



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF FILM # 1266

Date Filmed 10/14/80 Camera No. --- 2

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**SEDAM & HERGE**  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
7600 OLD SPRINGHOUSE ROAD  
MCLEAN, VIRGINIA 22102

RECEIVED

600#2670

80 SEP 18 A8:53

GLENN J. SEDAM, JR.  
J. CURTIS HERGE

(703) 821-1000

1700 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20006  
(202) 393-7124

ROBERT R. SPARKS, JR.  
MICHAEL D. HUGHES  
A. MARK CHRISTOPHER

September 16, 1980

TWX/TELEX: 710-831-0896  
CABLE: SEDAMHERGE

30000003

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

Dear Mr. Steele:

We are writing on behalf of our client, National Conservative Political Action Committee (NCPAC), with reference to your letter to Mr. Dolan, Chairman of NCPAC, dated July 28, 1980, relative to the complaint filed by NCPAC on or about June 16, 1980 against Senator George McGovern and George Cunningham.

In view of the fact that our client has not been notified of final action having been taken on the complaint, we would like to know whether or not the complaint has been dismissed, or whether or not the conciliation process has been concluded.

Sincerely,

  
J. Curtis Herge

80 SEP 18 A10:26

RECEIVED  
GENERAL COUNSEL

3004000004  
SEDAM & HERGE

ATTORNEYS AT LAW

7600 OLD SPRINGHOUSE ROAD

MCLEAN, VIRGINIA 22102



80 SEP 18 A 8:53

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

PS Form 3811, Jan. 1978

**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.....  
☐ Show to whom, date and address of delivery.....  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.....  
☐ RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 John Wilson Blvd.  
 Suite 513  
 Arlington, Va. 22209

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 115940

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent  
 Lmy Feagans  
 DATE OF DELIVERY 1/19/80

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE:

MUR 1266 S. Thomas

PS Form 3811, Jan. 1978

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

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☐ Show to whom, date and address of delivery.....  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.....  
☐ RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Robert F. Bauer  
 1101 17th St., N.W., Suite 400  
 Wash., D.C. 20036

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 246510

(Always obtain signature of addressee or agent)

I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent  
 Schaefer Ha...  
 DATE OF DELIVERY 1/19/80

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE:

MUR 1866 Thomas



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 16, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert F. Bauer  
1101 Seventeenth Street, N.W.  
Suite 406  
Washington, D.C. 20036

Re: MUR 1266

Dear Mr. Bauer:

On July 28, 1980, the Federal Election Commission notified your clients, Senator George McGovern and George Cunningham, of a complaint alleging that they may have violated the Federal Election Campaign Act of 1971, as amended.

The Commission, on September 12, 1980, determined that on the basis of the information in the complaint and the information provided by you, there is no reason to believe that a violation of any statute or regulation within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele  
General Counsel





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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RETURN RECEIPT REQUESTED

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Sincerely,

Charles N. Steele  
General Counsel

*KS*  
9/15/80

*yellow*



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 16, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

John T. Dolan, Chairman  
National Conservative Political  
Action Committee  
1500 Wilson Boulevard  
Suite 513  
Arlington, Virginia 22209

Dear Mr. Dolan:

The Federal Election Commission has reviewed the allegations of your complaint dated June 16, 1980, and determined that on the basis of the information provided in your complaint and information provided by the respondents, there is no reason to believe a violation of the Federal Election Campaign Act of 1971, as amended, has been committed. Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Scott Thomas, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele  
General Counsel

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

John T. Dolan, Chairman  
National Conservative Political  
Action Committee  
1500 Wilson Boulevard  
Suite 511  
Arlington, Virginia 22209

Dear Mr. Dolan:

The Federal Election Commission has reviewed the allegations of your complaint dated June 16, 1980, and determined that on the basis of the information provided in your complaint and information provided by the respondents, there is no reason to believe a violation of the Federal Election Campaign Act of 1971, as amended, has been committed. Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Scott Thomas, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

JS  
9/15/80



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Senator George McGovern )  
George Cunningham )

MUR 1266

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 12, 1980, the Commission decided by a vote of 5-1 to take the following actions regarding MUR 1266:

1. Find NO REASON TO BELIEVE Senator George McGovern or George Cunningham violated 2 U.S.C. §437g(a)(12)(A) or 11 C.F.R. §111.21 by issuing a May 23, 1980, press release.
2. Send the letters as attached to the First General Counsel's Report dated September 10, 1980.
3. CLOSE THE FILE.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Tiernan voted affirmatively. Commissioner Reiche dissented.

Attest:

9/12/80

Date

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

Received in Office of the Commission Secretary: 9-10-80, 12:52  
Circulated on 48 hour vote basis: 9-10-80, 4:00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*  
DATE: SEPTEMBER 12, 1980  
SUBJECT: OBJECTION FOR THE RECORD - MUR 1266, First  
General Counsel's Report dated 9-10-80

Attached is a copy of Commissioner Reiche's  
vote sheet with comments regarding his objection to MUR 1266.

