



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 674

Date Filmed 12/20/78 Camera No. --- 2

Cameraman LPC

PS Form 3811, Apr. 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

Letter *674(78)*

● **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 *C*
☒ Show to whom, date, and address of delivery *C*
☐ **RESTRICTED DELIVERY**
 Show to whom and date delivered *C*
☐ **RESTRICTED DELIVERY**
 Show to whom, date, and address of delivery \$
CONSULT POSTMASTER FOR FEES.

2. **ARTICLE ADDRESSED TO**
Mr. J. E. ...

3. **ARTICLE DESCRIPTION**
 REGISTERED NO. *943456* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE *[Signature]* Addressee Authorized agent

4. DATE OF DELIVERY *[Signature]* POSTMARK *101 9 1978*

5. ADDRESS/Complete only if requested
100 S. ...

6. UNABLE TO DELIVER BECAUSE *22202* CLERK'S INITIALS

FEDERAL ELECTION COMMISSION

DRAFT REPORTS AND LETTERS

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

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

date

Philip J. [Signature]
10/2/78



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

October 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lou Barnett, Treasurer
Young Republican National
Federation
310 First Street, S.E.
Washington, D.C. 20062

Re: MUR 674 (78)

Dear Mr. Barnett:

On September 29, 1978 the Commission voted to terminate its investigation in MUR 674 (78). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Should you have any questions, please contact Philip Kellett, the staff member assigned to this matter, at 202-523-4175.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosures

Commission Certification

78040081974



FEDERAL ELECTION COMMISSION

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

October 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Julian Gammon
1600 S. Eads Street, #10035
Arlington, Virginia 22202

Re: MUR 674(78)

Dear Mr. Gammon:

On September 29, 1978, the Commission voted to terminate its investigation in MUR 674(78). A copy of the Commission's determination and the General Counsel's Report are enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a large, light-colored circular mark.

William C. Oldaker
General Counsel

Enclosures

Commission Certification
General Counsel's Report

7 9 0 4 0 0 8 1 9 7 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Young Republican National) MUR 674 (78)
Federation;)
Lou Barnett, Treasurer)

CERTIFICATION

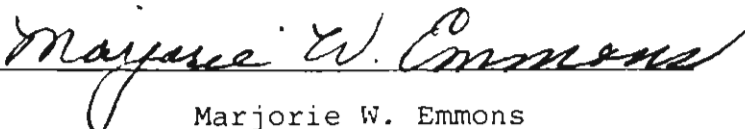
I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 29, 1978, the Commission determined by a vote of 5 - 0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe respondents are in violation of 2 U.S.C. §434(b) and 11 CFR 104.2(b)(4);
2. Send the letters attached to the General Counsel's Report; and
3. Close the file in this matter.

Voting for this determination were Commissioner Aikens, Tiernan, Staebler, Thomson, and Harris.

Attest:

9/29/78
Date


Marjorie W. Emmons
Secretary to the Commission

Report dated: 9-26-78
Received in Office of Commission Secretary: 9-27-78, 10:26
Circulated on 48 hour vote basis: 9-27-78, 3:00

RECEIVED
OFFICE OF THE
COMMISSIONER
BEFORE THE FEDERAL ELECTION COMMISSION
September 26, 1978

78 SEP 27 AIO: 26

In the Matter of)
)
Young Republican National) MUR 674 (78)
Federation;)
Lou Barnett, Treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND:

On August 30, 1978, the Commission found reason to believe that respondents were in violation of 2 U.S.C. §434(b) and 11 CFR §104.2(b)(4) for their failure to report a \$1,000 disbursement to the "Anti-Treaty Truth Squad."

II. EVIDENCE:

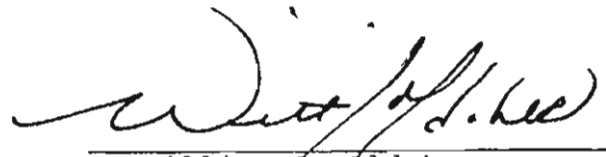
On September 13, 1978, respondents' counsel wrote the Commission to advise that the source of the disbursement in question was an independent State and local committee, and not the respondent Federal committee (see attached). Respondents' counsel went on to add that the newsletter accounts were in error when they cited respondent committee as the source of the disbursement.

