



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20461

THIS IS THE END OF TUE # 1432

Date Filmed 5/26/82 Camera No. --- 2

Cameraman SPC

FEDERAL ELECTION COMMISSION

12 Day Report

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

William Donald

date

5-13-82

FEC 9-21-77



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

Mr. Don M. Flynn
Southern Hills Tower
2431 East 61st Street
Suite 150
Tulsa, Oklahoma 74105

RE: MUR 1432

Dear Mr. Flynn:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

82040322966



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

Mr. John W. Ramsey, Jr.
Strategic Resources Corporation
One Parker Square
Suite 400
Wichita Falls, Texas 76308

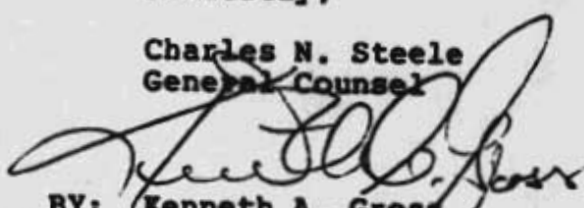
RE: MUR 1432

Dear Mr. Ramsey:

On March 16, 1982, the Commission notified you that it had received a complaint alleging that your wife 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

82040322967



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

Mr. Jaquelin E. Taylor
213 Ross Building
Richmond, Virginia 23219

RE: MUR 1432

Dear Mr. Taylor:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in dark ink, appearing to read "Kenneth A. Gross", is written over the typed name and title of the Associate General Counsel.

BY: Kenneth A. Gross
Associate General Counsel

82040322960



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

**Mr. Arthur P. Cary
2519 Farrington Street
Dallas, Texas 75207**

RE: MUR 1432

Dear Mr. Cary:

On March 16, 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 thirty days.

Sincerely,

**Charles N. Steele
General Counsel**

[Signature]
**BY: Kenneth A. Gross
Associate General Counsel**

32040322969



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

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

RE: MUR 1432

Dear Mr. Blaemire:

The Federal Election Commission, on April 27, 1982, found reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 441a, by accepting excessive contributions from Mr. A.P. Cary and Mr. Jaquelin Taylor, but voted to terminate its inquiry in connection with the complaint which you filed on March 8, 1982. 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 Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

82040322970



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1982

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

RE: MUR 1432

Dear Mr. Herge:

On April 27, 1982, the Commission found reason to believe that your client, the 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 acceptance of contributions from Jaquelin E. Taylor and A.P. Cary. 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 thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten 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 Susan Donaldson at (202) 523-4057.

Sincerely,

Frank P. Reiche

Frank P. Reiche
Chairman for the
Federal Election Commission

32040322971



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Don M. Flynn
Southern Hills Tower
2431 East 61st Street
Suite 150
Tulsa, Oklahoma 74105

RE: MUR 1432

Dear Mr. Flynn:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

82040322972

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4/2/82



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. John W. Ramsey, Jr.
Strategic Resources Corporation
One Parker Square
Suite 400
Wichita Falls, Texas 76308

RE: MUR 1432

Dear Mr. Ramsey:

On March 16, 1982, the Commission notified you that it had received a complaint alleging that your wife 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

82040322973

70
4/1/82



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Jaquelin E. Taylor
213 Ross Building
Richmond, Virginia 23219

RE: MUR 1432

Dear Mr. Taylor:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

82040322974

SD
4/29/82



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Arthur P. Cary
2519 Farrington Street
Dallas, Texas 75207

RE: MUR 1432

Dear Mr. Cary:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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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 1432

Dear Mr. Blaemire:

The Federal Election Commission, on April , 1982, found reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 441a, by accepting excessive contributions from Mr. A.P. Cary and Mr. Jaquelin Taylor, but voted to terminate its inquiry in connection with the complaint which you filed on March 8, 1982. 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 Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

RD
4/29/82



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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

RE: MUR 1432

Dear Mr. Herge:

On April , 1982, the Commission found reason to believe that your client, the 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 acceptance of contributions from Jaquelin E. Taylor and A.P. Cary. 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 thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten 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 Susan Donaldson at (202) 523-4057.

Sincerely,

82040322977

to
4-29-82

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
National Conservative Political)
Action Committee (NCPAC),)
Mr. Don Flynn, Ms. Nancy A.)
Ramsey, Mr. A. P. Cary,)
Mr. Arthur Cary,)
Mr. Jaquelin E. Taylor)

MUR 1432

CERTIFICATION

I, Marjorie W. Emons, Secretary of the Federal Election Commission, do hereby certify that on April 27, 1982, the Commission decided in a vote of 5-0 to take the following actions with regard to MUR 1432:

1. Find reason to believe that NCPAC accepted excessive contributions from A. P. Cary and Jaquelin E. Taylor. Take no further action in this matter.
2. Take no further action against Mr. Don Flynn, Ms. Nancy A. Ramsey, A. P. Cary, and Jaquelin E. Taylor.

Commissioners Aikens, Harris, McDonald, McGarry, and Reiche voted affirmatively. Commissioner Elliott did not cast a vote.

Attest:

4-27-82

Date

Marjorie W. Emons

Marjorie W. Emons
Secretary of the Commission

Received in the Office of the Commission Secretary: 4-23-82; 11:09
Circulated to the Commission: 4-23-82; 2:00

32040322978

April 23, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1432

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

Attachment

cc: Donaldson

32040322979

● **SENSITIVE** ●

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 4-23-82

MUR No. 1432
DATE COMPLAINT RECEIVED
OGC 3/9/82
DATE OF NOTIFICATION TO
RESPONDENT 3/16/82
STAFF MEMBER Susan Donaldson

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

RESPONDENT'S NAME: National Conservative Political Action
Committee (NCPAC), Mr. Don Flynn,
Ms. Nancy A. Ramsey, Mr. A.P. Cary,
Mr. Arthur Cary, Mr. Jaquelin E. Taylors

RELEVANT STATUTE: 2 U.S.C. § 441a

INTERNAL REPORTS CHECKED: NCPAC

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

A complaint filed by Robert Blaemire, President of the Committee for American Principles, alleges that several individuals may have contributed in excess of \$5,000 to NCPAC during 1980 in violation of 2 U.S.C. § 441a(a)(1)(C). 2 U.S.C. § 441a(f) prohibits a political committee from accepting any contribution from an individual in excess of \$5,000.

FACTUAL AND LEGAL ANALYSIS

1. The complainant states that the September, 1980 and October, 1980 reports filed by NCPAC show that Don Flynn contributed \$5,700 to NCPAC during 1980. Mr. Flynn responded to the Commission's notification and enclosed copies of his and his

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

wife's checks to NCPAC which reveal that he contributed \$2,700 to NCPAC and his wife contributed \$5,000 to NCPAC. NCPAC responded to the Commission and explained that Mrs. Flynn's contribution was erroneously credited to Mr. Flynn in the data entry process. NCPAC also stated that they clarified this particular matter with RAD in a letter dated January 5, 1982.

2. The complainant states that the September, 1980 report filed by NCPAC shows that Nancy A. Ramsey contributed \$10,000 to NCPAC during 1980. Mr. John Ramsey responded to the Commission and stated that he and his wife, Nancy, contributed \$5,000 each to NCPAC during 1980. NCPAC, in their response, enclosed a copy of a \$5,000 check signed by Mr. Ramsey, and stated that his contribution was erroneously credited to Mrs. Ramsey in the data entry process.

3. The complainant states that four monthly reports in 1980 show that Mr. Jaquelin E. Taylor contributed \$6,500 to NCPAC in 1980. Mr. Taylor's response to the Commission states that through an oversight, he contributed \$5,500 to NCPAC during 1980; however, NCPAC refunded \$500 to Mr. Taylor on January 12, 1982. He also stated that he had not contributed \$1,000 to NCPAC during March, 1980, as alleged in the complaint and as the G Index reveals. NCPAC explained that, in error, two contributor files had been created for Jaquelin E. Taylor which resulted in the acceptance of the excessive \$500 contribution. NCPAC also stated that a search of their records reveal no March 1980 contribution from Mr. Taylor. It appears that the \$1,000 contribution from

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Mr. Taylor in March, 1980, which appears on the G Index, is incorrect.

4. The complainant states that A.P. Cary and Arthur Cary appear to be the same person and if that proves to be correct, he contributed \$5,250 to NCPAC during 1980. Upon notification by the Commission, NCPAC has determined that A.P. Cary and Arthur Cary are the same person and \$250 was refunded to Mr. Cary on March 18, 1982.

Based on the information outlined above, it appears that although NCPAC accepted two excessive contributions in violation of 2 U.S.C. § 441a, the contributions were refunded, and the Committee does maintain a program to assure compliance with the contribution limitations in the Act. Therefore, it is recommended that no further action be taken in this matter.

RECOMMENDATIONS

1. Find reason to believe that NCPAC accepted excessive contributions from A.P. Cary and Jaquelin E. Taylor. Take no further action in this matter.
2. Take no further action against Mr. Don Flynn, Ms. Nancy A. Ramsey, A.P. Cary, and Jaquelin E. Taylor.

82040322982

3. Approve proposed letters.
4. Close the file.

Charles N. Steele
General Counsel

April 23, 1912
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Complaint
2. Response from NCPAC
3. Response from Flynn
4. Response from Ramsey
5. Response from Taylor
6. Proposed Letters (6)

3 2 0 4 0 3 2 2 9 8 3

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

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 \$5000 in any calendar year."

3) Commission records reveal contributions in excess of the legal limitations to NCPAC by at least three persons. The September, 1980 and October, 1980 reports show that Don Flynn gave in excess of \$5000 to NCPAC. The September, 1980 report shows that Nancy A. Ramsey gave in excess of \$5000 to NCPAC. Four monthly reports in 1980 show, in the aggregate, that Jaquelin E. Taylor gave in excess of \$5000 to NCPAC. Furthermore, the May, 1980 and October, 1980 reports show contributions by A.P. Cary and Arthur Cary, respectively, who appear to be one and the same person. If the two Cary names

prove to be one person, Mr. Cary also gave in excess of \$5000 to NCPAC in 1980. (SEE Exhibits)

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the 1980 reporting periods.

5) Complainant is concerned, by lengthy analysis of the voluminous NCPAC reports and subsequent, numerous requests for additional information, that further violations may be found. Complainant requests the Commission initiate an audit of NCPAC reports to satisfy these concerns and requests that the Commission, upon finding this Complaint to be substantiated, cite NCPAC and fine NCPAC officers sufficiently to compel future compliance with all legal reporting requirements.

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: 3/8/82

Subscribed by and sworn to before me this 8th day of
March, 1982.