ATTACHMENT:  
Copy of Vote Sheet

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

48 HOUR TALLY SHEET

80 SEP 12 P 3: 10



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: WEDNESDAY, 9-10-80  
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, MCGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: FRIDAY, SEPTEMBER 12, 1980  
4:00

MUR No. 1266 - First General Counsel's Report dated 9-10-80

- ( ) I approve the recommendation  
(✓) I object to the recommendation

COMMENTS:

*I object for the record, my objection being consistent with my previous objection in this matter. only (not for the agenda)*

Date: 9/12/80 Signature: Frank P. Reiche

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



September 10, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: 1266

Please have the attached First GC Report distributed  
to the Commission on a 48 hour tally basis. Thankyyou.

30001000013

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

FIRST GENERAL COUNSEL'S REPORT

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

9-10-80

MUR 80 SEP 10 2 52  
DATE COMPLAINT RECEIVED  
BY OGC 7/24/80

STAFF MEMBER S. Thomas

COMPLAINANT'S NAME:

John T. Dolan  
National Conservative Political  
Action Committee

RESPONDENT'S NAME:

Senator George McGovern  
George Cunningham

RELEVANT STATUTE:

2 U.S.C. § 437g(a)(12)(A); 11 C.F.R. § 111.21

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The complaint alleges that Senator George McGovern and George Cunningham, Senator McGovern's administrative assistant, violated the confidentiality requirement of 2 U.S.C. § 437g(a)(12)(A) and 11 C.F.R. § 111.21 by issuing a press release which referred to a complaint which had been filed earlier against the National Conservative Political Action Committee ("NCPAC").

FACTUAL AND LEGAL ANALYSIS

On May 23, 1980, the office of Senator George McGovern apparently issued a press release which made reference to a complaint which had been filed with the Commission on May 2, 1980, concerning certain expenditures by NCPAC in opposition to Senator McGovern's renomination. Specifically, the press release contained the following language:



NCPAC has been charged by the South Dakota Democratic Party with violating their independent status by "consulting, coordinating and cooperating" with the campaign of Congressman James Abdnor, who is seeking the 1980 Republican Senatorial nomination in South Dakota. That complaint is now pending before the Federal Election Commission.

In its present complaint, NCPAC asserts that Senator McGovern and his aide, George Cunningham, violated 2 U.S.C. § 437g(a)(12)(A) and 11 C.F.R. § 111.21 by making public the earlier complaint against NCPAC.

The Commission recently addressed the application of 2 U.S.C. § 437g(a)(12)(A) and 11 C.F.R. § 111.21 in MUR 1244 which involved the same parties that are involved here. The conclusion reached by the Commission in MUR 1244 was that the confidentiality provision of the statute did not prevent a complainant from making public the fact that it had filed a complaint and the substance of the complaint. The language of the statute only prohibits a person from making public a Commission notification or investigation.

With regard to the Commission's regulations, 11 C.F.R. § 111.21, the Commission recognized in MUR 1244 that the terms of the statute from which the regulations are drawn govern their application and that the regulations should therefore be read synonymously. Accordingly, it would be a violation of the regulation if a Commission notification or investigation was made public by a complainant; but it would not be a violation if the complainant made only the filing of a complaint and its substance public.

In the present matter the press release does not refer to any notification or investigation by the Commission. \*/ It merely indicates that the complaint against NCPAC was then pending before the Commission. Accordingly, there appears to be no basis for finding a violation of the statute or regulations.

---

\*/ No notification of "reason to believe" was made in MUR 1244, and no investigation was made, because the Commission voted to dismiss the complaint on July 29, 1980.

RECOMMENDATION

1. Find no reason to believe Senator George McGovern or George Cunningham violated 2 U.S.C. § 437g(a)(12)(A) or 11 C.F.R. § 111.21 by issuing a May 23, 1980, press release;
2. Send the attached letters; and
3. Close the file.

Attachments:

- A - Complaint
- B - Response
- C - Proposed letters

30040220016

80040220017

Attachment A

# National Conservative Political Action Committee

RECEIVED

90924

JUL 24 PM 12:09

1500 wilson bld. suite 513 arlington, va. 22209 (703) 522-2800

June 16, 1980

30 JUL 24 P 2:18  
GENERAL COUNSEL  
2047

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

Dear Sir:

On or about May 30, 1980, National Conservative Political Action Committee filed a complaint with the Federal Election Commission in which it was alleged that Senator George McGovern and George Cunningham may have violated the provisions of 2 U.S.C. 437g(a)(12)(A) and of 11 CFR 111.21 for having made public the fact that the complaint designated as MUR 1231 had been filed with the Federal Election Commission without the prior authorization of the respondent.

