthouse Square
Rockville, MD 20850

POSTAGE AND FEES PAID



CERTIFIED

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1982

Mr. R. Gregory Lamb
Washington Legal Foundation
- Texas Division
5031 McKinney Avenue
Dallas, TX 75205

Dear Mr. Lamb:

This letter is to acknowledge receipt of your complaint of October 27, 1982, against the Jim Cooper for Congress Committee, Majority Congress Committee, and Congressman James C. Wright, Jr. which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within five days.

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. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, appearing to read "Kenneth A. Gross".

By Kenneth A. Gross
Associate General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable James C. Wright, Jr.
1236 Longworth House Office Building
Washington, D.C. 20515

Re: MUR 1501

Dear Congressman Wright:

This letter is to notify you that on October 28, 1982, the Federal Election Commission received another complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1501. Please refer to this number in all future correspondence.

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

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

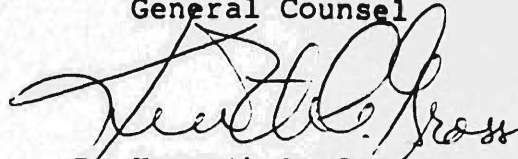
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

If you have any questions, please contact Judith Thedford, the staff member assigned to this matter at (202) 523-4529. 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

1501 10/29

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one):
☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery
☒ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee)

TOTAL \$

2. ARTICLE ADDRESSED TO
Hon. James C. Wright, Jr.
LHQB
Washington, D.C. 20540

3. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
LHQB 2h

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

4. DATE OF DELIVERY

5. ADDRESSEE'S ADDRESS (only if required)

6. UNABLE TO DELIVER REASON

NOV 3 1981
U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert N. Reeves, Treasurer
Majority Congress Committee
32 Courthouse Square
Rockville, MD 20850

Re: MUR 1501

Dear Mr. Reeves:

This letter is to notify you that on October 28, 1982, the Federal Election Commission received another complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1501. Please refer to this number in all future correspondence.

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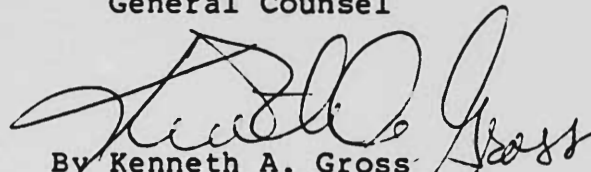
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- 2 -

If you have any questions, please contact Judith Thedford, the staff member assigned to this matter at (202) 523-4529. 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

33040380140



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Joe Remke, Treasurer
Jim Cooper for Congress Committee
413 East Lane Street
Shelbyville, TN 37160

Re: MUR 1501

Dear Mr. Remke:

This letter is to notify you that on October 28, 1982, the Federal Election Commission received another complaint which alleges that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1501. Please refer to this number in all future correspondence.

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

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

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

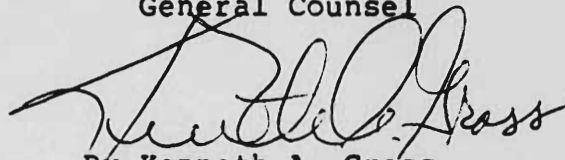
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

- 2 -

If you have any questions, please contact Judith Thedford, the staff member assigned to this matter at (202) 523-4529. 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

83040380143

October 27, 1982

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

Dear Commissioners:

The Washington Legal Foundation-Texas Division, complainant herein, files this complaint against JAMES H. COOPER, THE JIM COOPER FOR CONGRESS COMMITTEE, THE MAJORITY CONGRESS COMMITTEE, and CONGRESSMAN JAMES C. WRIGHT, JR., respondents, pursuant to 2 U.S.C. Sec. 437 g(a)(1). The complaint arises out of a newspaper article dated Monday, October 4, 1982 in the Dallas Times Herald which reported that Congressman Wright of Texas gave a contribution to Jim Cooper, a candidate for the 4th Congressional District in Tennessee. The article is attached hereto as Exhibit "A" and is incorporated herein. The article further states the contribution was "from a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Senator Baker's daughter. Before presenting it to the candidate, Wright had legally laundered the donation through his own PAC to prevent its being traced to the actual giver."

FEC records indicate that the Majority Congress Committee disbursed a \$500.00 contribution on September 23, 1982 to the Jim Cooper for Congress Committee and such committee reported receiving that contribution on September 25, 1982. The records are attached hereto as Exhibits "B" and "C", respectively.

