

SEP 29 1976

MEMORANDUM TO: FILE

FROM: DAVID R. SPIEGEL/~~XXXXXXXXXXXXXXXXXXXX~~

RE: MUR 191 (76)

The complainant in this MUR alleged generally that expenditures by the Young America Campaign Committee Reagan California Fund are not independent within the meaning of the Federal Election Campaign Laws. No further information was provided. In view of the fact that the issue in this MUR is being handled in MUR 203, we are closing the file herein.





FEDERAL ELECTION COMMISSION

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

23 AUG 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David DeWall, Esq.
DeWall and Degar
1242 Milam Bldg.
115 E. Travis at Soledad
San Antonio, Texas 78205

Re: MUR 191 (76)

Dear Mr. DeWall:

This is in response to your complaint dated June 1, 1976 alleging that expenditures by the Young American Campaign Committee Reagan California Fund are not independent within the meaning of the Federal Election Campaign Laws. Although I can appreciate your frustration in having to notarize your original letter, this, as indicated in our previous communication to you, is mandated by 2 U.S.C. §437g(a)(2). I apologize for our delay in responding.

The issue you raise is presently being reviewed by the Commission. We shall advise you of the outcome of any action the Commission decides to take in this regard.

Should you wish to supply us with any further information concerning your allegations, please do so within five days of your receipt of this letter. Further communications should be directed to the attorney assigned to this matter, Gloria R. Sulton (telephone no. 202/382-4041). This matter has been assigned reference number MUR 191 (76). Please refer to it in any future communications.

Sincerely yours,

John G. Murphy, Jr.
General Counsel



65, Hon: J.G.: 8/30/76

7704002157

PC

PS Form 3811, Mar. 1976

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

1. The following service is requested (check one).

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ **RESTRICTED DELIVERY.**
Show to whom and date delivered..... 65¢

☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery 85¢

2. **ARTICLE ADDRESSED TO:**

David DeWael

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	938210	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY

8-27-76

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK
AUG 27 1976

★ GPO : 1976-O-203-456

RECEIVED
AUG 27 1976
DIRECTOR

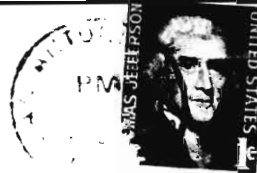
DeWALL & DEEGEAR

ATTORNEYS AT LAW

1242 Milam Building
115 E. Travis at Soledad
San Antonio, Texas 78205

OFFICE

Federal Election Commission
Attn: Gloria R. Sulton
1325 K Street N.W.
Washington, D.C. 20463



DeWALL & DEEGEAR

ATTORNEYS AT LAW

1242 Milam Building
115 E. Travis at Soledad
San Antonio, Texas 78205

David DeWall
James O. Deegear, III

July 7, 1976

76 JUL 12 P 3: 42

(512) 225-7236

RECEIVED
FEDERAL ELECTION COMMISSION
CONTROL # 76-983

Federal Election Commission
Attention: Gloria R. Sulton
1325 K Street N.W.
Washington, D.C. 20463

RE: Reagan California Fund

Dear Ms. Sulton:

The red tape is amazing which Federal agencies can create, apparently to keep a proper distance between citizens and their government. I enclose:

- (1) My letter of June 1, 1976, to Federal Election Commission
- (2) Reagan California Fund letter
- (3) Federal Election Commission letter of July 2, 1976

I have now notarized my letter of June 1, 1976. My original complaint included my full name, address, telephone number, a statement of the violative acts, and a copy of the evidence. It seems asinine to me that my letter should be returned simply for a notarization, when my complaint involved no personal knowledge on my part other than a reading of the Reagan California Fund letter.

Reference the question of your jurisdiction, I assumed you had jurisdiction over all major fund raising efforts in the Presidential election. As an attorney, I can understand your letter. But does it not bother you at all that an average citizen--wanting to file a complaint, would be completely frustrated by a letter such as yours of July 2nd? I would bet that most people filing complaints, upon receipt of your letter, would drop their complaint in frustration.

I would still like to know if the Reagan California Fund is not violating the letter of the Campaign Spending Limitations Laws.

Yours very truly,

David DeWall
David DeWall

cc: Congressman Bob Krueger

JUL 08 1976



FEDERAL ELECTION COMMISSION

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

July 2, 1976

MUR 150 (76)

David DeWall, Esquire
DeWall & Deegear
1242 Milam Building
115 E. Travis
San Antonio, Texas 78205

Dear Mr. DeWall:

770400:157)

This is in response to your letter of June 1, 1976, regarding the "Reagan California Fund." The Federal Election Campaign Act of 1971, as amended, requires that all complaints be signed, sworn, and notarized by the person(s) making the complaint (see 2 U.S.C. §437g(a)(2)). Under our new procedures, we also require that a complaint contain: (1) the full name, address and telephone number of the complainant; (2) a clear and concise statement of the facts upon which the assertion of jurisdiction of the Commission is based; (3) a clear and concise statement of the acts which are alleged to constitute a violation of the Federal Election Campaign Act; (4) copies of any evidence available to you which sustains the allegations of the complaint. In the event you wish to file a complaint, please comply with these requirements. For your information, I am enclosing a copy of the Commission's proposed regulations on independent expenditures, as well as a policy statement issued by the Commission on May 28, 1976.

