



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1513

Date Filmed 8/18/83 Camera No. --- 2

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Routing SlipsCommissioner Comment SheetConculation Information12 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 checked="" type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input checked="" 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 type="checkbox"/> (5) Internal Documents | |

Signed

Judy Shepard

Date

2/11/83



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 14, 1983

Mitchell A. Rosenfeld
711 Thrasher Road
McLean, Virginia 22101

Re: MUR 1513

Dear Mr. Rosenfeld:

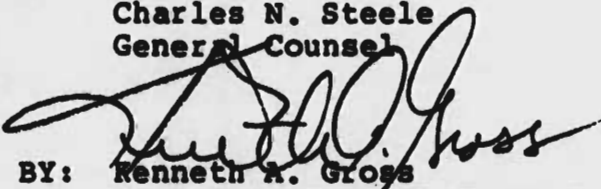
This is in reference to the complaint you filed with the Commission on December 21, 1982, concerning a leaflet circulated by the Spirit of American Vision.

After conducting an investigation in this matter, the Commission determined there was reason to believe that Philip Bart Moran and Spirit of American Vision violated: 1) 2 U.S.C. § 44ld by failing to include a disclaimer on a campaign leaflet and 2) 2 U.S.C. § 433 and § 434 for failing to register and file reports. On July 12, 1983, a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 1513. If you have any questions, please contact Gary Johansen, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040415070



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mitchell A. Rosenfeld
711 Thrasher Road
McLean, Virginia 22101

Re: MUR 1513

Dear Mr. Rosenfeld:

This is in reference to the complaint you filed with the Commission on December 21, 1982, concerning a leaflet circulated by the Spirit of American Vision.

After conducting an investigation in this matter, the Commission determined there was reason to believe that Philip Bart Moran and Spirit of American Vision violated: 1) 2 U.S.C. § 44ld by failing to include a disclaimer on a campaign leaflet and 2) 2 U.S.C. § 433 and § 434 for failing to register and file reports. On July 12, 1983, a conciliation agreement signed by the respondent was accepted by the Commission, thereby concluding the matter. A copy is enclosed for your information.

The file number in this matter is MUR 1513. If you have any questions, please contact Gary Johansen, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040415071

YAG

7-13-83



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 14, 1983

Mr. Philip Bart Moran
Spirit of American Vision
1300 Valley Road
Villanova, Pennsylvania 19085

RE: MUR 1513
Philip Bart Moran/Spirit of
American Vision

Dear Mr. Moran:

On July 12, 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of violations of 2 U.S.C. §§ 441d, 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040415072



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Philip Bart Moran
Spirit of American Vision
1300 Valley Road
Villanova, Pennsylvania 19085

RE: MUR 1513
Philip Bart Moran/Spirit of
American Vision

Dear Mr. Moran:

On , 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of violations of 2 U.S.C. §§ 441d, 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040415073

OK JSG
7/14/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Philip Bart Moran) MUR 1513
and)
Spirit of American Vision)

CONCILIATION AGREEMENT

83040415074
This matter was initiated by a signed, sworn, and notarized complaint by Mitchell A. Rosenfeld. An investigation was conducted and reason to believe was found that Philip Bart Moran/Spirit of American Vision ("Respondent") violated provisions of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act"). Specifically, Respondent violated: 1) 2 U.S.C. § 441d by failing to include a disclaimer on a campaign leaflet and 2) 2 U.S.C. § 433 and § 434 for failing to register and file reports.

NOW THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Spirit of American Vision was organized by Philip Bart Moran. The Spirit of American Vision's subtitle is "Committee to Unelect Coughlin."

2. Respondent, Philip Bart Moran/Spirit of American Vision, made expenditures to publish a flyer or leaflet.

3. Such flyer or leaflet explicitly called for the defeat of U.S. Representative Lawrence Coughlin.

4. Lawrence Coughlin was a candidate for reelection, to the U.S. House of Representatives, in the November 1982 general election, in the 13 District of Pennsylvania.

5. Respondent expended \$1,900 to print 100,000 of these flyers or leaflets advocating the defeat of Representative Coughlin.

6. Respondent estimates that \$900 was expended in distributing 60,000 to 70,000 of these flyers or leaflets.

7. The flyers or leaflets advocating the defeat of Representative Coughlin were distributed: a) by being stuffed in mailboxes b) by being placed on automobile windshields c) by being available at polling places and d) by being inserted in local newspapers.

8. The flyers or leaflets advocating the defeat of Representative Coughlin were distributed during the period starting three weeks before the November 1982 elections.

83040415075

9. Respondent expended a total of \$2,800 in printing and distributing the flyers or leaflets expressly advocating the defeat of Representative Coughlin.

10. Respondent did not register or file reports with the Commission.

11. The flyers or leaflets contained the name The Spirit of American Vision "Committee to Unelect Coughlin" and an address and telephone number. However, the flyers or leaflets did not include a statement indicating whether the communication was authorized by a candidate or an authorized political committee of a candidate or who paid for the communication.

V. 1. 2 U.S.C. §§ 433 and 434 require that political committees register and file reports of receipts and expenditures.

2. Respondent violated 2 U.S.C. § 433 and § 434 by failing to register and file required reports with the Commission.

VI. 1. 2 U.S.C. § 441d requires that communications expressly advocating the election or defeat of a clearly identified candidate include a disclaimer stating that the communication is not authorized by a candidate, an authorized political committee of a candidate, or its agents. Additionally such communication must state who paid for the communication. (See also 11 C.F.R. § 110.110.)

83040415076

2. Respondent Philip Bart Moran/The Spirit of American Vision violated 2 U.S.C. § 441d by failing to include a disclaimer stating who paid for and authorized the leaflets or flyers that expressly advocated the defeat of clearly identified candidate.

VII. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred (\$100) dollars, pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondent in settlement of this matter must register and file reports.

IX. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

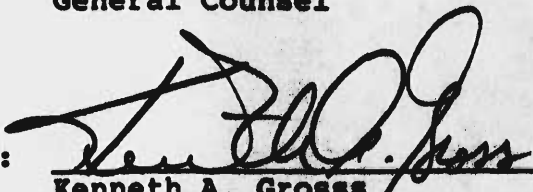
XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

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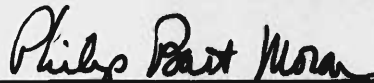
XII. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

Charles N. Steele
General Counsel

July 13, 1983
Date

BY: 
Kenneth A. Gross
Associate General Counsel

June 20 1983
Date


Philip Bart Moran
Spirit of American Vision

BY: _____

ITS: _____

83040415078

604410
JUN 20 1983
GENERAL COUNSEL
RECEIVED

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Philip Bart Moran
Spirit of American Vision

MUR 1513

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 12, 1983, the Commission decided by a vote of 5-0 to take the following actions in MUR 1513:

1. Approve the signed conciliation agreement as attached to the General Counsel's July 8, 1983 Memorandum to the Commission.
2. Close the file.
3. Approve and authorize the sending of the letter as attached to the July 8, 1983 Memorandum.

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

Attest:

7-12-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

7-8-83, 9:35
7-8-83, 2:00

83040415079



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cit*
DATE: July 8, 1983
SUBJECT: MUR 1513 - Memorandum to Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []


Litigation []
Closed MUR Letters []

Status Sheets []
Advisory Opinions []

Other (see distribution below) []

83040415080

8 3 0 4 0 4 1 5 0 8 1

P. BARTLEY MORAN		1809
June 20 1983		3-5/18 310/18
PAY TO THE ORDER OF	Federal Election Commission	\$ 100.00
one hundred & 00/100		DOLLARS
		
MEMO	MUR 1513	<i>P. Moran</i>
⑆031000053⑆ ⑆621 810 5⑆ 71809		

ATTACHMENT II

⑦

(Summary Page)

83 JUN 30 8 1:21 AM ALABAMA

ALIGN AREA

1. Name of Committee (in Full)
Spirit of American Vision
(Committee to Unelect Canfield)

Address (Number and Street)
1300 Valley Road
VH

City, State and ZIP Code
Villanova PA 19085

☐ Check here if address is different than previously reported.

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____

☒ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Oct 1982</u> through <u>Nov 1982</u>		
6. (a) Cash on hand January 1, 19 <u>82</u>		\$ —
(b) Cash on Hand at Beginning of Reporting Period	\$ —	
(c) Total Receipts (from Line 18)	\$ 2800	\$ 2500
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2800	\$ 2500
7. Total Disbursements (from Line 28)	\$ 2800	\$ 2800
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ —	\$ —
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ —	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ —	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Philip B. Moran
Type or Print Name of Treasurer

Philip B. Moran
SIGNATURE OF TREASURER

June 20, 1983
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4088

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

83040415082

SCHEDULE A

ITEMIZED RECEIPTS

Page 9 of for
LINE NUMBER
 (Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code PHILIP BEAR MORAN 1800 Valley Road Villanova PA 19185		Name of Employer SELF SALES Occupation	Date (month, day, year) Oct 7 Oct 28	Amount of Each Receipt this Period 900 950 950
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$ 2800		
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)				
TOTAL This Period (last page this line number only)				2800

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER _____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

10

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Spirit of American Vision (Committee to Unelect Caughlin)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Suburban & Wayne Times 134 N. Wayne Ave Wayne PA	Flyer Printing	Oct 7 1982	\$900 \$750
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Montgomery City Newspapers Fort Washington, PA	Fly Distribution	Oct 28	\$950
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$2800⁰⁰

83040415



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Philip Bart Moran
Spirit of American Vision
1300 Valley Road
Villanova, Pennsylvania 19085

RE: MUR 1513
Philip Bart Moran/Spirit of
American Vision

Dear Mr. Moran:

On , 1983, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of violations of 2 U.S.C. §§ 441d, 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within 30 days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

83040415085

BEFORE THE FEDERAL ELECTION COMMISSION

83 MAY 25 P4: 46

In the Matter of
Philip Bart Moran/
Spirit of American Vision

MUR 1513

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND AND PREVIOUS COMMISSION ACTION

On March 21, 1983, the Commission found reason to believe that Philip Moran and the Spirit of American Vision violated 2 U.S.C. § 441d; § 433 and § 434 of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act"). Specifically it appeared that respondent failed to place a disclaimer on a leaflet in violation 2 U.S.C. § 441d and failed to register and report in violation of 2 U.S.C. § 433 and § 434.

In furtherance of the investigation of this matter the Commission on March 21, 1983 authorized the sending of interrogatories and a letter. On April 7, 1983 the Office of General Counsel received respondent's answer to the interrogatories (see Attachment 1 pages 1-2 of Attachments).

Mr. Moran's response indicates that the name of his organization was the Spirit of American Vision. One of the purposes of the Spirit of American Vision was to inform voters of the power of their vote with regard to the nuclear freeze issue. (See answers 1 and 2 Attachment 1 page 1 of Attachments).

83040415086

Mr. Moran was the only member and had total duties and responsibilities in the organization. (See Answer 3 Attachment 1 page 1 of attachments). Mr. Moran spent \$1,900 of his own money to print 100,000 of the flyers. (See Answer 5 Attachment 1 page 1 of attachments). In addition, Mr. Moran estimates that \$900 was expended in distributing 60,000 to 70,000 of these flyers. (See Answer 6 Attachment 1 page 1 of attachments). The flyers were distributed by voters and students three weeks before the November 1982 election. (See Answers 7-9 Attachment 1 page 1 of attachments). The total contribution made by Mr. Moran to promote the activities of the Spirit of American Vision was \$2,800. Ten dollars was received by the Spirit of American Vision from other sources but this money was returned. (See answers 15 and 16 Attachment 1 page 2 of attachments.)

83040415087

II. RECOMMENDATIONS

Date

May 25, 1983

Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

83040415088

Villanova Associates
West Wing
1300 Valley Road
Villanova, PA. 19085
(215) 525-1589

April 4, 1983

Mr. Danny L. McDonald
Federal Election Commission
Washington, D. C. 20463

Dear Mr. McDonald,

The following is in response to your letter of March 23 identified as MUR 1513 and to the accompanying interrogatories

Sincerely,

Philip B. Moran

Philip B. Moran

Answers to Interrogatories (MUR 1513)

1. a) Yes. Spirit of American Vision was the name.
b) As a subtitle, yes.
c) No.
2. a,b,c) The Spirit of American Vision was conceived in August 1982 as a result of one of my children's reference to the possible occurrence of nuclear war in terms of when rather than if and was developed as a way to inform U. S. citizens of the danger of apathy and ignorance regarding nuclear weapons growth and proliferation.
d) In addition to the above, the objective was to inform voters how they could make their children's and their own fears and opinions of growing nuclear arsenals known at the ballot box and to remind them of the importance and power of their vote.
e,f,g) No.
3. I was the only member and had the duties and responsibilities necessary for the above objectives.
4. No
5. a) 100,000
b) \$1900
6. a) It is estimated that 60,000 to 70,000 were distributed.
b) Approximately \$900.
7. Voters and students.
8. To homes, on automobile windshields, by handout and as an insert in local newspapers.
9. During the period starting about three weeks before the November 1982 elections.

RECEIVED
OFFICE OF THE
COMMISSIONER
83 APR 7 P2:24

APR 7 1983 5:21

03040415089

Villanova Associates
West Wing
1300 Valley Road
Villanova, PA. 19085
(215) 325-1589

10. To voters in Congressional District 13.
11. I paid all costs of printing. Some individuals may have incurred some incidental costs associated with distribution
12. Approximately \$2800 was expended. I have no way of knowing what the cost of hand delivery were. They were probably limited to the cost of gasoline.
13. No
14. Philip B. Moran, 1300 Valley Road, Villanova, PA 19085. \$2800.
15. Ten dollars was collected and returned.
16. \$2800.
17. No

83040415090

83004150
Villanova Associates
West Wing
1300 Valley Road
Villanova, PA 19085



Mr. Danny L. McDonald
Federal Election Commission
Washington, D. C. 20463

17.20. Y APR 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1983

**Philip Bart Moran
Spirit of American Vision
1300 Valley Road
Villanova, Pennsylvania 19085**

Re: MUR 1513

Dear Mr. Moran:

The Federal Election Commission notified you on February 3, 1983, of a complaint which alleges that you and your organization had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on March 21, 1983, determined that there is reason to believe that you and your organization have violated 2 U.S.C. § 441d, 433 and 434 provisions of the Act. Specifically, it appears that you and your organization violated: a) 2 U.S.C. § 441d by failing to place a disclaimer on a leaflet and b) 2 U.S.C. § 433 and 434 by failing to register and report.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

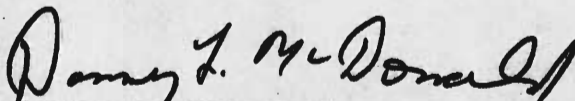
83040415092

Philip Bart Moran
Page Two

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 have any questions, please contact Deborah Curry, the attorney assigned to this matter at (202)523-4000.

Sincerely,


DANNY L. McDONALD
Chairman

Enclosure
Procedures
Interrogatories

83040415093

Philip Moran
The Spirit of American Vision

INTERROGATORIES (MUR 1513)

1. a) Is it correct to refer to The Spirit of American Vision by that name? Is that the name of the organization? If not, what is the correct name?

b) Is this organization also known as The Committee to Unelect Coughlin?

c) Was The Spirit of American Vision ever known by other names? If so, please list any history of name changes.

2. a) What type of organization is The Spirit of American Vision?

b) How was it formed?

c) When was it formed?

d) What are the objectives and purposes of The Spirit of American Vision?

e) Is it registered with any government entity?

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Philip Moran
The Spirit of American Vision
INTERROGATORIES (MUR 1513)
Page Two

f) Is The Spirit of American Vision incorporated or has it ever been incorporated? If so, what is the state of incorporation? When was it incorporated?

g) Does The Spirit of American Vision have any connection with any political committees?

3. What is your position and duties and responsibilities with The Spirit Of American Vision?

4. Are there other members of The Spirit of American Vision?

5. a) How many leaflets were printed?

b) What was the cost of printing the leaflets?

6. a) How many leaflets were distributed?

b) What was the cost of distributing the leaflets?

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7. Who distributed the leaflets?

8. How were the leaflets distributed? Be specific.

9. On what date(s) were the leaflets distributed?

10. To whom were the leaflets distributed?

11. Who paid for all the costs in connection with the printing and distribution of leaflets? Please identify each person and/or account from which disbursements were made.

12. What was the total cost expended in the printing and distribution of the leaflets? Please include cost of distributing leaflets by hand throughout the district.

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13. Did you or The Spirit of American Vision receive payments from any political committee for distribution of the leaflets? If so, please list the names of the committees and the amount.

14. Who contributed money to the printing and distribution of the leaflet? Please list name, address and amount .

15. What is the total amount collected by you or The Spirit of American Vision during 1982?

16. What is the total amount of money expended by you or The Spirit of American Vision during 1982?

17. Did you or the Spirit of American Vision support other federal candidates in any way? If so please indicate the candidate supported and the amount expended.

