



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1347

Date Filmed 4/22/81 Camera No. --- 2

Cameraman RPC

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:
Thomas A. Thompson

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>815046</i>	

 (Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☒ Addressee ☐ Authorized agent
A. Thompson

4. DATE OF DELIVERY
March 26, 1981

5. ADDRESS (Complete only if requested)
*1440 Bellefontaine
 Lima OH 45804*

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
Kucher

POSTMARK

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MAR 30 1981

1347

☆ GPO : 1975-388-948

PS Form 3811, Jan. 1979

● 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:
Jerry M. Johnson

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
915346

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: ☐ Addressee ☐ Authorized agent
Hunt, Mary J. Johnson

4. DATE OF DELIVERY
3-25-81

5. ADDRESS (Complete only if requested)
81 MAR 27 411:42

6. UNABLE TO DELIVER BECAUSE:
RECEIVED

CLERK'S INITIALS
BSL

POSTMARK
1981 MAR 27 411:42

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1347

Kucke

☆GPO : 1979-288-848



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas A. Thompson, President
Lima-Troy UAW-CAP
1440 Bellefontaine Avenue
Lima, Ohio 45804

Re: MUR 1347

Dear Mr. Thompson:

The Federal Election Commission has reviewed the allegations of your complaint dated November 17, 1980. The Commission determined that on the basis of the information provided in your complaint and information provided by the Respondent, there is no reason to believe that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). The evidence showed that Tom Ahl rather than Tom Ahl AMC-Jeep, Inc. purchased the radio advertisement.

However, it appears that the radio broadcast did not carry the required 2 U.S.C. § 441d disclaimer. Therefore, on March , 1981, the Commission found reason to believe that Tom Ahl violated 2 U.S.C. § 441d.

However, due to the circumstances of this matter, the Commission has determined to take no further action in the above referenced MUR.

Accordingly, the Commission has decided to close the file in the matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

A handwritten signature in black ink, reading "John Warren McGarry", is written over the typed name.

JOHN WARREN MCGARRY
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas A. Thompson, President
Lima-Troy UAW-CAP
1440 Bellefontaine Avenue
Lima, Ohio 45804

Re: MUR 1347

Dear Mr. Thompson:

The Federal Election Commission has reviewed the allegations of your complaint dated November 17, 1980. The Commission determined that on the basis of the information provided in your complaint and information provided by the Respondent, there is no reason to believe that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). The evidence showed that Tom Ahl rather than Tom Ahl AMC-Jeep, Inc. purchased the radio advertisement.

However, it appears that the radio broadcast did not carry the required 2 U.S.C. § 441d disclaimer. Therefore, on March , 1981, the Commission found reason to believe that Tom Ahl violated 2 U.S.C. § 441d.

However, due to the circumstances of this matter, the Commission has determined to take no further action in the above referenced MUR.

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Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

RR 3/19/81



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry M. Johnson
Hunt, Moritz and Johnson
Attorneys at Law
400 West North Street
Lima, Ohio 45801

Re: MUR 1347

Dear Mr. Johnson:

On November 19, 1980, the Commission notified you of a complaint alleging that Tom Ahl and Tom Ahl AMC-Jeep, Inc., had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March 16, 1981, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of 2 U.S.C. § 441b was committed by Tom Ahl AMC-Jeep, Inc.

However, on March 16, 1981, the Commission found reason to believe that Tom Ahl had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR.

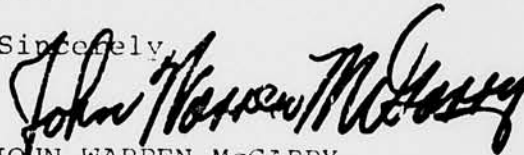
After considering the circumstances of this matter, the Commission has determined to take no further action and close its file. This matter will become a part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that Mr. Ahl's failure to include the proper disclaimer on the broadcast communication (the purchaser's name and whether the communication is authorized by any candidate or candidate's committee) appears to be a violation of 2 U.S.C. § 441d and he should take steps to ensure that this activity does not occur in the future.

Jerry M. Johnson
Page Two

If you have any questions regarding MUR 1347, please direct them to Randal Rucker, the staff member assigned to this matter, at (202)523-4039.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Warren McGarry". The signature is written in a cursive, somewhat stylized script.

