



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20541

THIS IS THE END OF TUCR # 1405

Date Filmed 4/21/82 Camera No. --- 2

Cameraman GPC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Robert Blaemire
President
Committee for American Principles
2000 N Street, N.W., Suite 105
Washington, D.C. 20036

Re: MUR 1405

Dear Mr. Blaemire:

The Federal Election Commission, on March 30, 1982, found reason to believe that the National Conservative Political Action Committee violated the Act but voted to terminate its inquiry in connection with the complaint which you filed on December 16, 1981. The Commission determined that substantial compliance had been achieved with respect to the allegations in your complaint. 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).

If you have any questions, please contact Duane A. Brown the attorney assigned this matter, at 523-4057.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

02040314789



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1405

Dear Mr. Herge:

On March 30, 1982, the Commission found reason to believe that your client National Conservative Political Action Committee ("NCPAC") violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 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 NCPAC's acceptance and delayed reimbursement of the excessive contributions nevertheless appears to be a violation of 2 U.S.C. § 441a(f) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at 523-5071.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

02040314790



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. Ben T. Shaw
100 Dement Avenue
Dixon, Illinois 61021

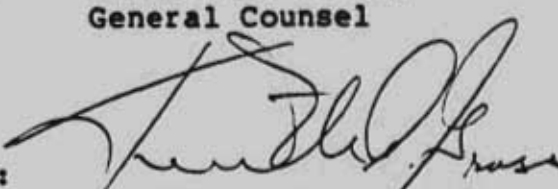
Dear Mr. Shaw:

On March 30, 1982 the Commission notified you that it had received a complaint alleging that you had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon further review, the Commission decided to take no action and close the file. This matter will be made part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

62040314791



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 1, 1982

Mr. Webber Haines, Esquire
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, Illinois 32790-0880

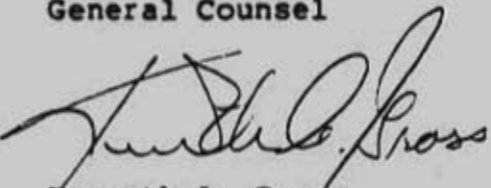
Dear Mr. Haines:

On March 30, 1982, the Commission notified you that it had received a complaint alleging that the late Sophia Fischer had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon further review, the Commission decided to take no action and close the file. This matter will be made part of the public record within 30 days.

Sincerely,

Charles N. Stkeelee
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

62040314792



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Webber Haines, Esquire
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, Illinois 32790-0880

Dear Mr. Haines:

On March , 1982, the Commission notified you that it had received a complaint alleging that the late Sophia Fischer had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon further review, the Commission decided to take no action and close the file. This matter will be made part of the public record within 30 days.

Sincerely,

Charles N. Stkeelee
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

KAG

02040314793



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1405

Dear Mr. Herge:

On March , 1982, the Commission found reason to believe that your client National Conservative Political Action Committee ("NCPAC") violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 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 NCPAC's acceptance and delayed reimbursement of the excessive contributions nevertheless appears to be a violation of 2 U.S.C. § 441a(f) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at 523-5071.

Sincerely,

62040314794



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Blaemire
President
Committee for American Principles
2000 N Street, N.W., Suite 105
Washington, D.C. 20036

Re: MUR 1405

Dear Mr. Blaemire:

The Federal Election Commission, on March 30, 1982, found reason to believe that the National Conservative Political Action Committee violated the Act but voted to terminate its inquiry in connection with the complaint which you filed on December 16, 1981. The Commission determined that substantial compliance had been achieved with respect to the allegations in your complaint. 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).

If you have any questions, please contact Duane A. Brown the attorney assigned this matter, at 523-4057.

Sincerely,

A handwritten signature, likely of Duane A. Brown, is located at the bottom right of the page.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Conservative Political) MUR 1405
Action Committee (NCPAC))

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 30, 1982, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1405:

1. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. §441a(f) and take no further action.
2. Take no action against Ben Shaw or Sophia Fischer.
3. Approve the letters attached to the General Counsel's March 16, 1982 report in this matter.
4. Close the file.

Commissioners Aikens, Harris, McDonald, and Reiche voted affirmatively for the decision; Commissioners Elliott and McGarry dissented.

Attest:

3/30/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

62040314796

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Conservative Political) MUR 1405
Action Committee (NCPAC))

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on March 23, 1982, do hereby certify that the Commission failed on a vote of 3-2 to pass a motion to take the following actions in MUR 1405:

1. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. §441a(f) and take no further action.
2. Take no action against Ben Shaw or Sophia Fischer.
3. Approve the letters attached to the General Counsel's March 16, 1982 report in this matter.
4. Close the file.

Commissioners Harris, McDonald, and Reiche voted affirmatively for the motion; Commissioners Elliott and McGarry dissented. Commissioner Aikens was not present at the time of the vote.

Attest:

3/24/82

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

82040314797



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. ~~WILSON~~ JODY CUSTER *jc*
DATE: MARCH 18, 1982
SUBJECT: OBJECTION - MUR 1405 First General Counsel's
Report dated March 16, 1982

The above-named document was circulated to the Commission on March 17, 1982 at 11:00.

Commissioners Aikens and Elliott submitted objections this date.

This matter will be placed on the agenda for the Executive Session of Tuesday, March 23, 1982.

32040314798

March 16, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1405

Please have the attached First General Counsel's
Report distributed to the Commission on a 48 hour tally
basis. Thank you.

Attachment

cc: Brown

82040314799

SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAR 16 P 2: 0.

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION: 3/10/82

MUR 1405
DATE COMPLAINT RECEIVED
BY OGC: 12/18/81
DATE OF NOTIFICATION TO
RESPONDENT: 12/18/81
STAFF MEMBER: Duane A.
Brown

COMPLAINANT'S NAME: Robert Blaemire - Committee for
American Principles

RESPONDENT'S NAME: National Conservative Political Action
Committee (NCPAC)

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(c) § 441a(f)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Robert Blaemire, President of the Committee for American Principles, ("complainant") alleges that the National Conservative Political Action Committee ("NCPAC") filed reports with the Commission during calendar year 1981 which reveal that several contributions were made to NCPAC in excess of the contribution limitation permitted in 2 U.S.C. § 441a(a)(1)(C) (Attachment I). Complaint's documentation indicates that Sophia W. Fischer and Ben J. Shaw exceeded their \$5,000 aggregate total contribution to NCPAC by \$50 and \$500 respectively.

02040314800

FACTUAL AND LEGAL ANALYSIS

Notification of the complaint was received by the respondent on December 28, 1981. J. Curtis Herge responded as counsel for NCPAC in a letter dated January 7, 1982 (Attachment II).

Mr. Herge concedes that NCPAC received excessive contributions from Mr. Shaw and Mrs. Fischer, but argues that the allegations are without merit since NCPAC made its best efforts^{1/} to comply with the Act. Mr. Herge explains in a very detailed statement that NCPAC has over 140,000 active contributors whose contributions are entered into a computer, "designed to aggregate the data relevant to a single contributor." In order to comply with the Act, Herge says that the computer, "has an inquiry feature which regularly identifies and publishes a monthly report of any contributor whose cumulative year-to-date total exceeds \$5,000." Using this information, Herge says that NCPAC then, "refunds the excess over \$5,000 to the contributor" Mr. Herge explains that some contributors exceed their limitation since, "they routinely respond to direct mail solicitations which are mailed periodically to all prior contributors." With respect to Mrs. Fischer, NCPAC appears to have mailed her two (2) letters in 1981 informing her that she had reached her contribution limit

^{1/}A defense of "best efforts" does not apply to violations of 2 U.S.C. § 441a but may be taken into account by the Commission as a factor mitigating the seriousness of the violation.

and to therefore ignore future solicitation requests received in the mail. Mrs. Fischer (now deceased) is said to have continued to send contributions to NCPAC causing her to exceed the limitation by \$1,000. Mr. Herge indicates that a check in that amount was mailed to the attorney for Mrs. Fischer's estate on December 30, 1981. With respect to Mr. Shaw, a similar situation appears to have occurred in that Mr. Shaw is claimed to have sent in additional contributions after receiving letters from NCPAC requesting that he not. Mr. Herge indicates that a check in the amount of \$1,106.70 was mailed to Mr. Shaw on December 30, 1981.

CONCLUSION

Its apparent that Mrs. Fischer and Mr. Shaw contributed and NCPAC accepted monies in excess of the limitation provided by the Act. Even though it appears from NCPAC's detailed summary and documentation that an honest effort was made by NCPAC to determine individual contributors year-to-date totals, and that for those who exceeded the \$5,000 limitation to discourage future contributions, NCPAC still accepted the contributions and failed to reimburse the contributors until after the complaint was filed. Accordingly, the Office of General Counsel recommends that the Commission find reason to believe that NCPAC violated 2 U.S.C. § 441a(f) but take no further action. It is further recommended that no action be taken against Mrs. Fischer (deceased) and Mr. Shaw.

02040314802

RECOMMENDATIONS

1. Find reason to believe the National Conservative Political Action Committee violated 2 U.S.C. § 441a(f) and take no further action.
2. Take no action against Ben Shaw or Sophia Fischer.
3. Approve proposed letters.
4. Close the File.

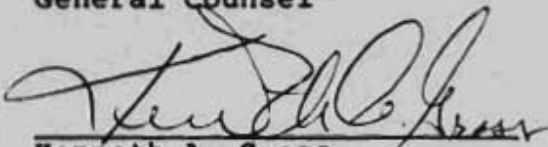
02040314803

March 15, 1982

Date

Charles N. Steele
General Counsel

BY:



Kenneth A. Gross
Associate General Counsel

ATTACHMENTS

1. Complaint
2. Letter from J. Curtis Herge
3. Letters (4)

COMMITTEE
FOR
AMERICAN
PRINCIPLES

ATTACHMENT 1

81 DEC 16 P 2: 26

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)
National Conservative)
Political Action)
Committee (NCPAC))

MUR No. _____

COMPLAINT

1) The National Conservative Political Action Committee (NCPAC) has filed monthly reports with the Commission of contributions received.

2) 11CFR Sec. 110.1(c) says; "No person...shall make contributions to any other political committee which in the aggregate exceed \$5,000 in any calendar year."

3) Commission records reveal contributions in excess of the legal limitations to NCPAC by two persons. The April 1981 report by NCPAC shows Mrs. Sophia W. Fischer to have reached the \$5000 aggregate total with a contribution of \$2665 on April 30, 1981. Mrs. Fischer, the reports then reveal, contributed another \$50 to NCPAC during May 1981, according to the monthly report of that period. The August 1981 report by NCPAC shows Mr. Ben T. Shaw to have reached the \$5000 aggregate total with a contribution of \$1606 on August 28, 1981. Mr Shaw, the reports then reveal, contri-

buted another \$500 to NCPAC on September 14, 1981, according to the monthly report for that period.

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the period of April to September, 1981.

5) Complainant is concerned that additional violations may be found in NCPAC's detailed and lengthy reports if a lengthy study is done. The large number of contributors to NCPAC makes reporting difficult, but also allows committees to obscure excessive contributions simply because of the large amount of information in the reports. Complainant requests that the Commission initiate an audit of NCPAC reports as part of an investigation into the matter described above, to satisfy concerns that there may be additional violations of the legal contribution limitations.

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec. 437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: Robert Blaemire
Robert Blaemire, President

Date: 12/16/81

(2)

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL)

Janet G. Meyer
Notary Public

My Commission Expires February 14, 1984

My Commission Expires: _____

02040314306

3

RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

TOTAL CONSERVATIVE PAC, PAR. NO. 1, LINE NO. 14A.

NAME, MAILING ADDRESS, AND ZIP CODE OCCUPATION AND PLACE OF BUSINESS AGGR. RECEIPT AMT. YTD. THIS PERIOD

10/81 JAMES D PARKER 500.00 500.0
100 PARKER LANE
VIRGINIA BCH VA 23454 RETIRED
INFO REQUESTED, NOT RECD

07/81 JOHN L POPE, II 1000.00 1000.0
PO BOX 2100
NORFOLK VA 23501 CHAIRMAN OF THE BOARD
SHIPBUILDING & RYDOCK CORP

4/81 W F RODMAN 215.00 100.0
904 AUGUSTA AVENUE
MORGANTOWN WV 26505 PHYSICIAN
INFO REQUESTED, NOT RECD

07/81 MRS FLAINE D KORN 400.00 300.0
10 SWAN LAKE DRIVE
SUMTER CA 29150 HOUSEWIFE
INFO REQUESTED, NOT RECD

13/81 INMAN BRANDON 700.00 500.0
3300 FIRST NATIONAL BANK
ATLANTA GA 30303 ATTORNEY
HANSELL, POST, REEDON & POTSEY

10/81 MRS SOPHIA W FISCHER 5000.00 2665.0
690 OSCEOLA AVENUE 603
WINTER PARK FL 32789 RETIRED
INFO REQUESTED, NOT RECD

16/81 MRS NELSON MORRIS 600.00 500.0
5333 COLLINS AVE
MIAMI FL 33140 INFO REQUESTED, NOT RECD
INFO REQUESTED, NOT RECD

3/81 J E PIERCE 3999.59 2529.0
6040 MOSS RANCH ROAD
MIAMI FL 33156 HOUSEWIFE
SELF-EMPLOYED

7/81 FREDERICK W GUARDABASSI 1000.00 1000.0
SUNRISE PROFESSIONAL BUILDING
915 MIDDLE RIVER DR ST
FORT LAUDERDALE FL 33304 INFO REQUESTED, NOT RECD
INFO REQUESTED, NOT RECD

