

77040023199

I. David Lerman, Esquire
1707 H Street, N.W.
Washington, D.C. 20006

JAN 06 1977

Re: MUR 229 (76)

Dear Mr. Lerman:

This will acknowledge receipt of your letter of November 10, 1976, and the enclosed letter from Mr. Viguerie and the Richard Viguerie for Vice President Committee.

On ^{December} November 4, 1976, the Commission voted to terminate its inquiry into the alleged violation of 2 U.S.C. §434(e). The Commission determined that substantial voluntary compliance had been obtained, and accordingly, the Commission has closed its file on this matter.

A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. If you have any questions, please contact David L. Anderson (telephone No. 202-382-3153), the attorney assigned to this matter.

Sincerely yours, **FEDERAL ELECTION COMMISSION**
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL
John G. Murphy, Jr.
General Counsel

Enclosures

DAnderson:cfb:11/18/76
cc: Compliance Section
DA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Richard A. Viguerie)

MUR 229 (76)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 2, 1976, the Commission determined by a vote of 5-0, that there was no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended, has been committed in the above-named case. Commissioner Staebler was not present.

Accordingly, the file in this matter is now closed.

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

FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
OFFICE OF GENERAL COUNSEL

77040013200

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 229 (76)
Richard A. Viguerie)

GENERAL COUNSEL'S REPORT

I. Allegations

This matter arises from an internally generated complaint reported by Michael Hershman and Keith Vance and dated August 30, 1976. The complaint stated that on August 17, 1976, an advertisement appeared in the Kansas City Times which stated that it was paid for by Richard A. Viguerie. A review of Commission records by investigative personnel revealed that the cost of the advertisement had not been reported as an independent expenditure.

II. Evidence

The full page advertisement was headlined **to read** "Is There A Republican Death Wish? The Nomination of Gerald Ford Will Destroy the Republican Party!" The advertisement concluded by noting that the "Republican Party must nominate a conservative this week or face a united conservative coalition which will replace the Republican Party as the nation's second major party." Commission investigative personnel determined that such an advertisement would cost a minimum of \$3,508.08 if the copy was prepared in advance by the payer.

As part of the Commission's preliminary inquiry into this matter, a letter requesting additional information about the reporting of this expenditure was sent to Mr. Viguerie on September 16, 1976. On October 20, 1976, I. David Lerman, an attorney for Mr. Viguerie responded that the amount expended for the advertisement (\$5,076) in fact had been reported as part of the quarterly report of the Richard Viguerie for Vice President Committee ("the Committee"). This report was filed on October 9, 1976. However, in the event that the Commission determined that Mr. Viguerie should also file as an individual, Mr. Lerman also enclosed a completed independent expenditure report.

A review of the October 9th report of the Committee revealed that while the cost of the advertisement had been disclosed, it had not been disclosed in accordance with current procedures for the reporting of independent expenditures by a political committee. Accordingly, a letter was sent on November 4, 1976, to Mr. Lerman which advised him of the proper method for reporting such expenditures and included the requisite forms. On November 10, 1976, Mr. Lerman responded (attachment #1) and enclosed a letter from Mr. Viguerie (attachment #2) and a completed Schedule E form (attachment #3).

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

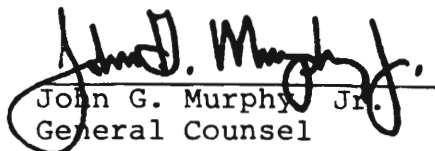
77994001120

III. Analysis and Recommendation

There appears to have been substantial voluntary compliance in this matter by Mr. Viguerie since the expenditure for the advertisement was reported (even though it was reported erroneously), and Mr. Viguerie took appropriate corrective action when the matter was called to his attention. Accordingly, we are of the view that there is no reason to believe that the respondent committed a violation of the Federal Election Campaign Act of 1971, as amended.

IV. Conclusion

We recommend that the matter be closed and the attached letter be sent.


John G. Murphy Jr.
General Counsel

Date: November 23rd
1976

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

ATTACHMENT #1

FEDERAL ELECTION
COMMISSION

MUR 229

LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.