We have no evidence to establish that the respondents, and not the State and local committee made this disbursement. Since the respondents apparently did not make this disbursement, they are not in violation of the Act for failure to report all disbursements.

III. RECOMMENDATION:

1. Find no reasonable cause to believe respondents are in violation of 2 U.S.C. §434(b) and 11 CFR §104.2(b)(4);
2. Send the attached letters; and
3. Close the file in this matter.

9/26/78
Date


William C. Oldaker
General Counsel

Attachments:

Certification
Letters to Respondent and Complainant
Letter to Commission from Respondents
Counsel

73718731973

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Young Republican National) MUR 674 (78)
Federation;)
Lou Barnett, Treasurer)

CERTIFICATION

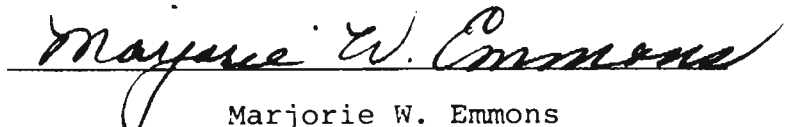
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1. Find no reasonable cause to believe respondents are in violation of 2 U.S.C. §434(b) and 11 CFR 104.2(b)(4);
2. Send the letters attached to the General Counsel's Report; and
3. Close the file in this matter.

Voting for this determination were Commissioner Aikens, Tiernan, Staebler, Thomson, and Harris.

Attest:

9/29/78
Date


Marjorie W. Emmons
Secretary to the Commission

Report dated: 9-26-78
Received in Office of Commission Secretary: 9-27-78, 10:26
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RECEIVED
OFFICE OF THE

BEFORE THE FEDERAL ELECTION COMMISSION
September 26, 1978

78 SEP 27 AIO: 26

In the Matter of)
)
Young Republican National) MUR 674 (78)
Federation;)
Lou Barnett, Treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND:

On August 30, 1978, the Commission found reason to believe that respondents were in violation of 2 U.S.C. §434(b) and 11 CFR §104.2(b)(4) for their failure to report a \$1,000 disbursement to the "Anti-Treaty Truth Squad."

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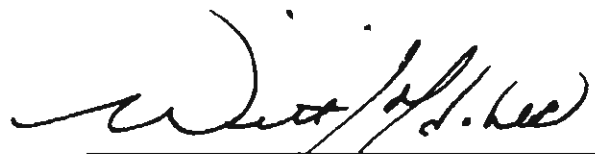
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We have no evidence to establish that the respondents, and not the State and local committee made this disbursement. Since the respondents apparently did not make this disbursement, they are not in violation of the Act for failure to report all disbursements.

III. RECOMMENDATION:

1. Find no reasonable cause to believe respondents are in violation of 2 U.S.C. §434(b) and 11 CFR §104.2(b)(4);
2. Send the attached letters; and
3. Close the file in this matter.

9/26/18
Date


William C. Oldaker
General Counsel

Attachments:

Certification
Letters to Respondent and Complainant
Letter to Commission from Respondents
Counsel

VORYS, SATER, SEYMOUR AND PEASE

1800 M STREET, N. W.

SUITE 800-SOUTH

WASHINGTON, D. C. 20036

TELEPHONE
202-296-2929
CABLE ADDRESS
VORYSATER

September 13, 1978 SEP 15 P 9: 51

52 EAST GAY STREET
COLUMBUS, OHIO 43215
TELEPHONE
614-464-6400

Office of the General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D. C. 20463

806183

Attention: Philip Kellett

RE: MUR 674(78)

Dear Sir:

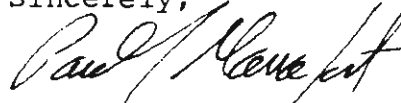
As we discussed on the telephone, the YRNF did not report a \$1,000 transfer to the "Anti-Treaty Truth Squad" because the YRNF Committee did not make the transfer.

Contrary to the reports of the newsletters cited by Mr. Gammon in his complaint, the contribution was made by an independent State and Local Committee. The reports in the newsletters were not accurate and were written without review by the staff of the YRNF. Thus, the error in reporting the source of the \$1,000.