(Seal)

My Commission Expires: February 14, 1984
My Commission Expires: _____

Notary Public

Janet G. Meizer

(2)

32040322985

SCHEDULE A

PERIOD 09/01/80 - 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	ACCR. RECEIPT AMT YTD. THIS PERIOD
09/19/80	JOHN R AREND CORPORATE PLACE STE 1104 5800 E SKELLY DR TULSA OK 74135		3100.00 : 3000.00
09/26/80	MRS ANN STINE 5309 S JOPLIN TULSA OK 74135	CONSULTING ENGINEER	500.00- 500.00
09/19/80	DON M FLYNN 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5700.00 5000.00
09/26/80	D H GALLEMORE 9920 SO YALE TULSA OK 74136	DEVELOPER	5000.00 5000.00
09/30/80	MRS SARAH M HAMMOND 3211 E 73RD ST TULSA OK 74136		250.00 250.00
09/30/80	PHILIP TABER 6218 LEWIS AVENUE, SUITE TULSA OK 74136		225.00 125.00
09/26/80	JACK D CARTER 4070 ONE WILLIAMS CENTER TULSA OK 74172	CONTROLLER FLYNN ENERGY CORP	1000.00 1000.00
09/19/80	J R ORWIG RT 3 SHANGRALA CHATEAU APTON OK 74331		2500.00 2500.00
09/18/80	DONALD L SMITH P.O. BOX 246 HENRYETTA OK 74437	OIL DEALER SELF-EMPLOYED	406.00 50.00
09/22/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED	600.00 500.00

SCHEDULE A

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

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	AGGR. RECEIPT AMT YTD. THIS PERIOD
10/31/80	DOM M FLYNN * 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5000.00 2000.00
10/20/80	D PILLOW 5524 EAST 62ND STREET TULSA OK 74136	PHYSICIAN EMERGENCY CARE INCORPORATED	300.00 100.00
10/31/80	PHILIP TABER 6218 LEWIS AVENUE, SUITE TULSA OK 74136	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	275.00 50.00
10/16/80	C W SELLERS PO BOX 1122 HENRYETTA OK 74437	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00 500.00
10/27/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED INFO REQUESTED, NOT RECD	700.00 100.00
10/28/80	JACK RAHM BOX 205 ADA OK 74820	OIL INDUSTRY INDIANA OIL & GAS	850.00 450.00
11/03/80	THELMA M COKER RURAL ROUTE 1, BOX 255-B SEMINOLE OK 74868	DP OPERATOR TINKER AIR FORCE BASE	275.00 200.00
11/24/80	EARL A DAVIS BOX 497 NEWCKA OK 74694	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	225.00 100.00
10/31/80	O G HAHN, JP ROUTE 2, BOX 367 MC KINNEY TX 75069	ACCOUNTANT WEIGHT TITUS AGENCY	315.00 50.00
10/23/80	PETER H FRANK 1120 PIONEER FLAND TX 75074	TECHNICIAN ROCKWELL	350.00 100.00

SCHEDULE A

PERIOD 09/01/80 - 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	AGGR. RECEIPT AMT YTD. THIS PERIOD
09/23/80	NANCY A RAMSEY 3510 CRANBROOK WICHITA FALLS TX 76308		10000.00 9000.00
09/15/80	C B HAZEL 101 MARSTON RANGER TX 76470	OIL PRODUCER RANGER TX	250.00 250.00
09/19/80	BILL PFLUGER 2657 VISTA DEL ARROYO SAN ANGELO TX 76901	RANCHER	500.00 500.00
09/23/80	I A BIRD SANCO ROUTE ROBERT LEE TX 76945	RETIRED SAME	450.00 100.00
09/12/80	MRS JESSE CARGILE SANKO ROUTE ROBERT LEE TX 76945	RANCHING BAR X RANCH	500.00 500.00
09/24/80	T G ANDERSON 936 MAIN BLDG HOUSTON TX 77002	GEOLOGIST	200.00 200.00
09/03/80	REX G BAKER 1100 MILAM BUILDING, STE HOUSTON TX 77002	OWNER SELF-EMPLOYED	270.00 25.00
09/24/80	JAMES BUTLER 6349 BROMPTON HOUSTON TX 77005	PHYSICIAN HOUSTON, TX	320.00 100.00
09/15/80	MRS HARRIS MASTERSON, III 1406 KIRBY DRIVE HOUSTON TX 77019	HOUSEWIFE	200.00 200.00
09/29/80	C A MUELLER 4545 POST OAK PLACE DRIV HOUSTON TX 77027	OFFICE WORKER SAME	760.00 100.00

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FEDERAL ELECTION COMMISSION

DATE 17JUL8

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)
SECTION I - INDIVIDUALS

PAGE

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
CARPENTER, WILLIAM X JR NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2893 #453747 CONTRIBUTION	200 EAST PALMETTO PARK ROAD	BOCA RATON RETIRED	FL 33580	28AUG79 PRIMARY SEPTEMBER MONTHLY	1,000
CARTER, F E NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3644 #435656 CONTRIBUTION	7405 FAIRFAX RD	BETHESDA	MD 20014	7AUG80 PRIMARY SEPTEMBER MONTHLY	256 AMENDMENT
CARTER, HARRIETT NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3495 #432570 CONTRIBUTION	SKY VIEW	CROTON-ON-HUDSON	NY 10520	24SEP80 PRIMARY OCTOBER MONTHLY	545
CARTER, JACK D NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3533 #433510 CONTRIBUTION	4070 ONE WILLIAMS CENTER	TULSA CONTROLLER	OK 74172	26SEP80 PRIMARY OCTOBER MONTHLY	1,000
CARY, A D NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2265 #402733 CONTRIBUTION	DRAWER AC	HUTCHINS ENGINEER	TX 75205	24APR80 PRIMARY MAY MONTHLY	250
CARY, ARTHUR NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3535 #433517 CONTRIBUTION	2519 FARRINGTON ST	DALLAS	TX 75207	2SEP80 PRIMARY OCTOBER MONTHLY	5,000
CARY, ARTHUR MN NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 79FEC/129/1636 #041018 CONTRIBUTION	2519 FARRINGTON STREET	DALLAS ENGINEER.	TX 75207	10MAY79 PRIMARY JUNE MONTHLY	5,000
CARY, ARTHUR MRS NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2907 #456537 CONTRIBUTION	3118 PERRYTON DRIVE	DALLAS	TX 75224	13AUG79 PRIMARY SEPTEMBER MONTHLY	5,000 AMENDMENT
CARY, ARTHUR MRS NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/174/0862 #460970 CONTRIBUTION		DALLAS	TX 75224	9OCT80 PRIMARY PRE-GENERAL	5,000 AMENDMENT

TABERY, FRED J
443 GOULD AVENUE
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/171/3548 1433563 CONTRIBUTION

TADLOCK, FRED A JR
PO BOX 1380
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/122/1196 1030059 CONTRIBUTION REF TO INDIVIDUAL

TANNER, EDWARD A JR
2000 COMMERCE TOWER
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4488 1392691 CONTRIBUTION

TATE, H C MRS
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/141/0219 1139495 CONTRIBUTION

TAYLOR, EARL W JR
FAIR HILL FARMS ROAD
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4517 1390968 CONTRIBUTION

TAYLOR, EVELYN MRS
3459 BINKLEY STREET
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/129/1640 1121050 CONTRIBUTION

TAYLOR, JAQUELIN E
212 ROSS BLDG
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/149/2858 1261171 CONTRIBUTION

TAYLOR, JAQUELIN E
213 ROSS BUILDING EIGHTH & MAIN ST
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/164/2197 1396213 CONTRIBUTION

TAYLOR, JAQUELIN E
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/185/3015 1523477 CONTRIBUTION

TAYLOR, JAQUELIN E
213 ROSS BUILDING
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4518 1390977 CONTRIBUTION

TAYLOR, JAQUELIN E
212 ROSS BUILDING
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/127/4679 1034439 CONTRIBUTION

TAYLOR, JOY A MRS
2930 KENT DRIVE
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/171/3531 1442702 CONTRIBUTION

OCTOBER MONTHLY

HOUSTON	TX 77001 26FEB79 PRIMARY MARCH MONTHLY	75-
KANSASCITY CONSULTANT	MO 64199 30DEC79 PRIMARY YEAR-END	300 AMENDMENT
BLUE HILL REQUESTED	ME 04614 12OCT79 PRIMARY NOVEMBER MONTHLY	400
SEWICKLEY	PA 15143 4JAN80 PRIMARY FEBRUARY MONTHLY	250 AMENDMENT
DALLAS SELF-EMPLOYED	TX 75205 1MAY79 PRIMARY JUNE MONTHLY	150
RICHMOND	VA 23219 30MAR80 PRIMARY MAY MONTHLY	1,000 AMENDMENT
RICHMOND	VA 23219 11MAR80 PRIMARY APRIL MONTHLY	4,500 AMENDMENT
RICHMOND	VA 23219 29OCT80 GENERAL POST-GENERAL	500 AMENDMENT
RICHMOND	VA 23219 21JAN80 PRIMARY FEBRUARY MONTHLY	500 AMENDMENT
RICHMOND REQUESTED	VA 23219 30MAR79 PRIMARY MAY MONTHLY	1,000
OKLAHOMA CTY	OK 75120 22SEP80 PRIMARY OCTOBER MONTHLY	510

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1000

8300 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22108

(703) 831-1000

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 BIVERTSEN

82 MAR 29 P1:49

Donaldson

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 831-1000
TELE: 710-831-0888
CABLE: SEDAMHERGE

March 26, 1982

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

Attention: Susan Donaldson

Re: MUR 1432

Dear Mr. Gross:

This letter is written in response to your letter to National Conservative Political Action Committee, dated March 16, 1982, with which was enclosed a copy of a complaint filed by Committee for American Principles. In the complaint, it is alleged that four individuals, Don M. Flynn, Nancy A. Ramsey, Jaquelin E. Taylor and Arthur P. Cary, made contributions to National Conservative Political Action Committee in 1980 in excess of the limitation contained in 2 U.S.C. 441 a(a) (1) (c). This matter has been numbered MUR 1432.

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

The subject complaint is similar in substance to a complaint filed by Committee for American Principles on December 16, 1981, in which it was alleged that two individuals made contributions to National Conservative Political Action Committee in 1981 in excess of the limitation contained in 2 U.S.C. 441 a(a) (1) (c). That matter, numbered MUR 1405, was responded to by counsel for National Conservative Political Action Committee by letter dated January 7, 1982. That letter described, in some detail, the compliance procedure adopted and followed by National Conservative Political Action Committee to assure compliance with

12 MAR 29 P5:14

GENERAL
FBI

3 2 0 4 0 3 2 2 9 9 1

8

Kenneth A. Gross, Esq.
March 26, 1982
Page 2

the contribution limitations set forth in 2 U.S.C. 441 a(a)(1)(c). That procedure, together with the factual response set forth below, amply demonstrate that no action should be taken on the basis of the instant complaint.

With reference to the allegation that four individuals made contributions to National Conservative Political Action Committee in 1980 in excess of the limitation contained in 2 U.S.C. 441 a(a)(1)(c), the facts are, as follows:

Don M. Flynn

Committee for American Principles alleged that Don M. Flynn contributed \$5,000.00 to National Conservative Political Action Committee in September, 1980 and an additional sum of \$2,000.00 in October, 1980.

In fact, in 1980, Mr. Flynn contributed an aggregate of \$2,700.00 and Mrs. Flynn contributed \$5,000.00 to National Conservative Political Action Committee. Enclosed herewith is a copy of a letter from Mr. Flynn to National Conservative Political Action Committee, dated January 13, 1982, together with copies of the checks Mr. or Mrs. Flynn wrote in favor of National Conservative Political Action Committee in 1980, which confirm the foregoing allocation.