83040415097

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Philip (Bart) Moran)

Spirit of American Vision)

MUR 1513

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 21, 1983, the Commission decided by a vote of 4-0 to take the following actions in MUR 1513:

1. Find reason to believe that Philip Moran and the Spirit of American Vision violated 2 U.S.C. § 441d of the Federal Election Campaign Act of 1971, as amended.
2. Find reason to believe that Philip Moran and the Spirit of American Vision violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended.
3. Approve the letter and interrogatories as attached to the First General Counsel's Report dated March 9, 1983,

Commissioners Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioners Aikens and Harris did not cast a vote.

Attest:

3-22-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

3-9-83, 9:51
3-10-83, 11:00

83040415098



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: MARCH 21, 1983

SUBJECT: WITHDRAWAL OF OBJECTION TO MUR 1513
First General Counsel's Report
dated March 9, 1983

The above-captioned report was circulated to the Commission at 11:00, March 10, 1983 on a 48 hour tally basis.

Commissioner Reiche submitted an objection to this report which placed this item on the Executive Session Agenda for March 22, 1983.

By memorandum this date, Commissioner Reiche has withdrawn his objection and cast an affirmative vote in this matter.

Copies of Commissioner Reiche's memorandum and the certification in this matter are attached.

Attachments

83040415099



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS /JODY C. RANSOM *JCR*

DATE: MARCH 15, 1983

**SUBJECT: COMMENTS RE: MUR 1513 First General Counsel's
Report dated March 9, 1983**

Attached is a copy of Commissioner Aiken's
vote sheet with comments regarding a typographical
error on page 4 of the interrogatories.

83040415100

ATTACHMENT:
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES STEELE,
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/ JAN SAVAGE *AS*

DATE:

MARCH 11, 1983

SUBJECT:

OBJECTION - MUR 1513 First General Counsel's
Report dated March 9, 1983

The above-named document was circulated to the
Commission on Thursday, March 10, 1983 at 11:00.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	<u> X (Comments) </u>

This matter will be placed on the Executive Session
agenda for Tuesday, March 22, 1983.

83040415101



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: March 9, 1983
SUBJECT: MUR 1513 - 1st GC Rpt

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote ☒
Sensitive ☒
Non-Sensitive ☐

24 Hour No Objection ☐
Sensitive ☐
Non-Sensitive ☐

Information ☐
Sensitive ☐
Non-Sensitive ☐

Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐

Litigation ☐

Closed MUR Letters ☐

Status Sheets ☐

Advisory Opinions ☐

Other (see distribution
below) ☐

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SENSITIVE

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 MAR 9 A 9: 51

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION: 3-9-83

MUR 1513
DATE COMPLAINT RECEIVED
BY OGC: 12/22/83
DATE OF NOTIFICATION TO
RESPONDENT: 01/04/83
STAFF MEMBER: Deborah Curry

COMPLAINANT'S NAME: Mitchell A. Rosenfeld

RESPONDENTS' NAME: Philip (Bart) Moran; Spirit of
American Vision

RELEVANT STATUTE: 2 U.S.C. §§ 441d; 433 and 434

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On December 22, 1982 the Office of General Counsel received a signed, sworn and notarized complaint (Attachment 1 pages 1-13 of attachments) from Mitchell A. Rosenfeld (hereinafter "complainant") alleging violations of the Federal Election Campaign Act of 1971, as amended (hereinafter the "Act") by Philip (Bart) Moran (hereinafter "respondent"). Although the complaint is specifically made against Mr. Moran, the Spirit of American Vision, the group whose telephone number and address is

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given on the flyer (also known as Committee to Unelect Coughlin) was also added as a respondent. Complainant alleges that respondent distributed a flyer or leaflet through mailboxes, polling places and newspapers. Complainant alleges that this publication explicitly called for the defeat of U.S. Representative Lawrence Coughlin in the general election. Specifically, complainant alleges that respondent violated the Act by not including a disclaimer on the flyer in violation of 2 U.S.C. § 441d. Additionally, complainant alleges that respondent failed to file a statement regarding independent expenditures in excess of \$250 in violation of 2 U.S.C. § 434(c). On January 27, 1983, the postal service returned the certified letter addressed to Spirit of American Vision. This letter was marked unclaimed. On January 28, 1983 the Office of General Counsel re-sent this letter by regular mail. On January 28, 1983, the postal service returned the certified letter addressed to Philip Moran. This letter was also marked unclaimed. On January 31, 1983 this letter was resent by regular mail.

On February 4, 1983, the Office of General Counsel received a telephone call from Philip Moran. Mr. Moran stated that he never received the initial mailing, but had just received the letter sent by regular mail on February 3, 1983. Mr. Moran asked what were the procedures and stated that he had written a response. On February 9, 1983 the Office of General Counsel received the response of Philip Moran. (Attachment 2 pages 14-16 of attachments).

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FACTUAL AND LEGAL ANALYSIS

United States Representative Lawrence Coughlin was a candidate for reelection, to the U.S. House of Representatives, in the November 1992 general election, in the 13th District of Pennsylvania. Complainant states that "a flyer or leaflet was published explicitly calling for the defeat of U.S. Representative Lawrence Coughlin ...". (See Attachment 1 page 2 and 5 - 8 of attachments). Complainant alleges that the publication was distributed by:

a) being stuffed in mailboxes in the 13th District of Pennsylvania (see affidavit of James G. Calhoun, Attachment 1 page 10 of attachments),

b) being available at polling places on election day, (see affidavit of Elizabeth J. Dunn, Attachment 1 page 11 of attachments),

c) being inserted in The Times-Chronicle, and other newspapers. (See affidavit of Lawrence Coughlin Attachment 1 page 12 of attachments).

Complainant alleges that no notice of sponsorship and "no individual name or names appear on the flyer." Moreover, complainant alleges that only the organizational name the Spirit of American Vision with an address and telephone number followed by the words "Committee to Unelect Coughlin" appear on the flyer. (See Attachment 1 page 2 of attachments).

Complainant states that according to Cole's Philadelphia Suburban Reverse Directory Phillip Moran is listed for the

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telephone number and address appearing on the flyer. Complainant states that he spoke with Mr. Moran and that Mr. Moran admitted that he was responsible for publishing and distributing the flyer. (See affidavit of Mitchell A. Rosenfeld, Attachment 1 page 13 of attachments). Additionally, complainant states that according to records at the Commission there has been no filing by Philip Moran or the Spirit of American Vision of a independent expenditure in excess of \$250.

Mr. Moran's response to the complaint, confirms and verifies all the material facts presented in the complaint. (See Attachment 2 pages 14 - 16 of attachments). Indeed, Mr. Moran states that "[o]nce it was brought to my attention that the election laws required personal identification, I obtained a personalized rubber stamp and stamped all available copies of the leaflet." (See Attachment 2 page 14 of attachments).

a. Alleged Violation of 2 U.S.C. § 441d

Complainant alleges that respondent violated 2 U.S.C. § 441d(a) because there was no proper notice of sponsorship. Complainant states that a disclaimer is mandated by the Act because complainant specifically advocated the defeat of Coughlin, a clearly-identified candidate (See Attachment 1 page 3 of attachments).

2 U.S.C. § 441d(a)(3) requires that

whenever any person makes an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate, or solicits any contribution through any

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broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication

3) if not authorized by a candidate, an authorized political committee of a candidate, or its agents, shall clearly state the name of the person who paid for the communication and state that the communication is not authorized by any candidate or candidates committee.

(See also 11 C.F.R. § 110.11)

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Examination of the leaflet in question reveals that it is indeed expressly advocating a clearly identified candidate within the meaning of 11 C.F.R. § 109.1(b)(2) and (3). With regard to the nuclear freeze issue unambiguous reference is made to Congressman Coughlin and the upcoming November 1982 elections. The title of the leaflet is "Major Campaign Unleashed to Freeze Coughlin Out" "Voters United to 'Unelect' Coughlin." (See Attachment 1 page 5 of attachments). Voters are told that his defeat will send a message (See Attachment 1 page 5 and 8 of attachments). Furthermore voters are urged to vote for Coughlin's opponent. (See Attachment 1 page 5 of attachments). Additionally, Mr. Moran states that the expenditures were made in opposition to Lawrence Coughlin. (See Attachment 2 page 16 of attachments).

With regard to the nuclear freeze issue, the clear thrust of the publication is to advocate defeat of Lawrence Coughlin and the election of his opponent Martin J. Cunningham in the upcoming election.

The leaflet urges reader to pass it on to friends and asks for volunteers to distribute the leaflet. (See Attachment 1 page 8 of attachments). The leaflet also solicits contributions to repay debts (See Attachment 1 page 8 of attachments).

The leaflet does not contain any clear statement of sponsorship, though a name of an organization, its address and its telephone number is given. There does appear on the leaflet a statement that it was put together by a private citizen with the help of many others but who is not affiliated with any organization. (See Attachment 1 page 8 of attachments).

Therefore, it appears that a violation of 2 U.S.C. § 441d has occurred since there is no disclaimer stating who paid for and authorized the leaflet and it clearly advocated the election and defeat of a identified candidate and/or solicited contributions. 1/

b. Alleged Violation of 2 U.S.C. § 434(c)

Complaint alleges that Mr. Moran spent more than \$250 on independent expenditures but has not filed a report with the Commission in violation of 2 U.S.C. § 434(c). (See also 11 C.F.R. § 109.1(a)).

2 U.S.C. § 434(c) requires the filing of a statement by every person (other than a political committee) when independent expenditures in excess of \$250 have been incurred. (See 11 C.F.R. 109.2(a)). 2 U.S.C. § 431(17) defines independent

1/ Mr. Moran's later efforts to identify the leaflet does not meet the requirements of 2 U.S.C. § 441d (see Attachment 2 page 14 of attachments).

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expenditure to mean any expenditure by a person expressly advocating the election or defeat of a clearly identified candidate and is made without the cooperation or consultation of any candidate authorized committee or agent.

Here, as noted supra the communciation in question expressly advocates the defeat of Congressman Coughlin. According to Mr. Moran's response the cost of printing and distributing the leaflet exceeded \$250. (See Attachment 2 page 14 and 16 of attachments). Mr. Moran states \$2,800 in disbursements were made to two newspaper companies. However, there is no indication of how much money was expended for printing and distributing the leaflet throughout the district. (See Attachment 2 page 16 of attachments). Mr. Moran admits that no report was filed and submits material to comply with the Act. (See Attachment 2 page 14 and 16 of attachments).

If Mr. Moran and Spirit of American Vision are not political committees a violation of 2 U.S.C. § 434(c) may have occurred.

c. Possible 2 U.S.C. § 433 and § 434 Violations

Though not raised directly in the complaint, there is a possibility that there are violations of 2 U.S.C. §§ 433 and 434. 2 U.S.C. §§ 433 and 434 require that all political committees register and file reports. 2 U.S.C. § 431(4)(a) defines political committee to mean, in part, "any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar

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year or which makes expenditures aggregating in excess of \$1,000 during a calendar year."

Here, we have an admission by one man Philip Moran, that he is responsible for the printing and distribution of the leaflet in question. However the leaflet itself states that it was put together with the help of others. (See Attachment 1 page 8 of attachments). The name of two organizations the Spirit of American Vision and Committee to Unelect Coughlin appear at the bottom of the last page of the leaflet. The leaflet solicits contributions to defray the costs of the publication. (See Attachment 1 page 8 of attachments).

Here, it is unclear whether Mr. Moran would constitute a political committee without further investigation. However, under certain circumstances the Commission has indicated that one-man may constitute a political committee. (See AO 1980-126).

Therefore, in order to determine the 2 U.S.C. §§ 433 434 issues a determination must be made as to whether Mr. Moran's actions fulfill the requirement a political committee. Consequently the Office of General Counsel recommends the finding of reason to believe a violation of 2 U.S.C §§ 433 and 434 has occurred and the authorization of the attached interrogatories.

RECOMMENDATIONS

1. Find reason to believe that Philip Moran and the Spirit of American Vision violated 2 U.S.C § 441d of the Federal Election Campaign Act of 1971, as amended.

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2. Find reason to believe that Philip Moran and the Spirit of American Vision violated 2 U.S.C. §§ 433 and 434 of the Federal Election Campaign Act of 1971, as amended.

3. Approve attached letter and interrogatories.

Charles N. Steele
General Counsel

March 8, 1983
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Complaint (pages 1 - 13)
2. Response of Philip Moran (pages 14 - 16)
3. Letter and Interrogatories (pages 17-22)

8304041511

1. FEB
 52 FEB 1952
 10 11 12
 100-1750

December 21, 1982

32 Attachment: 1

Gentlemen:

The complaint has been filed in accordance with the seven (7) points identified in the October 29, 1982 letter from FEC Associate General Counsel Kenneth A. Gross with accompanying exhibits and affidavits.

Sincerely,

W. T. Allen G. Russell

MAR/7
HAND DELIVERED

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BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

2

In the matter of:

Mitchell A. Rosenfeld
Complainant

v.

Philip (Bart) Moran
Respondent

MUR _____

COMPLAINT

Mitchell A. Rosenfeld, COMPLAINANT, 7111 Thrasher Road, McLean Virginia 22101, (703) 356-0323 and office address, 2467 Rayburn House Office Building, Washington, D.C. 20515, (202) 225-6111, files this complaint, the attached affidavits of Miss Elizabeth J. Dunn, Mr. James Calhoun, United States Congressman Lawrence Coughlin, and COMPLAINT, and accompanying exhibits pursuant to 2 U.S.C. 441(d) (a) and 11 CFR 110.11, and 2 U.S.C. 431(17) and 11 CFR 109.1(a), and 2 U.S.C. 434(c) and 11 CFR 109.2(a), against Philip (Bart) Moran, 1300 Valley Road, Villanova, Pennsylvania 19085 (215) 525-1589.

Facts

1. United States Representative Lawrence Coughlin was a candidate for reelection to the U.S. House of Representatives in the November 2, 1982, General Election, running in the 13th District of Pennsylvania.
2. A flyer or leaflet was published explicitly calling for the defeat of U.S. Representative Lawrence Coughlin in the General Election. (Exhibit 1 attached)
3. The flyer was distributed by:
 - a. being stuffed in mailboxes in the 13th District of Pennsylvania, (affidavit attached)
 - b. being available on General Election Day at polling places, (affidavit attached)
 - c. being inserted in The Times-Chronicle, (Jenkintown, Pennsylvania) and a number of other newspapers. (affidavit attached)
4. The flyer contained no, or improper, notice of sponsorship:
 - a. No individual name or names appear on the flyer. Only the organizational names "The Spirit of American Vision, 1300 Valley Road, Villanova, Pennsylvania 19085", "Committee to Unelect Coughlin", and telephone number "525-1589", appear. (Refer to Exhibit 1)

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Philip Moran is listed at 1300 Valley Road, Villanova, Pennsylvania telephone number 628-1559, according to Cole's Philadelphia Suburban Reverse Directory. (Exhibit 2 attached)

3

5. On October 21, 1982, COMPLAINANT spoke with RESPONDENT by telephone at which time RESPONDENT admitted that he was responsible for publishing and distributing the flyer. (affidavit attached)

6. RESPONDENT was under an affirmative duty to file proper disclosure with the Federal Election Commission. 2 U.S.C. 441(d) (a)

a. RESPONDENT spent more than \$250 on this independent expenditure. (affidavits attached)

b. On the morning of December 8, 1982, COMPLAINANT went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova Pennsylvania 19085, or any other address. (affidavit attached)

Violation

1. 2 U.S.C. 441(d) (a) and 11 CFR 110.11 provide that there must be proper notice of sponsorship -- commonly called a "disclaimer" -- clearly stating who paid for and authorized the advertising publication advocating the defeat of a clearly-identified candidate and/or soliciting contributions for that purpose. This requirement is an essential component of the policy of full disclosure which underlies the Federal Election Campaign Act. The attached flyer (refer to Exhibit 1) specifically advocates the defeat of Congressman Coughlin, a clearly-identified candidate. Accordingly, this flyer should have included the "disclaimer" mandated by the Act.

2. 2 U.S.C. 431(17) and 11 CFR 109.1(a), 1 U.S.C. 434(c) and 11 CFR 109.2(a) provide that proper disclosure information must be filed regarding independent expenditures aggregating more than \$250 in the calendar year. The attached flyer (refer to Exhibit 1) appears to have been handsomely produced and widely distributed. (refer to affidavits) The total production and distribution costs may well have exceeded \$250 and if so, RESPONDENT was required to file proper disclosure information by December 2, 1982. COMPLAINANT knows, however, of no such information filed with the Commission.

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Request for Relief

(4)

COMPLAINANT requests that the Federal Election Commission to enforce these violations, take any necessary enforcement action, require RESPONDENT to comply to the fullest extent of the law, and subject RESPONDENT to any penalties and sanctions deemed appropriate.

Verification

The undersigned complainant swears that the allegations and facts set forth in this complaint are true to the best of his knowledge, information and belief.

Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December, 1982

Mary Curtis Brown
Notary Public
My Commission Expires May 31, 84

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5

Exhibit 1



MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT VOTERS UNITED TO "UNELECT" COUGHLIN

Many in the majority of Montgomery County voters who favor a bilateral, verifiable freeze on nuclear weapons have joined forces to elect Congressman Lawrence Coughlin.