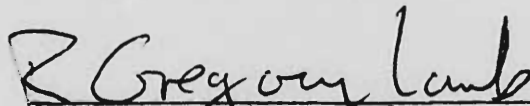
Such earmarking of a contribution without full disclosure to the

Federal Election Commission of the original source of the funds is prohibited. 2 U.S.C. Sec. 441 a(a)(8). The indirect passing of funds prevents the contribution from being counted toward the hidden contributor's limit for that candidate.

Based upon the article, respondents have violated 2 U.S.C. Sec. 441 f by making, permitting or accepting contributions in the name of another. Additionally, both committees have violated the reporting requirement of 2 U.S.C. Sec. 434 and possibly the accounting and record keeping requirements of 2 U.S.C. Sec. 432 (b) and (c).

Respectfully submitted,

WASHINGTON LEGAL FOUNDATION-TEXAS DIVISION



R. Gregory Lamb, Counsel
Washington Legal Foundation-Texas Division
5031 McKinney Ave.
Dallas, Texas 75205
214/559-0930

33040680111

STATE OF TEXAS
COUNTY OF DALLAS

X
X
X

Before me, the undersigned authority personally appeared,
R. GREGORY LAMB, known to me to be the person whose name is
subscribed below, and who, being first sworn by me, stated
his oath that he is authorized to make this complaint on behalf
of the Washington Legal Foundation and that he has read the
foregoing Complaint and that it is true and accurate information
and belief.

R Gregory Lamb
R. GREGORY LAMB for
Washington Legal Foundation

Subscribed and sworn to before me, the undersigned authority
on this 26th day of October, 1982 to certify which witness my
hand and seal of office.

Carol Hoffington
Notary Public in and for the
State of Texas

My Commission Expires:

3-15-86

Dallas Times Herald

MONDAY, OCTOBER 4, 1982

25 Cents

The Wright stuff

Congressman runs tirelessly in race for House speaker

by PAUL WEST

Washington Bureau

HURRICANE MILLS, Tenn. — He refrains from shouting over a pasture singer Loretta Lynn's ranch was sweet music to Jim Wright's ears. "Jim Wright," a candidate for Congress was telling supporters, "is gonna be our next speaker of the House. And Bob Clement's gonna be for him to be the next speaker of the House."

"Let me just make you a promise," Wright responded. "Send us Bob Clement and I guarantee you we'll get him on a major committee from which he can do the maximum good for the people of Tennessee."

They may not have known it, but the hundred or so Democrats cheering this exchange at an outdoor rally had just witnessed a classic scene from one of the longest running, and least noticed, national campaigns in America.

For the past six years, while serving as a congressman from Fort Worth, House Majority Leader James C. Wright Jr. has quietly been pursuing higher office. He has traveled in cities and towns across the country, where he often delivers the same promise he made here.

Already the second-ranking man in the House, Wright would like very much to occupy the speaker's chair, currently held by Rep. Thomas P. O'Neill, D-Mass.

When that might be, no one is saying. Wright admits he and O'Neill have talked about it but declines to discuss details.

Many in Congress think O'Neill will step down in 1984 at age 72, throwing his job open to a field that could include, in addition to Wright, Reps. Dan Rostenkowski, D-Ill., Tom Foley, D-Wash., Jim Jones, D-Okla., and others.

See WRIGHT on Page 11



House Majority Leader Jim Wright makes campaign appearance in Nashville late last month for Democrat Jim Cooper.

lengthy, somewhat melodramatic attack on the Reagan administration's

efforts to kill the American dream.

With his jaw justing and arms waving, Wright's rich voice dips and soars. He shouts. He whispers. He lambasts. He implores.

"If we get just 15 more, no more, just 15 more, solid, dependable, bed-rock, fundamental good Americans of the Democratic persuasion in Congress, we'd have America moving again," he says. "I tell you, I'm getting a little tired of being a majority leader with a minority to lead."

He winds up with a few words about clout and repeats his promise of a major committee assignment for Cooper.

The next day, he is off to a district in western Tennessee to endorse Democratic hopeful Clement at the barbecue held at Loretta Lynn's dude ranch, though the country music entertainer will not be present.

On the way, he answers Clement's questions about House committee assignments and informs him of something only congressional insiders know.

"Every member," Wright explains, "is entitled to one major committee assignment, if he wants it."

A few minutes later, of course, Wright will wow the audience at Loretta's place with the same information, in the form of a campaign promise he'll have no trouble keeping.

During his brief, 29-hour visit to the state, Wright has appeared at two rallies, two coffee receptions, one cocktail party, two group meetings with influential citizens and one press conference. He has endured three bumpy private plane rides, one helicopter trip and a lot of driving around by car.

For his efforts, he helped draw about \$50,000 for the local candidates.

plus some free coverage for them in local newspapers and on TV and radio. In return, he may have helped himself by protecting his party's majority in the House and picking up personal IOUs from three likely members of the next Congress.