Since the source was a non-federal committee, it is the YRNF's position that it was not involved in the transactions and therefore has not violated any reporting requirement. I am certain that you are aware of the efforts undertaken by YRNF in the past in order to comply with all federal regulations and can assure you that there never was nor will be any intention to violate any law.

I trust that this correspondence satisfies your inquiry into the \$1,000 transfer. If, however, you have any further questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Paul J. Manafort

PJM/1



FEDERAL ELECTION COMMISSION

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

August 31, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lou Barnett, Treasurer
Young Republican National Federation
310 First Street, S.E.
Washington, D.C. 20002

Re: MUR 674(78)

Dear Mr. Barnett:

The Federal Election Commission has received a complaint which alleges your committee committed certain violations 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 674(78). The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. § 434(b). Specifically, it appears that the committee's failure to report a \$1,000 transfer to the "anti-Treaty Truth Squad" violates Commission regulation at 11 C.F.R. § 104.2(b)(4) which requires the identification of any political organization to which any transfer is made by a reporting committee.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

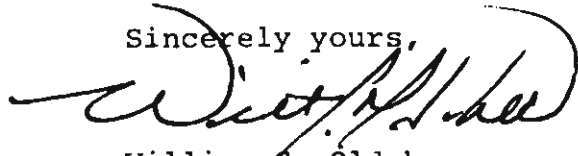
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Philip Kellett, the staff member assigned to this matter, at 202-523-4175.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", written over a large, faint circular stamp or watermark.

William C. Oldaker
General Counsel

Enclosure:

7 8 0 4 0 0 3 1 9 8 3



FEDERAL ELECTION COMMISSION

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

August 31, 1978

Mr. Julian Gammon
1600 S. Eads Street, #1003 S.
Arlington, Virginia 22202

Re: MUR 674(78)

Dear Mr. Gammon:

The Federal Election Commission has completed a preliminary review of your complaint and has numbered it as MUR 674(78). Please refer to this number in any further correspondence.

A summary of your complaint has been forwarded to respondents. If you have any further information you wish to make available to the Commission, please submit it within five days of your receipt of this letter.

The Commission's enforcement procedures are set forth in 2 U.S.C. §437g. Please note that 2 U.S.C. §437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the respondent.

If you have any questions, please call Philip Kellett, the staff member assigned to this matter, at 202-523-4175.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the word "Sincerely,".

William C. Oldaker
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 674 (78)
Young Republican National Federation)
Lou Barnett, Treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 30, 1978 1978, the Commission determined by a vote of 4-0 to adopt the recommendation of the General Counsel to find reason to believe respondents are in violation of 2 U.S.C. §434(b) and 11 CFR §104.2(b)(4).

Voting for this determination were Commissioners Harris Aikens, Staebler and Thomson.

Attest:

8/30/78

Date

Margaret E. Chaney

for Marjorie W. Emmons
Secretary to the Commission

First General Counsel's Report dated: 8-28-78
Received in Office of Commission Secretary: 8-28-78, 10:26
Circulated on 48 hour vote basis: 8-28-78, 3:00

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION AUG 28 1978

MUR NO. 674 (78)
DATE COMPLAINT RECEIVED
BY OGC August 9, 1978
STAFF
MEMBER Kellett

SOURCE: Julian Garmon
1600 S. Eads St., #1003 S.
Arlington, VA 22202

RESPONDENT'S NAME: Young Republican National Federation
Lou Barnett, Treasurer
310 First Street, S.E.
Washington, D.C. 20002

RELEVANT STATUTE: 2 U.S.C. §431(f), §431(d)
2 U.S.C. §434(b), 11 CFR §104.2(b)(4)

INTERNAL REPORTS CHECKED: Public Records, AO 1977-54

FEDERAL AGENCIES CHECKED:

BACKGROUND

In a notarized complaint dated August 1, 1978, complainant alleges that respondents failed to disclose a \$1,000 transfer to the "Anti-Treaty Truth Squad," a coalition of organizations formed in opposition to ratification of the Panama Canal treaties, in violation of 2 U.S.C. §434(b).