It will be noted that the title of Mr. and Mrs. Flynn's checking account is "Mr. or Mrs. Don M. Flynn" and that Mrs. Flynn signs her checks as "Mrs. Don M. Flynn". By the time Mrs. Flynn made her contribution, the computer, which National Conservative Political Action Committee utilizes to record and aggregate all its contributions, had a contributor file for Don M. Flynn at 6511 South Indianapolis, Tulsa, Oklahoma. When Mrs. Flynn's check was processed, an error was made in the data entry process and Mr. Flynn was erroneously credited with the contribution because of the identity of the title of the account and because of the way in which Mrs. Flynn signs her name. By letter addressed to the Reports Analysis Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee clarified the record with respect to the contributions made by Mr. Flynn and Mrs. Flynn in 1980.

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(9)

Nancy A. Ramsey

Committee for American Principles alleged that Nancy A. Ramsey contributed in excess of \$5,000.00 to National Conservative Political Action Committee in 1980.

In fact, in 1980, Nancy A. Ramsey contributed an aggregate of \$5,000.00 and, her husband, John W. Ramsey, Jr., contributed \$5,000.00 to National Conservative Political Action Committee. Enclosed herewith is a copy of a check drawn on the account of John W. Jr. or Nancy A. Ramsey to the order of National Conservative Political Action Committee and in the amount of \$5,000.00, which was signed by John W. Ramsey, Jr. As in the case of Mr. and Mrs. Flynn, Mr. Ramsey's contribution was erroneously credited to Mrs. Ramsey in the data entry process.

By letter addressed to the Reports Analysis Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee corrected the record with respect to the contributions made by Mr. Ramsey and Mrs. Ramsey in 1980.

Jaquelin E. Taylor

Committee for American Principles alleged that Jaquelin E. Taylor contributed in excess of \$5,000.00 to National Conservative Political Action Committee in 1980. In support of that allegation, there was submitted with the complaint a copy of a Selected List of Receipts and Expenditures prepared by the Federal Election Commission. That List appears to reflect the following contribution history for Jaquelin E. Taylor:

<u>Contributor</u>	<u>Date and Report</u>	<u>Amount</u>
Jaquelin E. Taylor	30 Mar. 80 May Monthly	\$ 1,000
Jaquelin E. Taylor	11 Mar. 80 April Monthly	4,500
Jaquelin E. Taylor	29 Oct. 80 Post-General	500

Jaquelin E. Taylor	21 Jan. 80 February Monthly	500
Jaquelin E. Taylor	30 Mar. 79 May Monthly	1,000

It is submitted that the foregoing listing is in error.

In fact, in 1980, Jaquelin E. Taylor contributed to National Conservative Political Action Committee \$500.00 in January; \$4,500.00 in March; and, \$500.00 in October. In conducting one of its periodic, detailed analyses of contribution histories, National Conservative Political Action Committee discovered that the contribution information for one of the \$500.00 contributions had been keyed in incorrectly, resulting in two contributor files for Jaquelin E. Taylor. National Conservative Political Action Committee thereupon refunded \$500.00 to Jaquelin E. Taylor. Enclosed herewith is a copy of the refund check and of the letter of transmittal to Jaquelin E. Taylor.

By letter addressed to the Reports Analyses Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee reported the refund of the \$500.00 and recorded the disbursement as a refund in its February Monthly Report.

With reference to the \$1,000.00 contribution reported in the Selected List of Receipts and Expenditures as having been made by Jaquelin E. Taylor in March, 1980, the report is in error. National Conservative Political Action Committee has examined its contributor files and reports for the period from March 1, 1980 through May 31, 1980 and was not able to find any record or report of that contribution. Furthermore, counsel has been advised by Mrs. Taylor that Mr. and Mrs. Taylor have examined their records and were not able to find any record of that contribution. Thus, National Conservative Political Action Committee denies that it received a contribution of \$1,000.00 from Jaquelin E. Taylor in March, 1980 as reported in the Selected List of Receipts and Expenditures prepared by the Federal Election Commission. It appears that the

32040322994

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Kenneth A. Gross, Esq.
March 26, 1982
Page 5

Federal Election Commission also suffers an occasional error in data entry.^{*/}

Arthur P. Cary

Committee for American Principles alleged that contributions to National Conservative Political Action Committee by A.P. Cary and by Arthur Cary may have been made by the same person. If A.P. Cary and Arthur Cary were the same person, then Mr. Cary contributed an aggregate of \$5,250.00 to National Conservative Political Action Committee in 1980.

An examination of the record will reveal that A.P. Cary, Drawer AC, Hutchins, Texas 75205, contributed \$250.00 to National Conservative Political Action Committee in April, 1980; and, that Arthur Cary, 2519 Farrington Street, Dallas, Texas 75207, contributed \$5,000.00 to National Conservative Political Action Committee in September, 1980. Because of the differences in identification, A.P. Cary and Arthur Cary were given separate alpha-numeric codes in the computer, giving the appearance of two separate contributors.

As a consequence of the allegation made in the complaint, National Conservative Political Action Committee communicated with Mr. Cary and learned that A.P. Cary and Arthur Cary is the same individual. Mr. Cary maintains two businesses in two cities, hence the separate addresses. Upon learning that information, National Conservative Political Action Committee refunded \$250.00 to Mr. Cary. A copy of the refund check and a copy of the letter of transmittal are enclosed.

^{*/} Note the similarity between the March 30, 1980 and March 30, 1979 entries for J.E. Taylor in the Selected List of Receipts and Expenditures. (The address being listed as 212, instead of 213; the date of receipt being Mar. 30; the amount being the same; and, both being reported in the May Monthly Report.) The reported March 30, 1979 entry, which is accurate, may have been erroneously duplicated.

12

In conclusion, National Conservative Political Action Committee has demonstrated:

(1) That, in fact, Mr. Flynn contributed \$2,700.00 and Mrs. Flynn contributed \$5,000.00 to National Conservative Political Action Committee in 1980.

(2) That, in fact, Mrs. Ramsey contributed \$5,000.00 and Mr. Ramsey contributed \$5,000.00 to National Conservative Political Action Committee in 1980.

(3) That, in fact, Jaquelin E. Taylor contributed \$5,500.00 to National Conservative Political Action Committee in 1980, \$500.00 of which was keyed in incorrectly in the data entry process. That error was discovered by National Conservative Political Action Committee as a result of its internal compliance review process and the excess amount was promptly refunded.

(4) That, in fact, Jaquelin E. Taylor did not make, and National Conservative Political Action Committee did not receive, the additional \$1,000.00 contribution attributed to Jaquelin E. Taylor for 1980 in the Selected List of Receipts and Expenditures prepared by the Federal Election Commission.

(5) That, in fact, National Conservative Political Action Committee received in 1980, \$250.00 from A.P. Cary, Drawer AC, Hutchins, Texas 75205; and \$5,000.00 from Arthur Cary, 2519 Farrington Street, Dallas, Texas 75207, it being reasonable to assume that those contributions had been made by two distinct individuals. Upon learning that the contributions came from a single source, the excess amount was promptly refunded.

It is evident from the foregoing that no additional action is justified or warranted in this matter. The record is clear that National Conservative Political Action Committee maintains a rigorous program to assure compliance with the contribution limitations in the Act. Isolated situations, such as those under review in this matter and in MUR 1405, are corrected promptly within the framework prescribed in 11 CFR 103.3(b). It is apparent that Committee for American Principles has made an exhaustive analysis of the contributions made to National Conservative Political Action Committee in 1980 and 1981, but has been unable to substantiate an allegation worthy of a compliance proceeding. As a result, no further action should be taken on this matter and the file should be closed.

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13

Kenneth A. Gross
March 26, 1982
Page 7

We appreciate this opportunity to respond and are willing to provide such other documentation as may be reasonably required to dispose of this matter.

Sincerely yours,



J. Curtis Herge
Counsel to National
Conservative Political
Action Committee

Enclosures

82040322997

(14)

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: *J. Curtis Heger*

ADDRESS: *7300 Greenbush Dr Suite 1100 Malvern, VA 22102*

TELEPHONE: *(703) 821-1000*

RE: MUR 1432

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

3/17/82
Date

BY:

Signature

Leif E. Jern - Treasurer

NAME: *National Conservative Political Action Committee*

ADDRESS: *1500 Wilson Blvd #513 Arlington, VA 22209*

HOME PHONE:

BUSINESS PHONE: *(703) 522-2800*

Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 81st Street
Tulsa, Oklahoma 74105

January 13, 1982

National Conservative Political Action Committee
1500 Wilson Blvd. - #513
Arlington, VA 22209

Attention: Mr. Leif Noren

Re: 1980 Contributions

Gentlemen:

Attached are copies of checks as verification of contributions to the NCPAC by myself and Mrs. Flynn during the year 1980.

Please note that contributions by myself equal \$2,700; those by Mrs. Flynn, \$5000.00.

Yours very truly,

Don M. Flynn

Don M. Flynn

DMF:bl
Attachments

16

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 743-9558
TULSA, OKLA. 74136

Pol. Action Committee, etc. 4409
2-22-80 88-3 1039

PAY TO THE
ORDER OF

NCPAC

200 \$

Two Hundred & No/100

DOLLARS

BANK OF OKLAHOMA

P.O. Box 2300
Tulsa, Oklahoma 74102

Don M. Flynn

⑆103900036⑆ 486927227 4409 ⑆000020000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 743-9558
TULSA, OKLA. 74136

4553

6/25 1980 88-3 1039

PAY TO THE
ORDER OF

NCPAC

500 \$

Five Hundred & No/100

DOLLARS

BANK OF OKLAHOMA

P.O. Box 2300
Tulsa, Oklahoma 74102

Don M. Flynn

⑆103900036⑆ 486927227 4553 ⑆0000050000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 743-9558
TULSA, OKLA. 74136

4614

8-15 1980 88-3 1039

PAY TO THE
ORDER OF

NCPAC - Independent Expenditures - Reagan's 1st term

One Thousand & No/100

DOLLARS

BANK OF OKLAHOMA

P.O. Box 2300
Tulsa, Oklahoma 74102

Don M. Flynn

⑆103900036⑆ 486927227 4614 ⑆0000100000⑆

82040323000

17

WICHITA FALLS, TEXAS 76301
WICHITA FALLS, TEXAS 76301

8-15-80

PAY TO THE ORDER OF Political Conservative Party \$ 5000.00
Five Thousand and no/100

FIRST WICHITA
NATIONAL BANK
WICHITA FALLS, TEXAS

John W. Ramsey

⑆111901292⑆0396 244-5433⑆

⑆0000500000⑆

32040323001

18

National Conservative
Political Action Committee

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

January 5, 1982

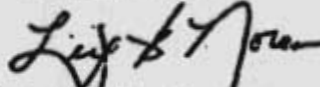
Mrs. Jaqueline E. Taylor
213 Ross Building
Eighth & Main Street
Richmond, VA 23219

Dear Mrs. Taylor:

As per our conversation on December 31, 1981, a recent audit of our contributor information shows that you donated \$500.00 in excess of the \$5,000.00 limit set by the Federal Election Commission. As a result of this, I am enclosing a check to refund the excess amount to you.

Thank you very much for your generosity and continuing support of NCPAC.