JOHN WARREN MCGARRY
Chairman

Jerry M. Johnson
Page Two

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry M. Johnson
Hunt, Moritz and Johnson
Attorneys at Law
400 West North Street
Lima, Ohio 45801

Re: MUR 1347

Dear Mr. Johnson:

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The Commission, on March , 1981, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of 2 U.S.C. § 441b was committed by Tom Ahl AMC-Jeep, Inc.

However, on March , 1981, the Commission found reason to believe that Tom Ahl had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR.

After considering the circumstances of this matter, the Commission has determined to take no further action and close its file. This matter will become a part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that Mr. Ahl's failure to include the proper disclaimer on the broadcast communication (the purchaser's name and whether the communication is authorized by any candidate or candidate's committee) appears to be a violation of 2 U.S.C. § 441d and he should take steps to ensure that this activity does not occur in the future.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Tom Ahl AMC-Jeep, Inc.)
Tom Ahl)

MUR 1347

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 16, 1981 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1347:

1. Find NO REASON TO BELIEVE that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. § 441b.
2. Find REASON TO BELIEVE that Tom Ahl violated 2 U.S.C. § 441d, but take no further action.
3. Approve and authorize the sending of the letters as attached to the First General Counsel's Report dated March 11, 1981.
4. CLOSE THE FILE.

Attest:

3-16-81
Date

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

Received in Office of the Commission Secretary: 3-11-81, 5:02
Circulated on 48 hour vote basis: 3-12-81, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: MARCH 16, 1981
SUBJECT: COMMENTS - MUR 1347

Attached is a copy of Commissioner Aikens' vote sheet with comments regarding MUR 1347.

ATTACHMENT:
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461Date and Time Transmitted: THURSDAY, 3-12-81
11:00Commissioner McGARRY, AIKENS, TIERNAN, THOMSON, REICHE, HARRISRETURN TO OFFICE OF COMMISSION SECRETARY BY: MONDAY, 3-16-81
11:00MUR No. 1347 - First General Counsel's Report dated 3-11-81

- ☒ I approve the recommendation
☐ I object to the recommendation

COMMENTS: Types in that line to make - issuewhere end of letterDate: 3-16-81Signature: [Signature]

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED.
PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE
COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN
ABOVE.





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: MARCH 16, 1981
SUBJECT: COMMENTS - MUR 1347

Attached is a copy of Commissioner McGarry's
vote sheet with comments regarding MUR 1347.

ATTACHMENT:
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION

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

MAR 16 09:47 OK

Date and Time Transmitted: THURSDAY, 3-12-81
11:00Commissioner: McGARRY, AIKENS, TIERNAN, THOMSON, REICHE, HARRISRETURN TO OFFICE OF COMMISSION SECRETARY BY: MONDAY, 3-16-81
11:00MUR No. 1347 - First General Counsel's Report dated 3-11-81

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

COMMENTS:

Note typed on p. 2, para 4, line 1:
OGC will change word "Contribution"
to "expenditure."

Date: 3/12/81Signature: J. W. McGarry

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED.
PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE
COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN
ABOVE.



March 11, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 1347

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

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

3-11-81

MUR #1347

DATE COMPLAINT RECEIVED

BY OGC Nov. 19, 1980

STAFF MEMBER(S)

R. Rucker

COMPLAINANT'S NAME: Thomas A. Thompson, President Lima-Troy Area
UAW-CAP Council

RESPONDENT'S NAME: Tom Ahl AMC-Jeep, Inc., Tom Ahl

RELEVANT STATUTE: 2 U.S.C. §441b, 441d

INTERNAL REPORTS CHECKED: n/a

FEDERAL AGENCIES CHECKED: n/a

MAR 11 5:02

SUMMARY OF ALLEGATIONS

Complainant, Thomas A. Thompson, filed a complaint with the Commission on November 19, 1980. Thompson alleges that Tom Ahl AMC Jeep, Inc., a corporation, paid for a radio advertisement advocating the election of Ronald Reagan. The complaint also states that the communication did not carry the required 2 U.S.C. §441d disclaimer.

FACTUAL AND LEGAL ANALYSIS

The allegations of Thompson's November 19, 1980 complaint (Attachment I) stem from a November 3, 1980 radio advertisement advocating the election of Ronald Reagan. The complainant believes, but is not certain, that the WIMA AM Radio advertisement was paid for and authorized by Tom Ahl AMC-Jeep, Inc. This local corporation, doing business as an auto dealership in Lima, Ohio, has an advertising budget with WIMA radio. The complainant feels that the ad was paid for from the corporate funds of the advertising budget although he does "not know that to be a fact."