ANALYSIS

2 U.S.C. §434(b) requires that political committees disclose all "expenditures" by the committee. "Expenditure" is defined by 2 U.S.C. §431(f) to include any payment made for the purpose of influencing a Federal election, or any transfer of funds from one political committee to another political committee. Moreover, Commission regulations at 11 CFR §104.2(b)(4) requires the identification of each political organization to which a reporting committee or candidate made any transfer of funds in any amount during the reporting period, together with the amounts and dates of transfers. The "Anti-Treaty Truth Squad" was organized to oppose the Panama Canal Treaties and is considered therefore, to be a "political organization" within the sweep of 11 CFR §104.2(b)(4).

136

70 AUG 2 PM 12:02

1600 S. Eads St., # 1003 S.
Arlington, Va. 22202
August 1, 1978

334984

Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

Gentlemen:

Section 437g(a)(1) of the Federal Election Campaign Act (FECA) provides that "Any person who believes a violation of this Act...has occurred may file a complaint with this Commission."

It is my belief that the Young Republican National Federation (YRNF), a partisan organization connected with the Republican National Committee, is in violation of the reporting requirements of the FECA. Specifically, it is my belief that the YRNF has failed to report a contribution of \$1,000 which it reportedly made to support the Truth Squad organized by the Committee to Save the Panama Canal -- a coalition of organizations which opposed ratification of the administration's Panama Canal treaties.

The February 28, 1978, issue of The Right Report, a newsletter published by the Richard A. Viguerie Co., Inc., of Falls Church, Va., reported that "The YRNF...gave \$1,000 to the anti-treaty Truth Squad..." The February 1978 issue of the Democratic Congressional Campaign Committee Report also notes that the YRNF was a member organization of the Committee to Save the Panama Canal, which "sponsored the 'Truth Squad'..." Xerox copies of the relevant pages from both publications are appended to this complaint.

I have personally examined YRNF filings with the FEC for 1977 and 1978 and have been unable to locate any reference therein to such a contribution. This apparent failure to report seems to be a violation of Section 434(b) of the FECA.

In accordance with FEC Regulations, Section 111, I state that this complaint is not filed "on behalf of or at the request or suggestion of" any candidate.

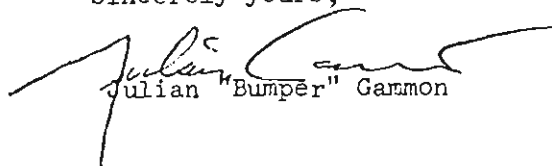
I may be reached by phone about this complaint either at my home (703-800-2269) or my place of employment (301-229-1000).

Following is a summary of the activities of several of the organizations listed above

Page 2 of 2

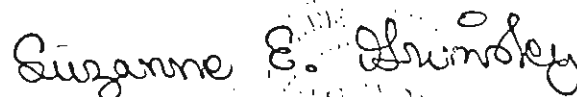
I swear that to the best of my knowledge and belief that the statements made in the above complaint are true.

Sincerely yours,


Julian "Bumper" Gammon

Att.
JBG:esr

On this 1st day of August, 1978, I testify that Julian "Bumper" Gammon appeared before me, a notary in the County of Fairfax, State of Virginia, and swore to the above as being true.


Suzanne E. Grimsley

MY COMMISSION EXPIRES
JANUARY 5, 1981

AUXILIARIES RESIST BROCK DEMANDS

Last week GOP national Chairman Bill Brock moved to do what two decades of previous Republican National Committee chairman weren't able to do: destroy the autonomy of the party's auxiliaries. Two memos were circulated at GOP headquarters in D. C. directing that all staff hirings and all printed material from all divisions must now be approved by chairman Brock's deputies, the expressed intent being to "coordinate" GOP activity. Leaders of the three main in-house GOP volunteer groups, the National Federation of Republican Women (NFRW), the Young Republican National Federation (YRNF), and the College Republican National Committee (CRNC), have each expressed to us various degrees of shock and dismay at Brock's move. Each group jealously guards its independence. Each group doubts Brock understands its activities,

Despite the big national lead in voter registration of the Democratic party, the Republican auxiliaries each dramatically outnumber their Democratic counterparts, primarily because the Democrats rely more on manpower from labor unions and patronage employees.