This letter constitutes an additional complaint filed with you by National Conservative Political Action Committee against Messrs. McGovern and Cunningham, as well as against unknown individuals in the employ of Senator McGovern, who may have violated the provisions of 2 U.S.C. 437g(a)(12)(A) and of 11 CFR 111.21 in publishing and distributing the enclosed press release. The third paragraph of the press release, which is captioned "George McGovern, 4239 Dirksen Senate Office Building, Washington, D.C. 20510," made public the fact that the complaint designated as MUR 1231 had been filed with the Federal Election Commission. The press release is dated May 23, 1980. The complaint designated as MUR 1231 was filed with the Federal Election Commission on May 2, 1980.

The respondents named herein were not authorized by the National Conservative Political Action Committee to make public the fact that the complaint designated as MUR 1231 had been filed with the commission.

Your attention to this matter will be appreciated.

Sincerely,

John T. Dolan,

Sworn to before me  
this 30th day of June, 1980.

Maury T. McGehee  
Notary Public

My Commission Expires - August 16, 1983

30 JUL 24 P 2:18

RECEIVED  
GENERAL COUNSEL  
JUL 24 1980



# George McGovern

4239 Dirksen Senate Office Building, Washington, DC 20510 phone: (202) 224-2321

CONTACT:  
George Cunningham  
202/224-2321

FOR RELEASE FRIDAY  
May 23, 1980

## NCPAC LINK EXTENDS TO BOTH ABDNOR AND SCHUMAKER

Senator George McGovern said today that there was now "hard evidence" of the involvement of the National Conservative Political Action Committee (NCPAC) in the campaign of Larry Schumaker.

Schumaker, a native of Britton, South Dakota, returned to the State after a 20-year absence to challenge McGovern in the 1980 South Dakota Democratic Senatorial primary.

NCPAC has been charged by the South Dakota Democratic Party with violating their independent status by "consulting, coordinating and cooperating" with the campaign of Congressman James Abdnor, who is seeking the 1980 Republican Senatorial nomination in South Dakota. That complaint is now pending before the Federal Election Commission.

"According to the evidence that has been developed," McGovern said, "a fund raiser letter on 'Schumaker for Senate' letterhead, obviously approved by Mr. Schumaker, was sent out by a Mr. Harry L. Johns of Washington, D.C. It now appears that the office of Mr. Johns is on the same floor of the same building which houses NCPAC in Arlington, Virginia, and that NCPAC is paying the rent!"

McGovern said that he has referred the matter to "Party attorneys to determine if this is a further violation of the Federal Election Act insofar as the independent status of NCPAC is concerned".

"Here we have a national group, headquartered in Arlington, Virginia, enticing a GOP candidate into the Senate race - but not being satisfied with that - they have apparently done the same thing to, essentially, 'create' an opponent in the Democratic primary on June 3rd," McGovern said.

"Many South Dakota Democrats asked me why Mr. Schumaker, after an absence of so many years, would decide to return to South Dakota and seek the Senate seat. The involvement with NCPAC may explain part of the reason. He is not his own man, or even his own candidate - he appears to be the creature of NCPAC, and one can only wonder what trades, promises and commitments have been made by Mr. Schumaker and NCPAC in the midst of this cozy relationship," McGovern said.

300019



30040220020

Attachment B

*Thomas*  
LAW OFFICES

ROBERT F. BAUER

SUITE 406

1101 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036

(202) 296-0555

August 18, 1980

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

RE: MUR 1266

Dear Sir:

On July 28, 1980, you notified Senator George McGovern and Mr. George Cunningham of a Complaint filed July 24 by the National Conservative Political Action Committee (NCPAC). In that Complaint, NCPAC alleges that the Senator and Mr. Cunningham may have violated §437g(a)(12)(A) of the Act and §111.21 of the FEC Regulations by "making public" a complaint previously filed against NCPAC by the South Dakota Democratic Party. The act of "making public" that complaint allegedly occurred through the issuance of a press release by Senator McGovern's Senate office on May 23, 1980. As shown below, however, the allegations of NCPAC in this matter are wholly without substance, and should, for that reason, be promptly dismissed.

Section 111.21 of the FEC Regulations provides that:

"... no complaint filed with the Commission ... shall be made public by the Commission ... or by any person or entity without the written consent of the respondent ..." (emphasis added).

Contrary to NCPAC's contention, Senator McGovern and Mr. Cunningham could not have "made public" the South Dakota Party complaint, for that complaint had already been a matter of public knowledge for three weeks. Specifically, on May 2, 1980 -- the day that complaint was filed, but several hours beforehand -- Senator McGovern's office issued a release supporting the Party's attempt through its complaint to address alleged illegal acts by NCPAC. As the Senator and Mr. Cunningham made clear in their response to a complaint by NCPAC based on that release, there is no prohibition against announcing to the public the imminent filing of a complaint. In other words, complaints may be "made public" before their filing. §111.21 can only be read to prohibit the "making public" of a previously undisclosed and already filed complaint. It cannot logically prohibit the "making public" of a complaint which has already been "made public".