From Abington to Upper and Lower Merion, Hallow to Norristown, voters are not disinterested. Inspired by Coughlin's last minute vote change to defeat a Congressional nuclear freeze resolution under pressure from the White House, their anger has erupted into a flurry of activity. From the ranks of the Social Register to the unemployed, Republicans and Democrats of all ages are distributing leaflets, phoning friends and neighbors and writing letters to local newspapers to draw attention to an example of party politics they consider "inappropriate by any measure," on an issue which "profoundly affects the very existence of us all."

They intend to put politicians across the country on notice that U.S. military policy is outside the partisan horse trading typical on other issues. One voter said, "Nuclear arms control is the issue of the day. All the rest are footnotes." District 13 voters believe the defeat of Coughlin, until recently considered unbeatable, will send a resounding message and perhaps even an apology to the 75% of the nation's population that favors an immediate, bilateral, verifiable freeze on nuclear weapons.

NOTE: Coughlin's opponent is Norristown Attorney Martin J. Cunningham. His position paper on the nuclear freeze states: I stand for and urge upon the administration, an immediate, verifiable world nuclear arms freeze agreement with the Russians, coupled with an immediate cessation of nuclear transfer to third countries such as India and Pakistan.

freeze, bilateral, verifiable freeze on the testing, production and development of nuclear weapons.

They are also upset with Coughlin's attempt to confuse the public by claiming that the Administration favors essentially the same freeze. "If that were the case why would he change his vote?" one asked.

The difference between the two freeze resolutions is the word "immediate." Rangan's idea is to keep building weapons during the current START negotiations, which voters believe will take years, to return from these higher levels and then to negotiate a freeze. They are apparently fed up with negotiations that have allowed round after round in the arms race without let up. They have done their homework and no longer believe Pentagon rhetoric that the U.S. is behind the Russians or that arms agreements cannot be verified.

Many of them have contributed to the wording of this leaflet and believe it should be read and acted on by all voters in the district by voting for Coughlin's opponent. (See note below).

This summer, Casper Weinberger petitioned to have the speed limit reduced on the road running in front of his summer house in Maine. When asked why, he said it endangers the lives of our children.



7

The Philadelphia Inquirer Pull back from the brink. 'Yes' for a nuclear freeze

Since the city of Hiroshima was buried in dust, some 40 years ago, when mushroom clouds erupted from American bombs and the trails of the Pacific, war for the South and Dr. Strangelove and the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few years ago, when the fear, among them, Goulter, a resident of the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few years ago, when the fear, among them, Goulter, a resident of the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few years ago, when the fear, among them, Goulter, a resident of the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans.

Today that faith is seriously eroded. From the moment President Reagan gave his address to Congress, the fear, among them, Goulter, a resident of the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few years ago, when the fear, among them, Goulter, a resident of the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans.

With the words "mutual" and "verifiable" tucked into the text of the freeze resolution, many have thought that even President Reagan would find it hard not to support the freeze. But on a political evening that took him to Columbus, Ohio, earlier this week, Mr. Reagan felt obliged to question the possibility of a crowd of pro-freeze demonstrators who lined him. They were demonstrating on behalf of a movement that has swept across the country that I think is inspired by, not the sincere, honest people who want peace, he said, "but by some people who want the weakening of America and who are manipulating many honest and sincere people."

Magwood: It is not the Kremlin that has

unleashed this movement. It was not, after all, KGB propaganda that pushed 700,000 Americans to march in New York last June in the largest political demonstration in the history of the United States. It has not been just the Soviets — Sen. Jeremiah O'Leary (D., Ala.) and the Reader Digest, notwithstanding — who have spread the old blanket of dread. Many also lie on the doorstep of the White House — and across the Capitol, Washington is the Ground Zero of the nuclear freeze movement.

The American people have been horrified at the news that coming out of official Washington — talk of the possibility of limited nuclear war, of backing up for "provoked" nuclear war, of nuclear "warning shots across the bow," of the feasibility of pulling America, and the rest of humanity, back up by the hair straps after a nuclear war.

The American people heard their contemporary of debate quoted as saying to Harde: "I'm a little over it with a couple of days, and then I'll be back out of dirt on top. Everyone's going to make it if there are enough aircraft to go around." Enough is enough. Nuclear war is too important to be left to generals and politicians unwilling to meet it with the gravity it demands. It is most generally the business of every citizen. The civilian population is, after all, the unfortunate nuclear military machine for the game of global brinkmanship. A loud "yes" vote will send a message to Washington to wake up and start making more urgency with the reality: There are not enough clouds to go around.

THREE MARTIN LUNCH?

Congressman Coughlin was recently asked in his office if he could disagree with the statement: "The Russians are ahead of the U.S. militarily," and "Arms agreements can be verified." He could not.

At a Main Line Chamber of Commerce luncheon in September, Chester County Congressman Richard Schulze stated that the Russians are ahead of us in arms. "If so," he was asked, "Why do Weinberger, Lehmann, Vessey, Haig, Rickover, and many other members of the current and past administrations, in many cases under oath before Congress, differ with your opinion?" Schulze said, "Well, you wouldn't expect those guys to say we were behind."

A prominent clergyman in the district, after a luncheon in Washington, had a chance to talk with Chief Arms Negotiator Rowney. Clergyman: "Why does virtually every outside source of compar-

ative arms figures say we have the edge?" Rowney: "The Defense Department has to make a case for Congressional appropriations." Clergyman: "Do you mean we're not being told the truth?" Rowney: "I wouldn't put it that way. They use a selective information technique."

At the Chamber of Commerce luncheon, Schulze said, "We're outclassed at the bargaining table. We're shoving more chips in the pile to see what happens. If it works good, if it doesn't..." He didn't finish the sentence. The Main Line Times phrased it "and his voice drifted off."

According to Schulze, his source of information on military superiority was "Jimmy" Schlesinger (Former Secretary of Defense). According to the April 5, 1982 Inquirer, Schlesinger says, "Superiority is very difficult to measure. Neither side is ahead. It's a standoff."

PSYCHIC NUMBING-TOLL OF THE NUCLEAR AGE

"Dad, what would you do if you were the only one left after a war?"

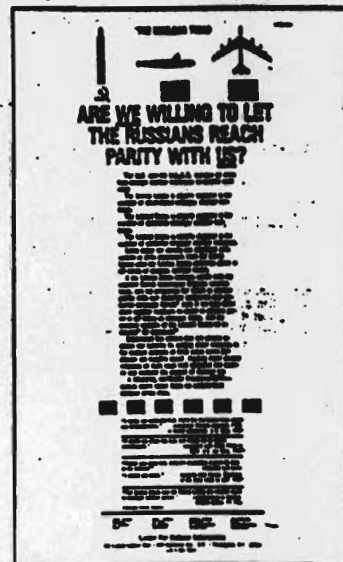
nine year old boy from Maryland. The question of nuclear weapons is taking a toll on the psyche of young people. Robert Jay Lifton, Professor of Psychiatry at Yale, wrote recently, "With the threat of nuclear annihilation, parents now doubt their ability to do their children's early and some form of humanistic education. And the child must also learn, early on, that only those personal doubts but the general history of the adult world to guarantee the safety of their children. The moral responsibility itself is threatened. Any long-term commitment becomes harder when the performance of all relationships is thrown into doubt. These tensions, whether domestic or not, are overwhelming us. At least some of the psychic pressure would be relieved by stopping the emotional children to nuclear events."

"The present generation cannot dream of its human power to choose, and, if it were to choose death and evil, this would be its own choice, its own responsibility, its own sin."

Arnold Toynbee

"We shall not suffer eternally the threat of nuclear holocaust. We have four children and two grandchildren. We care what happens to them."

Grandmother of the John 13th Kelly



1950: Eisenhower said "radioactive poisoning of the atmosphere and human annihilation of any life on earth has been brought within the range of technical possibility."

1956: Eisenhower said "One day both sides will have to meet at the conference table with the understanding that the era of armaments has ended and the human race must confront its actions to the truth or its fate."

1974: Henry Kissinger said "The accumulation of nuclear arms has to be controlled if mankind is not to destroy itself."

1980: Jimmy Carter said in the event of nuclear war "The survivors, if any, would live in despair amid the poisoned ruins of civilization that had committed suicide."

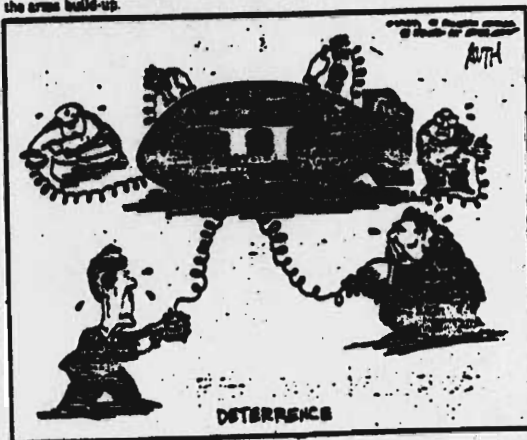
CAN COUGHLIN BE UPSET?

Yes. The race for our Congressional seat is much closer than most people think. Gains from reapportionment, pro-freeze campaigns that will bring voters out to the polls, Coughlin's flip-flop, the concern of senior citizens over social security, women's and the 18 to 25 year old's concern with the arms race are all special factors bearing on this year's election.

We must get Democrats and moderate Republicans to the ballot box. Even most of the conservatives we have talked with are upset with Mr. Coughlin's partisanship and last minute switch on the freeze issue and many are still undecided.

This year voters will have the opportunity in many townships and boroughs to join, informally, voters across the nation who will have freeze referendums on their ballots. Watch for flyers and other notices.

Since the economy, as an issue, is not as big a factor in our district as many others, an upset of Coughlin will be closely identified with the public's dismay of the arms build-up.



Dear Residents,

Please pass this leaflet on to a friend or read it over the telephone. And ask them to make phone calls. Impress on them the importance of their vote.

Volunteers to distribute this leaflet please call 525-1589.

To make our voices heard **WE MUST VOTE.**

This appeal was put together, along with the help of many others, by a private citizen with no affiliation to any organization except his family (which isn't all that organized). He registered Democrat for the first time this year but still considers himself unaffiliated with any organization.

CASPER'S CORNER

To the Editor
Casper Weinberger's Aug. 6th Great Page column of nuclear deterrence criticism captures the intelligence of the American people. It also misrepresents the facts. The "paradox" of nuclear deterrence is not an unreasonable paradox. It is a fact.

Thomas J. Montville
Bryn Mawr, PA

FOES AND FRIENDS

Readers of this leaflet are urged to take the time to read the entire document of a major campaign to elect a candidate who will be an effective force for peace.

The leaflet is the work of the American Friends of the Soviet Union, Inc. It is a major effort to elect a candidate who will be an effective force for peace.

Our objective with this leaflet is to bring you a review of the arms race, without graphic detail. Sometimes the truth can be painful, but lack of knowledge can be worse. And truth leads to action. There is an alternative to the arms race. Admiral Halsey, when asked by Congress how he thought we could control the arms race said he thought divine intervention was necessary. In discussions with hundreds of people, we came to a more to a higher conclusion. Our research leads us to believe that war is not inevitable, in fact, not likely, but we live in a complex world and divine intervention starts within each of us. One way we can express it is with our vote.

To everyone who has helped with this effort we thank you. Our next project, figuring out why some people want to ban Peter Pan, will be more fun.

WITH YOUR VOTE 1983 CAN BE THE YEAR OF THE THE NUCLEAR ARMS FREEZE

The preparation and distribution of this leaflet has caused us no direct substantial personal financial obligations. Any contribution you can make will help us reach these goals. Any amount is welcomed. Please mail your tax-deductible help today, including your address so we can send you a follow-up on the election.

The Spirit of American Vision
1300 Valley Road
Villanova, PA 19085

A non-profit, grassroots organization dedicated to American National Security thru Multi-National Arms Control.

Committee to "Unselect Coughlin"

83040415119

83040415120

[illegible]

9

10

AFFIDAVIT OF JAMES G. CALHOUN

James G. Calhoun for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I am a registered voter in Pennsylvania's 13th Congressional District and reside at 1107 Beech Road, Rosemont, Pennsylvania 19010 (Phone: 215-527-4864).
3. On Thursday, October 21, 1982, I found an unstamped political publication in my mailbox.
4. The publication carried a name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1199.
5. The publication featured headlines stating, "MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT," "VOTERS UNITED TO 'UNELECT' COUGHLIN," in which the flyer called explicitly for the defeat of U.S. Representative Lawrence Coughlin at the polls.
6. I telephoned the Washington, D. C., office of Representative Coughlin with the pertinent facts, and later discussed the flyer and its contents with Mitchell A. Rosenfeld, Representative Coughlin's Administrative Assistant.
7. In subsequent conversations with several neighbors, I learned that the publication also had been placed unstamped in their mailboxes.


James G. Calhoun

Subscribed and sworn before me this 23rd day of November 1982


Notary Public

My Commission Expires: _____

James R. Kelly, Notary Public
Lower Merion Twp., Montgomery County
My Commission Expires June 20, 1983
Member, Pennsylvania Association of Notaries

83040415121

(11)

AFFIDAVIT OF ELIZABETH J. DUNN

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a registered voter in Pennsylvania's 13th Congressional District; I reside at 425 Righters Mill Road, Gladwyne, Pennsylvania 19035 (telephone 215-649-1781), and I am employed as Manager of the Norristown office of U.S. Representative Lawrence Coughlin.

3. On Tuesday, November 2, 1982, I visited a number of polling places in Lower Merion Township, Pennsylvania, and found copies of political publication posted or available on tables for distribution at the polls.

4. The publication carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

5. The publication in headlines and text called specifically for the defeat of U.S. Representative Lawrence Coughlin at the polls.

6. I saw the publication posted or available for distribution at: Lower Merion 1-3, St. Christopher's Church, Gladwyne, PA 19035; Lower Merion 10-1, Haverford School, Lancaster Avenue, Haverford, PA 19041; Lower Merion 11-1, Lower Merion Baptist Church, Old Gulph Road, Bryn Mawr, PA 19010; Lower Merion 11-2, Bryn Mawr Fire House, Bryn Mawr, PA 19010.

Elizabeth J. Dunn
Elizabeth J. Dunn

Subscribed and sworn before me this 14th day of December 1982.

Notary Public
Notary Public

Notary Public, Notary State of Pa.
My Commission Expires March 4, 1984

83040415122

12

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a United States Representative from Pennsylvania's 13th Congressional District and I am a registered voter at 856 Mount Moro Road, Villanova, Pennsylvania 19085.

3. I was the Republican candidate for reelection in the November 2, 1982 General Election and I was opposed by Martin J. Cunningham, Democratic nominee.

4. On October 28, 1982, my Norristown office at 607 One Montgomery Plaza, Norristown, Pennsylvania 19401 (Telephone: 215-277-4040) was notified by phone that copies of an unsigned political flyer, The Spirit of American Vision, were distributed as an insert to a number of weekly newspapers.

5. A copy of the publication was obtained and it carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, Pennsylvania 19085, and a telephone number, 525-1589.

6. The publication in headlines and text called specifically for my defeat at the polls.

7. On October 28, 1982, I telephoned George B. McGeehan, Jr., managing editor of the Times-Chronicle, 413 Johnson Street, Jenkintown, Pennsylvania 19406, who confirmed that The Spirit of American Vision political flyer was distributed as an insert to his weekly newspaper and several others published by Montgomery Publishing Company. Mr. McGeehan told me that the publication was a paid insert and was distributed in about 20,000 newspapers.

Lawrence Coughlin
LAWRENCE COUGHLIN

Notary of Columbia

Subscribed and sworn before me this 21st day of December, 1982

Mary Curtis Bowman
Notary Public

My Commission Expires: May 30, 84

83040415123

13

STATEMENT OF ROSENFELD FOR HIS AFFIDAVIT BEFORE ME AND SAYS:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto:

2. I am Administrative Assistant to U.S. Representative Lawrence Coughlin and reside at 7111 Thrasher Road, McLean, Virginia 22101. (Telephone 703-356-0323) My office address is 2467 Rayburn House Office Building, Washington, D.C. 20515. (Telephone 202-225-6111)

3. In my capacity as Administrative Assistant, I was apprised in Representative Coughlin's Washington office on October 21, 1982, by telephone that a political publication was being distributed which called explicitly for the defeat of Representative Coughlin at the polls.

4. I was informed by Miss Elizabeth J. Dunn, Representative Coughlin's Norristown office manager, and by Mr. James G. Calhoun, 1107 Beech Road, Rosemont, Pennsylvania 19010, of the distribution including stuffing of mailboxes.

5. A copy of the publication was transmitted via telecopier and carried the name, The Spirit of American Vision; and address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

6. I recognized the address and telephone number as those of Philip (Bart) Moran with whom I had spoken by phone on at least two previous occasions.

7. After several attempts to reach Mr. Moran whose phone line was busy, I contacted him later the morning of October 21, 1982. I asked Mr. Moran directly if he was responsible for publishing and distributing the political flyer, and he freely admitted that he was.