Sincerely,



Leif E. Noren
Assistant Treasurer

LEN:ech

Enclosure

RECEIVED

MAR 23 1982

CE DAM & HERGE

19

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

1500 WILSON BLVD., No. 513
ARLINGTON, VA. 22209

1209

Jan. 6 19 82

SS-320 038
SMD

Pay

DOLLARS \$500.00

Jaqueline E. Taylor
21 Ross Building
Eighth & Main Street
Richmond, Va. 23219


State National Bank
ROCKVILLE, MARYLAND 20852

#001209# *055003201# #0007048025# *Left* #0000050000#

82040323003

FOR DEPOSIT ONLY:-

A/C Jacqueline E. Taylor 5983

NATIONAL ACTION
COMMITTEE

JAN 18 82

(20)

National Conservative
Political Action Committee

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

March 18, 1982

Mr. Arthur P. Cary
2519 Farrington St.
Dallas, TX 75207

Dear Mr. Cary:

A recent review of our contributor information has revealed that you contributed \$5,250 to our committee in 1980. Federal law prohibits committees such as NCPAC from accepting more than \$5,000 from an individual in a calendar year. As a result of this discovery, I am refunding \$250 to you.

The computer service that NCPAC utilizes is designed to "flag" those individuals who contribute more than \$5,000. You apparently sent two contributions in 1980. One was sent in as:

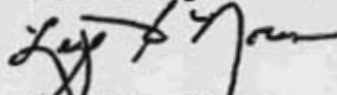
Arthur Cary
2519 Farrington St.
Dallas, TX 75207
(Sept. '80 for \$5,000)

A.P. Cary
Drawer AC
Hutchins, TX 75205
(May '80 for \$250)

As a result, you appeared on our contributor file as two separate contributors.

You will find a check for \$250 enclosed. I would like to take this opportunity to personally thank you for the support you have shown NCPAC in the past years.

Sincerely,


Deif E. Noren
Treasurer

CARB-OUT

DELUXE CHECK REATERS, INC.
BUILT TOUGH

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
1500 WILSON BLVD., No. 513
ARLINGTON, VA. 22209

1355

March 18 1982

66-320038
660 038

PAY N. C. P. A. C. 250 DOLLARS 00 CTS DOLLARS \$ 250.00

TO THE
ORDER
OF

Mr. Arthur Cary
2519 Farrington St.
Dallas, Tx. 75207


State National Bank
ROCKVILLE, MARYLAND 20852

⑆001355⑆ ⑆055003201⑆ ⑆0007048025⑆

Eleanor C. Hargreaves
Lutz & John

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
ARLINGTON, VA.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT RETURNED.

DELUXE - FORM WVC-S V-2

DATE	DESCRIPTION	AMOUNT
3/18	Return of Contribution in excess of \$5,000.00 Limit 400D	\$250.00

22

201056

IVED

62496

Donaldson

82 APR 6 AID: 03

Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 61st Street
Tulsa, Oklahoma 74105

March 30, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Commission
Washington, D.C. 20463

Attention: Mr. Kenneth A. Gross
Associate General Counsel

Re: MUR 1432

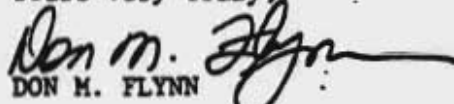
Gentlemen:

In response to your letter of 3/16/82 with reference to complaint filed alleging violation of FEC Act of 1971, etc., I submit the following in refuting such claim.

In 1980, contributions made to the National Conservative Political Action Committee (NCPAC) by myself, Don M. Flynn, totalled \$2,700.00 as check copies will substantiate. Contribution made by my wife, Mrs. Don M. (Patricia) Flynn, was in the amount of \$5,000.00, of her independent funds, copy of her check also submitted. As you will see by copy of letter attached to the NCPAC group on January 13, 1982, verification of these contributions were submitted to them as a cross check for their records.

I submit that I, Don M. Flynn, am in compliance with the Federal Election Campaign Act of 1971, as is my wife, Patricia Flynn, and refute all claims filed by the Committee for American Principles and/or any other persons and/or agencies making such accusations as to violations of the FEC Act of 1971 or any wrong doings in regard to contributions to any political organization and/or individual.

Yours very truly,


DON M. FLYNN

DMF:bl

cc: The National Conservative Political Action Committee
Attention: Mr. Terry Dolan
1500 Wilson Blvd. - #513
Arlington, VA 22209

23

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

20 JUL 9 1980

Committee

2-22-80

PAY TO THE ORDER OF NCPAC \$200.00

Two Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Don M. Flynn

⑆103900036⑆ 486927227 4409 ⑆000020000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4553

6/25-80

PAY TO THE ORDER OF NCPAC \$500.00

Five Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Don M. Flynn

⑆103900036⑆ 486927227 4553 ⑆000050000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4614

8-15-80

PAY TO THE ORDER OF NCPAC - Independent Expenditures - Rogers' Fund

One Thousand & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Don M. Flynn

⑆103900036⑆ 486927227 4614 ⑆000100000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4694

10-24-80

PAY TO THE ORDER OF N.C.P.A.C. \$1000.00

One Thousand & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Don M. Flynn

⑆103900036⑆ 486927227 4694 ⑆000100000⑆

RC 86-3

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

19284252783 09/24/80

9-17-80

PAY TO THE ORDER OF N.C.P.A.C. \$5000.00

Five Thousand and No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

Mr. Don M. Flynn

⑆103900036⑆ 486927227 4655 ⑆0000⑆

(24)

201046 Gcc#74E2
62 APR 5 All: 09
Donaldson

STRATEGIC RESOURCES CORPORATION

ONE PARKER SQUARE, SUITE 400
WICHITA FALLS, TEXAS 76308
817-822-8635

March 31, 1982

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

Re: MUR 1432
Nancy A. Ramsey

Dear Mr. Steele:

My wife, Nancy A. Ramsey, is in the hospital and unable at this time to respond to your letter of March 16, 1982. However, I understand tha Mr. Curt Herge, representing the National Conservative Political Action Committee, has prepared a letter to you explaining the confusion. I would also like to point out that my wife and I have not made any illegal contributions to NCPAC. Nancy and I each gave \$5,000.00 or less to NCPAC. Perhaps the confusion arose because all checks were written on a joint checking account. Please let me know if you need any further explanation.

Yours truly,

John W. Ramsey, Jr.
John W. Ramsey, Jr.

82040323008
(20)

JAQUELIN E. TAYLOR
210 ROSS BUILDING
RICHMOND, VIRGINIA 23219
March 19, 1982

REC'D
GCC# 7442
82 MAR 29 P 1:40

Donaldson

Federal Election Commission
Washington, D. C. 20463

Attention: Kenneth A. Gross, Associate General Council

Re: MUR 1432; Your letter of 16th March 1982, with enclosures
Gentlemen:

In response to subject material, received in this office via certified mail today, we wish to advise that our records indicate the following contributions to the National Conservative Political Action Committee were made by me through the Virginia National Bank (Richmond) during the calendar year 1980:

Date	Check No.	Amount
1/17	5827	500.00
3/06	5967	4,500.00
10/24	6498	500.00*
		<hr/> 5,500.00
		- 500.00*
1980 Net Contribution		<hr/> \$ 5,000/00

Through an oversight our check #6498 in the amount of \$500.00 was forwarded to the National Conservative Political Action Committee, and upon discovering this excess they returned to us their check in the amount of \$500.00 in order to bring this 1980 contribution to a net amount of \$5,000.00. Their check was deposited to our account on January 12, 1982.

Our records indicate that our check numbered 5177 in the amount of \$1,000.00 was sent to NCPAC on March 29, 1979. However, no check in the amount of \$1,000.00 was sent in March of 1980, or at any other time in that amount during the year 1980.

Sincerely,

Jaquelin E. Taylor
Mr. Jaquelin E. Taylor

emb

26



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 1432

Dear Mr. Blaemire:

The Federal Election Commission, on April , 1982, found reason to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 441a, by accepting excessive contributions from Mr. A.P. Cary and Mr. Jaquelin Taylor, but voted to terminate its inquiry in connection with the complaint which you filed on March 8, 1982. 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 Susan Donaldson, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

RE: MUR 1432

Dear Mr. Herge:

On April , 1982, the Commission found reason to believe that your client, the 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 acceptance of contributions from Jaquelin E. Taylor and A.P. Cary. 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 thirty days. Should you wish to submit any materials to appear on the public record, please do so within ten 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 Susan Donaldson at (202) 523-4057.

Sincerely,

28



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Don M. Flynn
Southern Hills Tower
2431 East 61st Street
Suite 150
Tulsa, Oklahoma 74105

RE: MUR 1432

Dear Mr. Flynn:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

92040323012

29



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. John W. Ramsey, Jr.
Strategic Resources Corporation
One Parker Square
Suite 400
Wichita Falls, Texas 76308

RE: MUR 1432

Dear Mr. Ramsey:

On March 16, 1982, the Commission notified you that it had received a complaint alleging that your wife 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

92040323013

30



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Jaquelin E. Taylor
213 Ross Building
Richmond, Virginia 23219

RE: MUR 1432

Dear Mr. Taylor:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

32040323014



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Arthur P. Cary
2519 Farrington Street
Dallas, Texas 75207

RE: MUR 1432

Dear Mr. Cary:

On March 16, 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 thirty days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

32040323015

201046 604#7483
82 APR 5 11:09
RECEIVED
GENERAL COUNCIL
82 APR 5 13:29

STRATEGIC RESOURCES CORPORATION

ONE PARKER SQUARE, SUITE 400
WICHITA FALLS, TEXAS 76308
817-322-8638

March 31, 1982

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

Re: MUR 1432
Nancy A. Ramsey

Dear Mr. Steele:

3 2 0 4 0 3 2 3 0 1 6

My wife, Nancy A. Ramsey, is in the hospital and unable at this time to respond to your letter of March 16, 1982. However, I understand tha Mr. Curt Herge, representing the National Conservative Political Action Committee, has prepared a letter to you explaining the confusion. I would also like to point out that my wife and I have not made any illegal contributions to NCPAC. Nancy and I each gave \$5,000.00 or less to NCPAC. Perhaps the confusion arose because all checks were written on a joint checking account. Please let me know if you need any further explanation.

Yours truly,

John W. Ramsey, Jr.
John W. Ramsey, Jr.

5204032017

STRATEGIC RESOURCES CORPORATION

ONE PARKER SQUARE, SUITE 400
WICHITA FALLS, TEXAS 76308



82 APR 5



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

201056

RECEIVED

Box # 7496

82 APR 6 410:03

Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 61st Street
Tulsa, Oklahoma 74106

March 30, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Commission
Washington, D.C. 20463

Attention: Mr. Kenneth A. Gross
Associate General Counsel

Re: MUR 1432

Gentlemen:

In response to your letter of 3/16/82 with reference to complaint filed alleging violation of FEC Act of 1971, etc., I submit the following in refuting such claim.

In 1980, contributions made to the National Conservative Political Action Committee (NCPAC) by myself, Don M. Flynn, totalled \$2,700.00 as check copies will substantiate. Contribution made by my wife, Mrs. Don M. (Patricia) Flynn, was in the amount of \$5,000.00, of her independent funds, copy of her check also submitted. As you will see by copy of letter attached to the NCPAC group on January 13, 1982, verification of these contributions were submitted to them as a cross check for their records.