WASHINGTON, D. C. 20006

76 NOV 10 PM 12:37

AREA CODE 202
298-7800

SOLOMON GROSSBERG
IRVING B. YOCHELSON
JULIUS I. FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
SHELTON M. BINSTOCK
STEVEN G. FRIEDMAN
DALY D. E. TEMCHINE
I. DAVID LERMAN

ISADORE BRILL (1905-1964)

763536

November 10, 1976

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

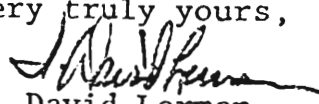
Re: MUR 229 (76)

Dear Mr. Anderson:

Enclosed please find a copy of the amended
October 10, 1976, Quarterly Report of the Richard Viguerie
for Vice President Committee, which has been revised in
accordance with the instructions of FEC General Counsel
John G. Murphy, Jr. (See, November 4, 1976 letter from
John G. Murphy, Jr. to I. David Lerman).

Please contact me if you have any further
questions regarding this matter.

Very truly yours,


I. David Lerman

IDL/oho
Enc.

HAND DELIVERED

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

ATTACHMENT 2
RECEIVED
FEDERAL ELECTION
COMMISSION
RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

76 NOV 18 PM 12:37

HAND DELIVERED

November 9, 1976

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

Gentlemen:

Attached please find an amended FEC Form 3 and accompanying schedules for the quarter ended September 30, 1976. I am filing this amended return in response to a letter received November 4, 1976 from John G. Murphy, your General Counsel. A copy of that letter is attached to the return.

In addition, I have signed Schedule E because the Treasurer of the Committee, Elaine O'L. Viguerie, is out of the country and will not be returning for several weeks.

I trust that I am now in full compliance with your request.

Regards,

Richard A. Viguerie

Richard A. Viguerie

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Itemized Independent Expenditures
for Line 21 F.E.C. Form 3

Schedule E
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

(See reverse side for instructions)

Name of Candidate or Committee in full Richard Viguerie for Vice President	Id. No.
Full Name, mailing address and ZIP code 6033 Crimson Court McLean, Virginia 22101	Is This a Separate Report by a Committee Filing on FEC Form 3A? <u>No</u>

Itemize expenditures which exceed, in the aggregate, \$100 within a calendar year				
Full Name, mailing address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Lewis Jenkins (Baton Rouge Advertising) P. O. Box 52889 Baton Rouge, Louisiana 70805	Payment for creating & arranging for publication of newspaper advertisement in Kansas City Star & Times, 8/17/76	8/12/76	5,076	Advocating defeat of Gerald Ford

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

(a) Subtotal of Itemized Independent Expenditures	\$ 5,076
(b) Subtotal of Unitemized Independent Expenditures	\$ -0-
(c) Total Independent Expenditures	\$ 5,076

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 9th day of September, 19 76.

My Commission Expires

12-18-77

William L. Conway
NOTARY PUBLIC

Richard Viguerie
Signature

September 7 1976
Date



FEDERAL ELECTION COMMISSION

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

I. David Lerman, Esquire
1707 H Street, N.W.
Washington, D.C. 20006

Re: MUR 229 (76)

Dear Mr. Lerman:

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On November , 1976, the Commission voted to terminate its inquiry into the alleged violation of 2 U.S.C. §434(e). The Commission determined that substantial voluntary compliance had been obtained, and accordingly, the Commission has closed its file on this matter.

A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. If you have any questions, please contact David L. Anderson (telephone No. 202-382-3153), the attorney assigned to this matter.

Sincerely yours,

John G. Murphy, Jr.
General Counsel

Enclosures

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



cc # 973

MUR 229

RECEIVED
FEDERAL ELECTION
COMMISSION

LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.

WASHINGTON, D.C. 20006

76 NOV 10 PM 12:37

AREA CODE 202
298-7600

763536

November 10, 1976

SOLOMON GROSSBERG
IRVING B. YOCHELSON
JULIUS I. FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
SHELTON M. BINSTOCK
STEVEN G. FRIEDMAN
DALY D. E. TEMCHINE
I. DAVID LERMAN

ISADORE BRILL (1905-1964)

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

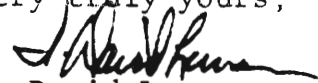
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October 10, 1976, Quarterly Report of the Richard Viguerie
for Vice President Committee, which has been revised in
accordance with the instructions of FEC General Counsel
John G. Murphy, Jr. (See, November 4, 1976 letter from
John G. Murphy, Jr. to I. David Lerman).

Please contact me if you have any further
questions regarding this matter.

Very truly yours,


I. David Lerman

IDL/oho
Enc.

HAND DELIVERED

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

cc # 923

RECEIVED
FEDERAL ELECTION COMMISSION
RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

76 NOV 19 PM 12:37

HAND DELIVERED

November 9, 1976

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

Gentlemen:

Attached please find an amended FEC Form 3 and accompanying schedules for the quarter ended September 30, 1976. I am filing this amended return in response to a letter received November 4, 1976 from John G. Murphy, your General Counsel. A copy of that letter is attached to the return.