8. On the morning of December 8, 1982, I went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address.

Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December 1982

Mary Curtis Bowman
Mary Curtis Bowman
Notary Public

83040415124

203978
Villanova Associates
West Wing
1300 Valley Road
Villanova, PA. 19085
(215) 923-1389

14 Curry
Attachment 2
February 3, 1983
6:14:19

Mr. Charles N. Steele
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Steele,

This letter is in response to the matter in your office designated MUR 1513. Your letter dated January 4 was received regular mail today, February 3. I was unavailable to receive the certified copy.

83040415125
It is true that I did compile and publish the referred to leaflet and that it did not at first include my name as called for in S 110.11 of the Code of Federal Elections. According to precedent setting cases, the law was established to restrain attempts at anonymous political campaigns. I had no such intention. Clearly, had anonymity been my goal, I would not have included my address and telephone number. Once it was brought to my attention that the election laws required personal identification, I obtained a personalized rubber stamp and stamped all available copies of the leaflet. It was not apparent to me that my personal identity was of any significance to the point of my message. Once I became aware of the law, every effort was made to comply.

As part of that effort, I visited the Villanova University Law Library and contacted a Federal Elections Commission representative at an 800 telephone number. After a lengthy description of my activities, and several questions as to my past and future obligations for compliance she informed me that the violation was minor, that I should comply in the future, that I should not be too concerned, and that I should wait to be notified if there was to be a complaint.

My research at Villanova did not alert me to the requirements to file an expenditure report with your office, which according to the complaint was due by December 2, 1982. The cost of printing and distribution of the leaflet did exceed \$250. Although it is past that date, I submit the enclosed pursuant to S 109.2.

I request a copy of FEC Form 5 so that, although late, I may formally comply at this time with the requirements.

In further defence of this complaint, I would like to repeat that I had no intention to hide my identity and, in fact, personally gave a copy of the leaflet to a friend and senior campaign worker of Lawrence Coughlin. As stated in the complaint, I freely admitted to Mitchell Rosenfeld that I was the author and, following his telephone call to me, in which he said they would probably be getting back to me, sent a letter signed by me to several local editors outlining the conversation. The leaflet was distributed

(15)

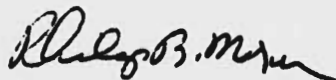
Villanova Associates
West Wing
1300 Valley Road
Villanova, PA. 19085
(215) 325-1509

throughout the district by members of several organizations, many of which I met with personally (at which time I indicated that they should not be placed in mailboxes) and was delivered by me personally to reporters at local newspapers who knew me by name.

I regret that my research into election laws did not disclose the requirements of a filing of expenditures but have included it here, albeit late. Although it is apparent that I did not conform to the letter of the law, there was no intent in spirit to circumvent my obligations and in fact, by preparing the leaflet, I was expressing a deep felt concern for an issue of great significance to our nation and planet. My intention was to fulfill my duty as a citizen and I was in fact, following the advice of Lawrence Coughlin who stated at a local Chamber of Commerce luncheon that citizens should overcome apathy and participate in government and the election process.

I respectfully request that this complaint be dismissed since compliance with the regulations would have in no way altered the effect of the leaflet or results of the election. If any consequence came from my activities, it was not materially different than had compliance been strictly adhered to and there was never any intention of violating any regulations. Certainly, any future election activities will be undertaken with every effort to comply to the letter of the Federal Election Commission regulations.

Very truly yours,



Philip E. Moran

83040415126

Villanova Associates
West Wing
1300 Valley Road
Villanova, PA. 19085
(215) 523-1589

16

FEC Form 5 Information

Reporting person: Philip B. Moran
Address: 1300 Valley Road, Villanova, PA 19085
Occupation: Sales
Employer: Self

Disbursements:	Suburban and Wayne Times,	\$1900.00
	Montgomery County Publishing Company	<u>900.00</u>
	Total	\$2800.00

The expenditures were made in opposition of Lawrence Coughlin-Congressman

It is hereby certified that expenditures described above were in no way made in cooperation, consultation or concert with, or at the request or suggestion of any candidate or any authorized committee or agent thereof.

Philip B. Moran
Philip B. Moran

Subscribed and sworn before me this 4th day of February 1983

James R. Rolli
Notary Public

My commission expires Lower Merion Twp., Montgomery County
My Commission Expires June 20, 1983
Member, Pennsylvania Association of Notaries

83040415127



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

17

Attachment 3

Philip Bart Moran
Spirit of American Vision
1300 Valley Road
Villanova, Pennsylvania 19085

Re: MUR 1513

Dear Mr. Moran:

The Federal Election Commission notified you on February 3, 1983, of a complaint which alleges that you and your organization had violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on February , 1983, determined that there is reason to believe that you and your organization have violated 2 U.S.C. § 441d, 433 and 434 provisions of the Act. Specifically, it appears that you and your organization violated: a) 2 U.S.C. § 441d by failing to place a disclaimer on a leaflet and b) 2 U.S.C. § 433 and 434 by failing to register and report.

Your response to the Commission's initial notification of this complaint did not provide complete information regarding the matter in question. Please submit answers to the enclosed questions within 10 days of receipt of this letter.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However in the absence of any information which demonstrates that no further action should be taken against your committee, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

83040415128

Philip Bart Moran
Page Two

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 have any questions, please contact Deborah Curry, the attorney assigned to this matter at (202)523-4000.

Sincerely,

Enclosure
Procedures
Interrogatories

83040415129

(19)

Philip Moran
The Spirit of American Vision

INTERROGATORIES (MUR 1513)

1. a) Is it correct to refer to The Spirit of American Vision by that name? Is that the name of the organization? If not, what is the correct name?

b) Is this organization also known as The Committee to Unelect Coughlin?

c) Was The Spirit of American Vision ever known by other names? If so, please list any history of name changes.

2. a) What type of organization is The Spirit of American Vision?

b) How was it formed?

c) When was it formed?

d) What are the objectives and purposes of The Spirit of American Vision?

e) Is it registered with any government entity?

83040415130

f) Is The Spirit of American Vision incorporated or has it ever been incorporated? If so, what is the state of incorporation? When was it incorporated?

g) Does The Spirit of American Vision have any connection with any other political committees?

3. What is your position and duties and responsibilities with The Spirit Of American Vision?

4. Are there other members of The Spirit of American Vision?

5. a) How many leaflets were printed?

b) What was the cost of printing the leaflets?

6. a) How many leaflets were distributed?

b) What was the cost of distributing the leaflets?

83040415131

(21)

7. Who distributed the leaflets?

8. How were the leaflets distributed? Be specific.

9. On what date(s) were the leaflets distributed?

10. To whom were the leaflets distributed?

11. Who paid for all the costs in connection with the printing and distribution of leaflets? Please identify each person and/or account from which disbursements were made.

12. What was the total cost expended in the printing and distribution of the leaflets? Please include cost of distributing leaflets by hand throughout the district.

83040415132

13. Did you or The Spirit of American Vision receive payments from any political committee for distribution of the leaflets? If so, please list the names of the committees and the amount.

14. Who contributed money to the printing and distribution of the leaflet? Please list name, address and amount .

15. What is the total amount collected by you or The Spirit of American Vision during 1982?

16. What is the total amount of money expended by you are The Spirit of American Vision during 1982?

17. Did you or the Spirit of American Vision support other federal candidates in any way? If so please indicate the candidate supported and the amount expended.

83040415133

8 3 0 4 0 4 1 5 1

FEC
WASHINGTON OFFICE
2407 RABORN BUILDING
620 0002-410:12
DATE: 12/21/82
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541
(202) 477-4040
556-1755

Congress of the United States
House of Representatives
Washington, D.C. 20515

December 21, 1982

Attachment 1

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

Gentlemen:

In reference to the October 27, 1982 letter of U.S. Representative Lawrence Coughlin and your October 29, 1982 reply, I am filing a formal complaint against Philip (Bart) Moran, 1300 Valley Road, Villanova, Pennsylvania 19085.

The complaint has been filed in accordance with the seven (7) points identified in the October 29, 1982 letter from FEC Associate General Counsel Kenneth A. Gross with accompanying exhibits and affidavits.

Sincerely,

Mitchell A. Rosenfeld

Mitchell A. Rosenfeld
Administrative Assistant

MAR/r
HAND DELIVERED

(2)

In the matter of:-

Mitchell A. Rosenfeld
Complainant

V.

Philip (Bart) Moran
Respondent

MUR _____

COMPLAINT

Mitchell A. Rosenfeld, COMPLAINANT, 7111 Thrasher Road, McLean Virginia 22101, (703) 356-0323 and office address, 2467 Rayburn House Office Building, Washington, D.C. 20515, (202) 225-6111, files this complaint, the attached affidavits of Miss Elizabeth J. Dunn, Mr. James Calhoun, United States Congressman Lawrence Coughlin, and COMPLAINT, and accompanying exhibits pursuant to 2 U.S.C. 441(d) (a) and 11 CFR 110.11, and 2 U.S.C. 431(17) and 11 CFR 109.1(a), and 2 U.S.C. 434(c) and 11 CFR 109.2(a), against Philip (Bart) Moran, 1300 Valley Road, Villanova, Pennsylvania 19085 (215) 525-1589.

Facts

1. United States Representative Lawrence Coughlin was a candidate for reelection to the U.S. House of Representatives in the November 2, 1982, General Election, running in the 13th District of Pennsylvania.
2. A flyer or leaflet was published explicitly calling for the defeat of U.S. Representative Lawrence Coughlin in the General Election. (Exhibit 1 attached)
3. The flyer was distributed by:
 - a. being stuffed in mailboxes in the 13th District of Pennsylvania, (affidavit attached)
 - b. being available on General Election Day at polling places, (affidavit attached)
 - c. being inserted in The Times-Chronicle, (Jenkintown, Pennsylvania) and a number of other newspapers. (affidavit attached)
4. The flyer contained no, or improper, notice of sponsorship:
 - a. No individual name or names appear on the flyer. Only the organizational names "The Spirit of American Vision, 1300 Valley Road, Villanova, Pennsylvania 19085", "Committee to Unelect Coughlin", and telephone number "525-1589", appear. (Refer to Exhibit 1)

1. Philip Moran is listed at 1300 Valley Road, Villanova, Pennsylvania telephone number 626-1889, according to Cole's Philadelphia Suburban Reverse Directory. (Exhibit 2 attached)

3

5. On October 21, 1982, COMPLAINANT spoke with RESPONDENT by telephone at which time RESPONDENT admitted that he was responsible for publishing and distributing the flyer. (affidavit attached)

6. RESPONDENT was under an affirmative duty to file proper disclosure with the Federal Election Commission. 2 U.S.C. 441(d) (a)

a. RESPONDENT spent more than \$250 on this independent expenditure. (affidavits attached)

b. On the morning of December 8, 1982, COMPLAINANT went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova Pennsylvania 19085, or any other address. (affidavit attached)

Violation

1. 2 U.S.C. 441(d) (a) and 11 CFR 110.11 provide that there must be proper notice of sponsorship -- commonly called a "disclaimer" -- clearly stating who paid for and authorized the advertising publication advocating the defeat of a clearly-identified candidate and/or soliciting contributions for that purpose. This requirement is an essential component of the policy of full disclosure which underlies the Federal Election Campaign Act. The attached flyer (refer to Exhibit 1) specifically advocates the defeat of Congressman Coughlin, a clearly-identified candidate. Accordingly, this flyer should have included the "disclaimer" mandated by the Act.

2. 2 U.S.C. 431(17) and 11 CFR 109.1(a), 1 U.S.C. 434(c) and 11 CFR 109.2(a) provide that proper disclosure information must be filed regarding independent expenditures aggregating more than \$250 in the calendar year. The attached flyer (refer to Exhibit 1) appears to have been handsomely produced and widely distributed. (refer to affidavits) The total production and distribution costs may well have exceeded \$250 and if so, RESPONDENT was required to file proper disclosure information by December 2, 1982. COMPLAINANT knows, however, of no such information filed with the Commission.

COMPLAINANT requests that the Federal Election Commission investigate these violations, take any necessary enforcement action, require RESPONDENT to comply to the fullest extent of the law, and subject RESPONDENT to any penalties and sanctions deemed appropriate.

Verification

The undersigned complainant swears that the allegations and facts set forth in this complaint are true to the best of his knowledge, information and belief.

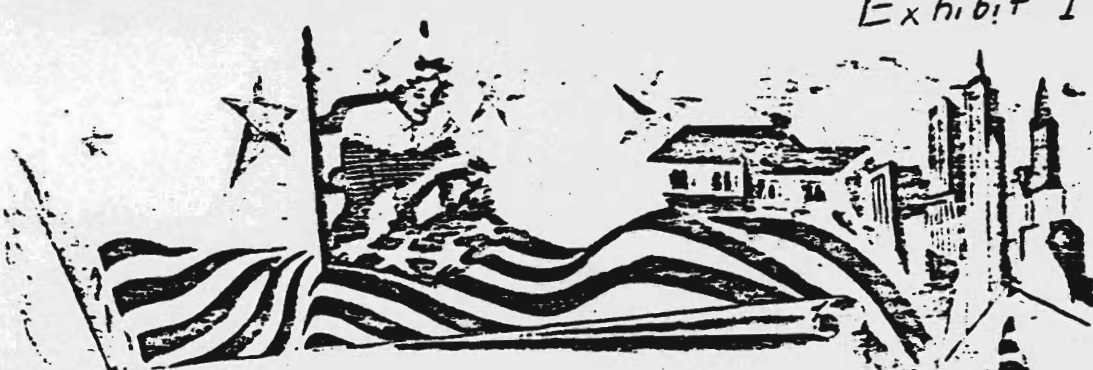
Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December, 1982

Mary Curtis Brown
Notary Public
My Commission Expires May 30, 84

(5)

Exhibit 1



MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT

VOTERS UNITED TO "UNELECT" COUGHLIN

Many in the majority of Montgomery County voters who favor a bilateral, verifiable freeze on nuclear weapons have joined forces to unseat Congressman Lawrence Coughlin.

From Abington to Upper and Lower Merion, Hatboro to Norristown, voters are out electioneering. Incensed by Coughlin's last minute vote change to defeat a Congressional nuclear freeze resolution under pressure from the White House, their anger has erupted into a flurry of activity. From the ranks of the Social Register to the unemployed, Republicans and Democrats of all ages are distributing leaflets, phoning friends and neighbors and writing letters to local newspapers to draw attention to an example of party politics they consider "inappropriate by any measure," on an issue which "profoundly affects the very existence of us all."

They intend to put politicians across the country on notice that U.S. military policy is outside the partisan horse trading typical on other issues. One voter said, "Nuclear arms control is the issue of the day. All the rest are footnotes." District 13 voters believe the defeat of Coughlin, until recently considered unbeatable, will send a resounding message and perhaps even an apology to the 75% of the nation's population that favors an immediate, bilateral, verifiable freeze on the testing, production and development of nuclear weapons.

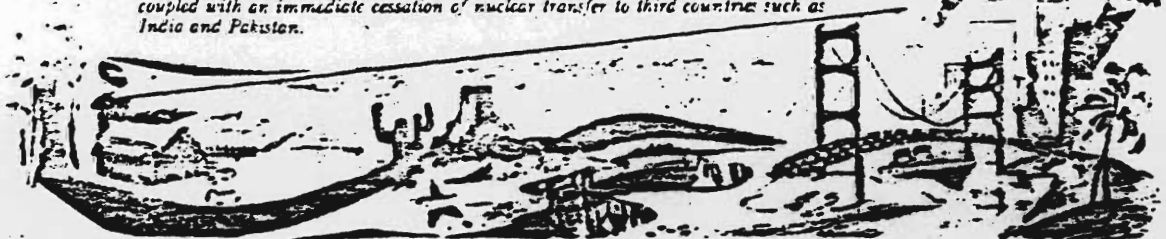
NOTE: Coughlin's opponent is Norristown Attorney Martin J. Cunningham. His position paper on the nuclear freeze states: I stand for and urge upon the administration, an immediate, verifiable world nuclear arms freeze agreement with the Russians, coupled with an immediate cessation of nuclear transfer to third countries such as India and Pakistan.

They are also upset with Coughlin's attempt to confuse the public by claiming that the Administration favors essentially the same freeze. "If that were the case why would he change his vote?" one asked.

The difference between the two freeze resolutions is the word "immediate." Reagan's idea is to keep building weapons during the current START negotiations, which voters believe will take years, to reduce from these higher levels and then to negotiate a freeze. They are apparently fed up with negotiations that have allowed round after round in the arms race without let up. They have done their homework and no longer believe Pentagon rhetoric that the U.S. is behind the Russians or that arms agreements cannot be verified.

Many of them have contributed to the wording of this leaflet and believe it should be read and acted on by all voters in the district by voting for Coughlin's opponent. (See note below).

This summer, Casper Weinberger petitioned to have the speed limit reduced on the road running in front of his summer house in Maine. When asked why, he said it endangers the lives of our children.



6

FREEZE COUGHLIN OUT

COUGHLIN LET'S DOWN NATION

Arms control is essential. The best way to start is by electing Congressmen who support an immediate, bilateral, verifiable freeze.

According to national polls, 75% of the American public desires an immediate bilateral, verifiable freeze on the testing, manufacture and deployment of nuclear weapons. Our Congressman, Larry Coughlin, let us down badly when he changed his vote at the last minute and defeated a Congressional resolution supporting a freeze.

