

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

OCT 21 1976

Mr. William L. Watson
Executive Director and Treasurer
ANPAC
P.O. Box 4449
Chicago, Illinois 60680

Re: MUR 270 (76)

Dear Mr. Watson:

This letter is in further reference to your complaint, dated October 11, 1976, which we numbered MUR 270, alleging a violation of 2 U.S.C. §437g(a)(3)(B) by Mr. Fred Wertheimer and Common Cause. On the basis of the information provided in your complaint the Commission has found no reason to believe that a violation of the Act has occurred.

2 U.S.C. §437g(a)(3)(B) refers to any notification or investigation made pursuant to a finding by the Commission of reason to believe under 2 U.S.C. §437g(a)(2). Conf. Rep. on S-3065, H.R. Rep. No. 94-1057, 94th Cong., 2d Sess., p. 47 (1976). Therefore, the prohibition of 2 U.S.C. §437g(a)(3)(B) is not triggered until the Commission has found reason to believe that a violation has been committed.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

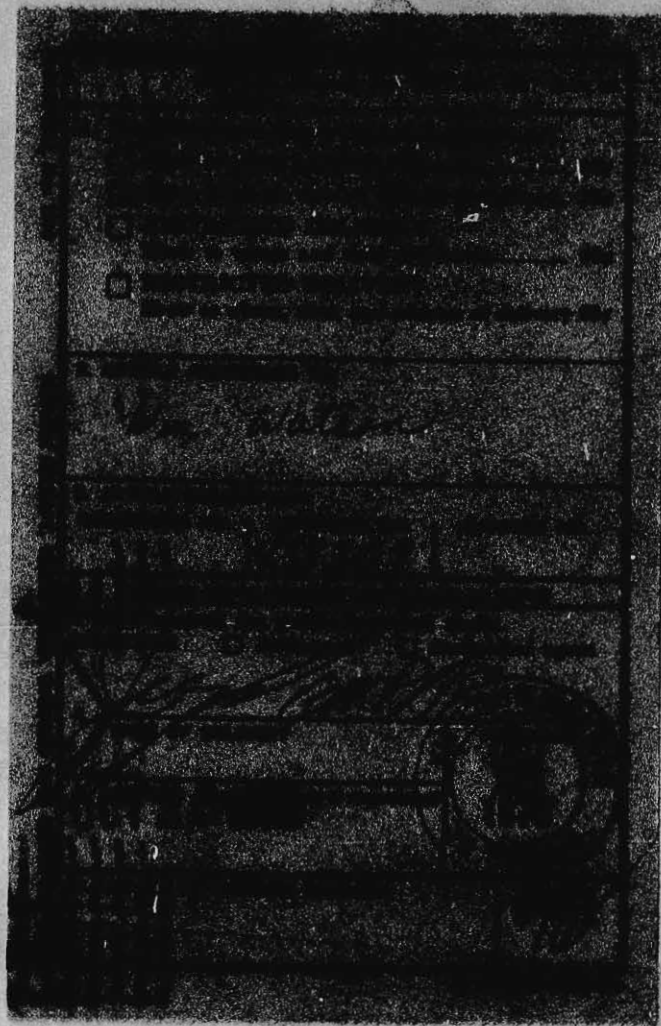
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cc: LO
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Common Cause,
Fred Wertheimer

MUR 270 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 21, 1976, the Commission adopted the recommendation of the General Counsel that it finds no reason to believe that a violation of the Federal Election Campaign Act, as amended, had been committed in the above-captioned matter.

Accordingly, the file in this case has been closed.



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

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OCT 21 1974

Mr. Fred Wertheimer
Vice President of Operations
Common Cause
2030 N Street, N.W.
Washington, D.C. 20036

Re: MUR 270 (76)

Dear Mr. Wertheimer:

I am forwarding the enclosed complaint pursuant to §437g(a)(2) of the Federal Election Campaign Act for your information. As shown by the attached copy of my letter to complainant, the Commission believes that on the basis of the information in the complaint there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission does not intend to investigate the matter any further.

Sincerely yours,

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John G. Murphy, Jr.
General Counsel

Enclosure

LO:lpant:pjg:10/15/76

cc: LO

Chron file

MUR file

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October 21, 1976

MEMORANDUM FOR: BILL OLDAKER
FROM: MARJORIE EMMONS *more - mee*
RE: MUR 265 (76) and MUR 270 (76)

The above mentioned MURs were transmitted to the
Commission on October 20, 1976 at 10:30 a.m.

As of 12:00 a.m. on October 21, 1976, no objections had
been received.

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common cause

2030 M STREET, N.W., WASHINGTON, D. C. 20036

John W. Gardner, Chairman

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AID: 14

CC #764
MUR 270

October 14, 1976

John G. Murphy, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

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Dear Mr. Murphy:

On October 11, 1976, The American Medical Political Action Committee (AMPAC), by its Executive Director and Treasurer William L. Watson, filed a complaint with the Federal Election Commission against Common Cause and Fred Wertheimer. The complaint charges that Common Cause and Mr. Wertheimer have "violated the spirit and the letter" of the Federal Election Campaign Act Amendments of 1976 (hereinafter FECA) by issuing a press release announcing the filing of a complaint with the Commission against AMPAC.

The instant complaint charges that Common Cause's action is unlawful in three respects:

- 1) it is a violation of 2 U.S.C. § 437g(a)(3)(B) which prohibits persons from making public any notification or investigation undertaken under § 437g(a)(2);
- 2) it constitutes an ex parte contact with the Commission in violation of the Commission's proposed regulations, § 111.15, 41 Fed. Reg. 35954 (August 25, 1976);
- 3) it was taken with the intent of influencing a federal election and constitutes an in-kind contribution or an independent expenditure on behalf of the opponents of the candidates named as recipients of AMPAC contributions.

In asserting that Common Cause and Fred Wertheimer have violated the FECA, AMPAC has misread the relevant statutory provisions as well as the legislative history and the construction by the Commission. Furthermore, AMPAC's reading of the

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statute, if adopted by the Commission, would constitute a violation of Common Cause's and Mr. Wertheimer's First Amendment rights.

The Alleged Violation of 2 U.S.C. § 437g(a) (3) (B).

This section of the statute provides that:

Any notification or investigation made under paragraph (2) shall not be made public by the Commission or by any person without the written consent of the person receiving such notification or the person with respect to whom such investigation is made.

(Emphasis added.)

As should be clear from the repeated use of the words "notification" and "investigation" and from the conspicuous absence of the word "complaint," the confidentiality requirement of this section does not extend to the filing of a complaint with the Commission.