In addition, I have signed Schedule E because the Treasurer of the Committee, Elaine O'L. Viguerie, is out of the country and will not be returning for several weeks.

I trust that I am now in full compliance with your request.

Regards,

Richard A. Viguerie

Richard A. Viguerie

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

77040010200



FEDERAL ELECTION COMMISSION

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

4 NOV 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

I. David Lerman, Esq.
1707 H Street, N. W.
Washington, D. C. 20006

Re: MUR 229 (76)

Dear Mr. Lerman:

This will acknowledge receipt of your letter of October 20, 1976, in which you stated that the costs of the August 17, 1976 advertisement in the Kansas City Times was reported on October 9, 1976, in the quarterly report of the Richard Viguerie for Vice President Committee ("the Committee").

While this has been confirmed by Commission staff, I wish to call to your attention the fact that in order for this information to be considered properly filed, it is necessary for the Committee to amend its October 9, 1976 report to conform with the appropriate Commission procedures for the reporting of independent expenditures by a political committee. I have enclosed an updated copy of FEC Form 3, Schedule D, and a Notice of Independent Expenditure Reporting to assist you in this regard.

Since the Commission is under a duty to investigate this matter expeditiously, you are requested to complete and return the enclosed forms within five days of the receipt of this letter. If you have any questions, please contact David Anderson (telephone no. 202/382-3153), the attorney assigned to this matter.

Sincerely yours,

John G. Murphy, Jr.
John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



**Report of Receipts and Expenditures
for a Candidate or Committee
Supporting any Candidate(s) for
Nomination or Election to Federal Office**

RECEIVED
FEDERAL ELECTION
COMMISSION

HAND DELIVERED

76 NOV 10 PM 12:37

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

C00062539

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Richard Viguerie for Vice President		2 Identification Number None
(b) Address (number and street) 6033 Crimson Court		3(a) Is this a report of receipts and expenditures for only one election? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
(c) City, State and ZIP code McLean, Virginia 22101		(b) If "Yes" for which election? General on 11/2/76 (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) <input checked="" type="checkbox"/> Amendment For <u>Oct. 10 Qtrly. Rept</u> <input type="checkbox"/> July 10 Quarterly Report (Which report) (d) <input type="checkbox"/> October 10 Quarterly Report		(e) <input type="checkbox"/> January 31 Year End Report
(b) <input type="checkbox"/> April 10 Quarterly Report		(f) <input type="checkbox"/> Monthly Report (Month)
(h) <input type="checkbox"/> Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)		(g) <input type="checkbox"/> Termination Report
(i) <input type="checkbox"/> Thirtieth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)		

Candidate or Committee Summary of Receipts and Expenditures

Covering Period: From July 1, 1976 Through September 30, 1976

Section A - Cash Balance Summary	Column A This Period	Column B Calendar Year-To-Date
Cash on hand January 1, 19		\$ -0-
Cash on hand at beginning of reporting period	\$ -0-	
Total receipts (from line 19)	\$ 40,000	\$ 40,000
(a) Subtotal (Add lines 7 and 8)	\$ 40,000	\$ 40,000
Total expenditures (From line 25)	\$ 34,890	\$ 34,890
Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 5,110	\$ 5,110
Contributed items on hand to be liquidated (attach itemized list)	\$ None	
Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		
12 Operating expenditures (from line 20)	\$ N/A	\$ N/A
13 Refunds and Rebates (from line 17)	\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b) Expenditures from prior years subject to limitation		\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)		\$

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

Richard Viguerie

(Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

(Date)

Note Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g or § 441j (See reverse side of form)

**For further
information
Contact:**

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

Any information reported herein may not be copied for sale or use by any person for purposes of soliciting contributions or for any commercial purpose.

Detailed Summary Schedule of Receipts and Expenditures

(Page 2)