Mr. Charles Steele  
August 18, 1980  
Page 2

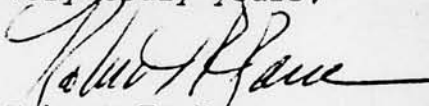
LAW OFFICES  
ROBERT F. BAUER

It is, in any event, far from clear that the Federal Election Campaign Act prohibits persons from "making public" a complaint that they or others have filed. §437g(a)(12)(A) protects, by its terms, only the confidentiality of a Commission "notification or investigation" concerning a complaint. Prior to 1980, the Commission consistently and properly held that this provision applied only to "any notification or investigation made pursuant to a finding by the Commission of reason to believe ..." (emphasis supplied). See General Counsel's report in MUR 270, in which the General Counsel concluded, with the Commission's unanimous concurrence, that "... the prohibition of 437g(a)(3)(B) (now §437g(a)(12)(A)) is not triggered until the Commission has found reason to believe." See also MUR 804, where this same conclusion is reached by the General Counsel and ratified by the Commission.

In the 1980 amendments to the FEC Regulations, however, the Commission introduced into its confidentiality regulations an ambiguous reference to the "complaint filed". The General Counsel has recently indicated, with no further explanation, his own view that this language may require confidential treatment of a complaint prior to any "reason to believe" finding. See MUR 1161. Yet there is no evidence that Congress has intended to broaden the scope of §437g(a)(12)(A) beyond its original and limited reference to "notification or investigation". The 1979 amendments to the Act certainly provide no such evidence; in those amendments, Congress renumbered §437g(a)(12)(A) but made no change in its original language. Nor has the Commission justified or otherwise explained its "complaint filed" language in its Explanation and Justification submitted to Congress along with the 1980 amendments. On an issue as important as this, i.e., the right of individuals and committees to speak freely on matters of public importance, the Commission is constrained to act carefully with full explanation of its intention to narrow such rights. Until it has done so, it cannot be presumed that Congress had intended to further restrict public discussion of FECA related issues. This is particularly the case where, as here, the discussion proceeds over matters already on the public record.

For these reasons, the Complaint filed by NCPAC on July 24 against Senator McGovern and Mr. Cunningham should be promptly dismissed.

Very truly yours,

  
Robert F. Bauer

RFB:peg

30040220023

Attachment C





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert F. Bauer  
1101 Seventeenth Street, N.W.  
Suite 406  
Washington, D.C. 20036

Re: MUR 1266

Dear Mr. Bauer:

On July 28, 1980, the Federal Election Commission notified your clients, Senator George McGovern and George Cunningham, of a complaint alleging that they may have violated the Federal Election Campaign Act of 1971, as amended.

The Commission, on September 3, 1980, determined that on the basis of the information in the complaint and the information provided by you, there is no reason to believe that a violation of any statute or regulation within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter.

Sincerely,

Charles N. Steele,  
General Counsel

30040220024





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

John T. Dolan, Chairman  
National Conservative Political  
Action Committee  
1500 Wilson Boulevard  
Suite 513  
Arlington, Virginia 22209

Dear Mr. Dolan:

The Federal Election Commission has reviewed the allegations of your complaint dated June 16, 1980, and determined that on the basis of the information provided in your complaint and information provided by the respondents, there is no reason to believe a violation of the Federal Election Campaign Act of 1971, as amended, has been committed. Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Scott Thomas, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele  
General Counsel

30040220025

LAW OFFICES  
**ROBERT F. BAUER**  
SUITE 406  
1101 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036

(202) 296-0555

August 18, 1980

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

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80 AUG 19 P 3: 56

GENERAL COURSE

920026

Mr. Charles Steele  
August 18, 1980  
Page 2

LAW OFFICES  
ROBERT F. BAUER

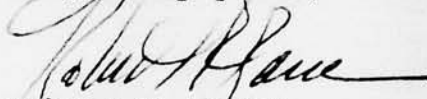
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It is, in any event, far from clear that the Federal Election Campaign Act prohibits persons from "making public" a complaint that they or others have filed. §437g(a)(12)(A) protects, by its terms, only the confidentiality of a Commission "notification or investigation" concerning a complaint. Prior to 1980, the Commission consistently and properly held that this provision applied only to "any notification or investigation made pursuant to a finding by the Commission of reason to believe ..." (emphasis supplied). See General Counsel's report in MUR 270, in which the General Counsel concluded, with the Commission's unanimous concurrence, that "... the prohibition of 437g(a)(3)(B) (now §437g(a)(12)(A)) is not triggered until the Commission has found reason to believe." See also MUR 804, where this same conclusion is reached by the General Counsel and ratified by the Commission.