But the GOP auxiliaries are each dominated by the more conservative wing of the party. And there's the rub. The Republican National Committee tends to operate on the "lowest common denominator" basis, trying to do nothing which offends either Sen. Jacob Javits or Sen. Paul Laxalt. Brock and his staff are very sensitive now about criticism of their failure to fight the Panama Canal treaties after raising many hundreds of thousands of net dollars from contributors who expected their money would be used to fight the Carter-Torrijos treaties.

The YRNF, for instance, gave \$1,000 to the anti-treaty Truth Squad organized by Sen. Laxalt and Rep. Phil Crane. YRNF chairman Roger Stone joined the trip. Neither the CRNC nor the NFRW has been bashful about the treaties, either.

NFRW national chairman Betty Heitman told TRR last week's directives demanding her hiring and printing be approved through Brock's channels was "most impractical." She said "They don't understand the volume of the material produced by our federation. We operate on our own tight deadlines already without having to sit and wait on another approval." Mrs. Heitman said most of the NFRW printing is done outside the RNC printshop because outside printers give better prices and better service. She also said the NFRW is forming its own independent, multi-candidate political action committee. If the NFRW had its activity "coordinated" by the RNC, the new PAC, under Federal law, could not legally help candidates to whom the RNC was already giving its maximum support.

The YRNF has been resisting RNC power grabs for decades and is now better positioned than ever before to assert its independence. The current YR national chairman, Roger Stone, was Ronald Reagan's 1976 youth director, so attempts to harass Stone have senior party ramifications. Moreover, the YRNF, unlike the other independent GOP national groups, now raises more than half of its own funds. The CRNC and NFRW are primarily funded by the RNC. The YRNF itself is an independent Federal political action committee so its domination by the RNC would cause legal problems.

CRNC executive director Jerry Lindsley told us his hiring decisions will continue to be independent, as in the past. As for printing, Lindsley said the College Republicans would continue to ask RNC approval only for CR flyers intended for mass distribution on campus. He said most of the CRNC material is printed on its own Gestetner mimeograph or by outside printers because the RNC printshop is overburdened and "printing from the (RNC) Chairman's office has highest priority" so CR projects are delayed. "The RNC bureaucracy is worse than the government," Lindsley said.

Vol. 1, No. 3

February, 1978

PROFILE

EFFORTS OF MAJOR CONSERVATIVE GROUPS OPPOSING RATIFICATION OF THE PANAMA CANAL TREAT

Ratification of the Panama Canal treaties is a complicated issue of great concern to Members of Congress and to the Administration. It is not a partisan issue. Apart from its intricacies, it is also an issue which has been seized by conservatives for use in building their constituency:

"This is a cutting issue ... It's an issue the conservatives can't lose on. If we lose the vote in the Senate, we will have had the issue for eight or nine months. We will have rallied many new people to our cause. We will have given our supporter an issue, a cause to work for. The left has had this over the years and the right hasn't. They've had their civil rights causes and their Vietnam war protests and ecology. People got involved in these causes for a particular reason, and the first thing they knew they were involved in all kinds of liberal activities ... Now conservatives can get excited about the Panama Canal giveaway and they can go to the polls, look for a person's name on the ballot who favored these treaties and vote against him ... Conservatives have one weapon the White House really doesn't have -- the ability to punish ... We're going to look very carefully at the votes when all this is over and do an awful lot of punishing next election. We're going to oppose people in the primaries, Republican or Democrat, if they came down on the wrong side of this issue. We're going to oppose 'em in the general election, and in some cases we're maybe going to be running third-party candidates." (Richard A. Vignerie, National Journal, October 8, 1977)

Conservative organizations have formed two major coalitions to coordinate anti-treat forces and thereby strengthen the issue as a cause around which to appeal to the electorate:

Emergency Coalition to Save the Panama Canal

Committee to Save the Panama Canal

The American Conservative Union
 The American Security Council
 Citizens for the Republic
 The Committee for the Survival of a Free Congress
 The Conservative Caucus
 The Council on National Defense
 The Council on Inter-American Security
 The National Conservative Political Action Committee
 The Campus Republican Action Organization
 The Committee for Responsible Youth Politics

The American Conservative Union
 The American Security Council
 Citizens for the Republic
 The Committee for the Survival
 a Free Congress
 The Conservative Caucus
 The Council on National Defense
 The National Conservative Political
 Action Committee
 The Young Republicans

The Emergency Coalition to Save the Panama Canal was initiated by the American Conservative Union at the end of August, 1977. The coalition coordinated a rally on the U.S. Capitol steps on September 7 -- the day the treaties were signed -- and meets regularly to plan strategies and united efforts to block passage of the treaties. The Committee to Save the Panama Canal sponsored the "Truth Squad," the four-city tour (Jan. 17-20) which enlisted the cooperation and participation of additional conservative organizations.