Name of Candidate or Committee Richard Viguerie for Vice President		REPORT COVERING THE PERIOD FROM: 7/1/76 TO: 9/30/76	
		Column A This Period	Column B Calendar year-to-date
PART I - RECEIPTS			
15 Contributions and other Income:			
(a) Itemized (use Schedule A)		\$ 40,000	
(b) Unitemized		\$	
(c) Sales and Collections Included Above: List by event on memo Schedule D (\$			
(d) Subtotal of contributions and other income		\$ 40,000	\$ 40,000
16 Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments received		\$	\$
17 Refunds, Rebates, Returns Received:			
(a) Itemized (use Schedule A)		\$	
(b) Unitemized		\$	
(c) Subtotal of refunds, rebates, returns		\$	\$
18 Transfers In:			
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)		\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)		\$	
(c) Subtotal of transfers in		\$	\$
19 Total Receipts		\$ 40,000	\$ 40,000
PART II - EXPENDITURES			
20 Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal and Accounting Expenditures):			
(a) Itemized (use Schedule B)		\$ 29,659	
(b) Unitemized		\$ 155	
(c) Subtotal of operating expenditures		\$ 29,814	\$ 29,814
21 Independent Expenditures (use Schedule E)		\$ 5,076	\$ 5,076
22 Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of loans and loan repayments made and contribution refunds		\$	\$
23 For Use Only By Presidential Campaigns Receiving Federal Funds; Exempt Fundraising, Legal and Accounting Expenditures:			
(a) Itemized (use Schedule B)		\$	
(b) Unitemized		\$	
(c) Subtotal of fundraising expenditures		\$	\$
24 Transfers Out:			
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)		\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)		\$	
(c) Subtotal of transfers out		\$	\$
25 Total Expenditures		\$ 34,890	\$ 34,890
PART III - DEBTS AND OBLIGATIONS			
26 Debts and obligations owed to the Committee (Itemize all on Schedule C)		\$ -0-	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)		\$ 18,946	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28 Total Receipts (from line 19)		\$ 40,000	
29 Transfers In (from line 18(a))		\$	
30 Net Receipts (Subtract line 29 from line 28)		\$ 40,000	
31 Total Expenditures (from line 25)		\$ 34,890	
32 Transfers out (from line 24(a))		\$	
33 Net Expenditures (Subtract line 32 from line 31)		\$ 34,890	

Schedule A

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see Instructions on back)

Page 1 of 1 forLINE NUMBER 15(a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Richard Viguerie for Vice President

Full Name, mailing address and ZIP code

Richard Viguerie
6033 Crimson Court
McLean, Virginia 22101

Note: All receipts consist of monies borrowed personally by Richard Viguerie and deposited in campaign account. No other contributions have been accepted.

Date (month, day, year)

7/30/76

Amount of each receipt this period

10,000

Principal place of business

7777 Leesburg Pike
Falls Church, Virginia 22043

Occupation

Executive☐ Check if Contributor is self-employedAggregate Year-to-date ▶ \$ **40,000**

8/16/76

30,000

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month, day, year)

Amount of each receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$ **40,000**

Total this period (last page this line number only)

▶ \$ **40,000**

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures**Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(see instructions on back)

Page 1 of 2 forLINE NUMBER 20(a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Richard Viguerie for Vice President

Full Name, mailing address and ZIP code

Charles Snider
2431 Burkelawn Drive
Montgomery, Alabama 36111

Purpose of Expenditure

Campaign management &
consulting & reimburse-
ment of expenses for
travel, meals, airline
fares, etc.

Date (month,
day, year)

7/30/76
9/3/76

Amount of each expendi-
ture this period

1,500
1,972

Full Name, mailing address and ZIP code

Lewis Jenkins (Baton Rouge Advertising)
P. O. Box 52889
Baton Rouge, Louisiana 70805

Purpose of Expenditure

Campaign management,
public relations; reim-
bursement of travel ex-
penses; room; printing;
meals; telephone; etc.

Date (month,
day, year)

7/30/76
8/12/76
8/24/76
9/10/76
9/20/76

Amount of each expendi-
ture this period

2,000
2,000
2,647
5,922
209

Full Name, mailing address and ZIP code

Diplomat National Bank
2033 K Street, N. W.
Washington, D. C. 20006

Purpose of Expenditure

Payment of principal &
interest of loan (see *
below) plus bank
charges

Date (month,
day, year)

8/16/76
8/19/76 &
8/26/76

Amount of each expendi-
ture this period

10,037
13

Full Name, mailing address and ZIP code

Metro Printing & Mailing Services Inc.
8446 Lee Highway
Fairfax, Virginia 22030

Purpose of Expenditure

Postage, printing &
mailing of campaign
materials & press
releases

Date (month,
day, year)

8/10/76
8/20/76
9/8/76

Amount of each expendi-
ture this period

301
845
1,097

Full Name, mailing address and ZIP code

Richard A. Viguerie Company Inc.
7777 Leesburg Pike
Falls Church, Virginia 22043

Purpose of Expenditure

Reimbursement of ex-
penses: envelopes,
labels, delivery ex-
penses

Date (month,
day, year)