The radio broadcast had a voice identifying itself as Tom Ahl advocating the election of Reagan and accentuating the economic decline of the auto industry under the Carter administration. The radio statement carried no disclaimer that it was paid for or authorized by any candidate or political committee.

On December 15, 1980, the Commission received a letter from Tom Ahl in which he stated that he was being represented by Jerry M. Johnson of the law firm Hunt, Moritz and Johnson (Attachment II). Also, On December 15, 1980, the Commission received a reply to the allegations from counsel Johnson. (Attachment III).

Counsel for Mr. Ahl sets forth facts contradictory to the allegations and/or assumptions of the complainant. First, the WIMA radio advertisement was paid by Tom Ahl. Second, the statement for the cost was mailed to respondent's personal residence. Third, and most important, payment of the advertisement came from respondent's personal account and not from corporate assets. To verify these facts, counsel enclosed a copy of the statement of the advertisement cost and a copy of Tom Ahl's personal check discharging his debt of the WIMA Radio advertisement.

An examination of the WIMA radio statement reveals a total cost of \$52.00 for the four-time aired political advertisement. An examination of the check submitted by counsel indicates that it was made out to WIMA Radio AM for the amount of fifty-two dollars and drawn on the personal account of Tom Ahl.

Based on the evidence discussed above, the office of General Counsel recommends that there is no reason to believe that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. §441b.

Since the contribution by Tom Ahl is an independent expenditure pursuant to 2 U.S.C. §431(17), a brief discussion pertaining to any reporting ramifications is necessary. The Act sets out the standards for reporting by persons other than political committees who make independent expenditures, 2 U.S.C. §434(c) states in relevant part:

- (1) Every person...who makes independent expenditures in an aggregate amount or value in excess of \$250 during a calendar year shall file a statement...See also: 11 C.F.R. §109.2(a)

Since Mr. Ahl has not exceeded the \$250 aggregate amount, he is not required to file a report of independent expenditures with the Commission.

The evidence indicates, however, that Mr. Ahl failed to place a disclaimer on the broadcast communication. 2 U.S.C. §441d states that a person advocating the election or defeat of a clearly identified candidate through any broadcasting station should clearly state the name of the person purchasing the communication and whether the advertisement is authorized by any candidate or candidate's committee.

It appears that no such disclaimer appeared on the radio broadcast. Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Mr. Ahl violated 2 U.S.C. §441d. However, because the expenditure of fifty two dollars for the broadcast was so minimal and because of the limited extent that the broadcast was aired, the Office of General Counsel recommends that the Commission take no further action with regard to this violation.

Recommendations

1. Find no reason to believe that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. § 441b.
2. Find reason to believe that Tom Ahl violated 2 U.S.C. § 441d, but take no further action.
3. Approve and authorize the sending of the attached letters.
4. Close the file

Attachments:

1. Copy of Complaint
2. Letter Authorizing Counsel
3. Respondents' Response
4. Notification Letter
5. Acknowledgement Letter
6. Proposed Letter to Complainant
7. Proposed Letter to Respondents

TROY

CAP

Council

80 NOV 19 P12:16

600#336



Lima - Troy UAW - CAP
1440 Bellefontaine Ave.
Lima, Ohio 45804
Ph. 419-222-8961

November 17, 1980

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

Dear Election Commission,

I am writing to register a complaint of what I believe to be a violation of the Federal Election Law. The incident which prompts this complaint was a radio advertisement which I heard on WIMA-AM Radio in Lima, Ohio. The ad was played on, (or about), Monday, November 3, 1980.

The radio ad was advocating the election of Ronald Reagan... it did not carry the usual disclaimer, but I have reason to believe that it was paid for and authorized by a local corporation doing business as Tom Ahl AMC-Jeep, (an auto dealership).

Following is a statement of facts, (as best as I can recall). I do hereby swear that this statement is a true representation of the ad, (to the best of my memory):

On or about Monday, November 3, while driving home from work between 5:30 P.M. and 6:00 P.M., I was listening to local news, weather and sports on WIMA-AM on my car radio. During a commercial break which came during the weather broadcast, (I believe), a voice came on and identified himself as Tom Ahl - the general nature of his statement I will attempt to reconstruct; this is not actual quotes but only my recollection of the gist of Mr. Ahl's radio statement.