14/81 THEODORE D STAFF 225.00 75.0
5600 N DIXIE HWY
WEST PALM BEACH FL 33407 RETIRED
INFO REQUESTED, NOT RECD

PERIOD 04/01/71 - 05/31/71

CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND PAYMENTS

10. SEPARATE PAGE PART NO. 1, LINE 42, 11A.

NAME, MAILING ADDRESS, AND ZIP CODE OCCUPATION AND PLACE OF BUSINESS ACCT. RECEIPT NO. YTD. THIS PERIOD

1/31	J. D. LANDERS PO BOX 433 NITRO WV 25143	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	200.00	200.00
1/31	CHARLES T JONES PORT KATHERINE CHARLESTON WV 25305	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00	500.00
5/31	IRVING BRANDON 3100 FIRST NATIONAL BANK ATLANTA GA 30303	ATTY HANSSELL, POST, BRANDON & DORSEY	1100.00	250.00
8/31	W. C. HANLAN 2355 RAMSGATE NW ATLANTA GA 30305	LAWYER ATLANTA GA	225.00	75.00
1/31	JOHN B. SMITH 3701 MADISON HALL ROAD, N ATLANTA GA 30327	INTERIOR DESIGN SAME	400.00	100.00
9/31	WILL D. MATHEWS PO BOX 103 OILFIELD CA 90701	INS. AGENT INFO REQUESTED, NOT RECD	250.00	150.00
1/31	MRS SOPHIA K. FISCHER 500 CECILIA AVENUE 503 WINTER PARK FL 32789	RETIRED INFO REQUESTED, NOT RECD	5000.00	50.00
1/31	MRS G. T. HOLBROOK 175 VILLAGE RD NORFOLK HAMPTON VA 23403	RETIRED INFO REQUESTED, NOT RECD	550.00	50.00
11/31	WILSON J. HINTO 2400 EAST LAZAR PALM DR PALM BEACH FL 33432	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	300.00	100.00
11/31	MRS BARBARA RICHARDS 213 CREAM DR LIPSDON FL 33453	HOUSEWIFE INFO REQUESTED, NOT RECD	300.00	100.00

08/1/81 - 08/31/81

September Report

RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

E	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AGGR. RECEIPT A YTD. THIS PER
28/81	MRS KATHERINE S DUNBAUGH 1 CALVIN TERRACE A102 PRESBYTERIAN HOME EVANSTON IL 60201	RETIRED INFO REQUESTED, NOT RECD	500.00 - 500.
04/81	MRS RUTH TRILLICH 2100 BENNETT AVENUE EVANSTON IL 60201	HOUSEWIFE INFO REQUESTED, NOT RECD	225.00 25.
31/81	MRS LILLIAN BUSA 639 WASHINGTON BLVD OAK PARK IL 60302	HOUSEWIFE INFO REQUESTED, NOT RECD	590.00 25.
28/81	MRS MAURINE C SHADWICK 2301 W 183RD ST HOMEROD IL 60430	WIDOW INFO REQUESTED, NOT RECD	900.00 400.
14/81	MRS VERYL H GERDE 212 W EUREKA ST CHAMPAIGN IL 60320	RETIRED INFO REQUESTED, NOT RECD	252.00 140.
29/81	BEN T SHAW 100 DEMENT AVE DIXON IL 61021	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	5000.00 1600.
20/81	MRS E H NEESE 12223 NORTH LEGES DRIVE ROSCOE IL 61073	HOUSEWIFE INFO REQUESTED, NOT RECD	1000.00 1000.
06/81	RICHARD H AMBLER 519 SO 6TH ST MONMOUTH IL 61462	WAREHOUSE MAN GAMBLES	335.00 75.
20/81	MRS FLORENCE EMRICK 504 E MAIN ST CASEY IL 62420	RETIRED INFO REQUESTED, NOT RECD	550.00 100.
24/81	GEORGE PARRISH 905 HICKORY DR NEWTON IL 62448	CRUDE OIL PRODUCER NEWTON IL	350.00 100.

6

NAME, MAILING ADDRESS,
AND ZIP CODE

OCCUPATION AND
PLACE OF BUSINESS

AGGR. RECEIPT AM
YTD. THIS PERIO

3/81	HENRY KAUSE 921. SOUTH TAYLOR OAK PARK IL 60304	RETAILER M I W INTERNATIONAL	300.00	50.0
5/81	LAWRENCE WEEKS RURAL ROUTE 2 MINDOOKA IL 60447	FARMING INFO REQUESTED, NOT RECD	335.00	200.0
4/81	BEN T SHAW 100 CEMENT AVE DIXON IL 61021	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	5000.00	500.0
8/81	ANNA JONAS 1222 BENSON BLVD FREEPORT IL 61032	P INFO REQUESTED, NOT RECD	250.00	50.0
9/81	LOUIS L LOHMAN 42 FAIRMONT ADDITION ALTON IL 62002	LAB TECHNICIAN OWENS ILLINOIS INC	250.00	100.0
2/81	GLENN G CROSS RURAL ROUTE 2 JACKSONVILLE IL 62650	VETERINARIAN JACKSONVILLE IL	350.00	50.0
2/25/81	MRS ELSIE A BOECKELMANN 5200 SOUTH BROADWAY SAINT LOUIS MO 63111	RETIRED CLERICAL WORK INFO REQUESTED, NOT RECD	270.00	26.0
2/81	MRS JOHN S LEHMANN 10 APPLE TREE LANE SAINT LOUIS MO 63124	HOUSEWIFE HOME	300.00	250.0
2/21/81	GRACE YOUNT 301 WEST COLLEGE FARMINGTON MO 63640	UNEMPLOYED INFO REQUESTED, NOT RECD	275.00	50.0
1/18/81	CHARLES L HUGHES 260 WINNEBAGO GREENWOOD MO 64034	RETIRED INFO REQUESTED, NOT RECD	225.00	100.0

ATTACHMENT II

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

6300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22108

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

January 7, 1982

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX 710-821000

CABLE SEDAMERGE

23:52

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Duane Brown, Esq.

Re: MUR 1405

Dear Mr. Gross:

This letter is written in reply to your letter to National Conservative Political Action Committee, dated December 21, 1981, with which was enclosed a copy of a complaint filed by Committee for American Principles. In the complaint, it is alleged that two individuals, Sophia W. Fischer and Ben T. Shaw, made contributions to National Conservative Political Action Committee in 1981 in excess of the limitation contained in 2 U.S.C. 441a(a)(1)(C). This matter has been numbered MUR 1405.

Enclosed herewith, for your records, is a Statement of Designation of Counsel, signed by the Assistant Treasurer of National Conservative Political Action Committee, designating the undersigned as its counsel in connection with this matter.

Committee for American Principles alleges that National Conservative Political Action Committee (hereinafter "NCPAC") should be found in violation of the provisions of the Federal Election Campaign Act of 1971, as amended, subjecting it to the possible imposition of a civil penalty, for having received from two individuals contributions in excess of the limitation contained in 2 U.S.C. 441a(a)(1)(C). Complainant also expresses concern that there may be additional violations of the contribution limitations because

8

Kenneth A. Gross, Esq.
Page Two
January 7, 1982

of the large number of contributors to NCPAC. These allegations are without merit.

It is reliably estimated that there are presently in excess of 140,000 active contributors^{1/} to NCPAC who, in the first eleven months of 1981, made in excess of 145,000 contributions to NCPAC. Those contributions amounted to approximately \$3,727,228, the average contribution being approximately \$25.00. To process that volume of contributions, NCPAC utilizes the most sophisticated systems and procedures available. Those systems and procedures are designed specifically to assure compliance with the provisions of the Federal Election Campaign Act of 1971, as amended.

NCPAC maintains an active vigil to assure compliance with the provisions of the Act relating to limitations on contributions. For example, all contributions to NCPAC, and the attendant contributor data, are entered into a computer^{2/} designed to aggregate the data relevant to a single contributor. In order to secure compliance with the limitation in 2 U.S.C. 441a(a)(1)(C), the computer has an inquiry feature which regularly identifies and publishes a monthly report of any contributor whose cumulative year-to-date total exceeds \$5,000.00. Utilizing that listing, NCPAC refunds the excess over \$5,000.00 to the contributor and informs the computer firm of the amount, or amounts, to be deleted from the data base. An analysis of the reports filed by NCPAC reveals that, during the period from January 1, 1980 through November 30, 1981, an aggregate of \$19,585.00 was refunded to contributors.^{3/} To safeguard against mechanical inaccuracies in the system, NCPAC also undertakes detailed analyses of its contributor data prior to year's end to determine whether the computer may have failed to identify any

^{1/} An active contributor is defined, for these purposes, as an individual who has contributed at least \$10.00 to NCPAC within the past twenty-four months.

^{2/} The data entry is handled by Directech, Inc., 11600 Nebel Street, Rockville, Maryland.

^{3/} A specific example of this monthly procedure may be found on line 26A and in the itemized schedule for line 26A of NCPAC's Post-General Election Report in 1980.

Kenneth A. Gross, Esq.
Page Three
January 7, 1982

contributor who exceeded his or her limitation. Such failure on the part of the computer, if at all, is usually due to errors in data entry, resulting in a single contributor having more than one key-line file.^{4/} While the statistical incidence of such inaccuracies is slight, this compliance procedure has been adopted to demonstrate that NCPAC utilizes its best efforts to comply with the Act.

The reason why some contributors exceed their limitation under 2 U.S.C. 441a(a)(1)(C) is that they routinely respond to direct-mail solicitations which are mailed periodically to all prior contributors. While NCPAC cautions contributors who have reached their limitation not to respond to future solicitations, some nevertheless continue to mail in checks which are received and processed by an independent caging concern. Mrs. Fischer and Mr. Shaw, the subjects of the instant complaint, are individuals who come within that category.

With respect to Mrs. Fischer, there is enclosed herewith a letter from a member of the finance staff of NCPAC to Mrs. Fischer, dated April 28, 1981, in which she was advised that she had reached her limitation under 2 U.S.C. 441a(a)(1)(C) and in which she was asked to please ignore any future solicitations she might receive in the mail.^{5/} Also enclosed is a second letter from NCPAC to Mrs. Fischer, dated May 12, 1981, in which she was again reminded that she could make no additional contributions to NCPAC in 1981. Notwithstanding these efforts to stop her, Mrs. Fischer persisted in sending in additional checks. A detailed analysis of her contribution history at year's end revealed that Mrs. Fischer had, in 1981, mailed NCPAC checks which aggregated \$6,200.00. As a result, a check in the amount of

- ^{4/} Duplicate or multiple key-line files on a single contributor may be due to typographical mistakes made during data entry, or because a single contributor provides different information on successive reply devices, e.g. home address one time and office address the next time, or full name one time and name with initials the next time.
- ^{5/} Portions of the letter, and portions of other letters which are enclosed herewith as exhibits, have been deleted because the passages are personal or otherwise irrelevant to this matter.

(10)

Kenneth A. Gross, Esq.
Page Four
January 7, 1982

\$1,200.00 was mailed to the attorney for Mrs. Fischer's estate^{6/} on December 30, 1981. A copy of the letter of transmittal is enclosed.

With respect to Mr. Shaw, there is enclosed herewith a letter from a member of the finance staff of NCPAC to Mr. Shaw, dated September 30, 1981, in which he was advised that he had reached his limitation under 2 U.S.C. 441a(a)(1)(C) and with which was returned a check from Mr. Shaw in the amount of \$1,000.00. The individual who wrote that letter was not then aware that, at the end of August, Mr. Shaw had mailed in another check in response to a direct-mail solicitation which had caused Mr. Shaw to reach his limitation at that time. As in the case of Mrs. Fischer, however, Mr. Shaw persisted in sending even additional amounts after he received the letter of September 30, 1981. Again, a detailed analysis of his contribution history at year's end revealed that Mr. Shaw had, in 1981, mailed NCPAC checks which aggregated \$6,106.70. As a result, a check in the amount of \$1,106.70 was mailed to Mr. Shaw on December 30, 1981. A copy of the letter of transmittal is enclosed.

In view of the fact that it has approximately 140,000 active contributors, who contributed approximately \$3,727,228 in approximately 145,000 separate contributions, NCPAC's record of ferreting out contributors who exceed the limitation in 2 U.S.C. 441a(a)(1)(C) must be considered excellent. Furthermore, the record demonstrates that NCPAC took reasonable and responsible action in trying to stop Mrs. Fischer and Mr. Shaw from sending additional checks to NCPAC. That Mrs. Fischer and Mr. Shaw failed to heed the warnings and protestations of NCPAC should not subject NCPAC to penalty. They both continued to mail checks to NCPAC in response to direct-mail solicitations, checks that were received, processed and deposited by an independent caging firm, the contributor data subsequently being recorded on computer memory by an independent computer firm. Those who wrote Mrs. Fischer in April and May and who wrote Mr. Shaw in September did not know that checks were still being sent in by those individuals until the records were subject to the detailed compliance internal review explained above.

^{6/} The attorney for Mrs. Fischer's estate had advised NCPAC, by letter dated November 20, 1981, that Mrs. Fischer had died.

02040314814

11

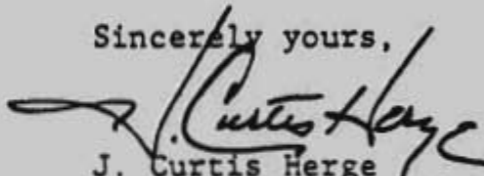
Kenneth A. Gross, Esq.
Page Five
January 7, 1982

When the problem was discovered, refunds were promptly mailed. Furthermore, the refunds were made prior to year's end. This means that, in fact, the aggregate amounts contributed by Mrs. Fischer and by Mr. Shaw did not exceed \$5,000.00 in the calendar year.

It is evident from the foregoing that no additional action is justified or warranted in this matter. The record is clear that NCPAC maintains a rigorous program to assure compliance with the contribution limitations in the Act. Isolated situations, such as those under review, are corrected promptly within the framework prescribed in 11 CFR 103.3(b). There are many examples of incidents such as these which are routinely called to the attention of political committees by the Reports Analysis Division and which are corrected informally without further action; or which, if brought to the attention of the Commission, are dismissed without penalty. See, generally, MUR 691. It is suggested, therefore, that the actions taken by NCPAC under the circumstances were actions that should be encouraged by the Commission without penalty and be recognized as meeting the best efforts requirement of the Act.

We appreciate this opportunity to respond and look forward to being of further assistance to you should you require any additional information.

Sincerely yours,



J. Curtis Herge
Counsel to National Conservative
Political Action Committee

Enclosures

STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: *J. Curtis Heege (Sedam & Heege)*
ADDRESS: *8300 Greensboro Dr, Suite 1100 McLean, VA. 22102*
TELEPHONE: *(703) 721-1000*

RE: MUR 1405

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

NATIONAL CONSERVATIVE POLITICAL
ACTION COMMITTEE

12/28/81
Date

BY: *Larry B. Green Asst. Treasurer*
Signature

NAME: *National Conservation PAC*
ADDRESS: *1500 Wilson Blvd. Suite 513*

HOME PHONE:

BUSINESS PHONE: *(703) 522-2800*

*National Conservative
Political Action Committee*

*Suite 513, 1500 Wilson Boulevard
Arlington, Virginia 22209*

April 28, 1981

(703) 522-2800

Council
Chron
Suspense

Spitz or
Terry

Mrs. Sophia W. Fischer
690 Osceola Avenue, Apt. 603
Winter Park, FL 32789

Dear Mrs. Fisher:

I cannot thank you enough for your \$1,565 contri-
bution to NCPAC.