COUGHLIN DOUBLESPEAKS DOUBLE-CROSS

Coughlin was pressured into his last minute switch by the White House. He told the Philadelphia Inquirer: "I made my decision the night before (the President telephoned.) It was based on individual judgment and how my constituents feel." The results of his own questionnaire, which he had before the vote, and before the President called, had already told him how his constituents feel. He used as a reason for his original vote, "I pushed the wrong button."

REAGAN WRESTLES COUGHLIN TO MAT WITH VOOODOO ARMS CONTROL

The Inquirer article said, "Reagan recently twisted the arms of Coughlin and Coyne (James K. Coyne - District 8) into voting for his version of a resolution on a nuclear freeze." Reagan's idea of a freeze is to build new generations of weapons, including 17,000 more warheads, negotiate a reduction from these higher levels and then freeze. This will take years. It took seven years to negotiate and not ratify SALT II.

WE OWE IT TO THE NATION TO UNELECT COUGHLIN

The Washington Post said, "Pennsylvania produced a record number of reversals, defections and shocks. Two who co-sponsored the freeze resolution, Coyne and Coughlin, went down the aisle and switched their votes in the seconds when it seemed the freeze was won. The President did his most successful digging for votes in the Pennsylvania delegation. Someone must have told him that convictions do not run deep in Keystone ranks. Reagan knew that a victory for the freeze advocates would be a clear statement that the House did not believe his lately adopted arms reduction rhetoric."

WE WILL BURY OURSELVES, THANK YOU

We're on a collision course with disaster. At the same time that our industrial plant is in desperate need of modernization, we're decimating our economy to support a \$1.6 trillion defense program. (A study by Pentagon Research Chief Richard DeLauer estimates cost overruns of \$500 billion.) We're sacrificing our ideology and national

"If each of the superpowers insists on primacy rather than parity in the arms race, how will it end? Since the cost of weapons grow almost geometrically in some cases and faster than inflation in others, a continued arms race must end in bankruptcy or war."

"Look at the record. Relentless competition without the slightest regard to all those warning voices. Missile on missile, weapon on weapon, new levels of destructiveness so grotesque as to defy rational understanding. What a confession of intellectual poverty, what a bankruptcy of intelligent statesmanship."



image as a just nation and are flirting with social unrest at home. We're being sold plans to acquire the ability to fight a six-month war that will, by Pentagon estimates, accept the possibility of 20 million deaths, up to 140 million by independent studies. The Pentagon is developing "launch on warning" and "first strike" strategies that destabilize the balance of power and increase the potential for accidental war. We're told that Russia is militarily superior to us and that arms agreements can't be verified.

WHO'S AHEAD

Most professionals say we're ahead, especially when quality and technology are considered, in some cases way ahead. On April 29, 1982, Senator Percy asked Secretary of Defense Casper Weinberger in a Senate Foreign Relations Committee: "Would you rather have at your disposal the U.S. nuclear arsenal or the Soviet Union nuclear arsenal?" Weinberger answered, "I would not for a moment exchange anything, because we have an immense edge in technology." Also under oath, Joint Chief of Staff General John Vessey said, "Overall, would I trade with the Russians? Not on your life."

Independent agencies in Sweden, England and the United States, even the Defense Department, say there is at least parity. With the tremendous overkill capacity of both nations, the question of who is ahead is irrelevant. IBM's Thomas Watson told a graduation class in June, "Politicians in administration after administration, heavily influenced by experts treating nuclear devices as simply upgraded conventional weapons, have been convinced that superiority is possible. Only rarely and briefly have some realized that all that really comes on either side is sufficiency. If I have a gun at your forehead, and you have one at mine, it makes little difference how many or what kind of guns either you or I have in reserve."

If the Russians destroyed, in a "blue lightning strike", all our ICBM's, all our bombers and the half of our submarines usually in port, we'd still be able to destroy with our invulnerable submarines at sea, every large and medium sized city in Russia, 15% of their population and 30% of their industry - twenty times. More important than size or quantity of bombs is which way the wind blows the fallout on the day of a strike.

CAN WE TRUST THE RUSSIANS?

We have the technology to verify Soviet arms production and deployment. We can photograph from satellites in such detail that even home clothes are readable. Our satellite sensors, radar, seismic stations and air sampling devices can detect any significant violations. William Colby, former director of the CIA, said in May, "A mutual and verifiable freeze on the development of nuclear weapons by the Soviet Union or the U.S. would be feasible to negotiate. We do not have to, nor should we, trust the Russians."

In a review of Reagan's *Ruling Class*, a book about the 100 top administration officials a question of whether the Soviets had military superiority over the U.S. drew no endorsement from CIA Director Casey, Chief over Negotiator Rowley or Deputy Defense Secretary Carlucci.

"With the unleashing of the atom, everything has changed, save our way of thinking. Thus we drift towards unparalleled catastrophe."

Einstein

"Where our country is in trouble, it is where people refused to change... We are in trouble wherever people predicted that past trends would always continue."

Jane Bryant Quinn

WHO'S IN CONTROL? WHO'S RESPONSIBLE?

In the opinion of dozens of objective professionals in many disciplines, our defense industry is run by inertia. It's out of the realm of human rationality and we're being propagandized to support this outrageous build-up out of irrational fear. Strategies are endless; reasons can always be found to arm a nation. But one after another, premises fail when they are analyzed in the context of history and human nature.

How many times have we seen the arms race described as necessary or endless? In April, nationally syndicated, conservative James J. Kilpatrick wrote, "A point was reached long ago at which further additions to these monstrous armaments became senseless. There have been 37 years of lunacy, of idiots racing against imbeciles, of civilized nations staggering blindly toward a finish line of unspeakable peril. The immediate necessity is to stop the further build-up of nuclear weapons by either side."

Who's in control? We, the voters are in control. Who's responsible? You and I.

To the Editor:

The U.S. military-industrial complex can now, more accurately than ever before be compared to a malignant tumor. There is a tunnel vision view of the world so profoundly distorted that it leaves one speechless with disbelief.

Philip H. Truender
King of Prussia, PA

WHAT'S THE CASE FOR URGENCY?

The international monetary system is in disarray and trade wars are emerging. Countries are insolvent and governments are failing. Russia will soon be undergoing transition to a new and unknown leadership. We need time to work out long-term solutions to international conflicts. Arnold Toynbee, the social historian who analyzed the rise and fall of 22 civilizations wrote in the fifties, "The most ominous thing about World Wars I and II is that they are not isolated. They are two wars in a series... not only a series but a progression. War has been following war in an ascending intensity, and the war of 1939-1945 is not the climax of this movement."

The Bulletin of Atomic Scientists measures its perceived imminence of war. Started a few years ago at 12 minutes to midnight it is now at four minutes to midnight, suggesting that the need for arms control is profound.

We need officials in Washington who will work to stop the arms race and who recognizes the need for serious arms reductions regardless of partisan politics. After an election, politicians and pollsters call the results in detail. If we keep Coughlin home for a couple of years, we will have sent a resounding announcement to politicians throughout the nation that they will be held accountable for significant progress in arms negotiations.

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The Philadelphia Inquirer Pull back from the brink: 'Yes' for a nuclear freeze

Since the city of Hiroshima was burned to dust, since the days when mushroom clouds erupted from American deserts and the atolls of the Pacific, since *On the Beach* and *Dr. Strangelove* and the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few game public voices to that fear, among them Quaker activists, frightened atomic scientists and the high-brow sorts of SANE. Among most others, there was a belief that political leaders were imbued with a healthy fear of incineration themselves, that common sense would keep fingers off the button.

Today that faith is seriously eroded. From the moment President Reagan came into office rattling a nuclear sabre, that latent fear began to surface and express itself. By last spring opinion surveys showed that 72 percent of Americans favored a freeze on nuclear.

With the words "mutual" and "verifiable" tacked into the text (of the freeze resolution), many have thought that even President Reagan would find it hard not to support the freeze. But on a political swing that took him to Columbus, Ohio, earlier this week, Mr. Reagan felt obliged to question the patriotism of a crowd of pro-freeze demonstrators who booed him. "They were demonstrating on behalf of a movement that I think is inspired by, not the sincere, honest people who want peace," he said, "but by some people who want the weakening of America and who are manipulating many honest and sincere people."

Hogwash! It is not the Kremlin that has

unleashed this movement. It was not clever KGB propaganda that provoked 700,000 Americans worried about the arms race to march in New York last June in the largest political demonstration in the history of the United States. It has not been just the Soviets — Sen. Jeremiah Denton (R., Ala.) and the *Reader's Digest*, notwithstanding — who have spread this cold blanket of dread. Shame also lies on the doorstep of the White House — and hangs over the Congress. Washington is the Ground Zero of the nuclear freeze movement.

The American people have been horrified at the loose talk coming out of official Washington — talk of the possibility of limited nuclear war, of buckling up for "protracted" nuclear war, of nuclear "warning shots across the bow," of the feasibility of pulling America and the rest of humanity back up to the boot straps after a nuclear war.

The American people heard their undersecretary of defense quoted as saying in March: "Dig a hole, cover it with a couple of doors, and then throw three feet of dirt on top. Everyone's going to make it if there are enough shovels to go around."

Enough is enough. Nuclear war is too important to be left to generals and politicians unwilling to treat it with the gravity it demands. It is most assuredly the business of every citizen. The civilian population is, after all, the unfortunate nuclear infantry drafted for this game of global brinksmanship. A loud "yes" vote will send a message to Washington to wake up and start dealing more urgently with the reality. There are not enough shovels to go around.

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PSYCHIC NUMBING-TOLL OF THE NUCLEAR AGE

"Lord, what would you do if you were the only one left after a war?"

nine year old boy from Glastonbury.

The existence of nuclear weapons is taking a crushing toll on humanity. Robert Jay Lifton, Professor of Psychiatry at Yale, wrote recently "With the threat of nuclear extinction, parents now doubt their ability to see their children safely into some form of functional adulthood. And the child must also sense, early on, not only these parental doubts but the general instability of the adult world to guarantee the safety of their children. The marital relationship itself is threatened. Any long-term commitment becomes harder when the permanence of all relationships is thrown into doubt."

These bombs, whether detonated or not, are terrorizing us. At least some of the psychic pressure would be relieved by stopping the constant addition to nuclear armaments.

"The present generation cannot divert itself of its human power to choose, and, if it were to choose death and evil, this would be its own choice, its own responsibility, its own sin."

Arnold Toynbee

"We shall not suffer silently the threat of nuclear holocaust. We have four children and two grandchildren. We care what happens to them."

Grandmother at the June 12th Rally

THREE MARTIN LUNCH?

Congressman Coughlin was recently asked in his office if he could disagree with the statements: "The Russians are ahead of the U.S. militarily," and "Arms agreements can be verified." He could not.

At a Main Line Chamber of Commerce luncheon in September, Chester County Congressman Richard Schulze stated that the Russians are ahead of us in arms. "If so," he was asked, "Why do Weinberger, Lehmann, Vessey, Haig, Rickover, and many other members of the current and past administrations, in many cases under oath before Congress, differ with your opinion?" Schulze said, "Well, you wouldn't expect those guys to say we were behind."

A prominent clergyman in the district, after a luncheon in Washington, had a chance to talk with Chief Arms Negotiator Rowney.

Clergyman: "Why does virtually every outside source of compara-

tive arms figures say we have the edge?"

Rowney: "The Defense Department has to make a case for Congressional appropriations."

Clergyman: "Do you mean we're not being told the truth?"

Rowney: "I wouldn't put it that way. They use a selective information technique."

At the Chamber of Commerce luncheon, Schulze said, "We're outclassed at the bargaining table. We're shoving more chips in the pile to see what happens. If it works good. If it doesn't..." He didn't finish the sentence. The Main Line Times phrased it "and his voice drifted off."

According to Schulze, his source of information on military superiority was "Jimmy" Schlesinger. (Former Secretary of Defense). According to the April 5, 1982 Inquirer, Schlesinger says, "Superiority is very difficult to measure. Neither side is ahead. It's a standoff."

ARE WE WILLING TO LET THE RUSSIANS REACH PARITY WITH US?

The following statements are taken from the records of the United Nations Conference on Disarmament, 1978-1981.

- 1950: Einstein said "radioactive poisoning of the atmosphere and human annihilation of any life on earth has been brought within the range of technical possibility."
- 1956: Eisenhower said "One day both sides will have to meet at the conference table with the understanding that the era of armaments has ended and the human race must conform its actions to this truth or die."
- 1974: Henry Kissinger said "The accumulation of nuclear arms has to be contained if mankind is not to destroy itself."
- 1980: Jimmy Carter said in the event of nuclear war "the survivors, if any, would live in despair amid the poisoned ruins of civilization that had committed suicide."

8

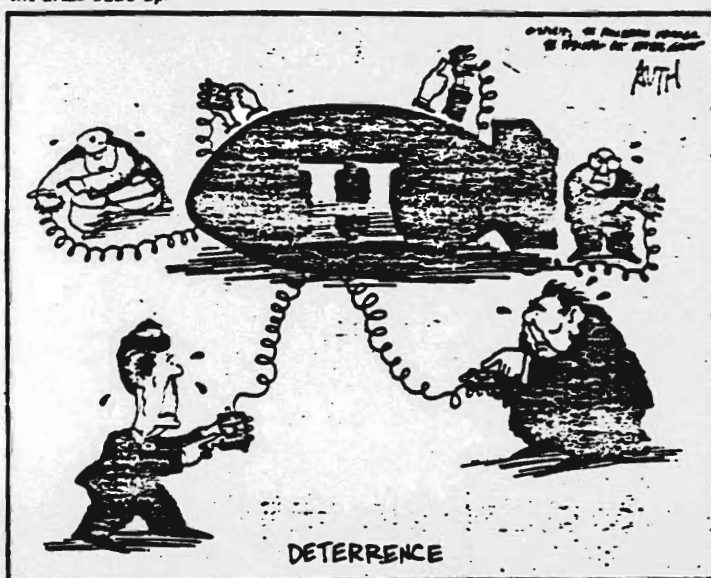
CAN COUGHLIN BE UPSET?

Yes. The race for our Congressional seat is much closer than most people think. Gains from reapportionment, pro-freeze campaigns that will bring voters out to the polls, Coughlin's flip-flop, the concern of senior citizens over social security, women's and the 18 to 35 year old's concern with the arms race are all special factors bearing on this year's election.

We must get Democrats and moderate Republicans to the ballot box. Even most of the conservatives we have talked with are upset with Mr. Coughlin's partisanship and last minute switch on the freeze issue and many are still undecided.

This year voters will have the opportunity in many townships and boroughs to join, informally, voters across the nation who will have freeze referendums on their ballots. Watch for flyers and other notices.

Since the economy, as an issue, is not as big a factor in our district as many others, an upset of Coughlin will be closely identified with the public's dismay of the arms build-up.

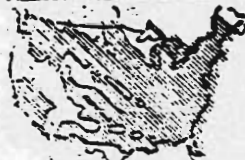


IN A NUCLEAR PAN...



THESE TARGETS ARE LIKELY TO BE HIT...

FALLOUT WOULD ENVELOPE...



THE SHADED AREAS

Dear Residents,

Please pass this leaflet on to a friend or read it over the telephone. And ask them to make phone calls. Impress on them the importance of their vote.

Volunteers to distribute this leaflet please call 525-1589.

To make our voices heard **WE MUST VOTE.**

This appeal was put together, along with the help of many others, by a private citizen with no affiliation to any organization except his family (which isn't all that organized). He registered Democrat for the first time this year but still considers himself unaffiliated with any organization.

CASPER'S CORNER

To the Editor:

Casper Weinberger's Aug. 9th Op-Ed Page defense of nuclear deterrence underestimates the intelligence of the American people. It also misrepresents the facts. The "paradox" of nuclear deterrence is not an unsatisfactory paradox. It is a hoax.

Thomas J. Montville
Bryn Mawr, PA

PROS AND CONS

"American nuclear forces 'have proved' and to date to force the Soviet Union to some serious reconsideration of its position on arms race." — New York Times, Aug. 20, 1982.

— Editor, Montville
The Evening Chronicle
New York, N.Y.
Signed by Casper Weinberger,
Secretary of Defense

"Our part on how to handle the Soviet Union is a matter of course — there would be no reason to do a war." — Editor to the Editor of the Evening Chronicle, June 22, 1982.

— Editor to the Editor of the Evening Chronicle, June 22, 1982.
Signed by Casper Weinberger,
Secretary of Defense

Our objective with this leaflet is to bring you a review of the arms race, without graphic detail. Sometimes the truth can be painful, but lack of knowledge can be worse. And truth leads to action. There is an alternative to the arms race. Admiral Rickover, when asked by Congress how he thought we could control the arms race said he thought divine intervention was necessary. In discussions with hundreds of people, we sense a move to a higher consciousness. Our research leads us to believe that war is not inevitable, in fact, not likely, but we live in a complex world and divine intervention starts within each of us. One way we can express it is with our vote.

To everyone who has helped with this effort we thank you. Our next project, figuring out why some people want to ban Peter Pan, will be more fun.