----This is Tom Ahl of Ahl AMC-Jeep, and I would like to urge everyone listening to this message to go out tomorrow, (or election day), and vote for Ronald Reagan. Jimmy Carter has made a shambles of the American economy and must be turned out of office.

When Carter was elected four years ago, the automobile business was good - x-number of cars were being sold in Allen County each week. The consumer could buy a new American made vehicle for as low as - x-number \$. We all know what has happened to those prices during Carter's term. American consumers cannot afford four more years of Jimmy Carter.

Attachment I

So go out and do yourself a favor and let's elect Ronald Reagan president and get the economy moving again.

Ahl AMC-Jeep looks forward to doing business with you during the much brighter years of the Reagan administration.-----

I repeat that the statement above is not actual quotes, but it does, to the best of my ability to recall, represent the substance of the political ad.

I suspect that the ad was paid for by corporate funds controlled by Mr. Ahl as part of his regular advertising budget with WIMA radio. I do not know that to be a fact. The ad carried no disclaimer that it was paid or authorized by any political or campaign authority.

I would like to have the incident properly investigated by the Commission and proper action taken as prescribed by law.

If you have any questions or need further information, I will be happy to co-operate.

Sincerely yours,

Thomas A. Thompson

Thomas A. Thompson, President
Lima-Troy Area UAW-CAP Council

TT/rs

Sworn to and subscribed in my presence this 17th day of Nov., 19 80.

Paul Ann Stewart

PAUL ANN STEWART, Notary Public
Lima-Troy Area UAW-CAP Council
My Commission Expires Feb. 2, 1992

December 3, 1980

Mr. Kenneth Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1347

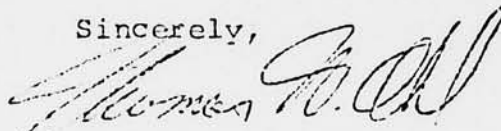
Dear Mr. Gross,

Please be advised that I am in receipt of your correspondence of November 24, 1980 concerning a complaint alleging violation of certain sections of the Federal Election Campaign Act of 1971.

Please note that from this date I will be represented with counsel by Jerry M. Johnson, located at 400 W. North Street, Lima, Ohio 45801, Telephone: (419) 222-1040.

I further request that any future notifications and communications be sent directly to Mr. Johnson's office and that all further communication by me will be through my said counsel.

Sincerely,



Thomas A. Ahl

50:28 91030 08

Attachment II

- 123 10 11-10

HUNT, MORITZ AND JOHNSON

ATTORNEYS AT LAW

400 WEST NORTH STREET

LIMA, OHIO 45801

JAMES L. HUNT
LARRY G. MORITZ
JERRY M. JOHNSONPHONE 222-1040
AREA CODE 419

December 6, 1980

Mr. Kenneth Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1347

Dear Mr. Gross:

Please be advised that Tom Ahl has retained our office concerning the complaint alleged with your office concerning possible violation of the Federal Election Campaign Act of 1971.

It is my understanding that the alleged violation was the result of an advertisement on a local radio station encouraging voters to vote for Ronald Reagan. It is further my understanding that if there is any violation in the Campaign Act of 1971, it would be only a result from a corporation using its assets to fund a political advertisement.

Let me assure the Commission that no such funds, assets, or property of the corporation was used in purchasing the political advertisement. It was carried out by an individual who has strong convictions and wished to have them expressed over radio. Any expenditures for this advertisement were paid personally by the individual, Tom Ahl. The statement for the cost of the advertisement was sent to Mr. Ahl's personal residence and not the business address. Further, payment of the advertisement came from Mr. Ahl's personal account and not from any corporation assets. To further substantiate this statement, please find enclosed a copy of the statement mailed to Mr. Ahl by the radio station indicating the amount due for the advertisement in question together with the times in which the advertisements were aired on radio. Also, please find enclosed a copy of Mr. Ahl's personal check made payable to WIMA Radio Station for the cost of the paid advertisement.

As the enclosures indicate the advertisement was strictly conducted by Mr. Ahl personally, and it is my understanding of the law that an individual has the right to express his own personal ideas in

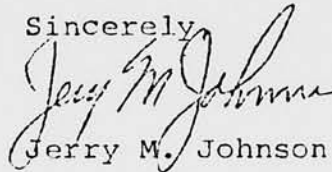
00DEC15 P12:11

Page 2
December 6, 1980

the manner he may choose. I would certainly hope that the rules and regulations of the Federal Election Commission has not reached the point of denying an individual freedom to express his own political beliefs.