Your contributions to NCPAC now total \$5,000;
therefore, you cannot contribute any more this year.
So, if by mistake you should receive direct mail sol-
icitations from NCPAC, please throw them away.

Again, thank you for your wonderful, continued support
of NCPAC. It is because of you that we prevail.

Very sincerely,

Brent

L. Brent Bozell, III
Director
National Conservative
Congressional Campaign Council

LBB/bcg

82040314817



NCCCC
Brent
Chron.
Chron. 2
Suspense
Council

National Conservative
Congressional Campaign Council
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209
703/522-2800

John T. Dolan
National Chairman, NCPAC
L. Brent Bozell, III
Director, NCCCC

May 12, 1981

Mrs. Sophia W. Fischer
690 Osceola Avenue, Apt. 603
Winter Park, FL 32789

Dear Mrs. Fischer:

Thank you for your very interesting card.

The letter you received from Terry Dolan regarding the Reagan Victory Fund, was a direct mail piece. Remember: These letters are now solely for your information; you cannot contribute to NCPAC any more this year.

Please keep in touch.

With warm regards,

L. Brent Bozell, III
Director,
National Conservative
Congressional Campaign Council

LBB/bcg

National Conservative
Political Action Committee

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

December 30, 1981

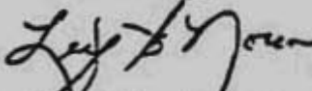
Mr. Webber Haines
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, FL 32790-0880

Dear Mr. Haines:

A recent review of Sophia Fischer's contributor history shows that she contributed \$6,200.00 to the National Conservative Political Action Committee during calendar year 1981. Federal Election Law restricts individuals from contributing over \$5,000.00 per year to a committee such as ours. As a result, I am returning \$1,200.00 to the estate of Sophia Fischer.

If you should have any questions regarding this information, please do not hesitate to contact me.

Sincerely,



Leif E. Noren
Asst. Treasurer

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 513 • 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

SPITZ CHANNELL
NATIONAL DIRECTOR OF FINANCE

September 30, 1981

Mr. Ben T. Shaw
100 Dement Avenue
Dixon, IL 61021

Dear Ben:

Thank you again for your wonderful generosity to NCPAC and its efforts to help create a conservative government in this country.

Very recently you sent us 2 checks, 1 for \$500 and 1 for \$1,000. It is with deepest regret that I must inform you that with the arrival of your first check, the \$500, you reached your legal permissible Federal Election contribution limit for 1981. I am, therefore, enclosing the second check for \$1,000. I am very sorry that we cannot accept it.

...cont'd.

CS

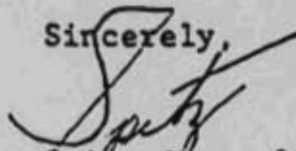
02040314820

B. Shaw
September 30, 1981
Page 2

Again, thank you for everything that you are doing for us. We do hope that we remain worthy of your maximum support.

With very warm regards,

Sincerely,



Spitz Channell
National Finance
Director

SC/jh

Enclosures:

1. Check \$1,000 No. 719

62040314821

National Conservative
Political Action Committee

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

December 30, 1981

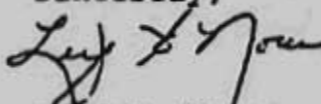
Mr. Ben T. Shaw
100 Dement Avenue
Dixon, IL 61021

Dear Mr. Shaw:

A recent review of your contributor history reveals that you have contributed \$6,106.70 to the National Conservative Political Action Committee during calendar year 1981. Federal Election Law restricts individuals from contributing over \$5,000.00 per year to committee's such as ours. As a result, we are returning to you a check for \$1,106.70.

If you should have any questions regarding this information, please do not hesitate to contact me.

Sincerely,



Leif E. Noren
Asst. Treasurer

02040314822



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Robert Blaemire
President
Committee for American Principles
2000 N Street, N.W., Suite 105
Washington, D.C. 20036

Re: MUR 1405

Dear Mr. Blaemire:

The Federal Election Commission, on March , 1982, found reason to believe that the National Conservative Political Action Committee violated the Act but voted to terminate its inquiry in connection with the complaint which you filed on December 16, 1981. The Commission determined that substantial compliance had been achieved with respect to the allegations in your complaint. 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).

If you have any questions, please contact Duane A. Brown the attorney assigned this matter, at 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

(20)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Suite 1100
8300 Greensboro Drive
McLean, Virginia 22102

Re: MUR 1405

Dear Mr. Herge:

On March , 1982, the Commission found reason to believe that your client National Conservative Political Action Committee ("NCPAC") violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 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 NCPAC's acceptance and delayed reimbursement of the excessive contributions nevertheless appears to be a violation of 2 U.S.C. § 441a(f) and you should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please direct them to Duane A. Brown at 523-5071.

Sincerely,

(21)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Webber Haines, Esquire
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, Illinois 32790-0880

Dear Mr. Haines:

On March , 1982, the Commission notified you that it had received a complaint alleging that the late Sophia Fischer had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon further review, the Commission decided to take no action and close the file. This matter will be made part of the public record within 30 days.

Sincerely,

Charles N. Stkeelee
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

(22)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Ben T. Shaw
100 Dement Avenue
Dixon, Illinois 61021

Dear Mr. Shaw:

On March , 1982 the Commission notified you that it had received a complaint alleging that you had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Upon further review, the Commission decided to take no action and close the file. This matter will be made part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

23

200989

RECEIVED

FOUNDED BY BENJAMIN F. SHAW IN 1881

B. F. SHAW PRINTING CO.

PUBLISHERS OF

The Dixon Evening Telegraph

113 PEORIA AVENUE
DIXON, ILLINOIS 61001Member:
United Press International
Audit Bureau of CirculationsTelephone
All Departments
294-2222

12 MAR 31

2:25

Mr. Kenneth A. Gross
Federal Election Commission
Washington, D.C.

This letter is in regard to
Mar. 1405 which states that I
had over-subscribed by \$1,000.⁰⁰ to
the National Conservative Political
Action Committee.

This was an error on my part.
The N. C. P. A. C. wrote me a letter
saying I had over-subscribed and
sent me their check for \$1,006.⁰⁰ as
I remember I deposited their check
at once. This made my subscription
to NCPAC less than \$5,000.⁰⁰

Their records will show the
exact amount.

I am now in Florida and will
be home April 15, 82 in Dixon-226-61001

Sincerely Ben F. Shaw

DIXON EVENING TELEGRAPH

PUBLISHED BY

B. F. MEAW PRINTING CO.

DIXON, ILLINOIS 61021



8204031482

Mr. Kenneth A. Gross
Federal Election Commission
Washington D.C.
20463

32 MAR 31 A 8:55

WINDERWEEDLE, HAINES, WARD & WOODMAN, P. A.
ATTORNEYS AT LAW

RECEIVED

GCC# 7441

82 MAR 29 P 1: 45

W. E. WINDERWEEDLE (1906-1979)
WEBBER B. HAINES
HAROLD A. WARD III
JOHN DEM. HAINES
VICTOR E. WOODMAN
WILLIAM A. WALKER II
W. E. WINDERWEEDLE, JR.
C. BRENT MCCAGHREN
JAMES L. FLY
J. R. CAROLAN III
GARY L. SIMMONS
LAURENCE C. HAINES
FREDERIC B. O'NEAL

BARNETT BANK BUILDING
250 PARK AVENUE, SOUTH
POST OFFICE BOX 880
WINTER PARK, FLORIDA
ZIP CODE 32780-0880
(305) 844-6312

March 26, 1982

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: MUR 1405

Dear Mr. Gross:

Answering your letter of March 16, 1982, there was received on January 8, 1982 a check from NCPAC made payable to the Estate of Sophia W. Fischer in the amount of \$1,200.00.

The explanation for this check was an overpayment during the 1981 of the sum of \$1,200.00.

Very truly yours,



WEBBER B. HAINES
Personal Representative of
Estate of Sophia W. Fischer,
Deceased

WBH/bh

12 MAR 29 P 5: 16

02040314829

WINDERWEEDLE HAINES WARD & WOODMAN P.A.
ATTORNEYS AT LAW
P.O. BOX 880
WINTER PARK, FLORIDA
ZIP CODE 32790 0880

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

22 MAR 29 P 1:45

#1405

ROUTING SLIP

___ Improper Complaint ltr.
___ No Jurisdiction ltr.
☒ Respondent Notification ltr.
___ Complainant Notification ltr.
☒ Other:

6
2
0
4
0
3
1
4
3
To MAC from AB on 3/15 for signature

To Docket from AB on KAC for mailing

3/15

I appreciate the form



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

Mr. Webber Haines, Esquire
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, Florida 32790-0880

Re: MUR 1405

Dear Mr. Haines:

This letter is to notify you that on December 18, 1981, the Federal Election Commission received a complaint which alleged that the late Sophia W. Fischer violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1405. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to administrative inadvertence. Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against her estate 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.

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.

020403148332

Webber Haines, Esquire
Page Two

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

Sincerely,

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1405 2/14/82

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

(POSTAL POSTMASTER FOR FEES)

2. Article assigned to:
Webber Haines, Esq.
P.O. Box 890
Leesburg, FL 34746

3. RECEIPT NO. 345346 CERTIFIED NO. INSURED NO.

4. I have received the article described above.
SIGNATURE Duane Brown
DATE OF DELIVERY 3-23-82 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

7. CLIENT'S SIGNATURE

8. POSTAL OFFICE USE ONLY



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 16, 1982

Mr. Ben T. Shaw
100 Dement Avenue
Dixon, Illinois 61021

Re: MUR 1405

Dear Mr. Shaw:

This letter is to notify you that on December 18, 1981, the Federal Election Commission received a complaint which alleged that you have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1405. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to administrative inadvertence. 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 completing the enclosed form 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.

82040314834

Ben T. Shaw
Page Two

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

Sincerely,

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

1405 3/11/82

RECEIVED: Complete Items 1, 2, and 3. Add your address in the "RETURN TO" space on front.	
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 5.....	
(CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Ben T. Shaw	
3. ARTICLE DESCRIPTION: Dixie T. Harris	
REGISTERED NO. 1-65546	INSURED NO.
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE: Blumenthal DATE OF DELIVERY: 3/29/82	
POSTMARK: 1982	
5. ADDRESS OF ADDRESSEE (if registered)	
6. UNABLE TO DELIVER REASON:	

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

02040314835



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 18, 1982

TO : CHARLES N. STEELE
GENERAL COUNSEL

THROUGH : B. ALLEN CLUTTER *AC*
STAFF DIRECTOR

FROM : JOHN D. GIBSON *JB*
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT : UPDATE TO MUR 1405 - NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE

Please find attached an update to MUR 1405 regarding National Conservative Political Action Committee ("NCPAC").

On December 16, 1981, the Commission received an outside complaint, which alleged that NCPAC may have violated 2 U.S.C. 441a(f) by receiving contributions from individuals in excess of \$5,000 during the calendar year of 1981.

This is to advise you that the same apparent violation occurred during the calendar of 1980, as evidenced on amended reports submitted by NCPAC on December 8, 1981.

Appropriate action has been taken by the Reports Analysis Division.

If you have any questions, please contact Mark Kleinman at 357-0026.

Attachment

62040314836

REPORTS ANALYSIS REFERRAL UPDATE

***ORIGIN:** OGC (Outside Complaint)

DATE February 18, 1982

ANALYST Mark Kleinman MK

TO: Office of General Counsel.
ATTENTION: Duane Brown

TEAM CHIEF Mike Filler MF

THROUGH: **STAFF DIRECTOR**

COMPLIANCE REVIEW _____

FROM: **ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS**

MUR No. 1405

DATE OF ORIGINAL REFERRAL N/A

****PURPOSE:**

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

This is being sent as an update because it deals with the same problems, excessive contributions from individuals, for 1980. MUR 1405 deals with 1981 reports. It should be noted that based upon the committee's responses, some of the problems resulted from errors in recordkeeping and data processing.

NOTE: SEE PAGE TWO

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

2040314837

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
UPDATE TO MUR 1405
PAGE TWO

The committee disclosed seven (7) apparent excessive contributions totalling \$13,585 on the following reports for 1980: October Monthly Amendment, 12 Day Pre-General Amendment and 30 Day Post-General Amendment (Attachment 1a, 1b and 1c - received on December 8, 1981).

<u>Name</u>	<u>Agg. Contributed</u>	<u>Reports</u>	<u>Excess</u>	<u>Attachment</u>
Nancy A. Ramsey	\$10,000	Oct. Monthly May Monthly	\$5,000	1a
R. Merrill Harris	5,100	Pre-General Oct. Monthly Aug. Monthly Mar. Monthly	100	1b
Arla Avery McMillan	10,000	Pre-General May Monthly	5,000	1b
Lloyd F. Gaubert	5,010	Pre-General	10	1b
Walker Peddicord	5,275	Pre-General Oct. Monthly Jul. Monthly	275	1b
Don M. Lynn	7,700	Post-General Oct. Monthly	2,700	1c
Jaquelin E. Taylor	5,500	Post-General Apr. Monthly Feb. Monthly	500	1c

Requests for Additional Information were sent to the committee on December 23, 1981 (Attachments 2a, 2b and 2c). Responses were received on January 7, 1982, clarifying each of the situations.

In the case of the October Monthly Amendment, there was one (1) excessive contribution of \$5,000 from an individual. The response indicated that the contribution should have been attributed to both husband and wife, thereby making the contribution within the limits (Attachment 3).

In the case of the 12 Day Pre-General Amendment, there were four (4) contributions totalling \$5,385 in excess of the limits, which the committee

82040314838

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
UPDATE TO MUR 1405
PAGE THREE

had reported as being refunded on the subsequent report (i.e., the 30 Day Post-General Amendment). The response confirmed this fact (Attachment 4). (Note: This part of the Request for Additional Information was informational in nature.)