WITH YOUR VOTE 1983 CAN BE THE YEAR OF THE THE NUCLEAR ARMS FREEZE

The preparation and distribution of this leaflet has caused us no incur substantial personal financial obligations. Any contribution you can make will help us repay these debts. Any amount is welcomed. Please mail your tax-deductible help, today, including your address so we can send you a follow-up on the election.

The Spirit of American Vision
1300 Valley Road
Villanova, PA 19085

A non-profit, grassroots organization dedicated to American National Security thru Multi-National Arms Control.

Committee to "Unelect Coughlin"

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318 Walter S Starnard	72 867-3766
319 S S Davidson	69 866-0755
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329 W A Edwards	866-3471
330 Dr F F Faudon	79 572-4782
331 M V Faudon	79 572-7692
332 M H Chubb	864-3630
333 S L Foster	69 576-0837
334 W G Andrews	867-5742
335 Joseph R Stok	867-8236
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Ac # Mrs Mary E Draper	857-3720
Ac # Garret Garage	857-4084
Ac # George T Glenn	76 857-4251
Ac # William T Giori	857-8341
Ac # F A Murray	80 857-4292
Ac # Eugene C Kuth	857-4049
Ac # Carl M London	78 857-2508
Ac # Charles London	75 857-3202
Ac # Wilbur N Marsh	857-5416
Ac # George W Mier	857-5403
Ac # J T Morrison	857-3301
Ac # Charles A Sorenson	857-3820
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31 Alex Turcotte	73 833-4317
61 John C Grover	833-7139
74 F L Pappas	78 836-0480
713 Part K Gable	86 833-0813
717 Douglas A Werner	833-6635
Patricia Werner	80 833-6535
719	NP
721 R Schultz	79 835-2964
723 K Ingelsby	80 833-7006
725 Joseph M Frisch	833-5056
727 William P Muthart	833-3081
726 Nicholas Kurniak	72 833-6562
730 Charles W Ferry	73 833-1202
731 E V Gracie	833-0751
732 M's Est W Davis	833-7876
733 Edgar M Blackburn	86 833-3706
736 Walter T Truen	73 833-0433
738 Joseph J Nordzon	833-4973
739 Jr J D Bookbinder	83 833-7324
740 Michael D Harvel	80 833-9107
741 Andrew Mayer	833-7167
742 Michael Suttall	84 833-7868
743 John E Foutch	75 835-1632
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745 Richard Lombard	73 833-2398
747 Joseph Varady	72 833-7462
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749 John J Gable	833-7256
751 John L Foulds Jr	68 833-5595
753 Wayne Fowler	71 833-7573
757 Norman W Boyer	833-7804
756 John Ragonetti	79 833-2555
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761 Warren H Byrum Jr	73 835-1808
Ac # James E Voytek Jr	73 833-8103
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23	John Maguire	277-1184
25	John M. P. P. A.	272-4511
27	J. W. W. W.	278-7171
29	Arthur D. R.	64 272-2511
31	W. R. R. R.	72 278-8674
33	W. R. R. R.	76 278-2514
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39	R. A. M. M.	278-8518
41	J. E. K. K.	278-2512
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1025	Continental Properties	76	525-4264
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	Jesse C. Gray, Jr.	75	527-2683
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	Dr. Ger. Morganroth	77	527-6295
1045	Dr. M. L. Posenstam	77	527-1607
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1051	Dr. Steven. Morantz	77	527-2236
1054	Stephen. Shemer	76	525-4440
1060	Frank R. Kasper	72	527-2182
1062	W. Henry Jr. & Assoc.	77	527-4687
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241	Mrs. J. J. Burrell	76	675-6750
251	Fred E. Wesson	76	675-6639
251	G. G. Gore	65	672-6853
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281	David L. Huse		443-6181
307	Don 349	NP	
366	Mrs. Karl Stein	66	672-4288
377	365 363 481		
406	Raymond Duenkel	76	672-2116
413	Stephen Harvey	68	674-5321
448	James P. Scott	67	672-7452
455	William Kuntz	66	672-0128
465	John Daley	79	441-9588
473	Richard Johnson	67	672-6775
483	Herbison Crichton	66	674-1638
483	James Masena	66	672-6133
487	Michael F. Water	66	672-6589
505	513 521 529	NP	
537	Patrick Scadden Sr.	68	672-7889
543			
551	Anthony Puso		672-6650
600	M. Plummer	76	343-4989
	M. Rappaport	76	343-4989
683		NP	
691	Scott C. Hoffman	80	674-1385
695	Wm. Carosano	72	343-1891
715	Vincent Pavia	72	674-0448
723		NP	
731	A. Barro	72	674-2217
	Raymond J. Barro	72	674-3488
745	Thomas E. Binkis	72	674-1689
753	Edward R. Clayton	72	674-0854

AFFIDAVIT OF JAMES G. CALHOUN

James G. Calhoun for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I am a registered voter in Pennsylvania's 13th Congressional District and reside at 1107 Beech Road, Rosemont, Pennsylvania 19010 (Phone: 215-527-4864).
3. On Thursday, October 21, 1982, I found an unstamped political publication in my mailbox.
4. The publication carried a name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.
5. The publication featured headlines stating, "MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT," "VOTERS UNITED TO 'UNELECT' COUGHLIN," in which the flyer called explicitly for the defeat of U.S. Representative Lawrence Coughlin at the polls.
6. I telephoned the Washington, D. C., office of Representative Coughlin with the pertinent facts, and later discussed the flyer and its contents with Mitchell A. Rosenfeld, Representative Coughlin's Administrative Assistant.
7. In subsequent conversations with several neighbors, I learned that the publication also had been placed unstamped in their mailboxes.


James G. Calhoun

Subscribed and sworn before me this 23rd day of November 1982


Notary Public

My Commission Expires: _____

James R. R. Notary Public
Lower Merion Twp., Montgomery County
My Commission Expires June 20, 1983
Member, Pennsylvania Association of Notaries

(11)

AFFIDAVIT OF ELIZABETH J. DUNN

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a registered voter in Pennsylvania's 13th Congressional District; I reside at 425 Righters Mill Road, Gladwyne, Pennsylvania 19035 (telephone 215-649-1781), and I am employed as Manager of the Norristown office of U.S. Representative Lawrence Coughlin.

3. On Tuesday, November 2, 1982, I visited a number of polling places in Lower Merion Township, Pennsylvania, and found copies of political publication posted or available on tables for distribution at the polls.

4. The publication carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

5. The publication in headlines and text called specifically for the defeat of U.S. Representative Lawrence Coughlin at the polls.

6. I saw the publication posted or available for distribution at: Lower Merion 1-3, St. Christopher's Church, Gladwyne, PA 19035; Lower Merion 10-1, Haverford School, Lancaster Avenue, Haverford, PA 19041; Lower Merion 11-1, Lower Merion Baptist Church, Old Gulph Road, Bryn Mawr, PA 19010; Lower Merion 11-2, Bryn Mawr Fire House, Bryn Mawr, PA 19010.

Elizabeth J. Dunn
Elizabeth J. Dunn

Subscribed and sworn before me this 14th day of December 1982.

Marta Ann Lewis
Notary Public

2000 Public Notary Bond, Maria, Co.
My Commission Expires March 4, 1984

AFFIDAVIT OF LAWRENCE COUGHLIN

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a United States Representative from Pennsylvania's 13th Congressional District and I am a registered voter at 856 Mount Moro Road, Villanova, Pennsylvania 19085.

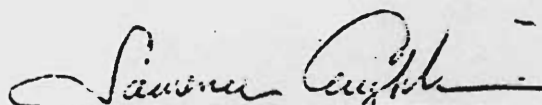
3. I was the Republican candidate for reelection in the November 2, 1982 General Election and I was opposed by Martin J. Cunningham, Democratic nominee.

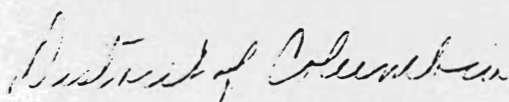
4. On October 28, 1982, my Norristown office at 607 One Montgomery Plaza, Norristown, Pennsylvania 19401 (Telephone: 215-277-4040) was notified by phone that copies of an unsigned political flyer, The Spirit of American Vision, were distributed as an insert to a number of weekly newspapers.

5. A copy of the publication was obtained and it carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, Pennsylvania 19085, and a telephone number, 525-1589.

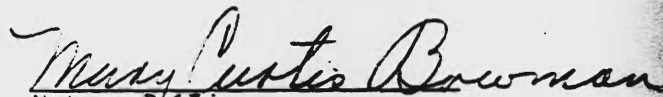
6. The publication in headlines and text called specifically for my defeat at the polls.

7. On October 28, 1982, I telephoned George B. McGeehan, Jr., managing editor of the Times-Chronicle, 413 Johnson Street, Jenkintown, Pennsylvania 19406, who confirmed that The Spirit of American Vision political flyer was distributed as an insert to his weekly newspaper and several others published by Montgomery Publishing Company. Mr. McGeehan told me that the publication was a paid insert and was distributed in about 20,000 newspapers.


LAWRENCE COUGHLIN



Subscribed and sworn before me this 21st day of December, 1982


Notary Public

My Commission Expires: May 30, 84

Mitchell A. Rosenfeld for his affidavit declares and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto:

2. I am Administrative Assistant to U.S. Representative Lawrence Coughlin and reside at 7111 Thrasher Road, McLean, Virginia 22101. (Telephone 703-356-0323) My office address is 2467 Rayburn House Office Building, Washington, D.C. 20515. (Telephone 202-225-6111)

3. In my capacity as Administrative Assistant, I was apprised in Representative Coughlin's Washington office on October 21, 1982, by telephone that a political publication was being distributed which called explicitly for the defeat of Representative Coughlin at the polls.

4. I was informed by Miss Elizabeth J. Dunn, Representative Coughlin's Norristown office manager, and by Mr. James G. Calhoun, 1107 Beech Road, Rosemont, Pennsylvania 19010, of the distribution including stuffing of mailboxes.

5. A copy of the publication was transmitted via telecopier and carried the name, The Spirit of American Vision; and address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

6. I recognized the address and telephone number as those of Philip (Bart) Moran with whom I had spoken by phone on at least two previous occasions.

7. After several attempts to reach Mr. Moran whose phone line was busy, I contacted him later the morning of October 21, 1982. I asked Mr. Moran directly if he was responsible for publishing and distributing the political flyer, and he freely admitted that he was.

8. On the morning of December 8, 1982, I went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address.

Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December 1982

Mary Curtis Bowman
Notary Public

Villanova Associates
West Wing
1500 Valley Road
Villanova, PA. 19085
(215) 523-1589

February 3, 1983

Mr. Charles N. Steele
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Steele,

This letter is in response to the matter in your office designated MUR 1513. Your letter dated January 4 was received regular mail today, February 3. I was unavailable to receive the certified copy.

It is true that I did compile and publish the referred to leaflet and that it did not at first include my name as called for in S 110.11 of the Code of Federal Elections. According to precedent setting cases, the law was established to restrain attempts at anonymous political campaigns. I had no such intention. Clearly, had anonymity been my goal, I would not have included my address and telephone number. Once it was brought to my attention that the election laws required personal identification, I obtained a personalized rubber stamp and stamped all available copies of the leaflet. It was not apparent to me that my personal identity was of any significance to the point of my message. Once I became aware of the law, every effort was made to comply.

As part of that effort, I visited the Villanova University Law Library and contacted a Federal Elections Commission representative at an 800 telephone number. After a lengthy description of my activities, and several questions as to my past and future obligations for compliance she informed me that the violation was minor, that I should comply in the future, that I should not be too concerned, and that I should wait to be notified if there was to be a complaint.

My research at Villanova did not alert me to the requirements to file an expenditure report with your office, which according to the complaint was due by December 2, 1982. The cost of printing and distribution of the leaflet did exceed \$250. Although it is past that date, I submit the enclosed pursuant to S 109.2.

I request a copy of FEC Form 5 so that, although late, I may formally comply at this time with the requirements.

In further defence of this complaint, I would like to repeat that I had no intention to hide my identity and, in fact, personally gave a copy of the leaflet to a friend and senior campaign worker of Lawrence Coughlin. As stated in the complaint, I freely admitted to Mitchell Rosenfeld that I was the author and, following his telephone call to me, in which he said they would probably be getting back to me, sent a letter signed by me to several local editors outlining the conversation. The leaflet was distributed

83040415147

13 FEB 8 4:19

RECEIVED
GENERAL INVESTIGATIVE
DIVISION

Villanova Associates

West Wing

1300 Valley Road

Villanova, PA. 19085

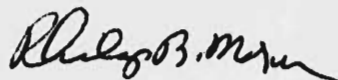
(215) 525-1589

throughout the district by members of several organizations, many of which I met with personally (at which time I indicated that they should not be placed in mailboxes) and was delivered by me personally to reporters at local newspapers who knew me by name.

I regret that my research into election laws did not disclose the requirements of a filing of expenditures but have included it here, albeit late. Although it is apparent that I did not conform to the letter of the law, there was no intent in spirit to circumvent my obligations and in fact, by preparing the leaflet, I was expressing a deep felt concern for an issue of great significance to our nation and planet. My intention was to fulfill my duty as a citizen and I was in fact, following the advice of Lawrence Coughlin who stated at a local Chamber of Commerce luncheon that citizens should overcome apathy and participate in government and the election process.

I respectfully request that this complaint be dismissed since compliance with the regulations would have in no way altered the effect of the leaflet or results of the election. If any consequence came from my activities, it was not materially different than had compliance been strictly adhered to and there was never any intention of violating any regulations. Certainly, any future election activities will be undertaken with every effort to comply to the letter of the Federal Election Commission regulations.

Very truly yours,



Philip B. Moran

83040415148

Villanova Associates
West Wing
1500 Valley Road
Villanova, PA. 19085
(215) 925-1589

FEC Form 5 Information

Reporting person: Philip B. Moran
Address: 1300 Valley Road, Villanova, PA 19085
Occupation: Sales
Employer: Self

Disbursements:	Suburban and Wayne Times,	\$1900.00
	Montgomery County Publishing Company	<u>900.00</u>
	Total	\$2800.00

The expenditures were made in opposition of Lawrence Coughlin-Congressman

It is hereby certified that expenditures described above were in no way made in cooperation, consultation or concert with, or at the request or suggestion of any candidate or any authorized committee or agent thereof.

Philip B. Moran
Philip B. Moran

Subscribed and sworn before me this 4th day of February 1983

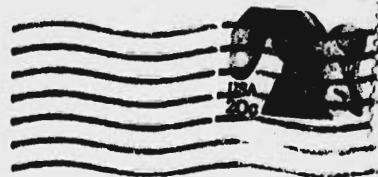
James R. Rolli
Notary Public

My commission expires Lower Merion Twp., Montgomery County
James R. Rolli, Notary Public
My Commission Expires June 20, 1983
Member, Pennsylvania Association of Notaries

83040415149

8 3 0 4 0 1 5 0

Villanova Associates
West Wing
1300 Valley Road
Villanova, PA 19085



Mr. Charles N. Steele
Federal Election Commission
Washington, D. C. 20463

Attentin: Deborah Curry

830404151

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use \$300

1/31/83
Permanently

RESPONSE
CLARENCE
90596

☐ HOLD

DATE

1-7-83
1ST NOTICE

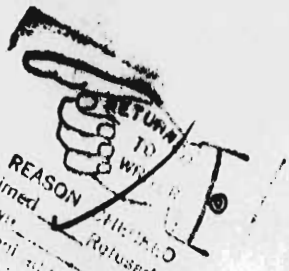
2ND NOTICE

RETURN

Detached from
PS Form 2840
Oct. 1980

Spirit of American Vision
1300 Valley Road
VILLAGE, PA 19085

POSTAGE AND FEES PAID



CERTIFIED

438704

83040415152

1/4

15/3

PS Form 3811, Oct. 1989

1. **SENDER:** Complete items 1, 2, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

2. The following service is requested (check one).

- ☐ Show to whom and date delivered _____
- ☐ Show to whom, date, and address of delivery _____

3. **RESTRICTED DELIVERY**

(The restricted delivery fee is charged to addressee in the return receipt form.)