Hopefully this is sufficient information for this matter to be terminated. If you need any further information or notification, please feel free to contact the undersigned. }

Sincerely



Jerry M. Johnson

JMJ:jac

enclosures

Attachment III

WJLA-TV-AM RADIO
667 West Market Street
Lima, Ohio 45802
Phone (419) 223-2060



AMOUNT PAID \$

TOM AHL

26205 01	11/30/80	1
CUSTOMER	TERMINAL	DATE

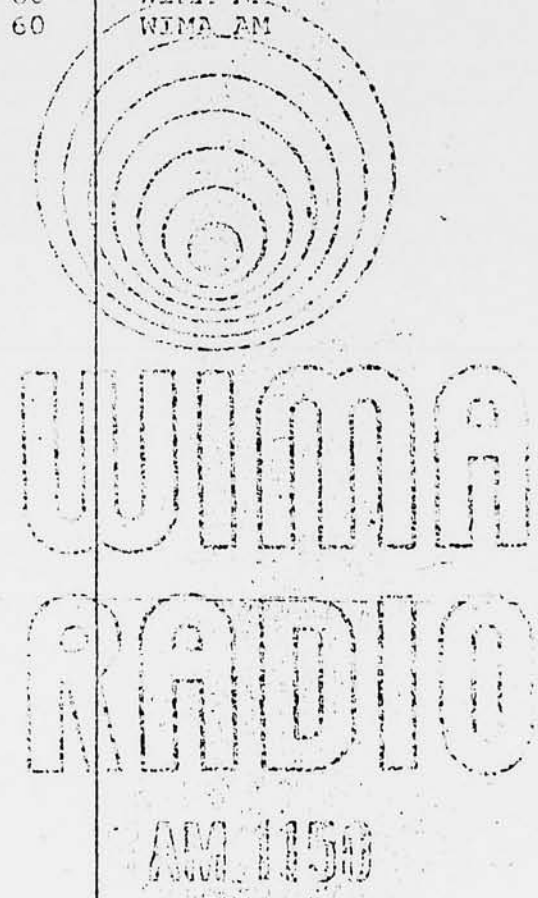
DETACH & RETURN WITH PAYMENT

TOM AHL
1577 WALNUT COURT
LIMA, OHIO 45805

This invoice does not include or reflect any future rebate, discount or merchandising bonus to which the advertiser may be entitled as a result of the purchase of larger amounts of time in future periods.

DATE	DAY	TIME	LENGTH	STATION	SPOTS	PRICE	AMOUNT
11/03/80	MON	4:08 PM	60	WJLA AM	1	13.00	13.00
11/03/80	MON	4:56 PM	60	WJLA AM	1	13.00	13.00
11/03/80	MON	5:26 PM	60	WJLA AM	1	13.00	13.00
11/03/80	MON	6:45 PM	60	WJLA AM	1	13.00	13.00

Handwritten: R.D. 12/6/80



Subscribed and sworn to before

Attachment III

Notary Public

My commission expires

Signed

Title

QUANTITY 4 TOTAL 52.00

TOTAL DUE 52.00

AFFIDAVIT OF PERFORMANCE CERTIFY THAT IN ACCORDANCE WITH OFFICIAL STATION LOGS, THE ABOVE ANNOUNCEMENTS WERE BROADCAST AS STATED.
SERVICE CHARGE OF 1 1/2% PER CENT PER MONTH (18 PER CENT PER YEAR) CHARGED AFTER ONE MONTH, ON THE UNPAID BALANCE.



THOMAS OT. ANDREA ARL
1877 WASHINGTON ST. 691-8977
LIMA, OHIO 45905

2791

53-102
412

Handwritten: 12/6/80 5570

THE METROPOLITAN BANK

OF LIMA, OHIO

22222 10030 10030

055 85587



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Ahl
Ahl AMC-Jeep
617 King Avenue
Lima, Ohio 45305

Re: MUR 1347

Dear Mr. Ahl:

This letter is to notify you that on November 19, 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 1347. 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 your Committee 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.