Please feel free to contact me if you have further questions. The attorney assigned to this matter is Gloria R. Sulton (telephone 202-382-4041).

Sincerely yours,

John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL COPY

Enclosures

DeWALL & DEEGEAR

ATTORNEYS AT LAW

1242 Milam Building
115 E. Travis at Soledad
San Antonio, Texas 78205

David DeWall
James O. Deegear, III

(512) 225-7236

June 1, 1976

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Federal Elections Commission
Washington, D.C. 20006

RE: The Enclosed Reagan Letter

Dear Sirs:

I assume you are aware of the "Reagan California Fund." Are the provisions of the campaign spending limitations laws this easy to circumvent?

A committee is not "independent" if it is actively campaigning for a particular candidate, in his name, and when the only purpose of that committee is for the election of that particular candidate, especially when he is one of the leading candidates in the field.

I would certainly like to hear back from you that this attempt to circumvent the intent of the campaign spending limitations laws is not going to be successful.

Yours very truly,

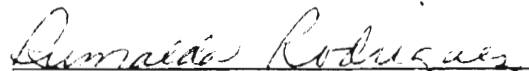


David DeWall

rr

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
JUL 1 1976

SWORN TO and SUBSCRIBED before me by DAVID DEWALL,
under my official hand and seal of office on this the 7th
day of July, 1976.


Notary Public in and for
Bexar County, Texas

My commission expires: 1-23-78

RUMALDA RODRIGUEZ
Notary Public, Bexar County, Texas

REAGAN CALIFORNIA FUND

A Project of:
Young America's Campaign Committee

Dear Friend:

Your assistance on a most urgent project could mean the difference between victory and defeat for Ronald Reagan in the June 8th primary in California--the most important primary of the campaign.

That is why I am writing to you today.

Gerald Ford and Ronald Reagan are in a virtual dead heat for convention delegates coming into the California primary. The winner of the California primary will take an extra 167 delegates to the convention.

These 167 delegates will mean the margin of victory for the Republican presidential nominee. More delegates are at stake in California than New Hampshire, Florida, Vermont, and North Carolina combined!

Ronald Reagan's stunning defeat of Gerald Ford in the North Carolina primary was a result of his aggressive media campaign in that state prior to the voting.

That is why the Reagan California Fund has been established by the Young America's Campaign Committee. We intend to place spot radio advertisements throughout California a week prior to the primary.

We have entered into an agreement with the nation's top producer of radio advertisements.

Efraim Zimbalist, Jr., the star of the television series The FBI, has agreed to do narration for the ads.

They will be targeted in communities across California with the precision that was apparent in the media blitz that brought Ronald Reagan victory in North Carolina.

Production costs, distribution fees, etc., will be \$25,000 and that amount is needed at once. Unless we receive that amount by May 25, 1976, the ads by Efraim Zimbalist, Jr., cannot be run.

These ads are the most economical and effective method for reaching the millions of California voters. Ronald Reagan's chances of victory in California will be severely set back without them. As a result, his chances for the Republican nomination could be lost.

That is why it is vital that you send what you can today. Please send at least \$20 today. If you cannot send \$20, we will be grateful for whatever you can contribute. But we must have whatever your generous contribution by May 25.

RECEIVED
MAY 27 1976
U.S. DEPT. OF JUSTICE

It is important to consider what Ronald Reagan's defeat could mean for the Republican Party.

Consider the record of the Ford administration and the possibility of its continuing should Ronald Reagan lose the California primary:

1. There would be more appointments of left-liberals into the administration such as Charles Goodell and Nelson Rockefeller.
2. Secretary of State Henry Kissinger would remain, throughout Ford's term, continuing the policy of one-way-street detente.
3. The United States would continue its second-rate military posture and perhaps slip to third rate or fourth rate.
4. The United States would continue its policy of surrender of American possessions such as the Panama Canal Zone.
5. Deficit spending would continue unabated, without a voice of leadership coming from the White House.

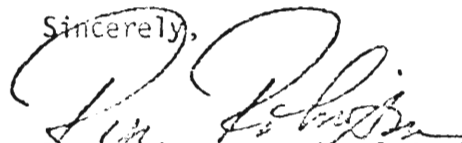
Before you decide how much to give, I should explain that the Reagan California Fund is an independent organization, entirely separate from the Citizens for Reagan campaign committee.

Because it is an independent committee, the Reagan California Fund may solicit funds from individuals beyond the \$1000 limit. Thus, if you have already contributed the maximum \$1000 to the official Citizens for Reagan campaign committee, you may contribute up to an additional \$24,000 to the Reagan California Fund.

In addition, while the official Reagan effort in California is limited in what it can spend on behalf of Ronald Reagan, our committee can wage an all-out effort to win in California without government-enforced spending restrictions.

If any contribution could tip the scale for a Reagan victory, your contribution to the Reagan California Fund could be it. Please be generous, and soon. Thank you.

Sincerely,


Ron Robinson, National Chairman
Reagan California Fund

RECEIVED
JAN 10 1977
U.S. DEPT. OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535

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