The distinction between the filing of a complaint and the institution of an investigation (including notification of the person to be investigated) is plain from a reading of 2 U.S.C. § 437g(a). Subsection (1) of that section describes how a complaint must be filed. Subsection (2) states that when the Commission has received a complaint and if it has reason to believe that a violation of the Act has occurred, it shall notify the person charged and shall make an investigation. Subsection (3), quoted in relevant part above, places a requirement of confidentiality on only those actions taken pursuant to Subsection (2), i.e., the notification and investigation. Subsection (3) places no such requirement on actions taken pursuant to Subsection (1), i.e., the filing of a complaint.

The Commission in its proposed regulations has recognized the distinction between the filing of a complaint and the notification and investigation phase of an enforcement proceeding. Section 111.2 of those regulations describes the form and content of a complaint; no confidentiality requirement is made in that section. Section 111.3 describes the Commission's initial processing of a complaint: The General Counsel makes a report to the Commission on the factual and legal basis of the alleged violation of the Act. On the basis of this report and other relevant materials, the Commission votes whether to conduct an investigation. Section 111.4 states that, if four members agree

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that there is reason to believe that a violation has occurred, the General Counsel will inform the respondent of that fact. This notification, the regulation states, shall be confidential.

What is clear both from the statute and from the Commission's regulations is that the filing of a complaint is not tantamount to the institution of an investigation. Before the enforcement machinery is brought into play by the Commission, the General Counsel and the members of the Commission must exercise their independent judgment on the matter. It is only after the determination has been made that there may be merit to the complaint that the confidentiality provision comes into play. The legislative history cited by AMPAC in the instant complaint supports this conclusion. The Conference Committee stated that § 437g(a)(3)(B) is violated "when publicity is given to a pending investigation." H.R. Rept. No. 94-1057, 94th Cong., 2d Sess., 50 (1976). (Emphasis added.)

The interpretation of § 437g(a)(3)(B) urged on the Commission by AMPAC in the instant complaint is contrary to the plain words of the statute and its legislative history. More importantly, it would lead to an unconstitutional result.

A restriction on the First Amendment right of free speech may not rest on a mere rational connection between the restriction and a legitimate state interest; the state interest in suppressing speech must be compelling, and the means chosen to promote that interest must be the least drastic means available. Buckley v. Valeo, 96 S.Ct. 612, 656 (1976). None of the interests advanced here by AMPAC to justify the application of the confidentiality requirement to the filing of a complaint by Common Cause meets this test.

The first interest advanced by AMPAC is the need to protect candidates for public office from adverse publicity. Complaint at p.5. It is true that Common Cause's complaint and press release name the 21 candidates who received excessive political contributions from AMPAC and the political action committees of the American Medical Association's constituent state medical societies. But the Supreme Court has held repeatedly that such an interest does not justify the suppression of speech. Mills v. Alabama, 384 U.S. 214 (1966); New York Times v. Sullivan, 376 U.S. 254 (1964); see also, Vanasco v. Schwartz, 401 F. Supp. 87 (S.D.N.Y. 1975), aff'd per curiam, 96 S.Ct. 763 (1976).

The second interest advanced by AMPAC is the need to prevent any prejudice to respondents' right to an impartial hearing before the Commission. Complaint at p.4. Common Cause submits

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that the public release of a sworn complaint in no way poses a clear and present danger to the integrity of the Commission's proceedings. Congress and the Courts have given great attention to the creation of a truly independent Commission. There is no reason to believe that the public release of the complaint by Common Cause will in any way prevent the Commissioners from exercising their judgment free of improper influence. See, Craig v. Harney, 331 U.S. 367 (1946); Bridges v. California, 314 U.S. 252 (1947); Times-Picayune Publishing Corp. v. Schulingkamp, 419 U.S. 1301 (1974).*

The Alleged Violation of the Proposed Regulation
Against Ex Parte Communications.

AMPAC has alleged that the issuance of a press release by Common Cause constituted an "ex parte communication" in violation of Section 111.15 of the Commission's proposed regulations. This allegation is utterly without merit.

Although there is no definition of the term "ex parte communication" in either the Act or in the proposed regulations, the meaning of the term is clear. It is an "undisclosed, informal contact between an agency official and a party interested in a matter before that official." Message of the President on Ethical Conduct in the Government, H.R. Doc. No. 145, 87th Cong., 1st Sess. 6-7 (1961). Certainly a press release cannot be characterized as an "undisclosed" contact with the agency. Moreover, the purposes of the ban on ex parte communications would not be advanced

* It should be noted in this connection that the Supreme Court of Michigan has recently ruled unconstitutional a provision of that state's political reform law that bars publication of any information relative to a sworn complaint filed with the Political Ethics Commission. Advisory Opinion on Constitutionality of 1975 PA 227, Docket No. 57850, Slip Op. at p.4 (May 21, 1976). That court went so far as to state that the confidentiality requirement could not apply at any point in the investigation. Common Cause does not make that argument here; it is merely urged that the confidentiality requirement may not constitutionally be applied to a public release of a complaint by a complainant before the Commission.

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by defining the term to include the issuance of a press release. The primary reason for prohibiting ex parte communications in administrative proceedings is a matter of procedural due process: it is patently unfair to allow secret contacts between an interested party and an agency decision-maker regarding an issue pending before the agency. Such communications give one party greater access to the decision-maker and do not allow the other party an adequate opportunity to respond.

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Courts have ruled in many cases on the problem of ex parte communications by interested parties in administrative proceedings. In Sangamon Valley Television Corp. v. United States, 269 F.2d 221 (D.C.Cir. 1959), a decision of the Federal Communications Commission was vacated because of secret ex parte contacts between an interested party and the FCC Commissioners. In that case, involving a change in the location of a television station, an intervenor in the FCC proceeding visited each Commissioner privately and sent, after the official record of the proceeding had been closed, private letters to the Commissioners advocating his position on the matter. The court stated that these ex parte communications vitiated the FCC's determination, because the secret contacts with the Commissioners prevented opposing parties from having an adequate opportunity to respond to intervenor's contentions. See also, Camero v. United States, 375 F.2d 777 (Ct.Cl. 1967) (decision of an Army grievance tribunal set aside because of ex parte contacts between the decision-makers and counsel for the Army).

In contrast is the case of United Air Lines, Inc. v. Civil Aeronautics Board, 309 F.2d 238 (D.C.Cir. 1962), where the court upheld an agency decision against a charge that improper ex parte contacts had been made. In that case, the court held that although one of the interested parties had sent vast quantities of correspondence to the CAB, those communications were "placed in a public file which was available to the petitioners if they chose to look." Sangamon, supra, was distinguished because the communications there were made "without the knowledge of the other parties in interest." 309 F.2d at 241.