In the case of the 30 Day Post-General Amendment, there were two (2) contributions totalling \$3,200 in excess of the limits. The response indicated that one (1) contribution, which was \$2,700 over the limits, was incorrectly attributed to the husband instead of the wife. The response corrects this error, thereby making the contribution within the limitations (Attachment 5). The other excessive contribution of \$500 was confirmed by the committee and the response indicated that the appropriate refund was made. The committee explained that there had been an error in data entry, in which two separate records were kept for the same individual. This caused an error in the aggregation for the calendar year (Attachment 5).

As a result of these responses, the committee had received only five (5) contributions totalling \$5,885 in excess of the limitations. All appropriate amounts have been refunded.

6 2 0 4 0 3 1 4 9 3 9

ATTACHMENT #1a
OCTOBER MONTHLY REPORT

SCHEDULE

PERIOD 09/01/80 - 09/30/80

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PAGE NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AGGR. RECEIPT YTD. THIS PER
09/23/80	NANCY A RAMSEY 3510 CRANBROOK WICHITA FALLS TX 76308		10000.00 9000
09/15/80	C B BASEL 101 MARSTON RANGER TX 76470	OIL PRODUCER RANGER TX	250.00 250.
09/19/80	BILL PFLOGER 2657 VISTA DEL ARROYO SAN ANGELO TX 76901	RANCHER	500.00 500.
09/23/80	I A BIRD SANCO ROUTE ROBERT LEE TX 76945	RETIRED SAME	450.00 100.
09/12/80	MRS JESSE CARGILE SANCO ROUTE ROBERT LEE TX 76945	RANCHING BAR X RANCH	500.00 500.
09/24/80	T G ANDERSON 936 MAIN BLDG HOUSTON TX 77002	GEOLOGIST	200.00 200.
09/23/80	REX G BAKER 1100 MILAM BUILDING, STE HOUSTON TX 77002	OWNER SELF-EMPLOYED	270.00 25.
09/24/80	JAMES BUTLER 6349 BROMPTON HOUSTON TX 77005	PHYSICIAN HOUSTON, TX	320.00 100.
09/15/80	MRS HARRIS MASTERSON, III 1406 KIRBY DRIVE HOUSTON TX 77019	HOUSEWIFE	200.00 200.
09/29/80	G A MUELLER 4545 POST OAK PLACE DRIV HOUSTON TX 77027	OFFICE WORKER SAME	760.00 100.

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May Monthly *MIC*

BALDWIN, A.

PERIOD 01/01/80 - 01/30/80

1772121 RECEIPTS--CONTINUATIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NOTICE OF RECEIPTS EXTRACT

PART NO. 1. LINE NO. 14A

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	ACCR YTD	RECEIPT AMT THIS PERIOD
04/09/80	Mrs. J. F. Sneed 2708 C Indian Creek Boulevard Oklahoma City, OK 73120	Unemployed	830.00	15.00
04/14/80	A. P. Cary Drawer AC Hutchins, TX 75141	Engineer	250.00	250.00
04/18/80	David C. Tyrrell 3529 Drexel Street Dallas, TX 75205		350.00	150.00
04/07/80	O. H. Raugh Box 911 Breckenridge, TX 76024	Executive Petroleum Corp. of Texas Breckenridge, TX 76024	300.00	100.00
04/08/80	Nancy A. Ramsey 3510 Cranbrook Wichita Falls, TX 76308		1000.00	1000.00
04/11/80	Mr. Thomas J. Holmes Box 22352 Houston, TX 77027	Investor Self-Employed 3419 Mercer Houston, TX 77027	1000.00	500.00
04/14/80	Mr. G. A. Mueller 4545 Post Oak Place Drive Houston, TX 77027	Office Worker Same Houston, TX	350.00	50.00
04/25/80	Mrs. Rosine B. McFaddin 880 Fifth Street Beaumont, TX 77701	Housewife Same Beaumont, TX	300.00	200.00
04/18/80	Mr. T. S. Morris PO Box 20570 Oklahoma City, OK 73120	Tom Morris Enterprises	200.00	200.00
04/14/80	Jane E. Champlin 612 South Tyler Enid, OK 73701		200.00	200.00

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12 DAY PRE-GENERAL REPORT
ATTACHMENT #1b

PERIOD 10/01/80 - 10/15/80

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AMOUNT YTD. THIS PERIOD	RECEIPT NO.
10/09/80	ROBERT L THOMSEN PO BOX 1847 JACKSON MS 39205		1000.00	1000.0
10/09/80	W E WALKER, JR PO BOX 9407 JACKSON MS 39206		2500.00	2500.0
10/09/80	GERALD P CRYSTAL PO BOX 9951 JACKSON MS 39208		500.00	500.0
10/15/80	DAN C HUGHES, JR PO BOX 6038 JACKSON MS 39209		1000.00	1000.0
10/15/80	B EDWARDS, III 1755 LELIA DR STE 301 JACKSON MS 39216		1000.00	1000.0
10/07/80	R MERFILL HARRIS LARELAND TOWERS, P.O. BOX JACKSON MS 39216	GEOLOGIST SELF-EMPLOYED	5100.00	2000.0
10/07/80	MRS DUDLEY J HUGHES 4050 CRANE BLVD JACKSON MS 39216		5000.00	5000.0
10/07/80	WILLIAM D MOUNGER 3833 OLD CANTON RD JACKSON MS 39216		1000.00	1000.0
10/07/80	MRS AUGUSTA PIPES VAUGHY 7 EASTBROOK JACKSON MS 39216		250.00	250.0
10/07/80	R ARNOLD TURNER, JR 4121 CRANE BLVD JACKSON MS 39216		1000.00	1000.0

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October Monthly MR

SCHEDULE A

PERIOD 09/01/60 - 09/30/60

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AMOUNT RECEIVED	AMOUNT PAID TO THIS FUND
09/25/60	E L ANDERSON, JR ROUTE 1, BOX 48 CLARKSDALE MS 39614	FARMER CAKELUST COMPANY	275.00	100.00
09/18/60	ISABEL M O'BRIEN PLANTATION MANOR, APT. 116 CLINTON MS 39026	RETIRED	250.00	150.00
09/15/60	J M O'BRIEN 50 LAKEVIEW DR CLINTON MS 39026		200.00	200.00
09/11/60	BUDLEY J EUGENE 1122 CAPITAL TOWERS JACKSON MS 39201		2510.00	1500.00
09/18/60	HILTON LADNER 903 1ST NATIONAL BANK BLDG JACKSON MS 39201	PETRO GEOLOGIST	500.00	500.00
09/11/60	JAMES P EVANS 1326 FIRST NATL BK BLDG PO BOX 1063 JACKSON MS 39205	IND OIL PRODUCER	500.00	500.00
09/30/60	R E NAYLOR 961 PARKWOOD PLACE JACKSON MS 39206	RETIRED	310.00	100.00
09/11/60	R MERRILL HARRIS LAKELAND TOWERS, P.O. BOX JACKSON MS 39216	GEOLOGIST SELF-EMPLOYED	3100.00	1000.00
09/15/60	JOHN QUINN 600 PALMETTO DRIVE SUMMIT MS 39666	RETIRED SELF-EMPLOYED	300.00	250.00
09/19/60	MRS ADELA C OLDSAN 2825 FIELD AVE LOUISVILLE KY 40206		200.00	200.00

SCHEDULE A

PERIOD 07/01/80 - 07/31/80

August Monthly Mkt

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC MF

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECEIPT A YTD. THIS PERIOD
07/09/80	MRS. SUZANNE BACHELLER	ATTORNEY	15.0
07/28/80	P.O. BOX 998 DELRAY BEACH, FL 33444	DELRAY BEACH, FL	300.0
			315.00
07/09/80	MR. FRANK BUTTERWORTH, JR.	RETIRED	250.0
07/19/80	920 SOUTH OCEAN BOULEVARD	NONE	500.0
07/30/80	LANTANA, FL 33460		1000.00 250.0
07/28/80	MRS. SYLVIA TUREAUD 800 SOUTH COUNTY ROAD PALM BEACH, FL 33480	HOUSEWIFE SAME PALM BEACH, FL	250.0
			250.00
07/23/80	FED. POLITICAL ACTION COMM. LIBERTY NAT'L LIFE INS. CO. P.O. BOX 2612 BIRMINGHAM, AL 35202	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.0
			500.00
07/17/80	MR. GEORGE P. COCHRAN		100.0
07/21/80	P.O. BOX 7447A BIRMINGHAM, AL 35223	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	1000.0
			1100.00
07/22/80	MR. EDWARD CAFFREY 3713 WEST END AVENUE NASHVILLE, TN 37205	RETIRED NONE	300.0
			300.00
07/09/80	R. MERRILL HARRIS LAKELAND TOWERS, P.O. BOX 4545 JACKSON, MS 39216	GEOLOGIST SELF-EMPLOYED 1755 LELA DRIVE JACKSON, MS 39216	1000.0
			1000.00
07/01/80	JUDGE JOEL M. SHARP	RETIRED	25.0
07/18/80	700 HIGHLAND AVENUE SALEM, OH 44460	NONE	200.0
			225.00
07/17/80	MR. CHARLES R. HOLTON, JR. 1565 PORTAL DRIVE, N.E. WARREN, OH 44484	BANKER UNION SAVINGS & TRUST COMPANY	250.0
			250.00

TOTAL THIS PERIOD
(LAST PAGE OF THIS PART ONLY)

PAGE 00004

SCHEDULE A

PERIOD 02/01/80 - 02/29/80

March Monthly mix

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC CLERKS EXTRACT

PART NO. 1, LINE NO. 141

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AGGR. RECEIPT AMT VTL. THIS PERIOD
02/04/80	MISS HELEN CUNNINGHAM BACHNSBURG, VA 24415	RETIRED NONE	500.00
02/13/80	MR. INMAN BRANDEN	ATTORNEY	100.00
02/21/80	3300 FIRST NATIONAL BANK TOWER ATLANTA, GA 30303	MARSELL, PCST, BRANDEN AND GCPSEY	450.00
			1000.00
02/19/80	GENERAL MILTON ARNOLD 250 VIA LINDA PALM BEACH, FL 33400	RETIRED NONE	250.00
02/21/80	MRS. LILLIAN BOYSON	HOUSEWIFE	100.00
02/22/80	LCT 16 15432 LAKESHORE VILLA STREET TAMPA, FL 33612	SAVE TAMPA, FL	200.00
			300.00
02/23/80	MRS. C. LUCILLE DUEFA 837 SPYGLASS LANE NAPLES, FL 33940	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	200.00
			300.00
02/15/80	MR. WILLIAM J. CABANISS 813 SHADES CREEK PARKWAY BIRMINGHAM, AL 35209	RETIRED NONE	250.00
			250.00
02/20/80	MR. ROBERT M. MCEN 1604 CAPITOL TOWERS JACKSON, MS 39201	OIL DEALER SELF-EMPLOYED	500.00
			500.00
02/26/80	MR. LYLE CASHION, JR. JACKSON, MS 39205	ENGINEER SELF-EMPLOYED JACKSON	250.00
			2500.00
02/14/80	MR. R. MERRILL FARRIS PO BOX 4545 JACKSON, MS 39216	GEOLOGIST SELF-EMPLOYED 1753 LEILA DRIVE JACKSON, MS 39216	1000.00
			1000.00

TOTAL THIS PERIOD
(LAST PAGE OF THIS PART ONLY)

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Attachment # 1-b (cont'd)
12 Day Pre-
General MK

8. A

PERIOD 10/01/80 - 10/25/80

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCP. RECEIPT A YTD. THIS PERI
10/09/80	J D MILLER ROUTE 15, EAST & LINDEN MOUNT VERNON IL 62864	OIL DEALER OIL & GAS DRILLING	215.00 25.0
10/10/80	WILDER L GARDEN SULLIVAN MO 63080		300.00 200.0
10/09/80	G A BUDER, JR BUDER BLDG. 7 N. 7TH ST. SAINT LOUIS MO 63101	ATTORNEY SAME	4500.00 2500.0
10/07/80	D J BILLER 550 SOUTH BRENTWOOD BOUL SAINT LOUIS MO 63105	RETIRED	200.00 50.0
10/10/80	MRS ARLA AVERY MCNILLAN 38 BRENTMOOR PARK SAINT LOUIS MO 63105	HOUSEWIFE	10000.00 5000.0
10/09/80	LORETTA BORN 10112 SQUIRE MEADOWS SAINT LOUIS MO 63123	UNEMPLOYED	335.00 50.0
10/01/80	MRS JOHN S LERHANN 10 APPLE TREE LANE SAINT LOUIS MO 63124	HOUSEWIFE	200.00 50.0
10/10/80	W B MCNILLAN, JR 12 UPPER LADUE RD LADUE MO 63124		200.00 200.0
10/15/80	R W EYLAR 1704 WEST O'BRIEN ROAD LEES SUMMIT MO 64063	RETIRED	800.00 125.0
10/09/80	MRS CLARA M CONGER 600 ADMIRAL BOULEVARD 19 KANSAS CITY MO 64106	RETIRED	235.00 15.0

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SCHEDULE A

PERIOD 04/01/80 - 04/30/80

May Monthly

ITEMIZED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC CLERKS EXTRACT

PART NO. 1. LINE NO. 14A

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AMOUNT YTD	RECEIPT AMT THIS PERIOD
04/14/80	Mr. Carl F. Dallmyer 215 East Polk Washington, IA 52353		200.00	200.00
04/04/80	Mrs. Priscilla B. Burck 28429 Herndonwood Drive Farmington, MI 48018		200.00	200.00
04/08/80	Mr. Charles Andrews 222 South Riverside Plaza Chicago, IL 60606		200.00	200.00
04/01/80	Veryl H. Gerde	Retired		25.00
04/04/80	212 West Eureka Street	None		20.00
04/15/80	Champaign, IL 61820			15.00
04/22/80			330.00	25.00
04/29/80	Mrs. Arla Avery McMillan 38 Brentmoor Park Saint Louis, MO 63105	Housewife Same Saint Louis, MO	5000.00	5000.00
04/07/80	Jean P. Sams 900 West 8th Street Kansas City, MO 64101	Wholesaler Helmert Wholesale Furniture	500.00	500.00
04/01/80	John Latshaw 920 Baltimore Kansas City, MO 64105		500.00	500.00
04/01/80	Ralph E. Myers 1801 Grand Avenue Kansas City, MO 64108		1000.00	1000.00
04/03/80	Raymond M. Alden 4550 Warwick Boulevard Kansas City, MO 64111	Executive United Telecommunication, Inc.	500.00	500.00
04/04/80	John A. Morgan 815 West 54th Street Kansas City, MO 64112		250.00	250.00
04/07/80	William C. Hanes 1820 Wyandotte Kansas City, MO 64141	Investor	500.00	500.00