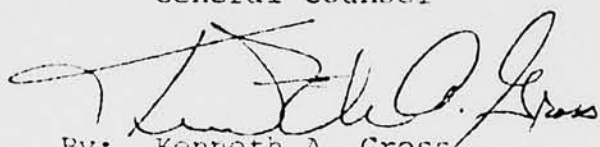
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment IV

If you have any questions, please contact Randal Rucker, the staff member assigned to this matter at (202) 523-4039. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure

1. Complaint
2. Procedures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

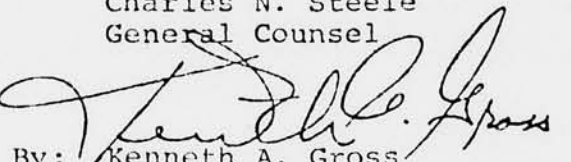
Thomas A. Thompson, President
Lima-Troy Area UAW-CAP Council
1440 Bellefontaine Avenue
Lima, Ohio 45804

Dear Mr. Thompson:

This letter is to acknowledge receipt of your complaint of November 17, 1980, against Tom Ahl which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondent's 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


By: Kenneth A. Gross
Associate General Counsel

Enclosure

Attachment V



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas A. Thompson, President
Lima-Troy UAW-CAP
1440 Bellefontaine Avenue
Lima, Ohio 45804

Re: MUR 1347

Dear Mr. Thompson:

The Federal Election Commission has reviewed the allegations of your complaint dated November 17, 1980. The Commission determined that on the basis of the information provided in your complaint and information provided by the Respondent, there is no reason to believe that Tom Ahl AMC-Jeep, Inc. violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). The evidence showed that Tom Ahl rather than Tom Ahl AMC-Jeep, Inc. purchased the radio advertisement.

However, it appears that the radio broadcast did not carry the required 2 U.S.C. § 441d disclaimer. Therefore, on March 1, 1981, the Commission found reason to believe that Tom Ahl violated 2 U.S.C. § 441d.

However, due to the circumstances of this matter, the Commission has determined to take no further action in the above referenced MUR.

Accordingly, the Commission has decided to close the file in the matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry M. Johnson
Hunt, Moritz and Johnson
Attorneys at Law
400 West North Street
Lima, Ohio 45801

Re: MUR 1347

Dear Mr. Johnson:

On November 19, 1980, the Commission notified you of a complaint alleging that Tom Ahl and Tom Ahl AMC-Jeep, Inc., had violated certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on March , 1981, determined that on the basis of the information in the complaint and information provided by you, there is no reason to believe that a violation of 2 U.S.C. § 441b was committed by Tom Ahl AMC-Jeep, Inc.

However, on March , 1981, the Commission found reason to believe that Tom Ahl had violated 2 U.S.C. § 441d, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act") in connection with the above referenced MUR.

After considering the circumstances of this matter, the Commission has determined to take no further action and close its file. This matter will become a part of the public record within thirty days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that Mr. Ahl's failure to include the proper disclaimer on the broadcast communication (the purchaser's name and whether the communication is authorized by any candidate or candidate's committee) appears to be a violation of 2 U.S.C. § 441d and he should take steps to insure that this activity does not occur in the future.

Sincerely,

Charles N. Steele
General Counsel

911593
6000
3580

RECEIVED
80 DEC 15 P12:11

December 3, 1980

Mr. Kenneth Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1347

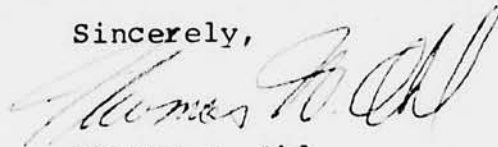
Dear Mr. Gross,

Please be advised that I am in receipt of your correspondence of November 24, 1980 concerning a complaint alleging violation of certain sections of the Federal Election Campaign Act of 1971.

Please note that from this date I will be represented with counsel by Jerry M. Johnson, located at 400 W. North Street, Lima, Ohio 45801, Telephone: (419) 222-1040.

I further request that any future notifications and communications be sent directly to Mr. Johnson's office and that all further communication by me will be through my said counsel.

Sincerely,



Thomas A. Ahl

50:2d 91030 00

RECEIVED
80 DEC 15 P12:11

RECEIVED
08 DEC 15 12:11

HUNT, MORITZ AND JOHNSON

ATTORNEYS AT LAW

400 WEST NORTH STREET

LIMA, OHIO 45801

JAMES I. HUNT
LARRY G. MORITZ
JERRY M. JOHNSON

PHONE 222-1040
AREA CODE 419

December 6, 1980

Mr. Kenneth Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1347

Dear Mr. Gross:

Please be advised that Tom Ahl has retained our office concerning the complaint alleged with your office concerning possible violation of the Federal Election Campaign Act of 1971.