The press release issued by Common Cause is more akin to the communications in United Air Lines than it is to the contacts in Sangamon. The press release, by definition, was not a secret matter. It did not prevent AMPAC or any other respondent named in the Common Cause complaint from responding to legal or factual arguments to the Commission. Not only was the release "available to the petitioners if they chose to look" as in United Air Lines,

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the release was actually read to one of AMPAC's officers over the telephone by a Common Cause employee on October 4. In short, the Common Cause press release is not an ex parte communication and thus is not prohibited by Section 111.15 of the Commission's proposed regulations.

The Alleged In-Kind Contribution or Independent Expenditure.

AMPAC states in its complaint at p.8 that Common Cause had a political purpose in making public the names of the candidates who received contributions from AMPAC and the state PACs. Common Cause's intent, it is alleged, was to secure the defeat of those candidates, and publication of the information constitutes an in-kind contribution or an independent expenditure which Common Cause has failed to report to the Commission as the statute requires. The statute defines "contribution" to include a "gift, subscription, loan, advance, or deposit of money or anything of value made for the purpose of influencing the ... election of any person to Federal office..." 2 U.S.C. § 431(e)(1)(A). "Independent expenditure" is defined as "an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate..." 2 U.S.C. § 431(p). To fall under either definition, the action must be undertaken to advocate the election or defeat of a candidate. No such purposes underlie Common Cause's publication of its complaint against AMPAC and the state PACs.

AMPAC, in the instant complaint, offers no grounds for its asserting that Common Cause's intent was to promote the election or defeat of congressional candidates. In fact, Common Cause has never, since its establishment in 1970, supported or opposed a candidate for public office. Its Articles of Incorporation state that Common Cause's purpose is "to operate on a non-profit, non-partisan basis for the promotion of the social welfare of the United States." Any actions taken for the purpose of advocating the election or defeat of a candidate would violate the corporate charter.

Since the enactment of the Federal Election Campaign Act in 1971, Common Cause has operated a campaign monitoring project. Mr. Wertheimer is its Director. This project analyzes the campaign reports filed with the Commission and publishes studies on the patterns of campaign giving and spending in Federal elections.

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It was in the course of this group's work that the practices of AMPAC and the state PACs were discovered. The complaint filed by Common Cause and the press release describing its contents were part of the efforts of the monitoring project to secure compliance with the FECA and wide dissemination of information contained in the reports filed under this Act. The analysis and dissemination by Common Cause of information about the financing of Federal election campaigns is a public service undertaken to fulfill the purposes for which the Act was designed. As the Supreme Court held in Buckley v. Valeo:

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... disclosure provides the electorate with information 'as to where political campaign money comes from and how it is spent by the candidate' [footnote omitted] in order to aid the voters in evaluating those who seek Federal office. It allows voters to place each candidate in the political spectrum more precisely than is often possible solely on the basis of party labels and campaign speeches. The sources of a candidate's financial support also alert the voter to the interests to which a candidate is most likely to be responsive and thus facilitates predictions of future performance in office.

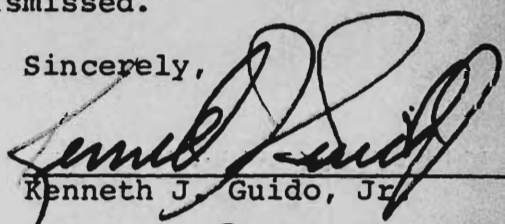
Id. at 657.

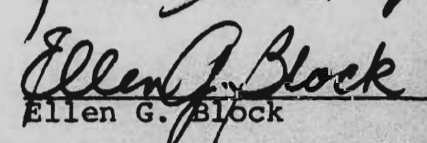
AMPAC states in its complaint that "no purpose, other than a political one, was served by publicizing the names of candidates involved in the subject complaint since they were not named as respondents." This inability to imagine a non-partisan, educational motive in making the campaign finance disclosure reports more accessible to the American public belies a cynical view of the Act and its purposes.

In light of the above, it is requested that the complaint by the American Medical Political Action Committee against Common Cause and Fred Wertheimer be dismissed.

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Sincerely,


Kenneth J. Guido, Jr.


Ellen G. Block

Counsel for Common Cause
and Fred Wertheimer

cc: Donald P. Wilcox, Esq.

CC # 689
REC 10
10/11/76 B.C.
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Office located at 535 North Dearborn

MUR 270

October 11, 1976

Dear Mr. Murphy:

The American Medical Political Action Committee is hereby filing a complaint with the Federal Election Commission.

AMPAC urges the Commission to consider this complaint on an emergency basis so as to prevent possible irreparable damage to over 120 candidates for Federal office.

Sincerely,

William L. Watson

William L. Watson
Executive Director and Treasurer

WLW/chs

NO. MUR 270 (76)

DATE AND TIME OF TRANSMITTAL: _____

REC'D: 10/11/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: William L. Watson, AMPAC (notarized)

Respondent's Name: Common Cause, Fred Wertheimer

Relevant Statute: 2 U.S.C. §437g(a)(3)(B)

Internal Reports Checked: N/A

Federal Agencies Checked: N/A

SUMMARY OF ALLEGATION

That Common Cause violated 2 U.S.C. §437g(a)(3)(B) by issuing a
press release announcing the filing of their complaint regarding AMPAC
on the following day.

PRELIMINARY LEGAL ANALYSIS

The language in 2 U.S.C. §437g(a)(3)(B) refers to any "notification
or investigation." The Conference Report on the 1976 amendments, House
Rpt. No. 94-1057, 94th Cong., 2d Sess., p. 47 (1976), states "Subsection (a)(3)
prohibits the Commission and any person from making public any investigation
or any notification made under subsection (a)(2) without the written consent
of the person receiving the notification or the person under investigation."

(See Continuation Sheet)

RECOMMENDATION

Close file. Send attached letters.

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Date of Next Commission Review: _____

CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

(Although the conference report refers to the Commission's finding of reasonable cause to believe, this is an apparent misprint on page 47 of the report, and should read "reason to believe.")

Sec. 313 (a) (2) (2 U.S.C. §437g(a) (2)) of the Act refers to notifications or investigations after the Commission has found reason to believe a violation has occurred. Therefore, it would appear that the prohibition of 2 U.S.C. §437g(a) (3) (B) is not triggered until the Commission has found reason to believe pursuant to 2 U.S.C. §437g(a) (2).