While the coalitions serve to focus media attention on specific events, they also use the existing direct-mail programs, events, and publications of the participants. The following is a summary of the activities of several of the organizations listed above and a report on the "Truth Squad."

The American Conservative Union

The American Conservative Union has spent nearly \$600,000 on the Panama Canal treaty issue. Approximately two million pieces of direct mail have been sent urging defeat of the treaties. In May of 1977, Senator Strom Thurmond (R-SC) agreed to head its Panama Canal Task Force at which time ACU began mailing a letter over his signature encouraging people to write to their Senators and Representatives and to raise money to place newspaper advertisements. Two sample ads were enclosed with this letter.

76 AUG 2 PM 12:02

1600 S. Eads St., # 1003 S.
Arlington, Va. 22202
August 1, 1978

004984

Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

Gentlemen:

Section 437g(a)(1) of the Federal Election Campaign Act (FECA) provides that "Any person who believes a violation of this Act...has occurred may file a complaint with this Commission."

It is my belief that the Young Republican National Federation (YRNF), a partisan organization connected with the Republican National Committee, is in violation of the reporting requirements of the FECA. Specifically, it is my belief that the YRNF has failed to report a contribution of \$1,000 which it reportedly made to support the Truth Squad organized by the Committee to Save the Panama Canal -- a coalition of organizations which opposed ratification of the administration's Panama Canal treaties.

The February 28, 1978, issue of The Right Report, a newsletter published by the Richard A. Viguerie Co., Inc., of Falls Church, Va., reported that "The YRNF...gave \$1,000 to the anti-treaty Truth Squad..." The February 1978 issue of the Democratic Congressional Campaign Committee Report also notes that the YRNF was a member organization of the Committee to Save the Panama Canal, which "sponsored the 'Truth Squad'..." Xerox copies of the relevant pages from both publications are appended to this complaint.

I have personally examined YRNF filings with the FEC for 1977 and 1978 and have been unable to locate any reference therein to such a contribution. This apparent failure to report seems to be a violation of Section 434(b) of the FECA.

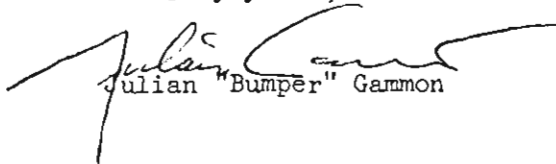
In accordance with FEC Regulations, Section 111, I state that this complaint is not filed "on behalf of or at the request or suggestion of" any candidate.

I may be reached by phone about this complaint either at my home (703-892-4249) or my place of employment (301-229-1000).

Page 2 of 2

I swear that to the best of my knowledge and belief that the statements made in the above complaint are true.

Sincerely yours,


Julian "Bumper" Gammon

Att.
JBG:esr

On this 1st day of August, 1978, I testify that Juliam "Bumper"
Gammon appeared before me, a notary in the County of Fairfax, State of
Virginia, and swore to the above as being true.


Suzanne E. Grimsley

MY COMMISSION EXPIRES
JANUARY 5, 1981

AUXILIARIES RESIST BROCK DEMANDS

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Despite the big national lead in voter registration of the Democratic party, the Republican auxiliaries each dramatically outnumber their Democratic counterparts, primarily because the Democrats rely more on manpower from labor unions and patronage employees.

But the GOP auxiliaries are each dominated by the more conservative wing of the party. And there's the rub. The Republican National Committee tends to operate on the "lowest common denominator" basis, trying to do nothing which offends either Sen. Jacob Javits or Sen. Paul Laxalt. Brock and his staff are very sensitive now about criticism of their failure to fight the Panama Canal treaties after raising many hundreds of thousands of net dollars from contributors who expected their money would be used to fight the Carter-Torrijos treaties.