I submit that I, Don M. Flynn, am in compliance with the Federal Election Campaign Act of 1971, as is my wife, Patricia Flynn, and refute all claims filed by the Committee for American Principles and/or any other persons and/or agencies making such accusations as to violations of the FEC Act of 1971 or any wrong doings in regard to contributions to any political organization and/or individual.

Yours very truly,

Don M. Flynn
DON M. FLYNN

DMF:bl

cc: The National Conservative Political Action Committee
Attention: Mr. Terry Dolan
1500 Wilson Blvd. - #513
Arlington, VA 22209

32040323018

2 APR 6

2:52

2 APR 6

2:52

GENERAL COUNSEL

GENERAL COUNSEL

Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 61st Street
Tulsa, Oklahoma 74105

81

January 13, 1982

National Conservative Political Action Committee
1500 Wilson Blvd. - #513
Arlington, VA 22209

Attention: Mr. Leif Noren

Re: 1980 Contributions

Gentlemen:

Attached are copies of checks as verification of contributions to the NCPAC by myself and Mrs. Flynn during the year 1980.

Please note that contributions by myself equal \$2,700; those by Mrs. Flynn, \$5000.00.

Yours very truly,

Don M. Flynn

Don M. Flynn

DMF:bl
Attachments

92040323019

445-9127

3 2 0 4 0 3 2 3

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

J.P. Action Committee, etc. 4409
2-22 1980 \$200.00

PAY TO THE ORDER OF NCPAC

Two Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Don M. Flynn

⑆103900036⑆ 486927227⑆ 4409 ⑆000020000⑆

4553

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

6/25 1980 \$500.00

PAY TO THE ORDER OF NCPAC

Five Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Don M. Flynn

⑆103900036⑆ 486927227⑆ 4553 ⑆000005000⑆

4614

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

8-15 1980

PAY TO THE ORDER OF NCPAC - Independent Expenditures - August 1980

One Thousand & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Don M. Flynn

⑆103900036⑆ 486927227⑆ 4614 ⑆000010000⑆

4694

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

10-24 1980 \$1000.00

PAY TO THE ORDER OF N.C.P.A.C.

One Thousand & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Don M. Flynn

⑆103900036⑆ 486927227⑆ 4694 ⑆000010000⑆

4655

RC 86-3

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

9-17 1980 \$5000.00

PAY TO THE ORDER OF N.C.P.A.C.

Five thousand and No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO Don M. Flynn

⑆103900036⑆ 486927227⑆ 4655 ⑆000050000⑆

1 0 3 2
●
Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 61st Street
Tulsa, Oklahoma 74105



Federal Election Commission
Washington, D.C.

ATTENTION: Mr. Kenneth A. Gross
Associate General Counsel

CERTIFIED

No. 607475

MAIL

RECEIVED

GCC# 7442

82 MAR 29 P 1:40

JAQUELIN E. TAYLOR
218 ROSS BUILDING
RICHMOND, VIRGINIA 23219

March 19, 1982

Federal Election Commission
Washington, D. C. 20463

Attention: Kenneth A. Gross, Associate General Council
Re: MUR 1432; Your letter of 16th March 1982, with enclosures
Gentlemen:

In response to subject material, received in this office via certified mail today, we wish to advise that our records indicate the following contributions to the National Conservative Political Action Committee were made by me through the Virginia National Bank (Richmond) during the calendar year 1980:

Date	Check No.	Amount
1/17	5827	500.00
3/06	5967	4,500.00
10/24	6498	500.00*
		<u>5,500.00</u>
		- 500.00*
1980 Net Contribution		\$ 5,000/00

Through an oversight our check #6498 in the amount of \$500.00 was forwarded to the National Conservative Political Action Committee, and upon discovering this excess they returned to us their check in the amount of \$500.00 in order to bring this 1980 contribution to a net amount of \$5,000.00. Their check was deposited to our account on January 12, 1982.

Our records indicate that our check numbered 5177 in the amount of \$1,000.00 was sent to NCPAC on March 29, 1979. However, no check in the amount of \$1,000.00 was sent in March of 1980, or at any other time in that amount during the year 1980.

Sincerely,

Jaquelin E. Taylor
Mr. Jaquelin E. Taylor

emb

JAQUELIN E. TAYLOR
213 ROSS BUILDING
RICHMOND, VIRGINIA 23219



Federal Election Commission
Washington, D. C. 20463

82 MAR 29 P 1:40

RECORDED

3 2 7 4 0 3 2 3 0

RECEIVED

600#7447

82 MAR 29 P 1:49

SEDAM & HERGE

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 1100

8300 GREENSBORO DRIVE

MOLAN, VIRGINIA 22108

(703) 881-1000

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

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 881-1000
TELEX 710-831-0888
CABLE: SEDAMHERGE

March 26, 1982

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

Attention: Susan Donaldson

Re: MUR 1432

Dear Mr. Gross:

This letter is written in response to your letter to National Conservative Political Action Committee, dated March 16, 1982, with which was enclosed a copy of a complaint filed by Committee for American Principles. In the complaint, it is alleged that four individuals, Don M. Flynn, Nancy A. Ramsey, Jaquelin E. Taylor and Arthur P. Cary, made contributions to National Conservative Political Action Committee in 1980 in excess of the limitation contained in 2 U.S.C. 441 a(a)(1)(c). This matter has been numbered MUR 1432.

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

The subject complaint is similar in substance to a complaint filed by Committee for American Principles on December 16, 1981, in which it was alleged that two individuals made contributions to National Conservative Political Action Committee in 1981 in excess of the limitation contained in 2 U.S.C. 441 a(a)(1)(c). That matter, numbered MUR 1405, was responded to by counsel for National Conservative Political Action Committee by letter dated January 7, 1982. That letter described, in some detail, the compliance procedure adopted and followed by National Conservative Political Action Committee to assure compliance with

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12 MAR 29 P 5:14

Kenneth A. Gross, Esq.
March 26, 1982
Page 2

the contribution limitations set forth in 2 U.S.C. 441 a(a)(1)(c). That procedure, together with the factual response set forth below, amply demonstrate that no action should be taken on the basis of the instant complaint.

With reference to the allegation that four individuals made contributions to National Conservative Political Action Committee in 1980 in excess of the limitation contained in 2 U.S.C. 441 a(a)(1)(c), the facts are, as follows:

Don M. Flynn

Committee for American Principles alleged that Don M. Flynn contributed \$5,000.00 to National Conservative Political Action Committee in September, 1980 and an additional sum of \$2,000.00 in October, 1980.

In fact, in 1980, Mr. Flynn contributed an aggregate of \$2,700.00 and Mrs. Flynn contributed \$5,000.00 to National Conservative Political Action Committee. Enclosed herewith is a copy of a letter from Mr. Flynn to National Conservative Political Action Committee, dated January 13, 1982, together with copies of the checks Mr. or Mrs. Flynn wrote in favor of National Conservative Political Action Committee in 1980, which confirm the foregoing allocation.

It will be noted that the title of Mr. and Mrs. Flynn's checking account is "Mr. or Mrs. Don M. Flynn" and that Mrs. Flynn signs her checks as "Mrs. Don M. Flynn". By the time Mrs. Flynn made her contribution, the computer, which National Conservative Political Action Committee utilizes to record and aggregate all its contributions, had a contributor file for Don M. Flynn at 6511 South Indianapolis, Tulsa, Oklahoma. When Mrs. Flynn's check was processed, an error was made in the data entry process and Mr. Flynn was erroneously credited with the contribution because of the identity of the title of the account and because of the way in which Mrs. Flynn signs her name. By letter addressed to the Reports Analysis Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee clarified the record with respect to the contributions made by Mr. Flynn and Mrs. Flynn in 1980.

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Nancy A. Ramsey

Committee for American Principles alleged that Nancy A. Ramsey contributed in excess of \$5,000.00 to National Conservative Political Action Committee in 1980.

In fact, in 1980, Nancy A. Ramsey contributed an aggregate of \$5,000.00 and, her husband, John W. Ramsey, Jr., contributed \$5,000.00 to National Conservative Political Action Committee. Enclosed herewith is a copy of a check drawn on the account of John W. Jr. or Nancy A. Ramsey to the order of National Conservative Political Action Committee and in the amount of \$5,000.00, which was signed by John W. Ramsey, Jr. As in the case of Mr. and Mrs. Flynn, Mr. Ramsey's contribution was erroneously credited to Mrs. Ramsey in the data entry process.

By letter addressed to the Reports Analysis Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee corrected the record with respect to the contributions made by Mr. Ramsey and Mrs. Ramsey in 1980.

Jaquelin E. Taylor

Committee for American Principles alleged that Jaquelin E. Taylor contributed in excess of \$5,000.00 to National Conservative Political Action Committee in 1980. In support of that allegation, there was submitted with the complaint a copy of a Selected List of Receipts and Expenditures prepared by the Federal Election Commission. That List appears to reflect the following contribution history for Jaquelin E. Taylor:

<u>Contributor</u>	<u>Date and Report</u>	<u>Amount</u>
Jaquelin E. Taylor	30 Mar. 80 May Monthly	\$ 1,000
Jaquelin E. Taylor	11 Mar. 80 April Monthly	4,500
Jaquelin E. Taylor	29 Oct. 80 Post-General	500

Jaquelin E. Taylor	21 Jan. 80 February Monthly	500
Jaquelin E. Taylor	30 Mar. 79 May Monthly	1,000

It is submitted that the foregoing listing is in error.

In fact, in 1980, Jaquelin E. Taylor contributed to National Conservative Political Action Committee \$500.00 in January; \$4,500.00 in March; and, \$500.00 in October. In conducting one of its periodic, detailed analyses of contribution histories, National Conservative Political Action Committee discovered that the contribution information for one of the \$500.00 contributions had been keyed in incorrectly, resulting in two contributor files for Jaquelin E. Taylor. National Conservative Political Action Committee thereupon refunded \$500.00 to Jaquelin E. Taylor. Enclosed herewith is a copy of the refund check and of the letter of transmittal to Jaquelin E. Taylor.

By letter addressed to the Reports Analyses Division of the Federal Election Commission dated January 5, 1982, National Conservative Political Action Committee reported the refund of the \$500.00 and recorded the disbursement as a refund in its February Monthly Report.

With reference to the \$1,000.00 contribution reported in the Selected List of Receipts and Expenditures as having been made by Jaquelin E. Taylor in March, 1980, the report is in error. National Conservative Political Action Committee has examined its contributor files and reports for the period from March 1, 1980 through May 31, 1980 and was not able to find any record or report of that contribution. Furthermore, counsel has been advised by Mrs. Taylor that Mr. and Mrs. Taylor have examined their records and were not able to find any record of that contribution. Thus, National Conservative Political Action Committee denies that it received a contribution of \$1,000.00 from Jaquelin E. Taylor in March, 1980 as reported in the Selected List of Receipts and Expenditures prepared by the Federal Election Commission. It appears that the

82040323027

Kenneth A. Gross, Esq.
March 26, 1982
Page 5

Federal Election Commission also suffers an occasional error in data entry.^{*/}

Arthur P. Cary

Committee for American Principles alleged that contributions to National Conservative Political Action Committee by A.P. Cary and by Arthur Cary may have been made by the same person. If A.P. Cary and Arthur Cary were the same person, then Mr. Cary contributed an aggregate of \$5,250.00 to National Conservative Political Action Committee in 1980.