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COMPLAINT
OF THE
AMERICAN MEDICAL POLITICAL ACTION COMMITTEE
TO THE
FEDERAL ELECTION COMMISSION

The American Medical Political Action Committee hereby submits this complaint to the Federal Election Commission pursuant to 2 U.S.C. 437g and urges timely and expeditious investigation of the matters alleged herein.

The Complainant is the American Medical Political Action Committee, P.O. Box 4449, Chicago, Illinois 60680, AC 312 644-1585, a multicandidate committee as defined by the Federal Election Campaign Act of 1971, as Amended.

The primary respondents are Common Cause, 2030 M Street, N.W., Washington, D.C. 20036 and Mr. Fred Wertheimer, Vice President of Operations, Common Cause, 2030 M Street, N.W., Washington, D.C. 20036, and secondarily, other un-named respondents who, on the basis of a Common Cause press release, have caused publicity to be disseminated concerning a complaint filed by Common Cause pending before the Commission.

This complaint is not being filed on behalf of or at the request or suggestion of a candidate for Federal office.

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It is Complainant's belief that Common Cause, Mr. Fred Wertheimer, and others have violated the spirit and letter of the Federal Election Campaign Act, as Amended, by issuing a press release on or about October 2, 1976, giving publicity to its complaint to the Federal Election Commission which accuses the American Medical Political Action Committee (AMPAC) and nine (9) other respondents of 21 violations of the Act and names 21 candidates for Federal office as recipients of such contributions. It is further Complainant's belief that other un-named respondents relied on the press release furnished by Common Cause and aggravated the violation by giving publicity to the complaint filed with the Federal Election Commission. Illustrative examples of this publicity are attached as Exhibits A through H.

I. Authorities

2 U.S.C. 437g (a) (3) (B) provides:

"Any notification or investigation made under paragraph (2) shall not be made public by the Commission or by any person without the written consent of the person receiving such notification or the person with respect to whom such investigation is made." (emphasis added)

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This provision of the law relates to any complaint received by the Federal Election Commission in connection with an alleged violation of the Act if the complaint has been properly filed under the Act as provided in 2 U.S.C. 437g (a).

The proposed F.E.C. Regulations presented to the Congress on August 4, 1976 and printed in the Federal Register on August 25, 1976 repeat the confidential nature of the notification in Section 111.4 as follows:

"...Such notification shall be confidential as required by 2 U.S.C. 437g (a)(3)(B)."

The legislative history supports this interpretation as printed in Conference Report No. 94-1057 to accompany S.3065, Page 50, April 28, 1976:

"The conferees' intent is that a violation within the meaning of Section 313 (c) occurs when publicity is given to a pending investigation..."

Further, 2 U.S.C. 437g (c) provides that:

"Any member of the Commission, any employee of the Commission, or any other person who violates the provisions of subsection (a)(3)(B) shall be fined not more than \$2,000. Any such member, employee, or other person who knowingly and willfully violates the provisions of subsection (a)(3)(B) shall be fined not more than \$5,000". (emphasis added)

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Section 111.15 of the proposed F.E.C. Regulations provides further that:

"(a) In order to avoid the possibility of prejudice, real or apparent, to the public interest in enforcement actions pending before the Commission... except to the extent required for the disposition of ex parte matters as required by law...no interested person outside the agency shall make or cause to be made to any Commissioner or any member of the Commission's staff involved in handling enforcement actions any ex parte communication relative to the factual merits of any enforcement action, nor shall any Commissioner or member of the Commission's staff involved in the decisional process make or entertain any such ex parte communications. (emphasis added)

"(b) This prohibition of this regulation shall apply from the time a complaint is filed with the Commission...."

II. Legislative Purpose

All of the above citations evidence the clear intent of Congress to maintain fair-play in connection with the complaint procedure. Congress went to great lengths to prevent the complaint, notification and investigation procedures to be used for or against candidates or committees in the heat of election campaigns.

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In fact, one of the impelling reasons for Congress to enact this legislation emanated from national incidents where the mere charges of wrong doing were as damaging to the reputation and future of individuals involved in national election processes as any conviction could possibly be. Further, it is inconceivable that Congress would create a process of enforcement which can be subjected to manipulation by those who seek to defeat candidates for Federal office.

AMPAC believes that subsections 437g (a) (2) and (3) (B) accomplish this purpose by prohibiting public comment from the time a complaint is filed until the time the matter under investigation is resolved by the Commission or a civil action is instituted. Subsection (a) (3) (B) references paragraph (a) (2), the principal subject of which is an alleged violation received as a complaint. It only, secondarily, provides for a procedural count-down. In using the term "violation" four (4) times, this subsection places affirmative responsibility on the Commission compelling it to act when it "has reason to believe that...a violation has occurred" and does not merely furnish a procedural timetable.

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III. Other Considerations

Complainant AMPAC urges the Commission to consider carefully the following points in its deliberations on this complaint:

- A. The necessity for confidentiality, which is in the public interest generally and which protects individuals from abuse specifically, does not have a special feature or function when "notification" occurs. Confidentiality is essential from the very moment a complaint is filed.
- B. Confidentiality must be provided to assure justice which, under the law, can only be enforced by the Commission. (2 U.S.C. 437d (e)). This provision can not be protective unless the Commission takes prompt enforcement action.
- C. An enforcement action begins when a complaint is filed(437g (a)).
- D. Publicity resulting from the filing of a complaint can cause an ex parte communication to members of the Commission and the Commission's staff. The person causing such publicity is making or causing to be made an ex parte communication within the meaning of the law as interpreted by Section 111.15 of the proposed Regulations Subsection (b) applies specifically to complaints.

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- E. Complaints concerning violations of PL 94-283 and precedent legislation have been brought to the Commission in great numbers, yet to the best of AMPAC's knowledge, those filing the complaints, the Commission, and the respondents have complied with the confidentiality provisions of the law by not issuing news releases, in the public interest and in the interest of fair-play.
- F. Subsection (a) (2), cited previously, places a special and onerous burden on the Commission if the publicity limitations of Section 437g (a) (3) (B) are interpreted as not applying to the complaint procedure. This subsection places a responsibility on the Commission to bring an action against an alleged violator if it has "reason to believe" a violation has occurred. Presumably the Commission would not make public its complaint and subsequent notification. If the Commission fails to act when it has sufficient information to believe a violation has occurred, and another party intervenes to file a complaint and attends that complaint with national publicity which is harmful to others not named as respondents in the complaint, suits for damages against the Commission could ensue.

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Examples of "sufficient information" might include:

1. Testimony presented to the Commission;
2. A member of the Commission's staff is widely quoted inferring that a violation might have occurred or that he had this opinion on an unstudied situation; or
3. The potential respondent has notified the Commission of its actions by timely filing over a long period of time.