The YRNF, for instance, gave \$1,000 to the anti-treaty Truth Squad organized by Sen. Laxalt and Rep. Phil Crane. YRNF chairman Roger Stone joined the trip. Neither the CRNC nor the NFRW has been bashful about the treaties, either.

NFRW national chairman Betty Heitman told TRR last week's directives demanding her hiring and printing be approved through Brock's channels was "most impractical." She said "They don't understand the volume of the material produced by our federation. We operate on our own tight deadlines already without having to sit and wait on another approval." Mrs. Heitman said most of the NFRW printing is done outside the RNC printshop because outside printers give better prices and better service. She also said the NFRW is forming its own independent, multi-candidate political action committee. If the NFRW had its activity "coordinated" by the RNC, the new PAC, under Federal law, could not legally help candidates to whom the RNC was already giving its maximum support.

The YRNF has been resisting RNC power grabs for decades and is now better positioned than ever before to assert its independence. The current YR national chairman, Roger Stone, was Ronald Reagan's 1976 youth director, so attempts to harass Stone have senior party ramifications. Moreover, the YRNF, unlike the other independent GOP national groups, now raises more than half of its own funds. The CRNC and NFRW are primarily funded by the RNC. The YRNF itself is an independent Federal political action committee, so its domination by the RNC would cause legal problems.

CRNC executive director Jerry Lindsley told us his hiring decisions will continue to be independent, as in the past. As for printing, Lindsley said the College Republicans would continue to ask RNC approval only for CR flyers intended for mass distribution on campus. He said most of the CRNC material is printed on its own Gestetner mimeograph or by outside printers because the RNC printshop is overburdened and "printing from the (RNC) Chairman's office has highest priority" so CR projects are delayed. "The RNC bureaucracy is worse than the government," Lindsley said.

U.S. Congressional Campaign Committee Report

CORRAN, CA; EX-OFFICIO: Thomas P. O'Neill, Jr., MA, Speaker; Jim Wright, TX, Majority Leader; Thomas S. Foley, WA, House Chairman; Youngie Briffwood Burke, CA, Sen. Co-Chair; Dan Rostenkowski, IL, Joe D. Wiggan, Jr., LA, Joseph D. East, MA, Ed D. Sullivan, MD, John M. Murtha, NY, Sen. Co-Chair; J. A. Pata, TX, R. Gunn McKay, UT; EXECUTIVE DIRECTOR: Wm. R. Swenson, Jr.; RESEARCH DIRECTOR: Mary Anne Edson; EDITOR: Ours Perkins.

NORTH CAPITOL STREET

SUITE 518

WASHINGTON, D.C. 20001 (202) 225-2758

Vol. 1, No. 3

February, 1978

PROFILE

EFFORTS OF MAJOR CONSERVATIVE GROUPS OPPOSING RATIFICATION OF THE PANAMA CANAL TREATIES

Ratification of the Panama Canal treaties is a complicated issue of great concern to Members of Congress and to the Administration. It is not a partisan issue. Apart from its intricacies, it is also an issue which has been seized by conservatives for use in building their constituency:

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Conservative organizations have formed two major coalitions to coordinate anti-treaty forces and thereby strengthen the issue as a cause around which to appeal to the electorate:

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The American Security Council
Citizens for the Republic
The Committee for the Survival of a Free Congress
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The Council on Inter-American Security
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The Emergency Coalition to Save the Panama Canal was initiated by the American Conservative Union at the end of August, 1977. The coalition coordinated a rally on the U.S. Capitol steps on September 7 -- the day the treaties were signed -- and meets regularly to plan strategies and united efforts to block passage of the treaties. The Committee to Save the Panama Canal sponsored the "Truth Squad," the four-city tour (Jan. 17-20) which enlisted the cooperation and participation of additional conservative organizations.

While the coalitions serve to focus media attention on specific events, they also unify the existing direct-mail programs, events, and publications of the participants. The following is a summary of the activities of several of the organizations listed above and a report on the "Truth Squad."

The American Conservative Union

The American Conservative Union has spent nearly \$600,000 on the Panama Canal treaties issue. Approximately two million pieces of direct mail have been sent urging defeat of the treaties. In May of 1977, Senator Strom Thurmond (R-SC) agreed to head its Panama Canal Task Force at which time ACU began mailing a letter over his signature encouraging people to write to their Senators and Representatives and to raise money to place newspaper advertisements. Two sample ads were enclosed with this letter.