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For these reasons, the Complaint filed by NCPAC on July 24 against Senator McGovern and Mr. Cunningham should be promptly dismissed.

Very truly yours,

  
Robert F. Bauer

RFB:peg

3 0 0 4 0 0 2 2 0 0 3 3  
ROBERT F. BAUER

SUITE 408

1101 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20036

MESSENGER

Mr. Scott Thomas, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463



RECEIVED

9094

80 AUG 6 PM 12:10

LAW OFFICES  
**ROBERT F. BAUER**  
SUITE 406  
1101 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036

0002234

(202) 296-0555

August 5, 1980

Mr. Scott Thomas, Esquire  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RE: MUR 1266

Dear Mr. Thomas:

This letter confirms that I am authorized to represent Senator George McGovern and Mr. George V. Cunningham in the above captioned matter.

I also wish to confirm through this letter that we have agreed that Senator McGovern and Mr. Cunningham will have an extension of time until August 19, 1980, to demonstrate that no action should be taken against them in this matter.

Very truly yours,

  
Robert F. Bauer

RFB:peg

22:30 9 AUG 6

RECEIVED  
FEDERAL ELECTION COMMISSION  
AUG 6 1980

300400220029



**SUITE 406**

101 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036



Mr. Scott Thomas, Esq.  
Office of General Counsel  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

RECEIVED  
AUG 6 PM 12.13



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 28, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

The Honorable George McGovern  
Dirksen Senate Office Building  
Room 4239  
Washington, D.C. 20510

Re: MUR 1266

Dear Senator McGovern:

This letter is to notify you that on July 24, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1266. Please refer to this number in all future correspondence.

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

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

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

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

30040220031

Letter to: The Honorable George  
McGovern  
Page Two

If you have any questions, please contact Scott Thomas,  
the attorney assigned to this matter at (202) 523-5071. For  
your information, we have attached a brief description of the  
Commission's procedures for handling complaints.

Sincerely,

*Charles N. Steele*  
Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Procedures

1266 Thomas

1. The following services are requested (check one):  
☐ Show to whom and date delivered.  
☐ Show to whom, date and address of delivery.  
☐ RESTRICTED DELIVERY.  
☐ Show to whom and date delivered.  
☐ RESTRICTED DELIVERY.  
☐ Show to whom, date, and address of delivery.

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE AUTHORIZED FOR RETURN

3. ARTICLE DESCRIPTION: *The Hon. George McGovern*

4. DATE OF DELIVERY

5. SIGNATURE: *C. Steele*

6. ADDRESS: *1266 Thomas*

7. UNABLE TO DELIVER REASON: *NO POSTAGE*

8. RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 28, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

George V. Cunningham  
Dirksen Senate Office Building  
Room 4239  
Washington, D.C. 20510

Re: MUR 1266

Dear Mr. Cunningham:

This letter is to notify you that on July 24, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1266. Please refer to this number in all future correspondence.

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

80040220033

If you have any questions, please contact Scott Thomas, the attorney assigned to this matter at (202) 523-5071. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

  
Charles N. Steele  
General Counsel

Enclosure

1. Complaint
2. Procedures

37747:200034

1266

1. The following service is requested (attach and): <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery.		(CONSULT POSTMASTER FOR FEES)	
2. ARTICLE REQUESTED FOR: <i>George V. Cunningham</i>		3. ARTICLE DESCRIPTION: REGISTERED NO. <i>1266</i> DATE OF DELIVERY <i>12/1/78</i> 1 have received this article described above. SIGNATURE <i>B. Steele</i>	
4. ADDRESS (Complete only if requested)		5. UNABLE TO DELIVER REASON:	

Form 3871, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 28, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

John T. Dolan  
Chairman  
National Conservative Political  
Action Committee  
1500 Wilson Blvd.  
Suite 513  
Arlington, Virginia 22209

Dear Mr. Dolan:

This letter is to acknowledge receipt of your complaint of June 16, 1980, against Senator George McGovern and George Cunningham which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

Enclosure

30040220035

90040220036

Form 3811, Jan. 1978

**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.....  
☐ Show to whom, date and address of delivery.....  
☐ RESTRICTED DELIVERY  
 Show to whom and date delivered.....  
☐ RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery.....  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
*John Dolan*

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
                     *945656*  
 (Always obtain signature of addressee or agent)  
 I have received the article described above.  
 SIGNATURE ☐ Addressee ☐ Authorized agent  
*Jerry Feagans*

4. DATE OF DELIVERY  
*7/30/80*

5. ADDRESS (Complete only if requested)  
 : 3 PM 31 JUL 80

6. UNABLE TO DELIVER BECAUSE:  
 RECEIVED  
*1261 Thomas*



GPO : 1979-205-6-15

# National Conservative Political Action Committee

RECEIVED

209247

JUL 24 PM 12:09

1500 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

June 16, 1980

80 JUL 24 P 2:18  
GENERAL COUNSEL  
2047

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

Dear Sir:

On or about May 30, 1980, National Conservative Political Action Committee filed a complaint with the Federal Election Commission in which it was alleged that Senator George McGovern and George Cunningham may have violated the provisions of 2 U.S.C. 437g(a)(12)(A) and of 11 CFR 111.21 for having made public the fact that the complaint designated as MUR 1231 had been filed with the Federal Election Commission without the prior authorization of the respondent.