G. Use or misuse of the complaint procedure for the publicity value attendant to it, if not prohibited, becomes a political ploy, has the intent of influencing a Federal election, and, in addition to violating the confidentiality provisions of the law, constitutes an in-kind contribution or an independent expenditure, both of which are reportable and require specific notices. No purpose, other than a political one, was served by publicizing the names of candidates involved in the subject complaint since they were not named as respondents. Assessment of the catastrophic damages to innocent candidates cannot be imagined much less measured.

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H. The Commission cannot enforce the law properly and still take the position that the confidentiality provisions in Section 437g (a) (2) and (3) (B) do not require confidentiality until there is notification of a complaint.

If the Commission is free to discuss and publicize a complaint until there is an action called "notification" by the Commission, then when the Commission no longer comments it is actually publicizing, loud and clear, that it has given notification. If, as the case may be, the Commission is not commenting from the outset, even about a complaint, when the Commission enforces the law prohibiting publicity after notification has been given, is it not then saying, loud and clear, that there has been a notification?

There is more than one way for the Commission to make known that a notification has been given other than by making a public statement. Once the Commission begins to enforce the confidentiality provisions of the law concerning notification and investigation it is, in fact, publically acknowledging notification and investigation.

The only way the Commission cannot make known that the notification and investigation procedure has commenced is to require the same confidentiality in connection with the complaint.

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IV. Emergency Consideration Essential

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The Federal Election Commission by design and practice, must be a rational, unemotional, non-political, fair forum in its enforcement of the Federal Election Campaign Act. The activities which it engages in, allows, permits to continue, or fails to terminate are key to its public purpose. But timeliness and confidentiality are twin essentials. The Commission will have failed to serve its purpose if, in order to get a problem or complaint resolved, the political process or an individual candidate is irreparably damaged.

We respectfully urge the Commission to consider this complaint with all possible speed under the least prejudicial conditions for all concerned and issue an informational directive concerning the confidentiality of complaints applicable to all.

AMPAC's September, 1976 Report of Receipts and Expenditures has been filed. About 120 candidates for Federal office appear on the appropriate contribution schedule. Since we do not know if these candidates have or will receive contributions from other political action committees, we cannot know how many may be subject to harassment or abuse by similar publicity attendant to complaints filed by Common Cause or by any other person.

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Page Eleven

Therefore, AMPAC urges emergency consideration of this complaint to assure compliance with the Federal Election Campaign Act of 1971, as Amended.

William L. Watson, Executive Director and Treasurer, American Medical Political Action Committee, P.O. Box 4449, Chicago, Illinois 60680, being first duly sworn, says that he has read the foregoing complaint and knows the contents thereof, and that the same is true on information and belief.

William L. Watson

William L. Watson
Executive Director and Treasurer
American Medical Political Action Committee

WLW:ts

State of Illinois

County of Cook

Subscribed and sworn to me this 11th day of
October, 1976

Lee Ann Elliott
(Notary Public)

My Commission expires April 17, 1977.

Attachments -- See next page.

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more -

78040043196

Attachments: Exhibit A - U.P.I. wire story, by Clay Richards, October 2, 1976
Exhibit B - WASHINGTON POST, "Common Cause Accuses AMA Units Of Violating Political Donation Limits", October 3, 1976
Exhibit C - THE SUN, "AMA gifts for politics criticized", October 4, 1976
Exhibit D - CHATTANOOGA TIMES, "Rep. Ruppe Says Gift From AMA To Be Returned", October 5, 1976
Exhibit E - CHICAGO SUN TIMES, "Back to AMA", October 5, 1976
Exhibit F - NEW YORK TIMES, "Gift of \$1,000 From A.M.A. Is Returned by Candidate", October 5, 1976
Exhibit G - WASHINGTON STAR, "AMA Campaign Aid To Virginians Questioned", October 5, 1976
Exhibit H - SUNDAY SUN-TIMES, "Charge AMA campaign gifts exceed limits", October 3, 1976

Copies:

Commissioner Vernon Thompson, Chairman
Commissioner Joan Aikens
Commissioner Thomas Harris
Commissioner Neil Stabler
Commissioner William Springer
Commissioner Robert Tiernan
Commissioner Edmund Henshaw, Ex Officio
Commissioner Francis Valeo, Ex Officio
Mr. John Murphy, General Counsel
Mr. Orlando Potter, Staff Administrator

Common Cause
Mr. Wertheimer

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R W

U.P.I.

AM-FUNDS SKED 10-2
ADV FOR 630PM EDT

October 2, 1976

BY CLAY RICHARDS

WASHINGTON (UPI) -- COMMON CAUSE CHARGED SATURDAY THAT POLITICAL ACTION COMMITTEES OF THE AMERICAN MEDICAL ASSOCIATION AND ITS STATE AFFILIATES VIOLATED THE \$5,000 LEGAL LIMIT ON CAMPAIGN CONTRIBUTIONS TO CONGRESSIONAL CANDIDATES 21 TIMES.

IN THE FIRST MAJOR ALLEGATION OF VIOLATION OF THE ELECTION REFORM ACT, THE CITIZENS LOBBY FILED A FORMAL COMPLAINT WITH THE FEDERAL ELECTION COMMISSION ASKING FOR AN ORDER HALTING THE CONTRIBUTIONS.

"IT IS PATENTLY UNFAIR TO ALLOW THE AMERICAN MEDICAL ASSOCIATION TO PLAY BY ITS OWN SET OF RULES IN THE 1976 ELECTIONS WHILE OTHERS ARE COMPLYING WITH THE LETTER AND SPIRIT OF THE NEW CAMPAIGN LAW," SAID COMMON CAUSE VICE PRESIDENT FRED WERTHEIMER.

COMMON CAUSE LISTED 21 CONGRESSIONAL CANDIDATES WHO HAVE RECEIVED MORE THAN \$5,000 FROM THE AMA POLITICAL COMMITTEE OR ITS STATE AFFILIATES. THE LIST INCLUDED SENS. LLOYD BENTSEN, D-TEX., WHO RECEIVED \$10,000 AND JAMES BUCKLEY, R-C.N.Y., WHO RECEIVED \$9,000.

AN EARLIER STUDY BY THE GROUP SHOWED THAT THE AMA AND ITS AFFILIATES HAD DONATED ALMOST \$1 MILLION TO CONGRESSIONAL CANDIDATES SO FAR THIS YEAR -- THE HIGHEST AMOUNT OF ANY SPECIAL INTEREST GROUP.