TOTAL \$

4. **ARTICLE RETURNED TO:**

Spent of America Union
1999 Valley Rd
Valley Forge, PA 19065

5. **TYPE OF SERVICE:**

- ☐ Registered ☐ Insured
- ☐ Certified ☐ COD

ARTICLE NUMBER

438706

6. **Signature of addressee or agent**

7. **Print name of addressee or agent**

8. **Address** ☐ Address ☐ Authorized agent

9. **NAME OF DELIVERER**

10. **ADDRESSER'S ADDRESS (only if required)**

11. **NAME TO DELIVER MESSAGE**



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

3304011515
 OF *NOTIFIED*
 CLAIM CHECK
 Pe 905988

\$300

☐ HOLD

DATE

1-8-83

1ST NOTICE

2ND NOTICE

RETURN

Detached from
 PS Form 3849-A
 Oct. 1980

POSTAGE AND FEES PAID



Philip (Bart) Moran
1300 Valley Road
Villanova, PA 19085

REASON FOR RETURN TO WRITER
 Enclosed _____
 Unknown _____
 Insufficient address _____
 Moved _____
 Do not re-mail this envelope

CHECKED
 RETURNED

CERTIFIED

438705

63040415154



1/4

1513

PS Form 3811, Oct. 1982

1. **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

2. The following service is requested (check one):

☐ Show to whom and date delivered. —

☐ Show to whom, date, and address of delivery. —

☐ RESTRICTED DELIVERY
(The restricted delivery fee is charged in addition to the return receipt fee.) —

TOTAL \$ —

3. ARTICLE ADDRESS TO:
Philip M. Mann
1300 Valley Road
Villanova, PA 19085

4. TYPE OF SERVICE:
☐ Registered ☐ Insured ☐ COD
☐ Signature Required ☐ Collect

5. **POSTAGE:** ☐ Signature of addressee or agent
☐ Meter ☐ Addressee ☐ Authorized agent

6. **POSTAGE PAID BY ADDRESSEE**

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RETURN RECEIPT, REGISTERED MAIL, INSURED MAIL, AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 4, 1983

Mitchell A. Rosenfeld
Administrative Assistant
United States House of Representatives
2467 Rayburn Building
Washington, D.C. 20515

Dear Mr. Rosenfeld:

This letter is to acknowledge receipt of your complaint of December 21, 1982, against Philip (Bart) Moran and The Spirit of American Vision 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 five days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Steven Barndollar at (202) 523-4073.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in cursive script, reading "Kenneth A. Gross", followed by a stylized flourish.

By Kenneth A. Gross
Associate General Counsel

Enclosure

83040415155



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 4, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip (Bart) Moran
1300 Valley Road
Villanova, PA 19085

Re: MUR 1513

Dear Mr. Moran:

This letter is to notify you that on December 22, 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"). A copy of the complaint is enclosed. We have numbered this matter MUR 1513. Please refer to this number in all future correspondence.

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

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

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

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

83040415156

If you have any questions, please contact Deborah Curry, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross - by JBT

By Kenneth A. Gross
Associate General Counsel

83040415157

Enclosures

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 4, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Spirit of America Vision
1300 Valley Road
Villanova, PA 19085

Re: MUR 1513

Dear Sir/Madam:

This letter is to notify you that on December 22, 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"). A copy of the complaint is enclosed. We have numbered this matter MUR 1513. Please refer to this number in all future correspondence.

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

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

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

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

83040415158

If you have any questions, please contact Deborah Curry, the staff member assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Kenneth A. Gross

By Kenneth A. Gross
Associate General Counsel

83040415159

Enclosures

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

LAWRENCE COUGHLIN
12th District, Pennsylvania

COMMITTEE ON
APPROPRIATIONS

FRANKLIN D. ROOSEVELT

SUBCOMMITTEE ON
TRANSPORTATION

SUBCOMMITTEE ON
DISTRICT OF COLUMBIA

MEMBER

SUBCOMMITTEE ON
INDEPENDENT AGENCIES

MEMBER

SELECT COMMITTEE ON
NARCOTICS

1513-203 654
Curry

Congress of the United States
House of Representatives
Washington, D.C. 20515

December 21, 1982

RECEIVED AT THE FEC
CASH 7/29
02 DEC 21 AM 10
U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20531
202-547-4000
202-547-1700

DEC 22 P 1:35

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

Gentlemen:

In reference to the October 27, 1982 letter of U.S. Representative Lawrence Coughlin and your October 29, 1982 reply, I am filing a formal complaint against Philip (Bart) Moran, 1300 Valley Road, Villanova, Pennsylvania 19085.

The complaint has been filed in accordance with the seven (7) points identified in the October 29, 1982 letter from FEC Associate General Counsel Kenneth A. Gross with accompanying exhibits and affidavits.

Sincerely,

Mitchell A. Rosenfeld

Mitchell A. Rosenfeld
Administrative Assistant

MAR/r
HAND DELIVERED

83040415160

82 DEC 22 AIO: 18

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the matter of:

Mitchell A. Rosenfeld
Complainant

V.

Philip (Bart) Moran
Respondent

MUR _____

COMPLAINT

Mitchell A. Rosenfeld, COMPLAINANT, 7111 Thrasher Road, McLean Virginia 22101, (703) 356-0323 and office address, 2467 Rayburn House Office Building, Washington, D.C. 20515, (202) 225-6111, files this complaint, the attached affidavits of Miss Elizabeth J. Dunn, Mr. James Calhoun, United States Congressman Lawrence Coughlin, and COMPLAINT, and accompanying exhibits pursuant to 2 U.S.C. 441(d) (a) and 11 CFR 110.11, and 2 U.S.C. 431(17) and 11 CFR 109.1(a), and 2 U.S.C. 434(c) and 11 CFR 109.2(a), against Philip (Bart) Moran, 1300 Valley Road, Villanova, Pennsylvania 19085 (215) 525-1589.

Facts

1. United States Representative Lawrence Coughlin was a candidate for reelection to the U.S. House of Representatives in the November 2, 1982, General Election, running in the 13th District of Pennsylvania.
2. A flyer or leaflet was published explicitly calling for the defeat of U.S. Representative Lawrence Coughlin in the General Election. (Exhibit 1 attached)
3. The flyer was distributed by:
 - a. being stuffed in mailboxes in the 13th District of Pennsylvania, (affidavit attached)
 - b. being available on General Election Day at polling places, (affidavit attached)
 - c. being inserted in The Times-Chronicle, (Jenkintown, Pennsylvania) and a number of other newspapers. (affidavit attached)
4. The flyer contained no, or improper, notice of sponsorship:
 - a. No individual name or names appear on the flyer. Only the organizational names "The Spirit of American Vision, 1300 Valley Road, Villanova, Pennsylvania 19085", "Committee to Unelect Coughlin", and telephone number "525-1589", appear. (Refer to Exhibit 1)

b. Philip Moran is listed at 1300 Valley Road, Villanova, Pennsylvania telephone number 525-1589, according to Cole's Philadelphia Suburban Reverse Directory. (Exhibit 2 attached)

5. On October 21, 1982, COMPLAINANT spoke with RESPONDENT by telephone at which time RESPONDENT admitted that he was responsible for publishing and distributing the flyer. (affidavit attached)

6. RESPONDENT was under an affirmative duty to file proper disclosure with the Federal Election Commission. 2 U.S.C. 441(d) (a)

a. RESPONDENT spent more than \$250 on this independent expenditure. (affidavits attached)

b. On the morning of December 8, 1982, COMPLAINANT went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova Pennsylvania 19085, or any other address. (affidavit attached)

Violation

1. 2 U.S.C. 441(d) (a) and 11 CFR 110.11 provide that there must be proper notice of sponsorship -- commonly called a "disclaimer" -- clearly stating who paid for and authorized the advertising publication advocating the defeat of a clearly-identified candidate and/or soliciting contributions for that purpose. This requirement is an essential component of the policy of full disclosure which underlies the Federal Election Campaign Act. The attached flyer (refer to Exhibit 1) specifically advocates the defeat of Congressman Coughlin, a clearly-identified candidate. Accordingly, this flyer should have included the "disclaimer" mandated by the Act.

2. 2 U.S.C. 431(17) and 11 CFR 109.1(a), 1 U.S.C. 434(c) and 11 CFR 109.2(a) provide that proper disclosure information must be filed regarding independent expenditures aggregating more than \$250 in the calendar year. The attached flyer (refer to Exhibit 1) appears to have been handsomely produced and widely distributed. (refer to affidavits) The total production and distribution costs may well have exceeded \$250 and if so, RESPONDENT was required to file proper disclosure information by December 2, 1982. COMPLAINANT knows, however, of no such information filed with the Commission.

Prayer for Relief

COMPLAINANT requests that the Federal Election Commission investigate these violations, take any necessary enforcement action, require RESPONDENT to comply to the fullest extent of the law, and subject RESPONDENT to any penalties and sanctions deemed appropriate.

Verification

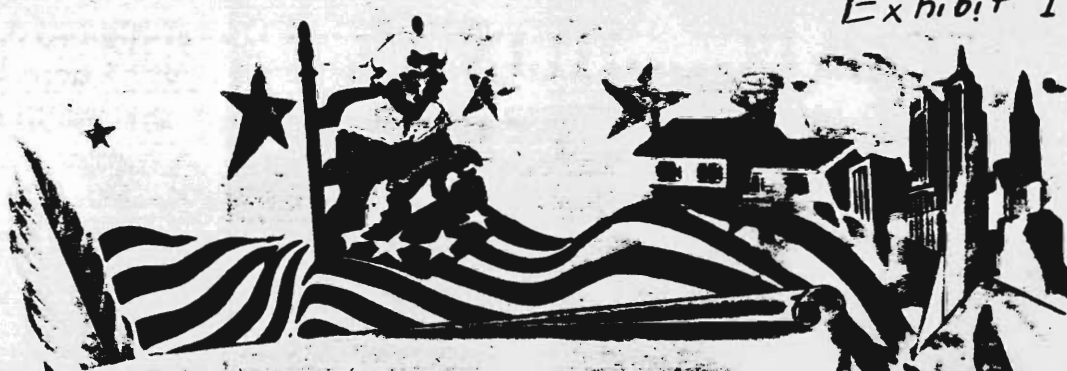
The undersigned complainant swears that the allegations and facts set forth in this complaint are true to the best of his knowledge, information and belief.

Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December, 1982

Mary Curtis Brown
Notary Public
My Commission Expires May 30, 84

Exhibit 1



MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT VOTERS UNITED TO "UNELECT" COUGHLIN

Many in the majority of Montgomery County voters who favor a bilateral, verifiable freeze on nuclear weapons have joined forces to unseat Congressman Lawrence Coughlin.

From Abington to Upper and Lower Merion, Hathors to Norristown, voters are out electioneering. Incensed by Coughlin's last minute vote change to defeat a Congressional nuclear freeze resolution under pressure from the White House, their anger has erupted into a flurry of activity. From the ranks of the Social Register to the unemployed, Republicans and Democrats of all ages are distributing leaflets, phoning friends and neighbors and writing letters to local newspapers to draw attention to an example of party politics they consider "inappropriate by any measure," on an issue which "profoundly affects the very existence of us all."

They intend to put politicians across the country on notice that U.S. military policy is outside the partisan horse trading typical on other issues. One voter said, "Nuclear arms control is the issue of the day. All the rest are footnotes." District 13 voters believe the defeat of Coughlin, until recently considered unbeatable, will send a resounding message and perhaps even an apology to the 75% of the nation's population that favors an immediate, bilateral, verifiable freeze on the testing, production and development of nuclear weapons.


They are also upset with Coughlin's attempt to confuse the public by claiming that the Administration favors essentially the same freeze. "If that were the case why would he change his vote?" one asked.

The difference between the two freeze resolutions is the word "immediate." Reagan's idea is to keep building weapons during the current START negotiations, which voters believe will take years, to reduce from these higher levels and then to negotiate a freeze. They are apparently fed up with negotiations that have allowed round after round in the arms race without let up. They have done their homework and no longer believe Pentagon rhetoric that the U.S. is behind the Russians or that arms agreements cannot be verified.

Many of them have contributed to the wording of this leaflet and believe it should be read and acted on by all voters in the district by voting for Coughlin's opponent. (See note below).

This summer, Casper Weinberger petitioned to have the speed limit reduced on the road running in front of his summer house in Maine. When asked why, he said it endangers the lives of our children.

NOTE: Coughlin's opponent is Norristown Attorney Martin J. Cunningham. His position paper on the nuclear freeze states: I stand for and urge upon the administration, an immediate, verifiable world nuclear arms freeze agreement with the Russians, coupled with an immediate cessation of nuclear transfer to third countries such as India and Pakistan.



FREEZE COUGHLIN OUT

COUGHLIN LET'S DOWN NATION

Arms control is essential. The best way to start is by electing Congressmen who support an immediate, bilateral, verifiable freeze.

According to national polls, 70% of the American public desires an immediate bilateral, verifiable freeze on the testing, manufacture and deployment of nuclear weapons. Our Congressman, Larry Coughlin, let us down last night when he changed his vote at the last minute and defeated a Congressional resolution supporting a freeze.

COUGHLIN DOUBLESPEAKS DOUBLE CROSS

Coughlin was pressured into his last minute switch by the White House. He told the Philadelphia Inquirer "I made my decision the night before (the President telephoned). It was based on individual judgment and how my constituents feel." The results of his own questionnaire, which he had before the vote, and before the President called, had already told him how his constituents feel. He used as a reason for his original vote, "I pushed the wrong button."

REAGAN WRESTLES COUGHLIN TO MAT WITH VOOODOO ARMS CONTROL

The Inquirer article said, "Reagan recently twisted the arms of Coughlin and Coyne (James K. Coyne—District 9) into voting for his version of a resolution on a nuclear freeze." Reagan's idea of a freeze is to build new generations of weapons, including 17,000 more warheads, negotiate a reduction from these higher levels and then freeze. This will take years. It took seven years to negotiate and not ratify SALT II.

WE OWE IT TO THE NATION TO UNELECT COUGHLIN

The Washington Post said, "Pennsylvania produced a record number of reversals, defections and shocks. Two who co-sponsored the freeze resolution, Coyne and Coughlin, went down the slide and switched their votes in the seconds when it seemed the freeze was won. The President did his most successful digging for votes in the Pennsylvania delegation. Someone must have told him that convictions do not run deep in Keystone state. Reagan knew that a victory for the freeze advocates would be a clear statement that the House did not believe his lately adopted arms reduction rhetoric."

WE WILL BURY OURSELVES, THANK YOU

We're on a collision course with disaster. At the same time that our industrial plant is in desperate need of modernization, we're decimating our economy to support a \$1.6 trillion defense program. (A study by Pentagon Research Chief Richard DeLauer estimates cost overruns of \$500 billion.) We're sacrificing our ideology and national

image as a first option and are drifting with social unrest at home. We're being pulled along to improve the ability to fight a global war that will cost 20 million lives and 100 million dollars in the process. We're being pulled along to develop "launch on warning" and "first strike" weapons that guarantee the balance of power and increase the potential for accidental war. We're told that Japan is actually superior to us in that state-of-the-art technology.

WHO'S AHEAD

Most profoundly, we're ahead, especially when quality and technology are considered. In some ways we are ahead. On April 20, 1981, Senator Percy asked Secretary of Defense Casper Weinberger in a Senate Foreign Relations Committee, "Would you rather have at your disposal the U.S. nuclear arsenal or the Soviet Union nuclear arsenal?" Weinberger answered, "I would not for a moment exchange anything, because we have an immense edge in technology." Also under oath, John Chief of Staff General John Vessey said, "Overall, would I trade with the Russians? Not on your life."

Independent agencies in Scotland, England and the United States, even the Defense Department, say there is at least parity. With the tremendous overkill capacity of both nations, the question of who is ahead is irrelevant. IBM's Thomas Watson told a graduation class in June, "Political class in administration after administration, heavily influenced by experts treating nuclear devices as simply upgraded conventional weapons, have been convinced that superiority is possible. Only rarely and briefly have some realized that all that really counts on either side is sufficiency. If I have a gun at your forehead, and you have one at mine, it makes little difference how many or what kind of guns either you or I have in reserve."

If the Russians developed, in a "last warning strike" all our ICBMs, all our bombers and the bulk of our submarines usually in port, we'd still be able to destroy with our invulnerable submarines at sea, every large and medium sized city in Russia, 35% of their production and 30% of their industry—twenty times Moscow's population and size or quantity of bombs in which way the wind blows the fallout on the day of a strike.

CAN WE TRUST THE RUSSIANS?

We have the technology to verify Soviet arms production and deployment. We can photograph from satellites in such detail that even license plates are readable. Our satellite sensors, radar, electronic stations and air sampling devices can detect any significant violations. William Callahan, former director of the CIA, said in May, "A mutual and verifiable freeze on the development of autonomous weaponry by the Soviet Union or the U.S. would be feasible to negotiate. We do not have to, nor should we, trust the Russians."

In a review of Reagan's *Rising Class*, a book about the 100 top administration officials, a question of whether the Soviets had military superiority over the U.S. drew no endorsement from CIA Director Casey, Chief over Negotiator Rowley or Deputy Defense Secretary Carlucci.

George Kennan

"With the unmaking of the atom, everything has changed, save our way of thinking. Thus we drift towards unparalleled catastrophe."

Einstein

"Where our country is in trouble, it is where people refused to change... We are in trouble wherever people predicted that past trends would always continue."

Jane Bryant Quinn

WHO'S IN CONTROL? WHO'S RESPONSIBLE?

In the opinion of dozens of objective professionals in every discipline, our defense industry is run by lunatics. It's out of the realm of human rationality and we're being programmed to support this outrageous build-up out of irrational fear. Resources are endless; resources can always be found to arm a nation. But one after another, promises fail when they are analyzed in the context of history and human nature.

How many times have we seen the arms race described as insanity or madness? In April, nationally syndicated, conservative James J. Kilpatrick wrote, "A plot was hatched long ago at which further additions to these monstrous armaments became madness. There have been 27 years of lunacy, of blind racing against lunatics, of civilized nations staggering blindly toward a finish line of unspeakable pain. The immediate insanity is to stop the further build-up of nuclear weapons by either side."

Who's in control? We, the voters are in control. Who's responsible? You and I.