This letter constitutes an additional complaint filed with you by National Conservative Political Action Committee against Messrs. McGovern and Cunningham, as well as against unknown individuals in the employ of Senator McGovern, who may have violated the provisions of 2 U.S.C. 437g(a)(12)(A) and of 11 CFR 111.21 in publishing and distributing the enclosed press release. The third paragraph of the press release, which is captioned "George McGovern, 4239 Dirksen Senate Office Building, Washington, D.C. 20510," made public the fact that the complaint designated as MUR 1231 had been filed with the Federal Election Commission. The press release is dated May 23, 1980. The complaint designated as MUR 1231 was filed with the Federal Election Commission on May 2, 1980.

The respondents named herein were not authorized by the National Conservative Political Action Committee to make public the fact that the complaint designated as MUR 1231 had been filed with the commission.

Your attention to this matter will be appreciated.

Sincerely,

John T. Dolan,

Sworn to before me  
this 30th day of June, 1980.

Marilyn T. Moseley  
Notary Public

My Commission Expires - August 16, 1983

80 JUL 24 P 2:18

RECEIVED  
GENERAL COUNSEL  
OFFICE OF THE  
FEDERAL ELECTION COMMISSION

RECEIVED

# George McGovern

4239 Dirksen Senate Office Building, Washington, DC 20510 phone: 202/224-2321

CONTACT:  
George Cunningham  
202/224-2321

FOR RELEASE FRIDAY  
May 23, 1980

## NCPAC LINK EXTENDS TO BOTH ABDNOR AND SCHUMAKER

Senator George McGovern said today that there was now "hard evidence" of the involvement of the National Conservative Political Action Committee (NCPAC) in the campaign of Larry Schumaker.

Schumaker, a native of Britton, South Dakota, returned to the State after a 20-year absence to challenge McGovern in the 1980 South Dakota Democratic Senatorial primary.

NCPAC has been charged by the South Dakota Democratic Party with violating their independent status by "consulting, coordinating and cooperating" with the campaign of Congressman James Abdnor, who is seeking the 1980 Republican Senatorial nomination in South Dakota. That complaint is now pending before the Federal Election Commission.

"According to the evidence that has been developed," McGovern said, "a fund raiser letter on 'Schumaker for Senate' letterhead, obviously approved by Mr. Schumaker, was sent out by a Mr. Harry L. Johns of Washington, D.C. It now appears that the office of Mr. Johns is on the same floor of the same building which houses NCPAC in Arlington, Virginia, and that NCPAC is paying the rent!"

McGovern said that he has referred the matter to "Party attorneys to determine if this is a further violation of the Federal Election Act insofar as the independent status of NCPAC is concerned".

"Here we have a national group, headquartered in Arlington, Virginia, enticing a GOP candidate into the Senate race - but not being satisfied with that - they have apparently done the same thing to, essentially, 'create' an opponent in the Democratic primary on June 3rd," McGovern said.

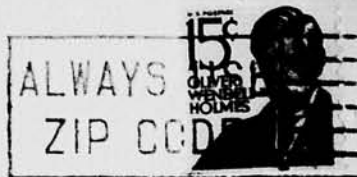
"Many South Dakota Democrats asked me why Mr. Schumaker, after an absence of so many years, would decide to return to South Dakota and seek the Senate seat. The involvement with NCPAC may explain part of the reason. He is not his own man, or even his own candidate - he appears to be the creature of NCPAC, and one can only wonder what trades, promises and commitments have been made by Mr. Schumaker and NCPAC in the midst of this cozy relationship," McGovern said.

NCPAC

Suite 513

1500 N. Wilson Blvd.

Arlington, VA 22209



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

80 JUL 24 PM 12:09

RECEIVED





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20543

THIS IS THE BEGINNING OF MUR # 1266

Date Filmed 10/14/80 Camera No. --- 2

Cameraman SPC

9034020040



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF TUE # 1228

Date Filmed 12/17/80 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 10, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Namer  
3313 Kingman Street  
Metairie, Louisiana 70002

Re: MUR 1228

Dear Mr. Namer:

The Federal Election Commission has reviewed the allegations of your complaint dated April 24, 1980, and determined to take no action and close the file in this matter. This determination was made due to the fact that you did not provide the Commission with the names and addresses of the respondents and a clear and concise recitation of the facts to enable the Commission to determine whether a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") or Commission Regulations has occurred.