At the airport, the state party chairman gives him something for the flight home — a newspaper story predicting big gains for the Democrats in the House elections of 1982. Once in his seat, Wright is reading, but even this good news can't stop him from falling into a sound slumber as the plane takes off.

DALLAS TIMES HERALD Monday, October 4, 1982

A-11

Texan works hard to become House speaker

WRIGHT — From Page One

Wright is convinced he has the support to win.

"I don't have any doubt about it," he said in an interview. "If it's anytime soon." How long is soon? "Two years."

His position as majority leader has strengthened his influence with those who have the only votes that count in the speaker's race — his House colleagues.

"Leader," as Wright's Democratic friends call him, regulates the flow of bills to the House floor and, with the fate of other congressmen's projects. Small wonder that every majority leader who sought to become speaker in the past half-century has succeeded.

Not that Wright is politicking overtly for O'Neill's job. His candidacy for the speakership is unannounced, and he has no intention, he says, of challenging his friend.

What Wright is doing to further his own ambitions is making sure that the House stays in Democratic hands, a vital objective since the

majority party organizes Congress and chooses its leaders. That means working hard at election time for his House Democratic colleagues and for Democrats seeking seats held by Republicans.

His political toils, as much as anything else, have helped solidify Wright's hold on the leadership position he won by a single vote in 1976 and made him the odds-on favorite to replace O'Neill.

Since 1976, Wright has personally raised more than \$700,000 in campaign cash through his Majority Congress Committee, a political action committee created by O'Neill when he was majority leader.

Wright doles out this money to Democratic candidates for Congress in contributions of \$250 to \$5,000. He makes additional donations from excess funds in two accounts intended mainly for his own re-election.

During the last campaign, he gave to at least 280 House candidates nationwide. Of these, 214 were elected, making Wright a contributor to almost every Democrat now serving in the House.

Direct giving is only the start of his political work for his colleagues. However, considered by many the finest orator in the House, Wright finds his talents in demand today as never before.

For the 59-year-old Texan, the route to the top is a year-round endurance contest of fund-raising events and after-dinner speeches, campaign endorsements and appearances on behalf of fellow Democratic congressmen and congresswomen-to-be.

He appears frequently, perhaps several nights a week, at their cocktail fund-raising parties in Washington. He lends his name to many as a sponsor to boost ticket sales.

He speaks regularly before groups of their constituents flown to Washington for a first-hand look at government. These are often his colleagues' potential contributors, who may be impressed that their representative can command the presence of an important member of Congress like Wright.

Finally, he campaigns in congressional districts throughout the country, helping Democrats attract votes.

So far this year Wright has been to at least 17 states to campaign for Democratic candidates. By election day, he will have been in seven more (plus Texas, where he faces a token Republican opponent of his own in November).

Two weekends ago, following an unusually heavy work week in Washington, a weary and throat-sore Wright flew off to Tennessee to assist three Democrats — one incumbent with a safe seat and a pair of hopefuls with a strong chance to capture two of the 58 seats without incumbents around the country that both parties say are key to this year's elections.

The trip would have been routine, except that in one district Wright was to campaign against Cissy Baker, a Republican candidate for Congress and the 26-year-old daughter of Senate Majority Leader Howard Baker.

The political sensitivity of his mission was illustrated by a brief encounter in the hall of a Nashville bank building soon after his arrival.

Warmly greeting Miss Baker's Democratic opponent, a 28-year-old lawyer named Jim Cooper, Wright retreated into a corner, reached in his coat pocket and produced a sealed envelope. Inside was a contribution from a group doing business in Washington that feared the consequences of being identified as a contributor to the opponent of Sen. Baker's daughter. Before presenting it to the candidate, Wright had illegally laundered the donation through his own PAC to prevent its being traced to the actual giver.

As they headed outside to meet with reporters, Wright asked Cooper if there was anything special he should say.

"Well, my opponent is talking a lot about her clout in Washington," confided Cooper. "If you could just say something about that."

A few minutes later, at an outdoor press conference, Wright delivered a line that brought a giddy smile to the young candidate's face.

As majority leader of the House, I have something to say about who gets appointed to what committees even more than a senator. I

might say, Wright announced. "I'll assure you that Jim Cooper is going to be assigned to a major committee and one from which he will be able to exercise clout for the people of Tennessee."

Many parts of his basic speech remain little changed from years past, though he is careful to keep abreast of current trends and always tailors a few words to the local area.

At a rally that night in tiny Tullahoma, Tenn., he is in top speaking



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1501

Date Filmed 3-9-83 Camera No. --- 2

Camera MeX