FEDERAL ELECTION COMMISSION

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

August 9, 1978

Juliam "Bumper" Gammon
1600 South Eads Street
#1003 S.
Arlington, Virginia 22202

Dear Mr. Gammon:

This is to acknowledge receipt of your complaint of August 1, 1978, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

(24) - 4302

16 AUG 2 12:02

1600 S. Eads St., # 1003 S.
Arlington, Va. 22202
August 1, 1978

334994

Federal Election Commission
1325 K St., NW
Washington, D.C. 20463

Gentlemen:

Section 437g(a)(1) of the Federal Election Campaign Act (FECA) provides that "Any person who believes a violation of this Act...has occurred may file a complaint with this Commission."

It is my belief that the Young Republican National Federation (YRNF), a partisan organization connected with the Republican National Committee, is in violation of the reporting requirements of the FECA. Specifically, it is my belief that the YRNF has failed to report a contribution of \$1,000 which it reportedly made to support the Truth Squad organized by the Committee to Save the Panama Canal -- a coalition of organizations which opposed ratification of the administration's Panama Canal treaties.

The February 28, 1978, issue of The Right Report, a newsletter published by the Richard A. Viguerie Co., Inc., of Falls Church, Va., reported that "The YRNF...gave \$1,000 to the anti-treaty Truth Squad..." The February 1978 issue of the Democratic Congressional Campaign Committee Report also notes that the YRNF was a member organization of the Committee to Save the Panama Canal, which "sponsored the 'Truth Squad'..." Xerox copies of the relevant pages from both publications are appended to this complaint.

I have personally examined YRNF filings with the FEC for 1977 and 1978 and have been unable to locate any reference therein to such a contribution. This apparent failure to report seems to be a violation of Section 434(b) of the FECA.

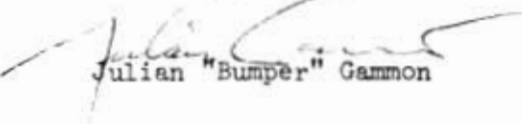
In accordance with FEC Regulations, Section 111, I state that this complaint is not filed "on behalf of or at the request or suggestion of" any candidate.

I may be reached by phone about this complaint either at my home (703-892-4249) or my place of employment (301-229-1000).

Page 2 of 2

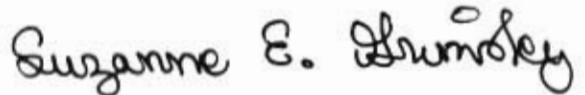
I swear that to the best of my knowledge and belief that the statements made in the above complaint are true.

Sincerely yours,


Julian "Bumper" Gammon

Att.
JBG:esr

On this 1st day of August, 1978, I testify that Julian "Bumper" Gammon appeared before me, a notary in the County of Fairfax, State of Virginia, and swore to the above as being true.


Suzanne E. Grimsley

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JANUARY 5, 1981

GOP AUXILIARIES RESIST BROCK DEMANDS

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Democratic Congressional Campaign Committee Report

CHAIRMAN: JAMES C. CORMAN, CA; EX-OFFICIO: Thomas P. O'Neill, Jr., MA, Speaker, Jim Wright, TX, Majority Leader, Thomas S. Foley, WA, Caucus Chairman;
EXECUTIVE COMMITTEE: Yvonne Brathwaite Burke, CA, Bo Ginn, GA, Dan Rostenkowski, IL, Joe D. Waggonner, Jr., LA, Joseph D. Early, MA, Bill D. Burton, MO, John M. Murphree, NY,
Fred B. Roney, PA, J. J. Pickle, TX, K. Gunn McKay, UT; EXECUTIVE DIRECTOR: Wm. R. Sweeney, Jr.; RESEARCH DIRECTOR: Marta David; EDITOR: Diane Farbank.

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Arlington, Virginia

22202

The Federal Election Commission

1325 K Street N.W.

Washington, D.C.

20463

ATTN: Compliance Division

Mr. William Oldaker



AD

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11203001



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 674

Date Filmed 12/20/78 Camera No. --- 2

Cameraman bpc