Should further information come to your attention which you believe establishes a violation of the Act, please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

A handwritten signature in cursive script, which appears to read "Charles N. Steele", is written over the typed name.

Charles N. Steele  
General Counsel

8004005585



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Namer  
3313 Kingman Street  
Metairie, Louisiana 70002

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Should further information come to your attention which you believe establishes a violation of the Act, please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,

Charles N. Steele  
General Counsel

*mw*  
*12/9/80*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of     )  
                              )  
Unknown Respondent    )

MUR 1228

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 8, 1980, the Commission decided by a vote of 6-0 to take the following actions in the above-captioned matter:

1. Take no action and close the file in this matter.
2. Send the letter attached to the General Counsel's December 4, 1980 report.

Accordingly, the file in this matter is closed.

Attest:

12/8/80

Date

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

8004002587



December 4, 1980

MEMORANDUM TO: Marjorie W. Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 1228

Please have the attached First GC Report distributed  
to the Commission on a 48 hour tally basis. Thank you.

80040025589

FEDERAL ELECTION COMMISSION  
1325 K Street, N.W.  
Washington, D.C. 20465

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

12-4-80

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY  
80 DEC 4 P12: 51  
MUR #1228  
DATE COMPLAINT RECEIVED  
BY CGC April 24, 1980

STAFF MEMBER M. White

COMPLAINANT'S NAME: Robert Namer

RESPONDENT'S NAME: Unknown

RELEVANT STATUTE: 2 U.S.C. § 437g(a)(1)  
11 C.F.R. § 111.4

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On April 24, 1980, Robert Namer, a congressional candidate in the third district of Louisiana, filed a complaint with the Federal Election Commission (Attachment 1). The complaint alleges that "[p]ublic debates and forums were set up without [Mr. Namer's] input as to the date, time and place" and that Mr. Namer was "not invited and...even barred from attending" forums conducted by civic and private organizations which were covered by the media. The complainant concludes that he "was not afforded the equal media exposure as [his] opponents."

FACTUAL BASIS AND LEGAL ANALYSIS

On October 7, 1980, the Office of General Counsel mailed a letter to the complainant in this matter which stated that, pursuant to Commission Regulations, a complaint should clearly identify all respondents and contain a clear and concise recitation of the facts describing the violation. The complainant was advised that the complaint neither identified the respondents nor contained a clear and concise recitation of facts, and that the full name and address of all respondents should be provided in the complaint (Attachment 2). A return receipt indicates that the complainant received the letter from the Office of General Counsel on October 10, 1980. To date, no response has been received from the complainant.

More than 30 days have elapsed since the complainant received notice that the names and addresses of all respondents and a clear and concise recitation of the facts should be provided in order to enable the Commission to determine whether a violation of the Act or regulations has occurred. The General Counsel therefore recommends that the Commission take no action and close the file in this matter.

## RECOMMENDATIONS

1. Take no action and close the file in this matter.
2. Send the attached letter.

Attachments:

- 1 -- Complaint  
2 -- Letter from Office of General Counsel  
3 -- Letter proposed (1)

ATTACHMENT #1

800455591



RECEIVED  
6007125  
'80 APR 21 11:40  
ROBERT NAMER ★ ★ ★ ★ 1980  
for CONGRESS

April 21, 1980

637569  
Federal Election Commission  
1325 K. Street, Northwest  
Washington, D.C. 20463

Gentlemen:

9  
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I was a candidate in the Louisiana May 19 3rd Congressional election. I am submitting the following to get a determination as to whether any F.E.C. regulations have been violated, and if so, what action I can take.

1. There were four candidates in this race, three of which were labeled "major candidates". Public debates and forums were set up without my input as to the date, time and place.
2. Civic and private organizations have held forums where the news media was invited to cover, and I was not invited and was even barred from attending.
3. I am Jewish, and a major public debate was held on the Jewish Passover night which did not allow me to attend. No such forum was scheduled on Holy Thursday, Good Friday or Easter Sunday. My objection fell to deaf ears.

Because these debates and forums were open to the news media, I was not afforded the equal media exposure as my opponents.

21  
COPIES TO AND SUBSCRIBED,  
COPIES ME THIS 21  
DATE OF 1980

Very truly yours,

Robert Namer

RN/kb

ATTACHMENT #2

80040225593



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 7, 1980

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Namer  
3313 Kingman Street  
Metairie, LA 70002

Re: MUR 1228

Dear Mr. Namer:

We have received your letter of April 24, 1980, inquiring into the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

As set forth in 2 U.S.C. § 437g(a)(1), any person who believes that there has been a violation of any law within the Commission's jurisdiction may file a written complaint. The complaint must be sworn to and signed in the presence of a notary, and notarized.