It is my understanding that the alleged violation was the result of an advertisement on a local radio station encouraging voters to vote for Ronald Reagan. It is further my understanding that if there is any violation in the Campaign Act of 1971, it would be only a result from a corporation using its assets to fund a political advertisement.

Let me assure the Commission that no such funds, assets, or property of the corporation was used in purchasing the political advertisement. It was carried out by an individual who has strong convictions and wished to have them expressed over radio. Any expenditures for this advertisement were paid personally by the individual, Tom Ahl. The statement for the cost of the advertisement was sent to Mr. Ahl's personal residence and not the business address. Further, payment of the advertisement came from Mr. Ahl's personal account and not from any corporation assets. To further substantiate this statement, please find enclosed a copy of the statement mailed to Mr. Ahl by the radio station indicating the amount due for the advertisement in question together with the times in which the advertisements were aired on radio. Also, please find enclosed a copy of Mr. Ahl's personal check made payable to WIMA Radio Station for the cost of the paid advertisement.

As the enclosures indicate the advertisement was strictly conducted by Mr. Ahl personally, and it is my understanding of the law that an individual has the right to express his own personal ideas in

RECEIVED

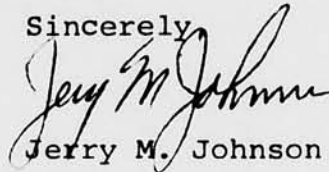
80 DEC 15 P12:11

Page 2
December 6, 1980

the manner he may choose. I would certainly hope that the rules and regulations of the Federal Election Commission has not reached the point of denying an individual freedom to express his own political beliefs.

Hopefully this is sufficient information for this matter to be terminated. If you need any further information or notification, please feel free to contact the undersigned.

Sincerely,



Jerry M. Johnson

JMJ:jac

enclosures



THOMAS OR ANDREA AHL
1577 WALNUT CT. 991-0977
LIMA, OHIO 45905

No. 2791

12/6/80

55-102
412

Pay to the order of LIMA RADIO - RM
Diffusion

\$57.00

DISBURSE

★
THE METROPOLITAN BANK

OF LIMA, OHIO

THOMAS OR ANDREA AHL

[Signature]

⑆04⑆20⑆020⑆

055 ⑆5567⑆

HUNT, MORITZ AND JOHNSON

ATTORNEYS AT LAW
400 WEST NORTH STREET
LIMA, OHIO 45801



Mr. Kenneth Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

REQUEST RETURN WITHIN 5 DAYS

CERTIFIED

No. 0056446

MAIL

Randall;

I need names
& addresses of
respondents ASAP.

E
1170

1347

MEMORANDUM

TO: ELISSA GARR

FROM: RANDAL RUCKER

R.R.

SUBJECT: NAME AND RESPONDENT IN MUR 1347

The name and address of the respondent in MUR 1347 follow:

Mr. Tom Ahl
Ahl AMC-Jeep
617 King Avenue
Lima, Ohio 45805

523- 4039



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tom Ahl
Ahl AMC-Jeep
617 King Avenue
Lima, Ohio 45805

Re: MUR 1347

Dear Mr. Ahl:

This letter is to notify you that on November 19, 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 1347. 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 your Committee 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.

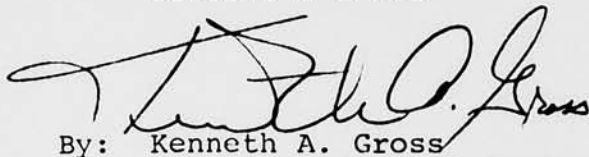
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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.

If you have any questions, please contact Randal Rucker, the staff member assigned to this matter at (202) 523-4039. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

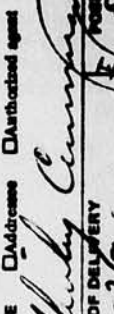


By: Kenneth A. Gross
Associate General Counsel

Enclosure

1. Complaint
2. Procedures

1347 Rucker

1. The following service is requested (check one.) <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.		2. ARTICLE ADDRESSED TO: Mr. Tom Ahl		3. ARTICLE DESCRIPTION: REGISTERED NO. 947395 INSURED NO.	
4. SIGNATURE  DATE OF DELIVERY 11-29-80		5. ADDRESS (Complete only if registered)		6. UNABLE TO DELIVER BECAUSE: STREET	