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Attachment #16 (cont'd)
12 Day Pre-
General MX

PERIC. 10/01/80 - 10/15/80

PERIC. 10/01/80 - 10/15/80

TEMISED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

BLPT NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCR. RECEIPT AMT YTD. THIS PERIC	ACCR. RECEIPT AMT YTD. THIS PERIC
10/10/80	WED TECKER PARKS NE 69041	FARMER	225.00	125.0
10/13/80	JAMES R NOFFETT 3421 N CATSEWAY BLVD METARIE LA 70062		5000.00	5000.0
10/13/80	MRS LOUISE BORHANN NOFFETT 21 COLONY RD GRETHA LA 70053	HOUSEWIFE	5000.00	5000.0
10/13/80	J S VUSKOVICH 516 GRETHA BLVD GRETA LA 70053		300.00	300.0
10/13/80	C C CLIFTON, JR 1224 1ST MTL BR COMM BLD NEW ORLEANS LA 70112	ESTATE MGR	1000.00	1000.0
10/13/80	JOSE G OLLER, MD 3422 BIENVILLE ST NEW ORLEANS LA 70119	PHYSICIAN	500.00	500.0
10/13/80	LLOYD F GAUBERT AND COL. EDWARD P. KETCHAM JR. 5668 BANCROFT DRIVE NEW ORLEANS LA 70122	RESIDENT L. F. GAUBERT & COMPANY	5010.00	5000.0
10/13/80	THOMAS J LUPO 145 ROBERT E LEE BLVD NEW ORLEANS LA 70124		1000.00	1000.0
10/07/80	EMILE M LAPEYRE PO BOX 430 BOUMA LA 70360		300.00	100.0
10/13/80	MRS BILL WALLIS 411 MISSOURI STREET NEW IBERIA LA 70560		1500.00	1000.0

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12 Day Pre-General

SCALE A

PERIOD 10/01/80 - 10/15/80

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCP. RECEIPT AMT. D.D. THIS PERIOD	ACCP. RECEIPT AMT. D.D. THIS PERIOD
10/09/80	DAPHNIS ATWATER 812 UNIVERSITY AVENUE PALO ALTO CA 94301	RETIRED	715.00	100.0
10/14/80	PRENTISS I COLE 2150 WEBSTER PALO ALTO CA 94301	RETIRED	200.00	50.0
10/07/80	PAUL MACERL PO BOX 11171 PALO ALTO CA 94304	UNEMPLOYED	400.00	300.0
10/13/80	A C NELSON UNIT 3 2412 FOOTHILL BOULEVARD CALISTOGA CA 94515	RETIRED	250.00	50.0
10/14/80	DONALD E HAVEN 1064-E STREET, APT. 304 HAYWARD CA 94541	RETIRED	250.00	50.0
10/14/80	WALKER PEDDICORD 860 BROADMOOR COURT LAFAYETTE CA 94549	RETIRED	5275.00	25.0
10/15/80	WILLIAM L DOMMERICH 359 DEER HOLLOW MESA CA 94558	RETIRED	925.00	100.0
10/10/80	MRS HELEN A BIGLEY 590 VINCENTE AVENUE BERKELEY CA 94707	HOUSEWIFE	225.00	50.0
10/09/80	L E WALDEN 10474 HERRIKAN ROAD CUPERTINO CA 95014	ENGINEER G T E SYLVANIA	385.00	200.0
10/14/80	EUGENE T BEATHCOTE 215 MONROE STREET SANTA CLARA CA 95050	RETIRED	1200.00	350.0

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October Monthly

BOLLETTA

PERIOD 01/01/80 - 01/31/80

. TENISED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCR. RECEIPT / YTD. THIS PER.
09/25/80	MALCOLM J WOOD 1170 SACRAMENTO STREET SAN FRANCISCO CA 94108	INVESTOR SAME	200.00 50.
09/22/80	JOSEPH E D ROGER 310 APEALLO DRIVE, 4-B SAN FRANCISCO CA 94132	RETIRED	220.00 20.
09/25/80	DAMARIS ATWATER 812 UNIVERSITY AVENUE PALO ALTO CA 94301	RETIRED	615.00 165.
09/18/80	NILTON GREENGARD 965 ARLINGTON EL CERRITO CA 94530	DOCTOR	225.00 100.
09/18/80	DONALD E HAVEN 1064-E STREET, APT. 304 HAYWARD CA 94541	RETIRED	200.00 50.
09/24/80	WALKER PEDDICORD 860 BROADMOOR COURT LAFAYETTE CA 94549	RETIRED	5250.00 25.
09/25/80	WILLIAM L DOMMERICH 359 DEER HOLLOW NAPA CA 94558	RETIRED	825.00 150.
09/15/80	M A CAVANAGE 3431 FOOTHILL BOULEVARD OAKLAND CA 94601	RETIRED	260.00 25.
09/25/80	WALTER C HALE 195 EUCALYPTUS AVENUE COTATI CA 94928	POULTRY FARMER	225.00 45.
09/29/80	D S FRENCH 220 MAR VISTA DRIVE, SPA APTOS CA 95003	RETIRED	450.00 50.

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July Monthly *MLK*

PERIOD 01/01/80 - 1

USED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PMT NO. 1. LIFT NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCT. RECEIPT AMT	STD. THIS PERIOD
28/80	DANARIS ATWATER 812 UNIVERSITY AVENUE PALO ALTO CA 94301	RETIRED	450.00	155.00
31/80	A C NELSON UNIT 3 2412 FOOTHILL BOULEVARD CALISTOGA CA 94515	RETIRED	200.00	25.00
11/80	J M BROWNING 1069 KAHARA DRIVE LAFAYETTE CA 94549	RETIRED	225.00	50.00
27/80	WALKER PEEDICORD 860 BROADMOOR COURT LAFAYETTE CA 94549	RETIRED	3225.00	3125.00
25/80	WILLIAM L DOMMERICH 359 DEER HOLLOW NAPA CA 94558	RETIRED	675.00	100.00
13/80	ROBERT L KEYES 3117 TERRE GRANADA, 1 WALNUT CREEK CA 94595	RETIRED	200.00	100.00
28/80	LOUIS P SEARS 1011 YGNACIO VALLEY ROAD WALNUT CREEK CA 94596	RETIRED	325.00	200.00
19/80	M A CAVANAGH 3431 FOOTHILL BOULEVARD OAKLAND CA 94601	RETIRED	235.00	50.00
28/80	MARGARET C WOOLLEY RETIRED 1850 ALICE STREET, APART OAKLAND CA 94612	RETIRED	275.00	110.00
26/80	D S FRENCH 220 MAR VISTA DRIVE, SPA APTOS CA 95003	RETIRED	400.00	100.00

62040314856

30 DAY POST-GENERAL REPORT
ATTACHMENT #1c

PERIOD 10/16/80 - 11/24/80

UNISSUED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

TE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	ACCT. RECEIPT AMT. YTD. THIS PERIOD
/31/80	DON M FLYNN 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5000.00 2000.00
/20/80	D PILLON 5524 EAST 62ND STREET TULSA OK 74136	PHYSICIAN EMERGENCY CARE INCORPORATED	300.00 100.00
/31/80	PHILIP TREP 6218 LEWIS AVENUE, SUITE TULSA OK 74136	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	275.00 50.00
/15/80	O W SELLERS PO BOX 1122 HENRYETTA OK 74437	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00 500.00
/24/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED INFO REQUESTED, NOT RECD	700.00 100.00
/22/80	JACK RAHM BOX 205 ADA OK 74820	OIL INDUSTRY INDIANA OIL & GAS	850.00 450.00
/02/80	THELMA M COKER RURAL ROUTE 1, BOX 255-B SEMINOLE OK 74868	BP OPERATOR TINKER AIR FORCE BASE	275.00 200.00
/24/80	EARL A DAVIS BOX 497 MENORA OK 74884	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	225.00 100.00
/31/80	O G BAHN, JR ROUTE 2, BOX 367 MC KINNEY TX 75069	ACCOUNTANT WRIGHT TITUS AGENCY	315.00 50.00
/23/80	PETER H FRANK 1120 PIONEER PLANO TX 75074	TECHNICIAN ROCKWELL	350.00 100.00

October Monthly MK

SCHEDULE A

PERIOD 01/01/80 - 09/30/80.

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NATIONAL CONSERVATIVE PAC

PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AGTL. RECEIPT VTL. THIS PER
09/19/80	JOHN R AREND CORPORATE PLACE STE 1104 5800 E SKELLY DR TULSA OK 74135		3100.00 3000
09/26/80	MRS ANN STINE 5309 S JOPLIN TULSA OK 74135	CONSULTING ENGINEER	500.00 500.
09/19/80	DOM M FLYNN 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5700.00 5000.
09/26/80	D B CALLENORE 9920 SO YALE TULSA OK 74136	DEVELOPER	5000.00 5000.
09/10/80	MRS SARAH H HAMMOND 3211 E 73RD ST TULSA OK 74136		250.00 250.
09/30/80	PHILIP TABER 6218 LEWIS AVENUE, SUITE TULSA OK 74136		225.00 125.
09/26/80	JACK D CARTER 4070 ONE WILLIAMS CENTER TULSA OK 74172	CONTROLLER FLYNN ENERGY CORP	1000.00 1000.
09/19/80	J R ORWIG RT 3 SHANGRALA CHATEAU AFTON OK 74331		2500.00 2500.
9/18/80	DONALD L SMITH P.O. BOX 246 HENRYETTA OK 74437	OIL DEALER SELF-EMPLOYED	406.00 50.
9/22/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED	600.00 500.

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Attachment #1-C (cont'd)

30 Day Post-
General

PERIOD 10/15/80 - 11/24/80

MIXED RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, A
TIONAL CONSERVATIVE PAC PART NO. 1. 1 10. 14A.

TE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	RECEIPT AMT THIS PERIOD
/16/80	LEON ROSENBERG BOX 84 KING GEORGE VA 22485	PRESIDENT MOUNT ROSE CANNING CO INC	2000.00 2000.00
/27/80	MRS CORNELIUS W MIDDLETON 2500 IVY ROAD, BIRCHWOOD CHARLOTTESVILLE VA 22901	HOUSEWIFE INFO REQUESTED, NOT RECD	250.00 100.00
/21/80	MRS ELIZABETH G SCHNEIDER BLOOMINGDALE FARM SOMERSET VA 22972	HOUSEWIFE INFO REQUESTED, NOT RECD	250.00 100.00
/37/80	JOSEPH S TERRELL JOSEPH S. TERRELL, INC. P.O. BOX 191 WILLIAMSBURG VA 23185	BUILDING CONTRACTOR JOSEPH S. TERRELL, INC.	225.00 75.00
/05/80	BRUCE A GRAY, III 927 ROSS BLDG RICHMOND VA 23219	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	200.00 200.00
/23/80	JACQUELIN E TAYLOR 213 ROSS BUILDING EIGHTH & MAIN STREETS RICHMOND VA 23219	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00 500.00
/22/80	N RIGSEY 2710 HILLARD ROAD, 4 RICHMOND VA 23228	CLERK INFO REQUESTED, NOT RECD	230.00 25.00
/27/80	W G VANSANT THE HERMITAGE P.O. BOX 300 ORANCOCK VA 23417	RETIRED INFO REQUESTED, NOT RECD	300.00 100.00
/30/80	J L REGUEZ 1336 W PRINCESS ANNE RD NORFOLK VA 23507	CHAIRMAN NORFOLK SHIPBUILDING & DRYDOCK CORP	250.00 250.00
1/06/80	C A YOUNG 1846 GREENWOOD ROAD SOUT ROANOKE VA 24015	RETIRED INFO REQUESTED, NOT RECD	302.00 100.00

April Monthly *mk*

01/01/80 - 03/31/80

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NCPAC CLERKS EXTRACT

PART NO. 2, LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	ACCT. RECEIPT A VAL. THIS PERI.
3/10/80	MRS. JOHN CAMPBELL WHITE ROUTE 1, BOX 320 CHESTER, MD 21619	OWNER SAME CHESTER, MD	200.0 400.00
3/19/80	MRS. WILLIAM B. KEMP 2147 FIFTH AVENUE DENTON, MD 21629	RETIRED NONE	300.0 300.00
3/11/80	JAOJELIN E. TAYLOR 213 ACSS BUILDING EIGHTH & MAIN STREETS RICHMOND, VA 23219	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	4500.0 4500.00
3/11/80	L. H. THOMAS 910 NEWTON ROAD CHARLESTON, WV 25317	RETIRED NONE	200.0 200.00
1/09/80	MR. RICHARD T. CHATMAN ELKIN, NC 28621	TEXTILE WORKER ELKIN, NC	250.0 350.00
1/12/80	MR. IMMAN BRANDEN 3303 FIRST NATIONAL BANK TOWER ATLANTA, GA 30303	ATTORNEY HAYSELL, POST, BRANDEN AND CHERSEY	25.0 1025.00
3/12/80	MR. & MRS. PAUL F. THIELE BOX 1056 SANDERSVILLE, GA 31082	HOMEOWNER SAME SANDERSVILLE, GA	100.0 300.00

TOTAL THIS PERIOD
(LAST PAGE OF THIS PART ONLY)

February
Monthly

ITEMIZED RECEIPTS—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS AND TRANSFERS
NCPAC CLERKS EXTRACT PART NO. 1. LINE NO. 14A.