An examination of the record will reveal that A.P. Cary, Drawer AC, Hutchins, Texas 75205, contributed \$250.00 to National Conservative Political Action Committee in April, 1980; and, that Arthur Cary, 2519 Farrington Street, Dallas, Texas 75207, contributed \$5,000.00 to National Conservative Political Action Committee in September, 1980. Because of the differences in identification, A.P. Cary and Arthur Cary were given separate alpha-numeric codes in the computer, giving the appearance of two separate contributors.

As a consequence of the allegation made in the complaint, National Conservative Political Action Committee communicated with Mr. Cary and learned that A.P. Cary and Arthur Cary is the same individual. Mr. Cary maintains two businesses in two cities, hence the separate addresses. Upon learning that information, National Conservative Political Action Committee refunded \$250.00 to Mr. Cary. A copy of the refund check and a copy of the letter of transmittal are enclosed.

^{*/} Note the similarity between the March 30, 1980 and March 30, 1979 entries for J.E. Taylor in the Selected List of Receipts and Expenditures. (The address being listed as 212, instead of 213; the date of receipt being Mar. 30; the amount being the same; and, both being reported in the May Monthly Report.) The reported March 30, 1979 entry, which is accurate, may have been erroneously duplicated.

82040323028

Kenneth A. Gross, Esq.
March 26, 1982
Page 6

In conclusion, National Conservative Political Action Committee has demonstrated:

(1) That, in fact, Mr. Flynn contributed \$2,700.00 and Mrs. Flynn contributed \$5,000.00 to National Conservative Political Action Committee in 1980.

(2) That, in fact, Mrs. Ramsey contributed \$5,000.00 and Mr. Ramsey contributed \$5,000.00 to National Conservative Political Action Committee in 1980.

(3) That, in fact, Jaquelin E. Taylor contributed \$5,500.00 to National Conservative Political Action Committee in 1980, \$500.00 of which was keyed in incorrectly in the data entry process. That error was discovered by National Conservative Political Action Committee as a result of its internal compliance review process and the excess amount was promptly refunded.

(4) That, in fact, Jaquelin E. Taylor did not make, and National Conservative Political Action Committee did not receive, the additional \$1,000.00 contribution attributed to Jaquelin E. Taylor for 1980 in the Selected List of Receipts and Expenditures prepared by the Federal Election Commission.

(5) That, in fact, National Conservative Political Action Committee received in 1980, \$250.00 from A.P. Cary, Drawer AC, Hutchins, Texas 75205; and \$5,000.00 from Arthur Cary, 2519 Farrington Street, Dallas, Texas 75207, it being reasonable to assume that those contributions had been made by two distinct individuals. Upon learning that the contributions came from a single source, the excess amount was promptly refunded.

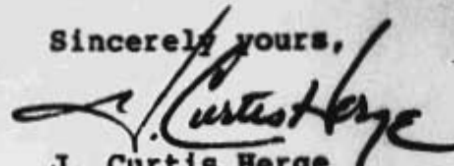
It is evident from the foregoing that no additional action is justified or warranted in this matter. The record is clear that National Conservative Political Action Committee maintains a rigorous program to assure compliance with the contribution limitations in the Act. Isolated situations, such as those under review in this matter and in MUR 1405, are corrected promptly within the framework prescribed in 11 CFR 103.3(b). It is apparent that Committee for American Principles has made an exhaustive analysis of the contributions made to National Conservative Political Action Committee in 1980 and 1981, but has been unable to substantiate an allegation worthy of a compliance proceeding. As a result, no further action should be taken on this matter and the file should be closed.

82040323029

Kenneth A. Gross
March 26, 1982
Page 7

We appreciate this opportunity to respond and are willing to provide such other documentation as may be reasonably required to dispose of this matter.

Sincerely yours,



J. Curtis Herge
Counsel to National
Conservative Political
Action Committee

Enclosures

320403223030

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: *J. Curtis Heger*

ADDRESS: *8300 Greenbush Dr. Suite 100 Melrose, VA. 22102*

TELEPHONE: *(703) 821-1000*

RE: MUR 1432

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

3/17/82

BY:

Signature

Lyle S. Jones - Treasurer

NAME:

National Conservative Political Action Committee

ADDRESS:

1500 Wilson Blvd #513 Arlington, VA 22209

HOME PHONE:

BUSINESS PHONE: *(703) 522-2800*

32040323031

Don M. Flynn

Suite 150
Southern Hills Tower
2431 E. 61st Street
Tulsa, Oklahoma 74105

January 13, 1982

National Conservative Political Action Committee
1500 Wilson Blvd. - #513
Arlington, VA 22209

Attention: Mr. Leif Noren

Re: 1980 Contributions

Gentlemen:

Attached are copies of checks as verification of contributions to the NCPAC by myself and Mrs. Flynn during the year 1980.

Please note that contributions by myself equal \$2,700; those by Mrs. Flynn, \$5000.00.

Yours very truly,

Don M. Flynn

Don M. Flynn

DMF:bl
Attachments

32040323032

8 2 0 4 0 3 2 3 0

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

Pay. action
Committee, etc. 4409
2-22 1980

PAY TO THE ORDER OF NCPAC \$200.00

Two Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO: Don M. Flynn

⑆103900036⑆ 486927227⑆ 4409 ⑆0000020000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4553
6/25 1980

PAY TO THE ORDER OF NCPAC \$500.00

Five Hundred & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO: Don M. Flynn

⑆103900036⑆ 486927227⑆ 4553 ⑆0000050000⑆

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4614
8-15 1980

PAY TO THE ORDER OF NCPAC - Independent Expenditures - Report 1 month

One Thousand & No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO: Don M. Flynn

⑆103900036⑆ 486927227⑆ 4614 ⑆0000100000⑆

PRC 86-3

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

4694
10-24 1980

PAY TO THE ORDER OF N.C.P.A.C. \$1000.00

One Thousand and No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO: Don M. Flynn

⑆103900036⑆ 486927227⑆ 4694 ⑆0000100000⑆

RC 86-3

MR. OR MRS. DON M. FLYNN
6511 S. INDIANAPOLIS PH. 742-9558
TULSA, OKLA. 74136

182867552783 09/24/80
9-17 1980

PAY TO THE ORDER OF N.C.P.A.C. \$5,000.00

Five thousand and No/100 DOLLARS

BANK OF OKLAHOMA
P.O. Box 2300
Tulsa, Oklahoma 74192

MEMO: Mrs. Don M. Flynn

⑆103900036⑆ 486927227⑆ 4655 ⑆0000500000⑆

Mrs. Flynn →

JOHN W. FRANK NANCY A. RAMSEY
CHANDLERBROOK P.O. 62-1897
WICHITA, KANSAS 67208

398

8-15-80

PAY TO THE
ORDER OF

National Conservative Political Club 5000.00
Five Thousand and no/100 DOLLARS

FIRST WICHITA
NATIONAL BANK
WICHITA, KANSAS

FOR

John W. Ramsey

⑆0111901292⑆ 0396 244-5433⑆

⑆0000500000⑆

CLASH CHECK

— — — — —

82040323034

Rec'd. 2/8/82

National Conservative
Political Action Committee

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

January 5, 1982

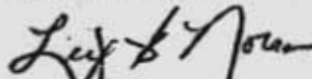
Mrs. Jaqueline E. Taylor
213 Ross Building
Eighth & Main Street
Richmond, VA 23219

Dear Mrs. Taylor:

As per our conversation on December 31, 1981, a recent audit of our contributor information shows that you donated \$500.00 in excess of the \$5,000.00 limit set by the Federal Election Commission. As a result of this, I am enclosing a check to refund the excess amount to you.

Thank you very much for your generosity and continuing support of NCPAC.

Sincerely,



Leif E. Noren
Assistant Treasurer

LEN:ech

Enclosure

RECEIVED

MAR 25 1982

DEAM & HERGE

92040323035

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

1500 WILSON BLVD., No. 513
ARLINGTON, VA. 22209

1209

Jan. 6 1982

66-320 038
550

11892610020

PAY

DOLLARS \$500.00

Jaqueline E. Taylor
21 Ross Building
Eighth & Main Street
Richmond, Va. 23219


State National Bank
ROCKVILLE, MARYLAND 20852

[Signature]
Left 2000050000

⑆001209⑆ ⑆055003201⑆ ⑆0007048025⑆

32040323036

FOR DEPOSIT ONLY:-
A/C Jacqueline E. Taylor 5983

NATIONAL FAIR
TRADE UNION

JAN 18 82

National Conservative
Political Action Committee

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

March 18, 1982

Mr. Arthur P. Cary
2519 Farrington St.
Dallas, TX 75207

Dear Mr. Cary:

A recent review of our contributor information has revealed that you contributed \$5,250 to our committee in 1980. Federal law prohibits committees such as NCPAC from accepting more than \$5,000 from an individual in a calendar year. As a result of this discovery, I am refunding \$250 to you.

The computer service that NCPAC utilizes is designed to "flag" those individuals who contribute more than \$5,000. You apparently sent two contributions in 1980. One was sent in as:

Arthur Cary
2519 Farrington St.
Dallas, TX 75207
(Sept. '80 for \$5,000)

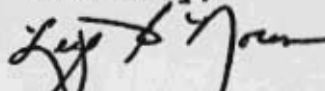
the other as:

A.P. Cary
Drawer AC
Hutchins, TX 75205
(May '80 for \$250)

As a result, you appeared on our contributor file as two separate contributors.

You will find a check for \$250 enclosed. I would like to take this opportunity to personally thank you for the support you have shown NCPAC in the past years.

Sincerely,


Lief E. Noren
Treasurer

32040323037

CARB-OUT

DE LUKE CHECK PRINTERS INC.
MADE IN U.S.A.

NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE

1500 WILSON BLVD., No. 518
ARLINGTON, VA. 22209

1355

March 18 1982

66-320 038
660

PAY N. C. P. A. C. 250 DOLLS 00 CTS DOLLARS \$ 250.00

TO THE ORDER OF

Mr. Arthur Cary
2519 Farrington St.
Dallas, Tx. 75207


State National Bank
ROCKVILLE, MARYLAND 20852

⑆001355⑆ ⑆055003201⑆ ⑆0007048025⑆

Eleanor C. Hargrave
Lyle & John

NATIONAL CONSERVATIVE
POLITICAL ACTION COMMITTEE
ARLINGTON, VA.

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
3/18	Return of Contribution in excess of \$5,000.00 Limit	\$250.00
	400D	

RECEIVED

MAR 29 11:48

SEDAM & HERGE
ATTORNEYS AT LAW
SUITE 1100
8300 GREENBORO DRIVE
MCLEAN, VIRGINIA 22102

To

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

Attention: Susan Donaldson

FIRST CLASS MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

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 March 8, 1982, against the National Conservative Political Action Committee, Mr. Don Flynn, Ms. Nancy A. Ramsey, Mr. A.P. Cary, Mr. Arthur Cary, and Ms. Jaquelin E. Taylor which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be 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,

Robert A. Hayson



82040323040



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

National Conservative PAC
1500 Wilson Blvd., Suite 513
Arlington, VA 22209

Re: MUR 1432

Dear Sir:

This letter is to notify you that on March 9, 1982 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 1432. 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.