PS Form 3811, Jan. 1978 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 24, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas A. Thompson, President
Lima-Troy Area UAW-CAP Council
1440 Bellefontaine Avenue
Lima, Ohio 45804

Dear Mr. Thompson:

This letter is to acknowledge receipt of your complaint of November 17, 1980, against Tom Ahl which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondent's 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,

. Steele
ounsel

. Gross
General Counsel

1347 Ruckel

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 type="checkbox"/> Show to whom and date delivered. <input type="checkbox"/> Show to whom, date and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery.	
(CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Thomas A. Thompson	
3. ARTICLE DESCRIPTION: REGISTERED NO. 947394	INSURED NO.
[Always obtain signature of addressee or agent] I have received the article described above. SIGNATURE [Signature] DATE OF DELIVERY 12/1/80	
4. ADDRESS Complete only if necessary	
5. UNABLE TO DELIVER BECAUSE: F 107	

DEC 1 1980

U.S. Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

LIMA
TROY

CAP

Council

RECEIVED

80 NOV 19 P12:

6th



Lima - Troy UAW - CAP
1440 Bellefontaine Ave.
Lima, Ohio 45804
Ph. 419-222-8961

November 17, 1980

80 NOV 19 P 2:02

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

Dear Election Commission,

I am writing to register a complaint of what I believe to be a violation of the Federal Election Law. The incident which prompts this complaint was a radio advertisement which I heard on WIMA-AM Radio in Lima, Ohio. The ad was played on, (or about), Monday, November 3, 1980.

The radio ad was advocating the election of Ronald Reagan... it did not carry the usual disclaimer, but I have reason to believe that it was paid for and authorized by a local corporation doing business as Tom Ahl AMC-Jeep, (an auto dealership).

Following is a statement of facts, (as best as I can recall). I do hereby swear that this statement is a true representation of the ad, (to the best of my memory):

On or about Monday, November 3, while driving home from work between 5:30 P.M. and 6:00 P.M., I was listening to local news, weather and sports on WIMA-AM on my car radio. During a commercial break which came during the weather broadcast, (I believe), a voice came on and identified himself as Tom Ahl - the general nature of his statement I will attempt to reconstruct; this is not actual quotes but only my recollection of the gist of Mr. Ahl's radio statement.

-----This is Tom Ahl of Ahl AMC-Jeep, and I would like to urge everyone listening to this message to go out tomorrow, (or election day), and vote for Ronald Reagan. Jimmy Carter has made a shambles of the American economy and must be turned out of office.

When Carter was elected four years ago, the automobile business was good - x-number of cars were being sold in Allen County each week. The consumer could buy a new American made vehicle for as low as - x-number \$. We all know what has happened to those prices during Carter's term. American consumers cannot afford four more years of Jimmy Car

page 2.... ltr 11/17/80
Federal Election Commission

So go out and do yourself a favor and let's elect
Ronald Reagan president and get the economy moving again.

Ahl AMC-Jeep looks forward to doing business with
you during the much brighter years of the Reagan adminis-
tration.-----

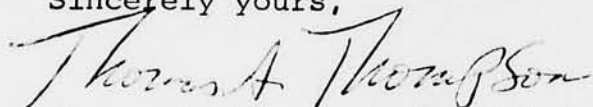
I repeat that the statement above is not actual quotes,
but it does, to the best of my ability to recall, represent
the substance of the political ad.

I suspect that the ad was paid for by corporate funds
controlled by Mr. Ahl as part of his regular advertising
budget with WIMA radio. I do not know that to be a fact.
The ad carried no disclaimer that it was paid or authorized
by any political or campaign authority.

I would like to have the incident properly investigated
by the Commission and proper action taken as prescribed by
law.

If you have any questions or need further information,
I will be happy to co-operate.


Sincerely yours,



Thomas A. Thompson, President
Lima-Troy Area UAW-CAP Council

TT/rs

Sworn to and subscribed in my presence this 17th day of
Nov., 19 80.



Public Notary Public
Notary for the State of Ohio
My Commission Expires Feb. 2, 1982

LIMA-TROY AREA UAW CAP COUNCIL
1440 BELLEFONTAINE AVENUE
LIMA, OHIO 45804



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

88 NOV 19 PM 12:17

RECEIVED



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1347

Date Filmed 4/22/81 Camera No. --- 2

Cameraman JPC