To the Editor:

The U.S. military-industrial complex can now, more accurately than ever before be compared to a malignant tumor. There is a tunnel vision view of the world so profoundly distorted that it leaves one speechless with disbelief.

Philip H. Trencher
Bishop of Franchia, PA

WHAT'S THE CASE FOR URGENCY?

The international monetary system is in disarray and trade wars are emerging. Countries are insolvent and governments are failing. Russia will soon be undergoing transition to a new and unknown leadership. We need time to work out long-term solutions to international conflicts. Arnold Toynbee, the social historian who analyzed the rise and fall of 22 civilizations wrote in the fifties, "The most ominous thing about World Wars I and II is that they are not isolated. They are two wars in a series... not only a series but a progression. War has been following war in an ascending intensity, and the war of 1939-1945 is not the climax of this movement."

The Bulletin of Atomic Scientists measures its perceived imminence of war. Started a few years ago at 12 minutes to midnight it is now at four minutes to midnight, suggesting that the need for arms control is profound.

We need officials in Washington who will work to stop the arms race and who recognize the need for serious arms reductions regardless of partisan politics. After an election, politicians and pollsters tell the results in detail. If we keep Coughlin home for a couple of years, we will have sent a resounding message to politicians throughout the nation that they will be held accountable for significant progress in arms negotiations.



The Philadelphia Inquirer

Pull back from the brink. 'Yes' for a nuclear freeze

Since the city of Hiroshima was burned to dust, since the days when mushroom clouds erupted from American deserts and the stools of the Pacific, since *On the Beach* and *Dr. Strangelove* and the Cuban missile crisis, a respectful, low-grade fear of the bomb has haunted Americans. A few game public voice to that fear, among them Quaker activists, frightened atomic scientists and the high-brow arts of SANE. Among most others, there was a belief that political leaders were imbued with a healthy fear of incineration themselves, that common sense would keep fireners off the button.

Today that faith is seriously eroded. From the moment President Reagan came into office rattling a nuclear sabre, that latent fear began to surface and express itself. By last spring opinion surveys showed that 72 percent of Americans favored a freeze on nuclear.

With the words "mutual" and "verifiable" tucked into the text (of the freeze resolution), many have thought that even President Reagan would find it hard not to support the freeze. But on a political swing that took him to Columbus, Ohio, earlier this week, Mr. Reagan felt obliged to question the patriotism of a crowd of pro-freeze demonstrators who booed him. "They were demonstrating on behalf of a movement that has swept across this country that I think is inspired by, not the sincere, honest people who want peace," he said, "but by some people who want the weakening of America and who are manipulating many honest and sincere people."

Hogwash! It is *not* the Kremlin that has

THREE MARTINI LUNCH?

Congressman Coughlin was recently asked in his office if he could disagree with the statements: "The Russians are ahead of the U.S. militarily," and "Arms agreements can be verified." He could not.

At a Main Line Chamber of Commerce luncheon in September, Chester County Congressman Richard Schulze stated that the Russians are ahead of us in arms. "If so," he was asked, "Why do Weinberger, Lehmann, Vessey, Haig, Rickover, and many other members of the current and past administrators, in many cases under oath before Congress, differ with your opinion." Schulze said, "Well, you wouldn't expect those guys to say we were behind."

Clergyman: "Why does virtually every outside source of compar-

unleashed this movement. It was not clever KGB propaganda that greeted 700,000 Americans worried about the arms race to march in New York last June in the largest political demonstration in the history of the United States. It was not them just the Soviets — Sen. Jeremiah Denton (R., Ala.) and the Reader's Digest, notwithstanding — who have spread this cold blizzard of dread. Blaise also lies on the doorstep of the White House — and hangs over the Congress. Washington is the Ground Zero of the nuclear freeze movement.

The American people have been horrified at the loose talk coming out of official Washington — talk of the possibility of limited nuclear war, of buckling up for "protracted" nuclear war, of nuclear "warning shots across the bow," of the feasibility of pulling America, and the rest of humanity, back up by the boot straps after a nuclear war.

The American people heard their undersecretary of defense quoted as saying in March: "Dig a hole, cover it with a couple of doors, and then throw three feet of dirt on top. Everyone's going to make it if there are enough shovels to go around."

Enough is enough. Nuclear war is too important to be left to generals and politicians unwilling to treat it with the gravity it demands. It is most assuredly the business of every citizen. The civilian population is, after all, the unfortunate nuclear infantry drafted for this game of global brinkmanship. A loud "yes" vote will send a message to Washington to wake up and start dealing more urgently with the reality: There are not enough shovels to go around.

tive arms figures say we have the edge."

Rowney: "The Defense Department has to make a case for Congressional appropriations."

Clergyman: "Do you mean we're not being told the truth?"

Rowney: "I wouldn't put it that way. They use a selective information technique."

At the Chamber of Commerce luncheon, Schulze said, "We're outclassed at the bargaining table. We're shoving more chips in the pile to see what happens. If it works good. If it doesn't . . ." He didn't finish the sentence. The Main Line Times phrased it "and his voice drifted off."

According to Schulze, his source of information on military superiority was "Jimmy" Schlesinger. (Former Secretary of Defense). According to the April 5, 1982 inquirer, Schlesinger says, "Superiority is very difficult to measure. Neither side is ahead. It's a standoff."

PSYCHIC NUMBING-TOLL OF THE NUCLEAR AGE

"Dad, what would you do if you were the only one left after a war?"

The existence of nuclear weapons is taking a tremendous toll on humanity. Robert Jay Lifton, Professor of Psychology at Yale, wrote recently: "With the threat of nuclear war, parents now doubt their ability to use their children easily into some form of emotional subjugation. And the child must also realize, early on, not only those personal doubts but the general inability of the adult world to guarantee the safety of their children. The marital relationship itself is threatened. Any long-term attachment becomes harder when the permanence of all relationships is thrown into doubt."

These bombs, whether detonated or not, are terrorizing us. At least some of the psychic pressure would be relieved by stopping the constant addition to nuclear armaments.

"The present generation cannot divert itself of its human power to choose; and, if it were to choose death and evil, this would be its own choice, its own responsibility, its own sin."

Arnold Toynbee

"We shall not suffer silently the threat of nuclear holocaust. We have four children and two grandchildren. We care what happens to them."

Grandmother at the June 12th Rally

[illegible]

1950: Einstein said "radioactive poisoning of the atmosphere and human annihilation of any life on earth has been brought within the range of technical possibility."

1956: Eisenhower said "One day both sides will have to meet at the conference table with the understanding that the era of armaments has ended and the human race must conform its actions to this truth or die."

1974: Henry Kissinger said, "The accumulation of nuclear arms has to be contained if mankind is not to destroy itself."

1980: Jimmy Carter said in the event of nuclear war "the survivors, if any, would live in a desolate, ruined, and impoverished world, a world that had committed suicide."

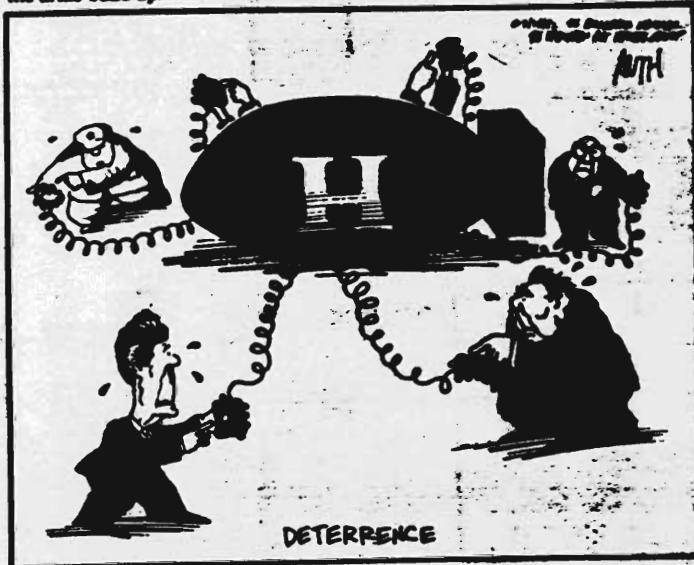
CAN COUGHLIN BE UPSET?

Yes. The race for our Congressional seat is much closer than most people think. Gains from reapportionment, pre-freeze campaigns that will bring voters out to the polls, Coughlin's flip-flop, the concern of senior citizens over social security, women's and the 18 to 35 year old's concern with the arms race are all special factors bearing on this year's election.

We must get Democrats and moderate Republicans to the ballot box. Even most of the conservatives we have talked with are upset with Mr. Coughlin's partisanship and last minute switch on the freeze issue and many are still undecided.

This year voters will have the opportunity in many townships and boroughs to join, informally, voters across the nation who will have freeze referendums on their ballots. Watch for flyers and other notices.

Since the economy, as an issue, is not as big a factor in our district as many others, an upset of Coughlin will be closely identified with the public's distaste of the arms build-up.



IN A NUCLEAR WAR...



THESE TARGETS ARE LIKELY TO BE HIT...

FALLOUT WOULD ENVELOP...



THE SHADY AREA...

Dear Residents,

Please pass this leaflet on to a friend or read it over the telephone. And ask them to make phone calls. Impress on them the importance of their vote.

Volunteers to distribute this leaflet please call 525-1589.

To make our voices heard **WE MUST VOTE.**

This appeal was put together, along with the help of many others, by a private citizen with no affiliation to any organization except his family (which isn't all that organized). He registered Democrat for the first time this year but still considers himself unaffiliated with any organization.

CASPER'S CORNER

To the Editor:

Editor: The New York Times, Aug. 28, 1982. Your editorial on nuclear deterrence today, "The 'paradox' of nuclear deterrence is not an unresolvable paradox. It is a fact."

Thomas J. Montville
Bryn Mawr, PA

ENDS AND MEANS

"Deterrence requires the threat of violence and the ability to carry out the threat. It is not a moral issue, but a practical one."

—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.

"The only way to have a nuclear war is to have a nuclear war. There is no other way."

—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.
—Editor, New York Times, July 28, 1982.

Our objective with this leaflet is to bring you a review of the arms race, without graphic detail. Sometimes the truth can be painful, but lack of knowledge can be worse. And truth leads to action. There is an alternative to the arms race. Admiral Rickover, when asked by Congress how he thought we could control the arms race said he thought divine intervention was necessary. In discussions with hundreds of people, we sense a move to a higher consciousness. Our research leads us to believe that war is not inevitable, in fact, not likely, but we live in a complex world and divine intervention starts within each of us. One way we can express it is with our vote.

To everyone who has helped with this effort we thank you. Our next project, figuring out why some people want to ban Peter Pan, will be more fun.

WITH YOUR VOTE 1983 CAN BE THE YEAR OF THE THE NUCLEAR ARMS FREEZE

The preparation and distribution of this leaflet has caused us to incur substantial personal financial obligations. Any contribution you can make will help us repay these debts. Any amount is welcomed. Please mail your tax-deductible help today, including your address so we can send you a follow-up on the election.

The Spirit of American Vision
1300 Valley Road
Villanova, PA 19085

A non-profit, grassroots organization dedicated to American National Security thru Multi-National Arms Control.

Committee to Unselect Coughlin


AFFIDAVIT OF JAMES G. CALHOUN

James G. Calhoun for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I am a registered voter in Pennsylvania's 13th Congressional District and reside at 1107 Beech Road, Rosemont, Pennsylvania 19010 (Phone: 215-527-4864).
3. On Thursday, October 21, 1982, I found an unstamped political publication in my mailbox.
4. The publication carried a name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.
5. The publication featured headlines stating, "MAJOR CAMPAIGN UNLEASHED TO FREEZE COUGHLIN OUT," "VOTERS UNITED TO 'UNELECT' COUGHLIN," in which the flyer called explicitly for the defeat of U.S. Representative Lawrence Coughlin at the polls.
6. I telephoned the Washington, D. C., office of Representative Coughlin with the pertinent facts, and later discussed the flyer and its contents with Mitchell A. Rosenfeld, Representative Coughlin's Administrative Assistant.
7. In subsequent conversations with several neighbors, I learned that the publication also had been placed unstamped in their mailboxes.


James G. Calhoun

Subscribed and sworn before me this 23rd day of November 1982


Notary Public

My Commission Expires: _____

James R. Roth, Notary Public
Lower Merion Twp., Montgomery County
My Commission Expires June 20, 1983
Member, Pennsylvania Association of Notaries

83040415169

AFFIDAVIT OF ELIZABETH J. DANN

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a registered voter in Pennsylvania's 13th Congressional District; I reside at 425 Righters Mill Road, Gladwyne, Pennsylvania 19035 (telephone 215-649-1781), and I am employed as Manager of the Norristown office of U.S. Representative Lawrence Coughlin.

3. On Tuesday, November 2, 1982, I visited a number of polling places in Lower Merion Township, Pennsylvania, and found copies of political publication posted or available on tables for distribution at the polls.

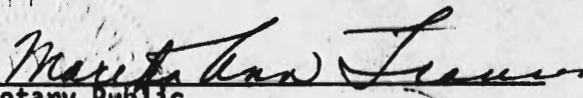
4. The publication carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

5. The publication in headlines and text called specifically for the defeat of U.S. Representative Lawrence Coughlin at the polls.

6. I saw the publication posted or available for distribution at: Lower Merion 1-3, St. Christopher's Church, Gladwyne, PA 19035; Lower Merion 10-1, Haverford School, Lancaster Avenue, Haverford, PA 19041; Lower Merion 11-1, Lower Merion Baptist Church, Old Gulph Road, Bryn Mawr, PA 19010; Lower Merion 11-2, Bryn Mawr Fire House, Bryn Mawr, PA 19010.


Elizabeth J. Dann

Subscribed and sworn before me this 14th day of December 1982.


Notary Public

Notary Public, Norristown Boro, Montg. Co.
My Commission Expires March 4, 1984

83040415170

AFFIDAVIT OF LAWRENCE COUGHLIN

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.

2. I am a United States Representative from Pennsylvania's 13th Congressional District and I am a registered voter at 856 Mount Moro Road, Villanova, Pennsylvania 19085.

3. I was the Republican candidate for reelection in the November 2, 1982 General Election and I was opposed by Martin J. Cunningham, Democratic nominee.

4. On October 28, 1982, my Norristown office at 607 One Montgomery Plaza, Norristown, Pennsylvania 19401 (Telephone: 215-277-4040) was notified by phone that copies of an unsigned political flyer, The Spirit of American Vision, were distributed as an insert to a number of weekly newspapers.

5. A copy of the publication was obtained and it carried the name, The Spirit of American Vision; an address, 1300 Valley Road, Villanova, Pennsylvania 19085, and a telephone number, 525-1589.


6. The publication in headlines and text called specifically for my defeat at the polls.

7. On October 28, 1982, I telephoned George B. McGeehan, Jr., managing editor of the Times-Chronicle, 413 Johnson Street, Jenkintown, Pennsylvania 19406, who confirmed that The Spirit of American Vision political flyer was distributed as an insert to his weekly newspaper and several others published by Montgomery Publishing Company. Mr. McGeehan told me that the publication was a paid insert and was distributed in about 20,000 newspapers.


LAWRENCE COUGHLIN

District of Columbia

Subscribed and sworn before me this 21st day of December, 1982


Notary Public
My Commission Expires: May 30, 84

83040415171

Mitchell A. Rosenfeld for his affidavit deposes and says:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto:

2. I am Administrative Assistant to U.S. Representative Lawrence Coughlin and reside at 7111 Thrasher Road, McLean, Virginia 22101. (Telephone 703-356-0323) My office address is 2467 Rayburn House Office Building, Washington, D.C. 20515. (Telephone 202-225-6111)

3. In my capacity as Administrative Assistant, I was apprised in Representative Coughlin's Washington office on October 21, 1982, by telephone that a political publication was being distributed which called explicitly for the defeat of Representative Coughlin at the polls.

4. I was informed by Miss Elizabeth J. Dunn, Representative Coughlin's Norristown office manager, and by Mr. James G. Calhoun, 1107 Beech Road, Rosemont, Pennsylvania 19010, of the distribution including stuffing of mailboxes.

5. A copy of the publication was transmitted via telecopier and carried the name, The Spirit of American Vision; and address, 1300 Valley Road, Villanova, PA 19085, and a telephone number, 525-1589.

6. I recognized the address and telephone number as those of Philip (Bart) Moran with whom I had spoken by phone on at least two previous occasions.

7. After several attempts to reach Mr. Moran whose phone line was busy, I contacted him later the morning of October 21, 1982. I asked Mr. Moran directly if he was responsible for publishing and distributing the political flyer, and he freely admitted that he was.

8. On the morning of December 8, 1982, I went to the Federal Election Commission offices at 1325 K Street, N.W., Washington, D.C. 20463 to determine if a post-general election report had been filed by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address. According to records at the FEC, there was no filing by Philip (Bart) Moran or The Spirit of American Vision from an address at 1300 Valley Road, Villanova, Pennsylvania 19085, or any other address.

Mitchell A. Rosenfeld
Mitchell A. Rosenfeld

Subscribed and sworn before me this 21 day of December 1982

Mary Curtis Bowman
Notary Public

My Commission Expires May 30, 84



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1513

Date Filmed 8/18/83 Camera No. --- 2

Camerman LPC

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