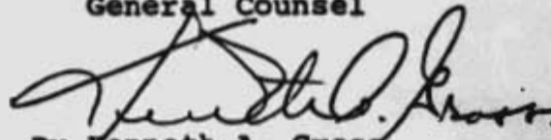
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

32040323041

If you have any questions, please contact Susan Donaldson, the staff member 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

82040323042





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Flynn
6511 South Indianapolis
Tulsa, OK 74136

Re: MUR 1432

Dear Mr. Flynn:

This letter is to notify you that on March 9, 1982 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1432. Please refer to this number in all future correspondence.

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

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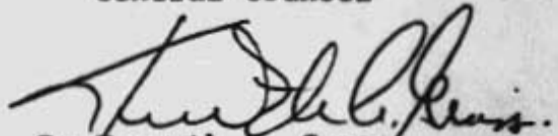
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

32040323043

If you have any questions, please contact Susan Donaldson, the staff member 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,

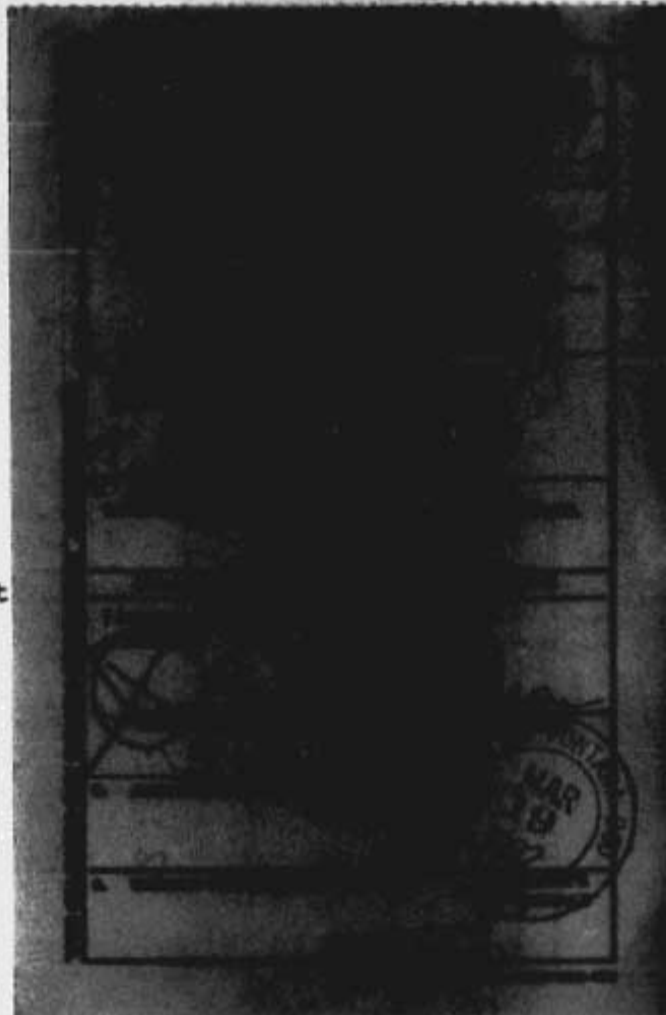
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

82040323044





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Nancy A. Ramsey
3510 Cranbrook
Wichita Falls, TX 76308

Re: MUR 1432

Dear Ms. Ramsey:

This letter is to notify you that on March 9, 1982 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1432. Please refer to this number in all future correspondence.

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

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

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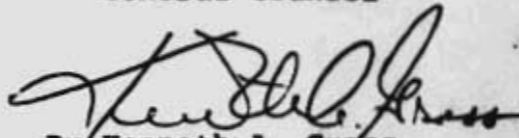
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

32040323043

If you have any questions, please contact Susan Donaldson, the staff member 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,

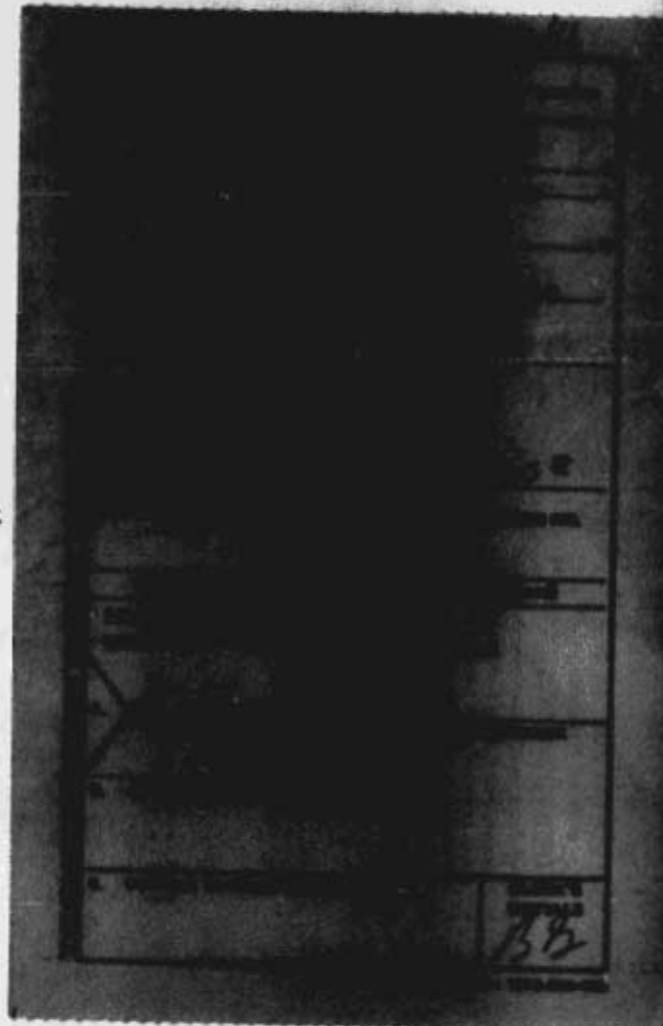
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

3 2 0 4 0 3 2 3 0 4 6





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Jaquelin E. Taylor
213 Ross Building
Richmond, VA 23219

Re: MUR 1432

Dear Ms. Taylor:

This letter is to notify you that on March 9, 1982 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1432. Please refer to this number in all future correspondence.

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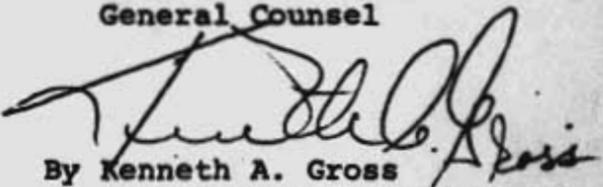
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

32040323047

If you have any questions, please contact Susan Donaldson, the staff member 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,

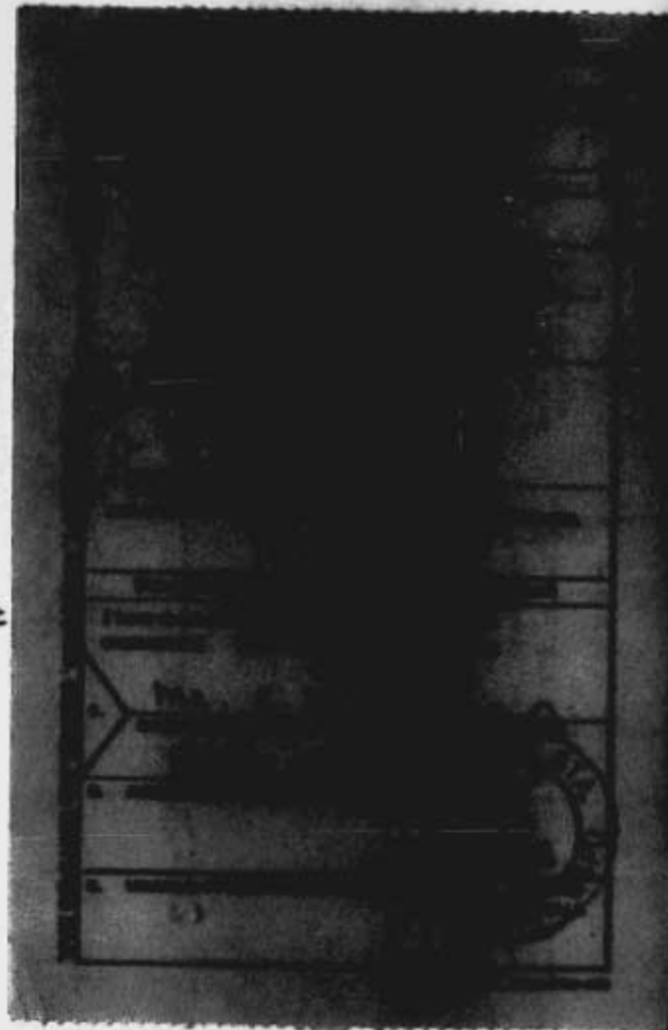
Charles N. Steele
General Counsel


By Kenneth A. Gross
Associate General Counsel

Enclosures

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

92040323048





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

A.P. Cary
Drawer AC
Hutchins, TX 75205

Re: MUR 1432

Dear Mr. Cary:

This letter is to notify you that on March 9, 1982 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1432. Please refer to this number in all future correspondence.

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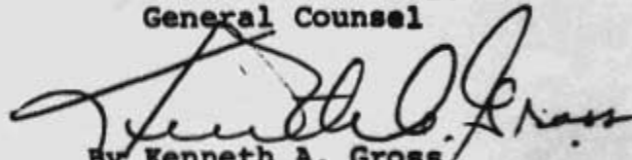
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

82040323049

If you have any questions, please contact Susan Donaldson, the Staff Member 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

82040323050

Enclosures

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





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 16, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Cary
2519 Farrington Street
Dallas, TX 75207

Re: MUR 1432

Dear Mr. Cary:

This letter is to notify you that on March 9, 1982 the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1432. Please refer to this number in all future correspondence.

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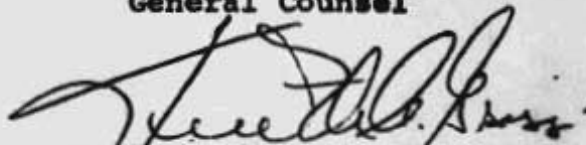
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

92040323051

If you have any questions, please contact Susan Donaldson, the staff member 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

82040323052

Enclosures

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



Donaldson
Staff mt

MUR # 1432
DATE 3-11-82

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.

- ① NATIONAL CONSERVATIVE PAC
1500 WILSON BLVD, SUITE 513
ARL, VA 22209
- ② DON FLYNN
6511 SOUTH INDIANAPOLIS
TULSA, OK 74136
- ③ NANCY A. RAMSEY
3510 CRANBROOK
WICHITA FALLS, TX 76308
- ④ JAQUELIN E. TAYLOR
213 ROSS BLDG.
RICHMOND, VA. 23219
- ⑤ A. P. CARY
DRAWER AC
HUTCHINS, TX 75205
- ⑥ ARTHUR CARY
2519 FARRINGTON ST
DALLAS, TX 75207

32040323053

COMMITTEE
FOR
AMERICAN
PRINCIPLES

200 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

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 \$5000 in any calendar year."