THE ELECTION REFORM ACT LIMITS CONTRIBUTIONS BY EACH GROUP TO \$5,000 PER CANDIDATE. A SPECIAL AMENDMENT TO THE LAW THIS YEAR PROHIBITED STATE AFFILIATES OF A NATIONAL ORGANIZATION LIKE THE AMA FROM GIVING INDIVIDUAL \$5,000 CONTRIBUTIONS BECAUSE IT COULD RESULT MASSIVE CONTRIBUTIONS.

THE OTHER 19 CANDIDATES NAMED WERE: RALPH ARGEN, NEW YORK, \$10,000; BELDEN BELL, INDIANA, \$10,000; ADAM BENJAMIN, INDIANA, \$7,500; VINCENT CALLAHAN JR., VIRGINIA \$8,000; WILLIAM CHAPPELL, FLORIDA, \$5,500; DAVID CRANE, INDIANA, \$7,500; ROBERT DANIEL JR., VIRGINIA, \$7,000; JAMES J. DELANEY, NEW YORK, \$8,330; ROSS FREEMAN, KANSAS, \$5,500; JOHN GRADY, FLORIDA, \$7,500; J. PRESTON HUGHES, UTAH, \$10,000; NANCY JUDY, TEXAS, \$6,000; RICHARD LUGAR, INDIANA, \$10,000; JOHN Y. MCCOLLISTER, NEBRASKA, \$10,000; WILMER MIZELL, NORTH CAROLINA, \$10,000; PHILIP RUPPE, MICHIGAN, \$6,000; JAMES R. TATE, VIRGINIA, \$7,000; WILLIAM C. WAMPLER, VIRGINIA, \$7,000 AND G. WILLIAM WHITEHURST, VIRGINIA, \$6,000.

UPI 10-02 04:25 PED

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Exhibit A

WASHINGTON POST
October 3, 1976

Common Cause Accuses AMA Units Of Violating Political Donation Limits

By Morton Mintz
Washington Post Staff Writer

Common Cause has accused the American Medical Association Political Action Committee and some of its more than 50 affiliates of 21 violations of the \$5,000 limit on contributions to House and Senate candidates.

The self-styled citizens' lobby made the charges in a formal complaint filed with the Federal Election Commission late Friday.

The FEC should promptly stop the AMPACs from making additional joint contributions exceeding the \$5,000 limit, particularly because congressional campaigns are now in their "most crucial and active period," said Fred Wertheimer, the Common Cause vice president who heads its campaign finance monitoring project.

The national AMPAC's counsel, Donald P. Wilcox of Chicago, said in a telephone interview that the organization complies with the election law. But that law bars comment on a complaint, he said.

FEC General Counsel John G. Murphy Jr. said he was unaware of the complaint and would have no comment on it.

Murphy did say, however, that the commission has taken "a sturdy position" on enforcement of the "anti-proliferation" amendment to the election law on which Common Cause bases its complaint.

The amendment, effective last May 11, was designed to prevent an organi-

zation from exceeding the law's limit of \$5,000 per candidate per election by having numerous affiliates also contribute.

Specifically, the law says that all contributions made by political committees "established or financed or maintained or controlled by...any person, including any...branch, division, department or local unit of such...person" are considered to have been made by a single contributor. The law defines "person" to include a professional association.

"The AMA and its affiliates are doing precisely what the 1976 amendment was designed to prohibit," Wertheimer said.

The complaint to the FEC said agency records list 17 Republican and four Democratic congressional candidates who received \$5,500 to \$10,000 each from more than one AMPAC for a primary or general-election race after the effective date of the amendment.

In an interview last July 22, the FEC's Murphy told The Washington Post that for purposes of the \$5,000 limit, the AMPACs are a single committee, "as we read the law, subject to further factual information."

If the commission finds that any political committee has exceeded the \$5,000 limit, it can compel recipients of the excess to refund it. If a violation is ruled deliberate rather than inadvertent, the FEC can seek an injunc-

tion or refer the case to the Justice Department for possible criminal prosecution.

In reports to the FEC, fund transfers among the national AMPAC and affiliates are frequently listed. Usually, a state or county medical society collects AMPAC and state PAC fees along with dues. Some of the AMA's approximately 170,000 paid-up members contribute directly to a state PAC, with part of the contribution going to the national AMPAC.

THE project reported last Wednesday that the AMPACs ranked first among the special-interest groups that together contributed a record \$10,132,895 in the 20-month period ending Aug. 31.

FEC records list contributions of \$963,725, for the AMPACs, compared with \$682,184 for dairy co-ops' committees and \$630,974 for AFL-CIO units, Common Cause said. Physicians who give to AMPACs generally have special concerns about health insurance and a wide range of other legislation before Congress.

The Common Cause complaint listed \$19,000 contributions to Sen. Lloyd M. Bentsen (D-Tex.) and the following Republican House and Senate candidates: Ralph Arsen (N.Y.), Belden Ball (Ind.), J. Preston Hughes (Utah), Richard Lugar (Ind.), Rep. John Y. McCollister (Neb.) and Wilmer Mizell (N.C.). Other recipients were listed as:

Sen. James L. Buckley (Cons.-R-N.Y.), \$9,000; Rep. James J. Delaney (D-N.Y.), \$5,300; Vincent Callahan Jr. (R-Va.), \$9,000; Adam Benjamin (D-Ind.), David Crane (R-Ind.) and John Grady (R-Fla.), \$7,500 each; Rep. Robert W. Denier Jr. (R-Va.), James R. Tate (R-Va.) and Rep. William C. Wampler (R-Va.), \$7,000 each; Nancy Judy (R-Tex.), Rep. Philip E. Russo (R-Mich.) and Rep. G. William Whitehurst (R-Va.), \$6,000 each; and Rep. Bill Chappell Jr. (D-Fla.) and Ross Freeman (R-Ken.), \$5,500 each.

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Exhibit B

THE SUN, Monday, October 4, 1976

AMA gifts for politics criticized

Washington (AP)—The American Medical Association has been accused of violating the limits on contributions to political candidates in a complaint filed by Common Cause with the Federal Election Commission.

The complaint, announced by the citizens group during the weekend, accuses political action committees of the AMA and its state affiliates of more than 20 violations.

Federal law limits the contribution by a committee to any single candidate for federal office to \$5,000 for any given election. The AMA has contended that its state affiliates are independent bodies and may give their own contributions up to the limit in addition to the gifts by the national group.

In its complaint, Common Cause argues that all political committees of a national organization and its state affiliates should be treated as one committee and subjected collectively to the limit of \$5,000 for a candidate.