DATE	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND BUSINESS ADDRESS	AMOUNT RECEIPT AMT THIS PERIOD
1/21/80	MR. JACQUELIN E. TAYLOR 213 ACSS BUILDING RICHMOND, VA 23219	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	900.00 900.00
1/22/80	L. N. THOMAS 910 NEWTON ROAD CHARLESTON, WV 25317	RETIRED NONE	300.00 300.00
1/24/80	MRS. ROGER WILLIAMS 627 OTIS BOULEVARD SPARTANBURG, SC 29302	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	2000.00 2000.00
1/28/80	C. S. LEE OVIEDO, FL 32765	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.00 500.00
1/29/80	MRS. JOHN D. SMILEY 626 NORTH CASEY KEY ROAD OSPREY, FL 33559	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.00 500.00
1/21/80	JAMES E. LEARY 5363 WAYNE CIRCLE MEMPHIS, TN 38117	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.00 500.00
1/17/80	WALTER M. DENNY, JR. 1616 CAPITAL TOWERS JACKSON, MS 39201	CPA INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	250.00 250.00
1/24/80	MARCAFT PRODUCTS, INC. GRAVES LANE CINCINNATI, OH 45241	INFORMATION REQUESTED, BUT NOT RECEIVED FROM CONTRIBUTOR	500.00 500.00

TOTAL THIS PERIOD
(LAST PAGE OF THIS PART ONLY)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

Candace M. Taw, Treasurer
 National Conservative
 Political Action Committee
 1500 Wilson Boulevard
 Suite 513
 Arlington, VA 22209

Identification No: C00024687

Reference: October 1980 Monthly Amendment (9-1-80 to 9-30-80)

Dear Ms. Taw:

This letter is prompted by the Commission's preliminary review of your October Monthly Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution which appears to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or political committee, from making a contribution to a political committee in excess of \$5,000 in the calendar year. If you have received an excessive contribution, the Commission recommends that you refund the amount in excess of \$5,000. (Any refund itemized on Schedule B should be reported on Line 26(a) of the Detailed Summary Page of your next report.)

If you find the contribution in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission.

-The independent expenditure schedule (Schedule E) must be notarized.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

02040314863

Candace M. Tew
National Conservative
Political Action Committee

2

contact me on our toll free number, (800) 424-9530. My local number is
(202) 357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

02040314864



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

Candace M. Taw, Treasurer
 National Conservative
 Political Action Committee
 1500 Wilson Boulevard
 Suite 513
 Arlington, VA 22209

Identification No: C00024687

Reference: 12 Day Pre-General Election Amendment (10-1-80 to 10-15-80)

Dear Ms. Taw:

This letter is prompted by the Commission's preliminary review of your 12 Day Pre-General Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

- Schedule A of your report (pertinent portions attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or political committee, from making contributions to a political committee, in excess of \$5,000 in the calendar year.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions, the fact that you have refunded the appropriate amounts will be taken into consideration by the Commission.

- The independent expenditure schedule (Schedule E) must be notarized.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to

02040314865

Candace M. Taw
National Conservative
Political Action Committee

2

contact me on our toll free number, (800) 424-9530. My local number is
(202) 357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

62040314866



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 23, 1981

Candace M. Taw, Treasurer
 National Conservative
 Political Action Committee
 1500 Wilson Boulevard
 Suite 513
 Arlington, VA 22209

Identification No: C00024687

Reference: 30 Day Post-General Election Amendment (10-16-80 to
 11-24-80)

Dear Ms. Taw:

This letter is prompted by the Commission's preliminary review of your 30 Day Post-General Amendment. The review raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act. An itemization of these areas follows:

-Schedule A of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in 2 U.S.C. 441a. The Act precludes an individual or political committee, from making contributions to a political committee in excess of \$5,000 in the calendar year. If you have received excessive contributions, the Commission recommends that you refund the amounts in excess of \$5,000. (Any refunds itemized on Schedule B should be reported on Line 26(d) of the Detailed Summary Page of your next report.)

If you find the contributions in question were disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, your prompt refund of the excessive contribution to the donor will be taken into consideration by the Commission.

-Schedule A of your report (pertinent portion attached) discloses apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b, unless made from separate segregated funds established by the corporations. If you have received corporate contributions, the Commission recommends that you refund the full amounts to the donors. (Any refund itemized

02040314867

on Schedule B should be reported on Line 26(a) of the Detailed Summary Page of your next report.)

If you should find, however, that the receipts in question are not corporate, but are from partnerships, an allocation of the contributions according to either (1) the partners' share of the profits or (2) an agreement among the partners, must be provided together with the identification of the partners. 11 C.F.R. 110.1(e).

If you find that sources of the contributions are permissible and were disclosed incorrectly or incompletely on your report, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, your prompt refund of the contribution to the donor will be taken into consideration by the Commission.

-The independent expenditure schedule (Schedule E) must be notarized.

An amendment to your report correcting the above problems should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll free number, (800) 424-9530. My local number is (202) 357-0026.

Sincerely,

Mark Kleinman

Mark Kleinman
Reports Analyst
Reports Analysis Division

02040314868

RECEIVED
82 JAN 7 12:40

**National Conservative
Political Action Committee**

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

January 3, 1982

Mr. Mark Kleinman
Reports Analysis Division
Federal Election Commission
1325 K St., NW
Washington, DC 20463

Reference: October 1980 Amendment (9/1/80-9/30/80)

Dear Mr. Kleinman:

Upon reviewing the National Conservative Political Action Committee's October 1980 report, there appears to be an individual who has contributed \$10,000. The contributor in question is Nancy Ramsey of Wichita Falls, Texas. (page 50, schedule A) Further investigation of this matter has uncovered the following facts:

- Nancy Ramsey and her husband, John Ramsey are both NCPAC contributors.
- They have a joint checking account in which both names appear on the check.
- Since Nancy Ramsey's name appears on the check first, all contributions were mistakenly credited to her.
- Nancy Ramsey signed checks totaling \$5,000 and John Ramsey signed checks totaling \$5,000. Both individuals have been requested to supply their occupation and name of employer on all contribution solicitations. These headings should read "information requested, but not received" for both categories.

This discrepancy does not effect cash balances or the balances on any other schedules of the report.

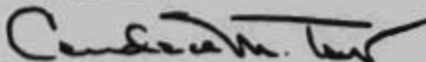
In addition to this, the final page of schedule E was not notarized. I have enclosed copies of both summary pages along with a notarized copy of page 53 of 53, schedule E.

16111032121

Page Two
Mr. Mark Kleinman
January 9, 1982

Please accept this as an amendment to MCPAC's October
1980 report.

Sincerely,



Candace M. Taw
Treasurer

LEN: cab

Enclosure

82032121162

RECEIVED

National ~~CONFIDENTIAL~~ Political Action Committee

82 JAN 7 P2: 48

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

January 5, 1982

Mr. Mark Kleinman
Reports Analysis Division
Federal Election Commission
1325 K St. NW
Washington, D.C.

Reference: 12 Day Pre-General Election Amendment (10/1/80-10/15/80)

Dear Mr. Kleinman:

Reports Analysis Division has raised questions about individuals who may have contributed in excess of \$5,000.00 in a calendar year. The following individuals were singled out for possible violations:

R. Merrill Harris
Lakeland Towers
Jackson, MS 39216 (page 17, Sch. A)

Mrs. Arla A. McMillan
38 Brentmoor Park
Saint Louis, MO 63105 (p. 29)

Lloyd F. Gaubert
5668 Bancroft Dr.
New Orleans, LA 70122 (p. 32)

Walker Peddicord
860 Broadmoor Ct.
Lafayette, CA 94549 (p. 47)

All of the contributors listed above were refunded all contributions that totaled an excess of \$5,000.00. These refunds were made in October 1980 and all appeared on the Post-General Election Report (Sch.B, line 26A). I am enclosing a copy of line 26A from the Post-General report.

I have discovered that the last page of schedule E was not notarized. I have enclosed both summary pages along with a notarized copy of page 18 of 18, schedule E.

Please accept this as an amendment to NCPAC's Pre-General Election Report.

Sincerely,



Candace M. Taw
Treasurer

8204032121135

ITEMIZED DISBURSEMENTS

Page 1 of 2 for
 Lyle H. Hays (P. 18)
 (See separate schedule for each
 category of the Detailed
 Summary Page)

Page 1 of 2 Post-Election Report 1980

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
National Conservative Political Action Committee			
A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
R. Merrill Harris Lakeland Towers Jackson, Mississippi 39216	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/80	100.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mrs. Avery McMillian 38 Brentmoor Park Saint Louis, MO 63105	Contribution refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/80	5,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lloyd F. Gaubert 5668 Bancroft Drive New Orleans, LA 70122	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/80	10.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Walter Peddicord 860 Broadmoor Court Lafayette, CA 94558	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/28/80	275.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mr. Hendrix Davis, Jr. c/o Texas Comm. for the Constitution P.O. Box 7446 Houston, Texas 77008	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/07/80	100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
James Calhoon 1107 Beech Road Rosemont, PA 19010	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/27/80	100.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mr. Donald G. Crowell 104 Church Street New London, MI 63459	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/4/80	50.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
L W Hardy Co 3809 E Highway 66 Kingman, AZ 86401	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/23/80	250.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cardiology Associates P A 509 W. Main Street Bozhan, AL. 36303	Contribution Refund Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	11/03/80	200.00
SUBTOTAL of Disbursements This Page (optional)			6,085.00

RECEIVED

**National Conservative
Political Action Committee**

82 JAN 7 12:40

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

January 5, 1982

Mr. Mark Kleinman
Reports Analysis Division
Federal Election Commission
1325 K St. NW
Washington, D.C.

Reference: Post-General Election Amendment (10/16/80-11/24/80)

Dear Mr. Kleinman:

Reports Analysis Division has raised questions concerning possible violations of NCPAC by acceptance of checks from individuals who may have contributed more than \$5,000.00 in a calendar year. Don M. Flynn (page 96, schedule A) and his wife Mrs. Don M. Flynn are both NCPAC contributors. In the data entry process, Don M. Flynn was erroneously credited with all contributions when Mrs. Don M. Flynn signed and sent checks totaling \$2,700.00. Schedule A should list Don M. Flynn as having given \$5,000.00 in 1980 and Mrs. Don M. Flynn as having given \$2,700.00. In the case of Jaqueline E. Taylor (page 32, schedule A), an error was also made in data entry. Mr. Taylor contributed in 3 separate months to NCPAC. In January 1980, his name and address were keyed in differently than they were in March 1980 and October 1980. This caused separate records to be created for Mr. Taylor. An excessive contribution amount of \$500.00 was refunded to Mr. Taylor and appears on line 26A of the 1/1/82- 1/31/82 report.

Questions have also been raised about the possible acceptance of corporate contributions. The contributors in question include the following: Ruddy and Son Inc (Sch. A, page 138); Spruiell Drilling Co Inc (Sch. A, page 101); and Allied Precision Products Inc (Sch. A, page 45). In April 1981, Reports Analysis Division questioned NCPAC about these very same contributors. I am enclosing the cover letter that accompanied NCPAC's May 5, 1981 response.

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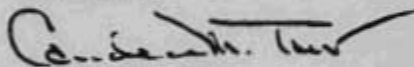
**National Conservative
Political Action Committee**

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

Additionally, I have confirmed that the final page of schedule E was not notarized. I am enclosing both summary pages along with a notarized copy of page 63 of 63, schedule E.

Please accept this as an amendment to NCPAC's Post-General Election Amendment.

Sincerely,



Candace M. Taw
Treasurer

8:032121149

82040714074

12 DAY REPORT
January 27, 1982

MUR 1405
STAFF MEMBER: Duane A. Brown
DATE ASSIGNED: 12/21/71

SOURCE OF MUR: Robert Blaemire - Committee for
American Principles

RESPONDENT'S NAME: National Conservative Political Action
Committee (NCPAC)

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(C)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

STATEMENT OF THE CASE

The complainant Robert Blaemire, President of the Committee for American Principles, ("complainant") alleges that the National Conservative Political Action Committee ("NCPAC") filed reports with the Commission during calendar year 1981 which reveal that several contributions were made to the NCPAC in excess of the contribution limitation permitted in 2 U.S.C. § 441a(a)(1)(C). Complainant's documentation indicates that a Sophia W. Fischer and a Ben J. Shaw exceeded their \$5,000 aggregate total contribution to NCPAC by \$50 and \$500 respectively.

Although NCPAC is a recognized multicandidate committee, that committee is permitted only to accept contributions from persons aggregating \$5,000 in a calendar year. Confirmation of the allegations would cause NCPAC to be in violation of 2 U.S.C. § 441a(f) and the individuals to be in violation of 2 U.S.C. § 441a(a)(1)(C).

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STATEMENT OF PRELIMINARY DISCOVERY PLAN

Information necessary to establish the elements of the alleged violation should be found in the reports filed by NCPAC. The persons alleged to have contributed in excess of the contribution limitation would be traced and their contributions verified.

STATEMENT OF TRACK DESIGNATION

This matter is not so complicated as to require more than a Track I designation.

82040314876

Comment Sheet

12 Day Report

MUR # 1405
Staff Member D.A. Brown

Date 1-27-82

Time of Transmittal 1/27/82 4:15 pm

Expiration of 72-hour Comment Period: 2/1/82

Comments: Very Tardy

approve ML

object _____

no comment _____

initials _____

conference date/time _____

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KAG

FORM #54
Comment Sheet

Comment Sheet

12 Day Report

MUR # 1405

Staff Member D.A. Brown

Date 1-27-82

Time of Transmittal 1/27/82 4:15pm

Expiration of 72-hour Comment Period: 2/1/82

Comments:

approve ✓

object

no comment

initials KAB

conference date/time

62040304878

crochet

FORM #54
Comment Sheet

Comment Sheet
12 Day Report

MUR # 1405
Staff Member D.A. Brown
Date 1-27-82
Time of Transmittal 1/27/82 4:15pm
Expiration of 72-hour Comment Period: 2/1/82
Comments:

approve _____

object _____

no comment _____

initials _____

conference date/time _____

62040614879

C

6040

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

McLEAN, VIRGINIA 22108

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

January 7, 1982

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000
TELEX: 710-830088
CABLE: SEDAMHERGE

8
P 3:52

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attention: Duane Brown, Esq.

Re: MUR 1405

Dear Mr. Gross:

This letter is written in reply to your letter to National Conservative Political Action Committee, dated December 21, 1981, with which was enclosed a copy of a complaint filed by Committee for American Principles. In the complaint, it is alleged that two individuals, Sophia W. Fischer and Ben T. Shaw, made contributions to National Conservative Political Action Committee in 1981 in excess of the limitation contained in 2 U.S.C. 441a(a)(1)(C). This matter has been numbered MUR 1405.

Enclosed herewith, for your records, is a Statement of Designation of Counsel, signed by the Assistant Treasurer of National Conservative Political Action Committee, designating the undersigned as its counsel in connection with this matter.

Committee for American Principles alleges that National Conservative Political Action Committee (hereinafter "NCPAC") should be found in violation of the provisions of the Federal Election Campaign Act of 1971, as amended, subjecting it to the possible imposition of a civil penalty, for having received from two individuals contributions in excess of the limitation contained in 2 U.S.C. 441a(a)(1)(C). Complainant also expresses concern that there may be additional violations of the contribution limitations because

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Kenneth A. Gross, Esq.
Page Two
January 7, 1982

of the large number of contributors to NCPAC. These allegations are without merit.