In addition, Commission Regulations, found at 11 C.F.R. § 111.4, provide that a complaint:

- (1) must contain the full name and address of the person making the complaint;
- (2) should clearly identify as a respondent each person or entity who is alleged to have committed a violation;
- (3) should identify the source of information upon which the complaint is based;
- (4) should contain a clear and concise recitation of the facts describing the violation of the statute or law over which the Commission has jurisdiction; and
- (5) should be accompanied by supporting documentation if known and available to the person making the complaint.

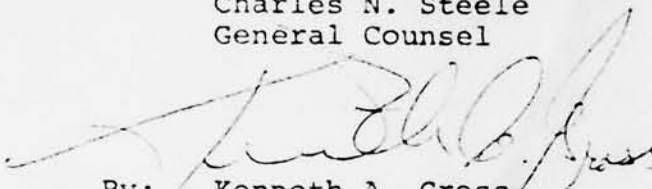
Your letter did not identify as a respondent each person or entity who is alleged to have committed a violation of the Act nor did it contain a clear and concise recitation of the facts describing the violation of the statute or law over which the Commission has jurisdiction. The full name and address of all respondents should be provided.

Enclosed please find a copy of §§ 111.4-111.10 of Commission Regulations which deal with preliminary enforcement procedures. I hope that an examination of these materials will answer most of your questions, and will enable you to be specific in any assertions or allegations you might make in the event that you wish to file a legally sufficient complaint with the Commission. Please accept my sincere apology for the delay in processing your letter.

Please contact Maura White, at 202-523-4060, if you have any questions.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure

ATTACHMENT #3

00040225593





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Namer  
3313 Kingman Street  
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Sincerely,

Charles N. Steele  
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 7, 1980

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- (2) should clearly identify as a respondent each person or entity who is alleged to have committed a violation;
- (3) should identify the source of information upon which the complaint is based;
- (4) should contain a clear and concise recitation of the facts describing the violation of the statute or law over which the Commission has jurisdiction; and
- (5) should be accompanied by supporting documentation if known and available to the person making the complaint.

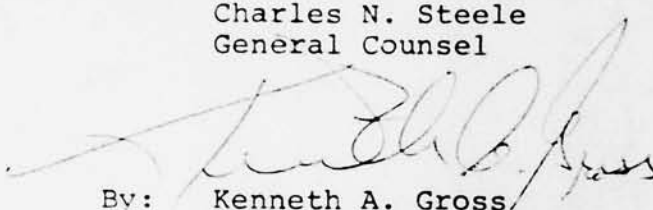
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Sincerely,

Charles N. Steele  
General Counsel

By:   
Kenneth A. Gross  
Associate General Counsel

Enclosure

● 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.) <input checked="" type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery.	
2. ARTICLE ADDRESSED TO: <b>Robert Namer</b> (CONSULT POSTMASTER FOR FEES)		3. ARTICLE DESCRIPTION: REGISTERED NO. <b>946764</b> INSURED NO. I have received the article described above. SIGNATURE <b>Mrs Paul</b> <input type="checkbox"/> Address <input type="checkbox"/> Authorized agent (Always obtain signature of addressee or agent)	
4. DATE OF DELIVERY <b>OCT 17 1980</b>		5. ADDRESS (Complete only if different from return address) <b>MOBILE, LA</b>	
6. UNABLE TO DELIVER REASON: <b>1501</b>		7. CLERK'S INITIALS <b>US</b>	

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

**NOV 12 2 8**

RECEIVED

0007125

'80 APR 24 AM 11:43

# ROBERT NAMER ★ ★ ★ ★ 1980 for CONGRESS

April 21, 1980

007569

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

Gentlemen:

I was a candidate in the Louisiana May 19 3rd Congressional election. I am submitting the following to get a determination as to whether any F.E.C. regulations have been violated, and if so, what action I can take.

1. There were four candidates in this race, three of which were labeled "major candidates". Public debates and forums were set up without my input as to the date, time and place.
2. Civic and private organizations have held forums where the news media was invited to cover, and I was not invited and was even barred from attending.
3. I am Jewish, and a major public debate was held on the Jewish Passover night which did not allow me to attend. No such forum was scheduled on Holy Thursday, Good Friday or Easter Sunday. My objection fell to deaf ears.

Because these debates and forums were open to the news media, I was not afforded the equal media exposure as my opponents.

SENT TO AND SUBSCRIBED.

RECEIVED ME THIS

DAY OF

Very truly yours,

*Robert Namer*

Robert Namer

RN/kb

80 APR 24 P 2:24

RECEIVED  
GENERAL COUNSEL

2180

National Business Consultants, Inc.

3313 KINGMAN STREET • METAIRIE, LA. 70002



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





FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1228

Date Filmed 12/17/80 Camera No. --- 2

Cameraman SPC

20952001008



FEDERAL ELECTION COMMISSION

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

MICROFILM ROLL #

22

80040225603