"We are now in the most crucial and active period of the national campaign," Common Cause's vice president, Fred Wertheimer, said.

"It is patently unfair to allow the American Medical Association to play by its own set of rules in the 1976 elections while others are complying with the letter and spirit of the new campaign finance law," he said.

Mr. Wertheimer said other groups with state affiliates regard political contributions from national offices and state affiliates to any one candidate as a single gift subject to a single \$5,000 limit.

The complaint to the FEC lists 21 congressional candidates who have received more than \$5,000 from AMA-related committees, including seven who received the full \$5,000 from both national and state AMA committees for a total of \$10,000 to each of the seven.

The seven identified as receiving \$10,000 from AMA-related committees in either a primary or general election campaign include Ralph Argen (R., N. Y.), Beiden Bell (R., Ind.), Lloyd M. Bentzen (D., Texas), J. Preston Hughes (R., Utah), Richard Lugar (R., Ind.), John McCollister (R., Neb.) and Wilmer Mitchell (R., N. C.).

Others on the list were Adam Benjamins (D., Ind.), \$7,750; James Buckley (C.-R., N. Y.), \$9,800; Vincent Callahan Jr. (R., Va.), \$4,000; William Chappell (D., Fla.), \$5,500; David Crane (R., Ind.), \$7,500; Robert Daniel, Jr. (R., Va.), \$7,000; James J. Delaney (D., N. Y.), \$4,300; Ross Freeman (R., Kan.), \$5,500; John Grady (R., Fla.), \$7,500; Henry Jody (R., Texas), \$4,000; Philip Rapp (R., Mich.), \$5,900; James R. Tate (R., Va.), \$7,000; William C. Wampler (R., Va.), \$7,000; and G. William Whitcomb (R., Va.), \$4,000.

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CHATTANOOGA TIMES

October 5, 1976

Rep. Ruppe Says Gift From AMA To Be Returned

HOUGHTON, Mich. (AP) — Rep. Philip E. Ruppe, R-Mich. says his campaign committee is returning a check for \$1,000 to the national American Medical Association Political Action Committee.

Ruppe was one of 21 congressional candidates listed by the citizens lobby Common Cause who, it said, received contributions from the American Medical Association and its state affiliates in excess of legal limits.

Common Cause filed a complaint last weekend with the Federal Election Commission saying that the AMA has violated the limits on contributions to political candidates.

It said Ruppe received \$6,000 from political action committees of the AMA, while the law sets the limit at \$5,000.

Ruppe, campaigning in Michigan, said Monday that his committee has accepted two separate contributions from two separate medical association committees — the national committee and the state of Michigan committee.

"While the total of the two was \$6,000, neither has exceeded the authorized limit of \$5,000 per election," he said.

"Pending a formal ruling from the FEC, and so there is absolutely no question about my consistent record of complying fully with the law, my committee will return at once to the American Medical Association's Political Action Committee — the national committee — a check for the amount of \$1,000," Ruppe said.

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CHICAGO SUN TIMES
October 5, 1976

Back to AMA

HOUGHTON, Mich. — Rep. Philip E. Ruppe (R-Mich.) said his campaign committee will return \$1,000 of \$6,000 donated by the American Medical Assn. The Common Cause citizens lobby had said Ruppe was one of 21 congressional candidates who received contributions in excess of the \$5,000 legal limit from the AMA and its state affiliates. Ruppe said the total came from a national and a state committee, and neither contribution exceeded the limit. But the \$1,000 would be returned pending a Federal Election Commission ruling, he said, "so there is absolutely no question about my consistent record of complying fully with the law."

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NEW YORK TIMES
October 5, 1976

GIFT OF \$1,000 FROM A.M.A. IS RETURNED BY CANDIDATE

HOUGHTON, Mich., Oct. 4 (AP)—Representative Philip E. Ruppe, Republican of Michigan, says his campaign Committee is returning a check for \$1,000 to the national American Medical Association's Political Action Committee.

Mr. Ruppe was one of 21 Congressional candidates listed by public affairs lobby, Common Cause, who, it said, received contributions from the American Medical Association and its state affiliates in excess of legal limits.

Common Cause filed a complaint last weekend with the Federal Election Commission saying the A.M.A. had violated the limits on contributions to political candidates. It said Mr. Ruppe received \$6,000 from political action committees of the A.M.A. while the law sets the limit at \$5,000.

Mr. Ruppe said today that his committee had accepted two separate contributions from two medical association committees—the national committee and the state Michigan committee.

"While the total of the two was \$6,000, neither has exceeded the authorized limit of \$5,000 per election," he said.

"Pending a formal ruling from the F.E.C., and so there is absolutely no question about my consistent record of complying fully with the law, my committee will return at once to the American Medical Association's Political Action Committee—the national committee—a check for the amount of \$1,000," he said.

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Exhibit F

Callahan, Tate Deny Wrongdoing AMA Campaign Aid to Virginians Questioned

By Rebecca Lest

Washington Star Staff Writer

Two Northern Virginia congressional candidates are among 21 candidates nationwide who have received more in campaign contributions from the political action committees of the American Medical Association than is legally allowed, according to Common Cause.

In a complaint filed last week with the Federal Elections Commission, the self-proclaimed national citizens lobby named James R. Tate, who is challenging 8th District Democratic Rep. Herbert E. Harris, and Vincent F. Callahan Jr., who is challenging 18th District Democratic Rep. Joseph L. Fisher, as the two who received more than the legal maximum from the AMA and its state affiliates.

Common Cause maintains that the political action committees of the AMA and its state units meet the FEC criteria for being a single organization and hence may give only \$5,000 to a congressional candidate in the general election.

TATE RECEIVED \$5,000 from the AMA and \$2,000 from the Virginia medical association. Callahan got \$5,000 from the AMA and \$3,000 from the state.

"We were assured by their (the AMA legal) counsel that they were two distinct committees," said a Callahan spokesman yesterday. He added that Fisher "has been heavily financed by out-of-state labor unions."

"Our understanding was that they came from separate organizations and we presumed the AMA and various state affiliates have competent legal counsels which would advise them about the requirements about the law," a Tate spokesman said.

He called Harris' complaint about the contribution "hypocrisy" in light of the amount of money Harris has accepted from labor unions.

Neither Tate nor Callahan spokesmen alleged that the two Democrats have received any illegal contributions, however.

Harris suggested that Tate return the \$7,000 pending the FEC's decision on whether the money is a legal contribution or not.

"After the nightmare of Watergate, Mr. Tate and his campaign staff should be more attentive to the law limiting contributions and should have returned any illegal funds voluntarily by now," Harris said.