It is reliably estimated that there are presently in excess of 140,000 active contributors^{1/} to NCPAC who, in the first eleven months of 1981, made in excess of 145,000 contributions to NCPAC. Those contributions amounted to approximately \$3,727,228, the average contribution being approximately \$25.00. To process that volume of contributions, NCPAC utilizes the most sophisticated systems and procedures available. Those systems and procedures are designed specifically to assure compliance with the provisions of the Federal Election Campaign Act of 1971, as amended.

NCPAC maintains an active vigil to assure compliance with the provisions of the Act relating to limitations on contributions. For example, all contributions to NCPAC, and the attendant contributor data, are entered into a computer^{2/} designed to aggregate the data relevant to a single contributor. In order to secure compliance with the limitation in 2 U.S.C. 441a(a)(1)(C), the computer has an inquiry feature which regularly identifies and publishes a monthly report of any contributor whose cumulative year-to-date total exceeds \$5,000.00. Utilizing that listing, NCPAC refunds the excess over \$5,000.00 to the contributor and informs the computer firm of the amount, or amounts, to be deleted from the data base. An analysis of the reports filed by NCPAC reveals that, during the period from January 1, 1980 through November 30, 1981, an aggregate of \$19,585.00 was refunded to contributors.^{3/} To safeguard against mechanical inaccuracies in the system, NCPAC also undertakes detailed analyses of its contributor data prior to year's end to determine whether the computer may have failed to identify any

- ^{1/} An active contributor is defined, for these purposes, as an individual who has contributed at least \$10.00 to NCPAC within the past twenty-four months.
- ^{2/} The data entry is handled by Directech, Inc., 11600 Nebel Street, Rockville, Maryland.
- ^{3/} A specific example of this monthly procedure may be found on line 26A and in the itemized schedule for line 26A of NCPAC's Post-General Election Report in 1980.

02040314881

Kenneth A. Gross, Esq.
Page Three
January 7, 1982

contributor who exceeded his or her limitation. Such failure on the part of the computer, if at all, is usually due to errors in data entry, resulting in a single contributor having more than one key-line file.^{4/} While the statistical incidence of such inaccuracies is slight, this compliance procedure has been adopted to demonstrate that NCPAC utilizes its best efforts to comply with the Act.

The reason why some contributors exceed their limitation under 2 U.S.C. 441a(a)(1)(C) is that they routinely respond to direct-mail solicitations which are mailed periodically to all prior contributors. While NCPAC cautions contributors who have reached their limitation not to respond to future solicitations, some nevertheless continue to mail in checks which are received and processed by an independent caging concern. Mrs. Fischer and Mr. Shaw, the subjects of the instant complaint, are individuals who come within that category.

With respect to Mrs. Fischer, there is enclosed herewith a letter from a member of the finance staff of NCPAC to Mrs. Fischer, dated April 28, 1981, in which she was advised that she had reached her limitation under 2 U.S.C. 441a(a)(1)(C) and in which she was asked to please ignore any future solicitations she might receive in the mail.^{5/} Also enclosed is a second letter from NCPAC to Mrs. Fischer, dated May 12, 1981, in which she was again reminded that she could make no additional contributions to NCPAC in 1981. Notwithstanding these efforts to stop her, Mrs. Fischer persisted in sending in additional checks. A detailed analysis of her contribution history at year's end revealed that Mrs. Fischer had, in 1981, mailed NCPAC checks which aggregated \$6,200.00. As a result, a check in the amount of

- ^{4/} Duplicate or multiple key-line files on a single contributor may be due to typographical mistakes made during data entry, or because a single contributor provides different information on successive reply devices, e.g. home address one time and office address the next time, or full name one time and name with initials the next time.
- ^{5/} Portions of the letter, and portions of other letters which are enclosed herewith as exhibits, have been deleted because the passages are personal or otherwise irrelevant to this matter.

82040314882

Kenneth A. Gross, Esq.
Page Four
January 7, 1982

\$1,200.00 was mailed to the attorney for Mrs. Fischer's estate^{6/} on December 30, 1981. A copy of the letter of transmittal is enclosed.

With respect to Mr. Shaw, there is enclosed herewith a letter from a member of the finance staff of NCPAC to Mr. Shaw, dated September 30, 1981, in which he was advised that he had reached his limitation under 2 U.S.C. 441a(a)(1)(C) and with which was returned a check from Mr. Shaw in the amount of \$1,000.00. The individual who wrote that letter was not then aware that, at the end of August, Mr. Shaw had mailed in another check in response to a direct-mail solicitation which had caused Mr. Shaw to reach his limitation at that time. As in the case of Mrs. Fischer, however, Mr. Shaw persisted in sending even additional amounts after he received the letter of September 30, 1981. Again, a detailed analysis of his contribution history at year's end revealed that Mr. Shaw had, in 1981, mailed NCPAC checks which aggregated \$6,106.70. As a result, a check in the amount of \$1,106.70 was mailed to Mr. Shaw on December 30, 1981. A copy of the letter of transmittal is enclosed.

In view of the fact that it has approximately 140,000 active contributors, who contributed approximately \$3,727,228 in approximately 145,000 separate contributions, NCPAC's record of ferreting out contributors who exceed the limitation in 2 U.S.C. 441a(a)(1)(C) must be considered excellent. Furthermore, the record demonstrates that NCPAC took reasonable and responsible action in trying to stop Mrs. Fischer and Mr. Shaw from sending additional checks to NCPAC. That Mrs. Fischer and Mr. Shaw failed to heed the warnings and protestations of NCPAC should not subject NCPAC to penalty. They both continued to mail checks to NCPAC in response to direct-mail solicitations, checks that were received, processed and deposited by an independent caging firm, the contributor data subsequently being recorded on computer memory by an independent computer firm. Those who wrote Mrs. Fischer in April and May and who wrote Mr. Shaw in September did not know that checks were still being sent in by those individuals until the records were subject to the detailed compliance internal review explained above.

^{6/} The attorney for Mrs. Fischer's estate had advised NCPAC, by letter dated November 20, 1981, that Mrs. Fischer had died.

82040314883

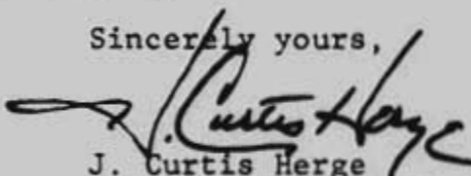
Kenneth A. Gross, Esq.
Page Five
January 7, 1982

When the problem was discovered, refunds were promptly mailed. Furthermore, the refunds were made prior to year's end. This means that, in fact, the aggregate amounts contributed by Mrs. Fischer and by Mr. Shaw did not exceed \$5,000.00 in the calendar year.

It is evident from the foregoing that no additional action is justified or warranted in this matter. The record is clear that NCPAC maintains a rigorous program to assure compliance with the contribution limitations in the Act. Isolated situations, such as those under review, are corrected promptly within the framework prescribed in 11 CFR 103.3(b). There are many examples of incidents such as these which are routinely called to the attention of political committees by the Reports Analysis Division and which are corrected informally without further action; or which, if brought to the attention of the Commission, are dismissed without penalty. See, generally, MUR 691. It is suggested, therefore, that the actions taken by NCPAC under the circumstances were actions that should be encouraged by the Commission without penalty and be recognized as meeting the best efforts requirement of the Act.

We appreciate this opportunity to respond and look forward to being of further assistance to you should you require any additional information.

Sincerely yours,



J. Curtis Herge
Counsel to National Conservative
Political Action Committee

Enclosures

82040314884

STATEMENT OF DESIGNATION OF COUSEL

NAME OF COUNSEL: *J. Curtis Herge (Sedam & Herge)*
ADDRESS: *8300 Greensboro Dr., Suite 1100 McLean, VA. 22102*
TELEPHONE: *(703) 821-1000*

RE: MUR 1405

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

NATIONAL CONSERVATIVE POLITICAL
ACTION COMMITTEE

Date 12/28/81

BY:

Signature

Larry E. Green Asst. Treasurer

NAME: *National Conservation PAC*

ADDRESS: *1500 Wilson Blvd. Suite 513*

HOME PHONE:

BUSINESS PHONE: *(703) 522-2800*

*National Conservative
Political Action Committee*

*Suite 513, 1500 Wilson Boulevard
Arlington, Virginia 22209*

April 28, 1981

(703) 522-2800

Council
Chron
Suspense

Spitz or
Terry

Mrs. Sophia W. Fischer
690 Osceola Avenue, Apt. 603
Winter Park, FL 32789

Dear Mrs. Fisher:

I cannot thank you enough for your \$1,565 contri-
bution to NCPAC.

Your contributions to NCPAC now total \$5,000;
therefore, you cannot contribute any more this year.
So, if by mistake you should receive direct mail sol-
icitations from NCPAC, please throw them away.

Again, thank you for your wonderful, continued support
of NCPAC. It is because of you that we prevail.

Very sincerely,

Brent

L. Brent Bozell, III
Director
National Conservative
Congressional Campaign Council

LBB/bcg

82040314886



NCCCC
Brent
Chron
Chron 2
Suspense
Council

National Conservative
Congressional Campaign Council
1500 Wilson Boulevard
Suite 513
Arlington, Virginia 22209
703/522-2800

John T. Dolan
National Chairman, NCPAC
L. Brent Bozell, III
Director, NCCCC

May 12, 1981

Mrs. Sophia W. Fischer
690 Osceola Avenue, Apt. 603
Winter Park, FL 32789

Dear Mrs. Fischer:

Thank you for your very interesting card.

The letter you received from Terry Dolan regarding the Reagan Victory Fund, was a direct mail piece. Remember: These letters are now solely for your information; you cannot contribute to NCPAC any more this year.

Please keep in touch.

With warm regards,

L. Brent Bozell, III
Director,
National Conservative
Congressional Campaign Council

LBB/bcg

62040314887

**National Conservative
Political Action Committee**

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

December 30, 1981

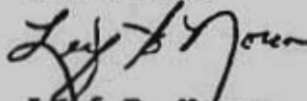
Mr. Webber Haines
Barnett Bank Building
250 Park Avenue South
P.O. Box 880
Winter Park, FL 32790-0880

Dear Mr. Haines:

A recent review of Sophia Fischer's contributor history shows that she contributed \$6,200.00 to the National Conservative Political Action Committee during calendar year 1981. Federal Election Law restricts individuals from contributing over \$5,000.00 per year to a committee such as ours. As a result, I am returning \$1,200.00 to the estate of Sophia Fischer.

If you should have any questions regarding this information, please do not hesitate to contact me.

Sincerely,


Leif E. Noren
Asst. Treasurer

02040314888

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
SUITE 513 • 1500 WILSON BOULEVARD
ARLINGTON, VIRGINIA 22209

SPITZ CHANNELL
NATIONAL DIRECTOR OF FINANCE

September 30, 1981

Mr. Ben T. Shaw
100 Dement Avenue
Dixon, IL 61021

Dear Ben:

Thank you again for your wonderful generosity to NCPAC and its efforts to help create a conservative government in this country.

Very recently you sent us 2 checks, 1 for \$500 and 1 for \$1,000. It is with deepest regret that I must inform you that with the arrival of your first check, the \$500, you reached your legal permissible Federal Election contribution limit for 1981. I am, therefore, enclosing the second check for \$1,000. I am very sorry that we cannot accept it.

...cont'd.

CS

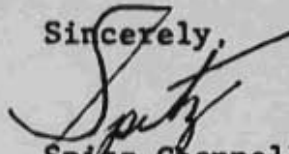
82040314889

B. Shaw
September 30, 1981
Page 2

Again, thank you for everything that you are
doing for us. We do hope that we remain worthy
of your maximum support.

With very warm regards,

Sincerely,



Spitz Channell
National Finance
Director

SC/jh

Enclosures:

1. Check \$1,000 No. 719

62040314890

**National Conservative
Political Action Committee**

1500 Wilson Blvd. Suite 513 Arlington, Va. 22209 (703) 522-2800

December 30, 1981

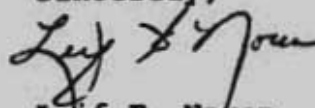
Mr. Ben T. Shaw
100 Dement Avenue
Dixon, IL 61021

Dear Mr. Shaw:

A recent review of your contributor history reveals that you have contributed \$6,106.70 to the National Conservative Political Action Committee during calendar year 1981. Federal Election Law restricts individuals from contributing over \$5,000.00 per year to committee's such as ours. As a result, we are returning to you a check for \$1,106.70.

If you should have any questions regarding this information, please do not hesitate to contact me.

Sincerely,



Leif E. Noren
Asst. Treasurer

02040314891

62040314892

SEDAM & HERGE
ATTORNEYS AT LAW
SUITE 1100
4300 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

To

WILLIAM M. A. (1991) - President
of the American Bar Association
1500 K Street, N.W.
Washington, D.C. 20005
Attention: Public Policy Committee

FIRST CLASS MAIL

MUR # 1405
DATE 12-16-81

PLEASE PROVIDE THE NAMES AND ADDRESSES OF ALL RESPONDENTS WHICH ARE TO BE SENT A COPY OF THE COMPLAINT. IF A PRINCIPAL CAMPAIGN COMMITTEE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE CANDIDATE AND PUT A "CC" BESIDE THE CANDIDATE'S NAME. IF A CANDIDATE IS A RESPONDENT, A CARBON COPY IS TO BE SENT TO THE CANDIDATE'S PRINCIPAL CAMPAIGN COMMITTEE. PLEASE PROVIDE THE NAME AND ADDRESS OF THE PRINCIPAL CAMPAIGN COMMITTEE AND PUT A "CC" BESIDE THE COMMITTEE'S NAME. PLEASE PROVIDE THIS INFORMATION, ON THIS SHEET, WITHIN 24 HOURS OF RECEIPT OF THIS NOTICE. THANK YOU.

NCPAC
1500 Wilson Blvd
Suite 513
Arlington, VA 22209

LISA Stoltzenberg
Tran.