3) Commission records reveal contributions in excess of the legal limitations to NCPAC by at least three persons. The September, 1980 and October, 1980 reports show that Don Flynn gave in excess of \$5000 to NCPAC. The September, 1980 report shows that Nancy A. Ramsey gave in excess of \$5000 to NCPAC. Four monthly reports in 1980 show, in the aggregate, that Jaquelin E. Taylor gave in excess of \$5000 to NCPAC. Furthermore, the May, 1980 and October, 1980 reports show contributions by A.P. Cary and Arthur Cary, respectively, who appear to be one and the same person. If the two Cary names

prove to be one person, Mr. Cary also gave in excess of \$5000 to NCPAC in 1980. (SEE Exhibits)

4) Thus, the NCPAC violated the Act by failing to observe the legal restrictions on contributions by individuals during the 1980 reporting periods.

5) Complainant is concerned, by lengthy analysis of the voluminous NCPAC reports and subsequent, numerous requests for additional information, that further violations may be found. Complainant requests the Commission initiate an audit of NCPAC reports to satisfy these concerns and requests that the Commission, upon finding this Complaint to be substantiated, cite NCPAC and fine NCPAC officers sufficiently to compel future compliance with all legal reporting requirements.

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: 3/8/82

Subscribed by and sworn to before me this 8th day of
March, 1982.

(Seal)

My Commission Expires February 14, 1984 ;
My Commission Expires: _____
Notary Public Janet G. Meyer

32040323053

SCHEDULE A

PERIOD 09/01/80 - 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	AGGR. RECEIPT AMT YTD. THIS PERIOD	
09/19/80	JOHN R AREND CORPORATE PLACE STE 1104 5800 E SKELLY DR TULSA OK 74135		3100.00	3000.00
09/26/80	MRS ANN STINE 5309 S JOPLIN TULSA OK 74135	CONSULTING ENGINEER	500.00	500.00
09/19/80	DON M FLYNN 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5700.00	5000.00
09/26/80	D H CALLEMORE 9920 SO YALE TULSA OK 74136	DEVELOPER	5000.00	5000.00
09/30/80	MRS SARAH M HAMMOND 3211 E 73RD ST TULSA OK 74136		250.00	250.00
09/30/80	PHILIP TABER 6218 LEWIS AVENUE, SUITE TULSA OK 74136		225.00	125.00
09/26/80	JACK D CARTER 4070 ONE WILLIAMS CENTER TULSA OK 74172	CONTROLLER FLYNN ENERGY CORP	1000.00	1000.00
09/19/80	J R ORMIG RT 3 SHANGRALA CHATEAU AFTON OK 74331		2500.00	2500.00
09/18/80	DONALD L SMITH P.O. BOX 246 HENRYETTA OK 74437	OIL DEALER SELF-EMPLOYED	406.00	50.00
09/22/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED	600.00	500.00

SCHEDULE A

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

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	AGGR. RECEIPT AMT YTD. THIS PERIOD	
10/31/80	DON H FLYNN 6511 SOUTH INDIANAPOLIS TULSA OK 74136	EXECUTIVE FLYNN ENERGY CORPORATION	5000.00	2060.00
10/20/80	D PILLOW 5524 EAST 62ND STREET TULSA OK 74136	PHYSICIAN EMERGENCY CARE INCORPORATED	300.00	100.00
10/31/80	PHILIP TABER 6218 LEWIS AVENUE, SUITE TULSA OK 74136	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	275.00	50.00
10/16/80	O W SELLERS PO BOX 1122 HENRYETTA OK 74437	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	500.00	500.00
10/27/80	T GARRARD BOX 729 MC ALESTER OK 74501	RETIRED INFO REQUESTED, NOT RECD	700.00	100.00
10/28/80	JACK RAHM BOX 205 ADA OK 74820	OIL INDUSTRY INDIANA OIL & GAS	850.00	450.00
11/03/80	THELMA H COKER RURAL ROUTE 1, BOX 255-B SEMINOLE OK 74868	DP OPERATOR TINKER AIR FORCE BASE	275.00	200.00
11/24/80	EARL A DAVIS BOX 497 NEWCKA OK 74684	INFO REQUESTED, NOT RECD INFO REQUESTED, NOT RECD	225.00	100.00
10/31/80	O G HAHN, JR ROUTE 2, BOX 367 MC KINNEY TX 75069	ACCOUNTANT WRIGHT TITUS AGENCY	315.00	50.00
10/23/80	PETER H FRANK 1120 PICNEER FLAHO TX 75074	TECHNICIAN POCKWELL	350.00	100.00

SCHEDULE A

PERIOD 09/01/80 - 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	ACCR. RECEIPT AMT YTD. THIS PERIOD	ACCR. RECEIPT AMT YTD. THIS PERIOD
09/23/80	NANCY A RANNEY 3510 CRANBROOK NICHITA FALLS TX 76308		10000.00	9000.00
09/15/80	C B HASEL 101 HARBTON RANGER TX 76470	OIL PRODUCER RANGER TX	250.00	250.00
09/19/80	BILL PFLUGER 2657 VISTA DEL ARROYO SAN ANGELO TX 76901	RANCHER	500.00	500.00
09/23/80	I A BIRD SANCO ROUTE ROBERT LEE TX 76945	RETIRED SAME	450.00	100.00
09/12/80	MRS JESSE CARGILE SANCO ROUTE ROBERT LEE TX 76945	RANCHING BAR X RANCH	500.00	500.00
09/24/80	T G ANDERSON 936 MAIN BLDG HOUSTON TX 77002	GEOLOGIST	200.00	200.00
09/03/80	REX G BAKER 1100 MILAM BUILDING, STE HOUSTON TX 77002	OWNER SELF-EMPLOYED	270.00	25.00
09/24/80	JAMES BUTLER 6349 BROMPTON HOUSTON TX 77005	PHYSICIAN HOUSTON, TX	320.00	100.00
09/15/80	MRS HARRIS MASTERSON, III 1406 KIRBY DRIVE HOUSTON TX 77019	HOUSEWIFE	200.00	200.00
09/29/80	C A MUELLER 4545 POST OAK PLACE DRIV HOUSTON TX 77027	OFFICE WORKER SAME	760.00	100.00

FEDERAL ELECTION COMMISSION

DATE 17JUL81

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)
SECTION 1 - INDIVIDUALS

PAGE

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
CARPENTER, WILLIAM X MR NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2893 #453747 CONTRIBUTION	200 EAST PALMETTO PARK ROAD	BOCA RATON RETIRED	FL 33580	28AUG79	PRIMARY SEPTEMBER MONTHLY	1,000
CARTER, F E NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3644 #435656 CONTRIBUTION	7405 FAIRFAX RD	BETHESDA	MD 20014	7AUG80	PRIMARY SEPTEMBER MONTHLY	256 AMENDMENT
CARTER, HARRIETT NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3495 #432570 CONTRIBUTION	SKY VIEW	CROTON-ON-HUDSON	NY 10520	24SEP80	PRIMARY OCTOBER MONTHLY	545
CARTER, JACK D NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3533 #433510 CONTRIBUTION	4070 ONE WILLIAMS CENTER	TULSA CONTROLLER	OK 74172	26SEP80	PRIMARY OCTOBER MONTHLY	1,000
CARY, A P NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2265 #402733 CONTRIBUTION	DRAWER AC	HUTCHINS ENGINEER	TX 75205	24APR80	PRIMARY MAY MONTHLY	250
CARY, ARTHUR NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/171/3535 #433517 CONTRIBUTION	2519 FARRINGTON ST	DALLAS	TX 75207	2SEP80	PRIMARY OCTOBER MONTHLY	5,000
CARY, ARTHUR MR NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 79FEC/129/1636 #041018 CONTRIBUTION	2519 FARRINGTON STREET	DALLAS ENGINEER	TX 75207	10MAY79	PRIMARY JUNE MONTHLY	5,000
CARY, ARTHUR MRS NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/164/2907 #456537 CONTRIBUTION	3118 PERRYTON DRIVE	DALLAS	TX 75224	13AUG79	PRIMARY SEPTEMBER MONTHLY	5,000 AMENDMENT
CARY, ARTHUR MRS NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 80FEC/174/0862 #460970 CONTRIBUTION		DALLAS	TX 75224	9OCT80	PRIMARY PRE-GENERAL	5,000 AMENDMENT

TABERY, FRED J
443 GOULD AVENUE
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/171/3548 #433563 CONTRIBUTION

TADLOCK, FRED A MR
PO BOX 1380
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/122/1198 #030059 CONTRIBUTION REF TO INDIVIDUAL

TANNER, EDWARD A JR
2000 COMMERCE TOWER
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4488 #392691 CONTRIBUTION

TATE, H C MRS
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/141/4219 #139495 CONTRIBUTION

TAYLOR, EARL R MR
FAIR HILL FARMS ROAD
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4517 #390968 CONTRIBUTION

TAYLOR, EVELYN MRS
1459 BINKLEY STREET
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/129/1640 #341050 CONTRIBUTION

TAYLOR, JAQUELIN E
212 ROSS BLDG
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/149/2858 #281171 CONTRIBUTION

TAYLOR, JAQUELIN E
213 ROSS BUILDING
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/164/2197 #396213 CONTRIBUTION

TAYLOR, JAQUELIN E
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/185/3015 #523477 CONTRIBUTION

TAYLOR, JAQUELIN E
213 ROSS BUILDING
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/163/4518 #390977 CONTRIBUTION

TAYLOR, JAQUELIN E
212 ROSS BUILDING
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
79FEC/127/4679 #034439 CONTRIBUTION

TAYLOR, JOY A MRS
2930 KENT DRIVE
NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE
80FEC/171/3531 #442702 CONTRIBUTION

HOUSTON

KANSASCITY

CONSULTANT

BLUE HILL

REQUESTED

SEWICKLEY

DALLAS

SELF-EMPLOYED

RICHMOND

RICHMOND

RICHMOND

RICHMOND

RICHMOND

REQUESTED

OKLAHOMA CTY

OCTOBER MONTHLY

TX 77001 26FEB79 PRIMARY
MARCH MONTHLY

75-

MO 64199 30DEC79 PRIMARY
YEAR-END

300
AMENDMENT

ME 04614 12OCT79 PRIMARY
NOVEMBER MONTHLY

400

PA 15143 4JAN80 PRIMARY
FEBRUARY MONTHLY

250
AMENDMENT

TX 75205 1MAY79 PRIMARY
JUNE MONTHLY

150

VA 23219 30MAR80 PRIMARY
MAY MONTHLY

1,000
AMENDMENT

VA 23219 11MAR80 PRIMARY
APRIL MONTHLY

4,500
AMENDMENT

VA 23219 29OCT80 GENERAL
POST-GENERAL

500
AMENDMENT

VA 23219 21JAN80 PRIMARY
FEBRUARY MONTHLY

500
AMENDMENT

VA 23219 30MAR79 PRIMARY
MAY MONTHLY

1,000

OK 73120 22SEP80 PRIMARY
OCTOBER MONTHLY

510



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF FUR # 1432

Date Filmed 5/26/82 Camera No. --- 2

Cameraman SPC