"THE AMA MIGHT plead ignorance of the law, but that is no excuse for Mr. Tate accepting the money," he added.

Tate will return any money the FEC finds ex-

ceeds the contribution limit, his spokesman said, adding: "It's hard to keep track of the new election law. It's so complex you just about have to consult with a lawyer anytime you do anything."

Both Tate and Harris are attorneys by profession.

Tate charged just last week that Harris' friend of one of the most powerful special interests around — the big unions. He called for "government that responds to (people's) needs, not those of the powerful interest groups."

Common Cause recently compiled a list of special interest groups, including the political action committees of the major unions, which have contributed the most money nationwide to candidates for Congress. It found that the AMA was the largest single spender, having given away close to \$1 million by Sept. 1, and having another \$1 million still available to contribute.

THE COMMON CAUSE complaint, which names three other Virginia Republican congressional candidates along with incumbents like Sen. Lloyd Bentsen, D-Tex., and Sen. James Buckley, Conservative-Republican of New York, seeks to have the FEC prohibit the AMA and its state units from further contributions.

Fred Wertheimer, a Common Cause vice president, noted that the AMA had violated an amendment to the federal election law which was enacted last May. "The AMA and its affiliates are doing precisely what the 1976 amendment was designed to prohibit," he said.

The FEC could require Tate or Callahan to return any money over the \$5,000 limit or, if it finds the violation is deliberate, could fine the candidates or refer the cases to the Justice Department for criminal prosecution.

Tuesday, October 5, 1976

The Washington Star

FEDERAL ELECTION COMMISSION
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Charge AMA campaign gifts exceed limits

WASHINGTON (UPI) — Common Cause charged Saturday that political action committees of the American Medical Assn. and its state affiliates violated the \$5,000 legal limit on campaign contributions to congressional candidates 21 times.

In the first major allegation of violation of the election reform act, the citizens hobby filed a formal complaint with the Federal Election Commission asking for an order halting the contributions.

Common Cause listed 21 committee or its state affiliates congressional candidates who have received more than \$5,000 from the AMA political committee on its state affiliates. The list included Senators Lloyd M. Bentsen (D-Tex.), who received \$10,000, and James L. Buckley (Con-R-N.Y.), who received \$9,000.

An earlier study by the group showed that the AMA and its affiliates had donated almost \$1 million to congressional candidates so far this year — the highest amount of any special-interest group.

The other 19 candidates named were Ralph Argen, New York, \$10,000; Belden Bell, Indiana, \$10,000; Adam Benjamin, Indiana, \$7,500; Vincent Callahan Jr., Virginia \$8,000; William Chappell Jr., Florida, \$5,500; David Crane, Indiana, \$7,500; Robert W. Daniel Jr., Virginia, \$7,000; James J. Delaney, New York, \$8,330; Ross Freeman, Kansas, \$5,500; John Grady, Florida, \$7,500; J. Preston Hughes, Utah, \$10,000; Nancy Judy, Texas, \$6,000; Richard J. Lugar, Indiana, \$10,000; John Y. McCollister, Nebraska, \$10,000; Wilmer Mizell, North Carolina, \$10,000; Philip E. Ruppe, Michigan, \$6,000; James R. Tate, Virginia, \$7,000; William C. Wampler, Virginia, \$7,000 and G. William Whitehurst, Virginia, \$6,000.

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Exhibit H

78040043205



FEDERAL ELECTION COMMISSION

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

October 18, 1976

Memorandum To: Bill Oldaker
Through: Al Keena/Drew McKay *GAU*
From: Nancy Davis *ND*
Subject: Letter submitted by AMPAC
RAS #09-76

AMPAC filed a letter of personal protest with their October 10 Report. RAS is referring this complaint to OGC for your information.

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JAMES C. MacLennan, M.D., San Diego, California
Secretary
Mrs. John M. CHAMBERS, President, Alabama
GEOFFREY T. BARNETT, M.D., M.D., Brown, North Carolina
WILLIAM M. CURRY, M.D., Washington, D.C.
JAMES F. CROMBIE, M.D., Fayetteville, Rhode Island
BRYAN F. BARNETT, M.D., Oklahoma City, Oklahoma
THOMAS P. LEVIN, M.D., Fairleigh, Pennsylvania
W. J. LAMM, M.D., Dayton, Ohio
JAMES M. BARNETT, Jr., M.D., San Francisco, Texas
JAMES C. VAN TANK, M.D., Cocoa Beach, Florida
WILLIAM L. BARNETT, Executive Director and Treasurer
Miss Ann BARNETT, Assistant Executive Director and Assistant Treasurer

Offices located at 535 North Dearborn

October 8, 1976
Certified Mail
Ident.#C 00000422

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

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

Dear Commissioners:

This report is being filed under personal protest.

As Treasurer of the American Medical Political Action Committee I protest the filing of this report due to the unwillingness of the Federal Election Commission to protect the public interest by insuring that complaints filed on the basis of our reports are not kept confidential by all parties. The Federal Election Commission's failure to act under the enforcement provisions of the Federal Election Campaign Act exposes candidates for the United States Congress to abusive and unfair publicity.

The Law in 2 U.S.C. 437g (a) (3) (B), the proposed regulations in Sections 111.4 and 111.15, and the legislative history of the Act (Report Number 94-1057, April 28th, 1976, Page 50) protects candidates, in the heat of an election, from false and inflammatory charges. The sole relief for those accused is the strict enforcement of these provisions by the Federal Election Commission. No real relief exists if the Commission fails to act expeditiously to remove any complaint from the public forum of the newspapers to the confidential forum of the Commission, as provided by law.

I have reluctantly enclosed our 10th Report of Receipts and Expenditures covering the period of September 1st, 1976 through September 30th, 1976. This filing is in accordance with the Federal Election Act of 1971 and subsequent Amendments.

Sincerely,
William L. Watson
William L. Watson

WLW:ts

Executive Director and Treasurer

Attached: Schedule A-15a -- Schedule B-20a, Schedule A-18b (7 Pages),
Schedule B-23b, (18 Pages).

cc: Secretary of state offices in: Montana, District of Columbia, Texas, Georgia, Florida, Colorado, Kansas, Wisconsin, Oklahoma, Delaware, Connecticut, Michigan, New Jersey, Virginia, Tennessee, Indiana, Utah, North Carolina, California, Pennsylvania, Louisiana, Washington, Iowa, North Dakota, Illinois, Missouri, Arizona, Massachusetts, New York, Rhode Island, Miss. and Md.

Stacy R. F. R. B. J.

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 270