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:
M. Stoltzenberg
NCPAC

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
513E46

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
NCPAC
DATE OF DELIVERY 12-28-81

4. ADDRESS (Complete only if requested)

5. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

198
USP

★GPO : 1979-505-488



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Lisa Stoltenberg, Treasurer
National Conservative PAC
1500 Wilson Blvd., Suite 513
Arlington, Virginia 22209

Re: MUR 1405

Dear Ms. Stoltenberg:

This letter is to notify you that on December 16, 1981 the Federal Election Commission received a complaint which alleges that your Committee 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 1405. 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.

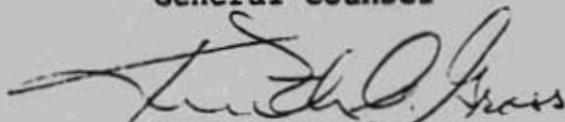
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

62040314894

If you have any questions, please contact Duane Brown, the attorney assigned to this matter at (202)-523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel



By Kenneth A. Gross
Associate General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

82040314895



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 18, 1981

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Robert Blaemire
Committee For American Principles
2000 N Street, NW, Suite 105
Washington, D.C. 20036

Dear Mr. Blaemire:

This letter is to acknowledge receipt of your complaint of December 15, 1981, against National Conservative Political Action Committee 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 five 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 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,

Elissa T. Garr

Elissa T. Garr
Docket Chief

Enclosure

1405 12-18-81

1. The following services are 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 3.....		(CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Robert Blaemire Committee for American Principles		3. ARTICLE DESCRIPTION: REGISTERED NO. 943389 CERTIFIED NO. INSURED NO.	
4. I have received the article described above. SIGNATURE: [Signature] DATE OF DELIVERY: 12-18-81		5. ADDRESS REASONABLE ONLY IF REQUESTED	
6. UNABLE TO DELIVER BECAUSE:		7. INITIALS	

PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

buted another \$500 to NCPAC on September 14, 1981, according to the monthly report for that period.

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the period of April to September, 1981.

5) Complainant is concerned that additional violations may be found in NCPAC's detailed and lengthy reports if a lengthy study is done. The large number of contributors to NCPAC makes reporting difficult, but also allows committees to obscure excessive contributions simply because of the large amount of information in the reports. Complainant requests that the Commission initiate an audit of NCPAC reports as part of an investigation into the matter described above, to satisfy concerns that there may be additional violations of the legal contribution limitations.

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec. 437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

By: 
Robert Blaemire, President

Date: 12/14/81

02040314898

Subscribed by and sworn to before me this 16th day of
December, 1981.

(SEAL)

James G. Meyer
Notary Public

My Commission Expires February 14, 1984

My Commission Expires: _____

62040314999

FIFTH—CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

LOVAL CONSERVATIVE PAC PAR. NO. 1. LINE NO. 14A.

NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AGGR. RECEIPT AM YTD. THIS PERIOD
--	-------------------------------------	--------------------------------------

10/81 JAMES D PARKER 100 PARKER LANE VIRGINIA BCH VA 23454	RETIRED INFO REQUESTED, NOT RECD	500.00 500.0
--	-------------------------------------	--------------

10/81 JOHN L ROPEL, II PO BOX 2100 NORFOLK VA 23501	CHAIRMAN OF THE BOARD SHIPBUILDING & RYDOCK CORP	1000.00 1000.0
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4/81 N F RODMAN 804 AUGUSTA AVENUE MORGANTOWN WV 26505	PHYSICIAN INFO REQUESTED, NOT RECD	215.00 100.0
--	---------------------------------------	--------------

0/81 MRS FLAINE D KORN 10 SWAN LAKE DRIVE SUMTER CA 29150	HOUSEWIFE INFO REQUESTED, NOT RECD	400.00 300.0
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13/81 INMAN BRANDON 3300 FIRST NATIONAL BANK ATLANTA GA 30303	ATTORNEY HANSELL, POST, REEDON & FORSEY	700.00 500.0
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10/81 MRS SOPHIA W FISCHER 690 OSCEOLA AVENUE 603 WINTER PARK FL 32789	RETIRED INFO REQUESTED, NOT RECD	5000.00 2665.0
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16/81 MRS NELSON MORRIS 5333 COLLINS AVE MIAMI FL 33140	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	600.00 500.0
---	--	--------------

3/81 J E PIERCE 6040 MOSS RANCH ROAD MIAMI FL 33156	HOUSEWIFE SELF-EMPLOYED	3999.59 2529.0
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7/81 FREDERICK W GUARDABASSI SUNRISE PROFESSIONAL BUILDING 915 MIDDLE RIVER DR ST FORT LAUDERDALE FL 33304	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	1000.00 1000.0
---	--	----------------

14/81 THEODORE D STAFF 5600 N DIXIE HWY WEST PALM BEACH FL 33407	RETIRED INFO REQUESTED, NOT RECD	225.00 75.0
--	-------------------------------------	-------------

PERIOD 05/01/01 - 05/31/01

RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

13 OBSERVANCE PAC

PART 42.1. LINE 40.11.

NAME, MAILING ADDRESS, AND ZIP CODE OCCUPATION AND PLACE OF BUSINESS ACCT. RECEIPT YTD. THIS PERIOD

4/01	J. D. LADDERS PO BOX 433 NITRO WV 25143	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	200.00	200.00
4/01	CHARLES T JONES PORT AMHERST CHARLESTON WV 25302	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00	500.00
5/01	IMMAN BRANDON 3300 FIRST NATIONAL BANK ATLANTA GA 30303	ATTY HANSELL, POST, BRANDON & DORSEY	1100.00	250.00
5/01	H. C. HANLAN 2355 RAMSGATE NW ATLANTA GA 30305	LAWYER ATLANTA GA	225.00	75.00
5/01	DEAN B SMITH 3741 MADDOX HALL ROAD, N ATLANTA GA 30327	INTERIOR DESIGN SAME	400.00	400.00
5/01	BILL D HATHEWS PO BOX 123 CALICO CA 30701	INS. AGENT. INFO REQUESTED, NOT RECD	350.00	150.00
5/01	MRS SOPHIA A FISCHER 500 SECEOLA AVENUE 503 CLIFPER PARK FL 32739	RETIRED INFO REQUESTED, NOT RECD	5000.00	50.00
5/01	MRS S J HOLBROOK 175 VILLAGE RD NORTH PALM BEACH FL 33408	RETIRED INFO REQUESTED, NOT RECD	550.00	50.00
5/01	MICHAEL J WINTO 2400 LASELMAZA PALM DR PALM BEACH FL 33432	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	300.00	100.00
5/01	MRS BARLETTA RICHARDS 213 CREAM DR TALLAHASSEE FL 32304	HOUSEWIFE INFO REQUESTED, NOT RECD	300.00	100.00

RECEIPTS--CONTRIBUTIONS, SALES AND COLLECTIONS, LOANS, AND TRANSFERS

NAL CONSERVATIVE PAC *September Report* PART NO. 1. LINE NO. 14A.

E	NAME, MAILING ADDRESS, AND ZIP CODE	OCCUPATION AND PLACE OF BUSINESS	AGGR. RECEIPT A YTD. THIS PERI
28/81	MRS KATHERINE S DUNBAUGH 1 CALVIN TERRACE A102 PRESBYTERIAN HOME EVANSTON IL 60201	RETIRED INFO REQUESTED, NOT RECD	500.00 500.
04/81	MRS RUTH TRILLICH 2100 BENNETT AVENUE EVANSTON IL 60201	HOUSEWIFE INFO REQUESTED, NOT RECD	225.00 25.
31/81	MRS LILLIAN BUZA 639 WASHINGTON BLVD OAK PARK IL 60302	HOUSEWIFE INFO REQUESTED, NOT RECD	590.00 25.
28/81	MRS MAURINE C SHADWICK 2301 W 183RD ST HOMERWOOD IL 60430	WIDOW INFO REQUESTED, NOT RECD	900.00 400.
14/81	MRS VERYL H GERDE 212 W EUREKA ST CHAMPAIGN IL 60320	RETIRED INFO REQUESTED, NOT RECD	252.00 140.
29/81	BEN T SHAW 100 DEMENT AVE DIXON IL 61021	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	5000.00 1605.
20/81	MRS E H NEESE 12223 NORTH LEGES DRIVE ROSCOE IL 61073	HOUSEWIFE INFO REQUESTED, NOT RECD	1000.00 1000.
06/81	RICHARD H AMBLER 519 SO 6TH ST MONMOUTH IL 61462	WAREHOUSE MAN GAMBLES	335.00 75.
20/81	MRS FLORENCE EMRICK 504 E MAIN ST CASEY IL 62420	RETIRED INFO REQUESTED, NOT RECD	550.00 100.
24/81	GEORGE PARRISH 805 HICKORY DR NEWTON IL 62448	CRUDE OIL PRODUCER NEWTON IL	350.00 100.

CONSERVATIVE PAC

09/81 - 09/81

PART NO. 1. LINE NO. 14A.

NAME, MAILING ADDRESS, AND ZIP CODE OCCUPATION AND PLACE OF BUSINESS AGGR. RECEIPT AM YTD. THIS PERIOD

3/81	HENRY KAUSE 921. SOUTH TAYLOR OAK PARK IL 60304	RETAILER M I W INTERNATIONAL	300.00	50.0
0/81	LAWRENCE WEEKS RURAL ROUTE 2 MINOOKA IL 60447	FARMING INFO REQUESTED, NOT RECD	335.00	280.0
4/81	BEN T SHAW 100 CEMENT AVE DIXON IL 61021	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	5000.00	500.0
8/81	ANNA JONAS 1222 BENSON BLVD FREEPORT IL 61032	P INFO REQUESTED, NOT RECD	250.00	50.0
09/81	LOUIS L LOHMAN 42 FAIRMONT ADDITION ALTON IL 62002	LAB TECHNICIAN OWENS ILLINOIS INC	250.00	100.0
2/81	GLENN G GROSS RURAL ROUTE 2 JACKSONVILLE IL 62650	VETERINARIAN JACKSONVILLE IL	350.00	50.0
25/81	MRS ELSIE A BOECKELMANN 5200 SOUTH BROADWAY SAINT LOUIS MO 63111	RETIRED CLERICAL WORK INFO REQUESTED, NOT RECD	270.00	26.0
10/81	MRS JOHN S LEHMANN 10 APPLE TREE LANE SAINT LOUIS MO 63124	HOUSEWIFE HOME	300.00	250.0
11/81	GRACE YOUNT 301 WEST COLLEGE FARMINGTON MO 63640	UNEMPLOYED INFO REQUESTED, NOT RECD	275.00	50.0
1/18/81	CHARLES L HUGHES 260 WINNEBAGO GREENWOOD MO 64034	RETIRED. INFO REQUESTED, NOT RECD	225.00	100.0

COMMITTEE
FOR
AMERICAN
PRINCIPLES

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)

National Conservative)
Political Action)
Committee (NCPAC))

MUR No. _____

COMPLAINT

1) The National Conservative Political Action Committee (NCPAC) has filed monthly reports with the Commission of contributions received.

2) 11CFR Sec. 110.1(c) says; "No person...shall make contributions to any other political committee which in the aggregate exceed \$5,000 in any calendar year."

3) Commission records reveal contributions in excess of the legal limitations to NCPAC by two persons. The April 1981 report by NCPAC shows Mrs. Sophia W. Fischer to have reached the \$5000 aggregate total with a contribution of \$2665 on April 30, 1981. Mrs. Fischer, the reports then reveal, contributed another \$50 to NCPAC during May 1981, according to the monthly report of that period. The August 1981 report by NCPAC shows Mr. Ben T. Shaw to have reached the \$5000 aggregate total with a contribution of \$1606 on August 28, 1981. Mr Shaw, the reports then reveal, contri-

02040314904

buted another \$500 to NCPAC on September 14, 1981, according to the monthly report for that period.

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the period of April to September, 1981.

5) Complainant is concerned that additional violations may be found in NCPAC's detailed and lengthy reports if a lengthy study is done. The large number of contributors to NCPAC makes reporting difficult, but also allows committees to obscure excessive contributions simply because of the large amount of information in the reports. Complainant requests that the Commission initiate an audit of NCPAC reports as part of an investigation into the matter described above, to satisfy concerns that there may be additional violations of the legal contribution limitations.

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec. 437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

Date: _____

By: _____
Robert Blaemire, President

82040314905

Subscribed by and sworn to before me this _____ day of
_____, 1981.

(SEAL)

Notary Public

My Commission Expires: _____

82040314906

COMMITTEE
FOR
AMERICAN
PRINCIPLES

2000 N Street NW, Suite 105
Washington, D.C. 20036
(202) 775-0313

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

December 15, 1981

Dear Sir:

Before The Federal Election Commission

In The Matter Of:)

National Conservative)
Political Action)
Committee (NCPAC))

MUR No. _____

COMPLAINT

1) The National Conservative Political Action Committee (NCPAC) has filed monthly reports with the Commission of contributions received.

2) 11CFR Sec. 110.1(c) says; "No person...shall make contributions to any other political committee which in the aggregate exceed \$5,000 in any calendar year."

3) Commission records reveal contributions in excess of the legal limitations to NCPAC by two persons. The April 1981 report by NCPAC shows Mrs. Sophia W. Fischer to have reached the \$5000 aggregate total with a contribution of \$2665 on April 30, 1981. Mrs. Fischer, the reports then reveal, contributed another \$50 to NCPAC during May 1981, according to the monthly report of that period. The August 1981 report by NCPAC shows Mr. Ben T. Shaw to have reached the \$5000 aggregate total with a contribution of \$1606 on August 28, 1981. Mr Shaw, the reports then reveal, contri-

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buted another \$500 to NCPAC on September 14, 1981, according to the monthly report for that period.

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the period of April to September, 1981.

5) Complainant is concerned that additional violations may be found in NCPAC's detailed and lengthy reports if a lengthy study is done. The large number of contributors to NCPAC makes reporting difficult, but also allows committees to obscure excessive contributions simply because of the large amount of information in the reports. Complainant requests that the Commission initiate an audit of NCPAC reports as part of an investigation into the matter described above, to satisfy concerns that there may be additional violations of the legal contribution limitations.

Wherefore, I hereby request that the Commission initiate a compliance matter on this Complaint pursuant to 2USC Sec. 437g and 11CFR Part III.

Respectfully submitted,

COMMITTEE FOR AMERICAN
PRINCIPLES

Date: _____

By: _____
Robert Blaemire, President

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Subscribed by and sworn to before me this _____ day of
_____, 1981.

(SEAL)

Notary Public

My Commission Expires: _____

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1405

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