8/20/76
8/20/76
9/22/76

Amount of each expendi-
ture this period

19
12
64

Full Name, mailing address and ZIP code

Bruce Herschensohn
2475 Virginia Avenue, N. W.
Washington, D. C. 20037

Purpose of Expenditure

Consulting & public
relations

Date (month,
day, year)

8/30/76

Amount of each expendi-
ture this period

480

Full Name, mailing address and ZIP code

Lee Edwards & Associates Inc.
1735 DeSales Street, N. W.
Washington, D. C. 20036

Purpose of Expenditure

Reimbursement of
luncheon expenses

Date (month,
day, year)

9/3/76

Amount of each expendi-
ture this period

157

Full Name, mailing address and ZIP code

Prep Inc.
1121 Arlington Boulevard
Arlington, Virginia 22209

Purpose of Expenditure

Printed letters

Date (month,
day, year)

9/8/76

Amount of each expendi-
ture this period

118

Subtotal of expenditures this page (optional).

\$ 29,393

Total this period (last page this line number only).

\$

Page

*Candidate borrowed this money personally and contributed to this Committee(See Schedule A).

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures**Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3**

(see instructions on back)

Page 2 of 2 for

LINE NUMBER 20(a)

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Richard Viguerie for Vice President

Full Name, mailing address and ZIP code

**The Conrad Hilton
720 South Michigan Avenue
Chicago, Illinois 60605**

Purpose of Expenditure

**Hotel bill for Richard
Viguerie, August 25 -
28, 1976**

Date (month,
day, year)

9/8/76

Amount of each expendi-
ture this period

204

Full Name, mailing address and ZIP code

**American Mailing Lists Corporation
7777 Leesburg Pike
Falls Church, Virginia 22043**

Purpose of Expenditure

Labels

Date (month,
day, year)

9/22/76

Amount of each expendi-
ture this period

62

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Subtotal of expenditures this page (optional).

\$ 266

Total this period (last page this line number only).

\$ 29,659

Schedule C

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Debits and Obligations for Line Numbers 26 and/or 27 of FEC Form 3

(see instructions on back)

Page 1 of 1 for

LINE NUMBER 27

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Richard Viguerie for Vice President				
Full Name, mailing address and ZIP code, and nature of obligation American Express Company 777 American Expressway Ft. Lauderdale, Florida 33337 (Travel, hotels, car rentals, charter)	Date (month, day, year) 8/76 Various	\$ 7,423	\$ 	\$ 7,423
Full Name, mailing address and ZIP code, and nature of obligation Richard A. Viguerie Company Inc. 7777 Leesburg Pike Falls Church, Virginia 22043 (Employee time, phones)	Date (month, day, year) 8/76 Various	\$ 3,600	\$ 	\$ 3,600
Full Name, mailing address and ZIP code, and nature of obligation Richard Viguerie 6033 Crimson Court McLean, Virginia 22101 (Expenditures by candidate to be reimbursed: AIP Convention, printing, etc.)	Date (month, day, year) 8/76 Various	\$ 7,923	\$ 	\$ 7,923
Full Name, mailing address and ZIP code, and nature of obligation Touche Ross & Company 1900 M Street, N. W. Washington, D. C. 20036	Date (month, day, year) 8/76-9/76 Various	\$ Accounting services have been rendered, but Touche Ross & Company's recordkeeping procedures make determination of amount due unfeasible at filing time.	\$ 	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	\$	\$	\$
Subtotals this period this page (optional)	►	\$ 18,946	\$	\$ 18,946
Total this period (last page this line number only)	►	\$ 18,946	\$	\$ 18,946

Carry outstanding balance only, to appropriate line of summary.

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

(See reverse side for instructions)

Page 1 of 1 Pages[illegible]

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Subscribed and sworn to before me this 15th day of

My Commission Expires

12-18-79

NOTARY PUBLIC

Signature _____

Date _____



FEDERAL ELECTION COMMISSION

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

4 NOV 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

I. David Lerman, Esq.
1707 H Street, N. W.
Washington, D. C. 20006

Re: MUR 229 (76)

Dear Mr. Lerman:

This will acknowledge receipt of your letter of October 20, 1976, in which you stated that the costs of the August 17, 1976 advertisement in the Kansas City Times was reported on October 9, 1976, in the quarterly report of the Richard Viguerie for Vice President Committee ("the Committee").

While this has been confirmed by Commission staff, I wish to call to your attention the fact that in order for this information to be considered properly filed, it is necessary for the Committee to amend its October 9, 1976 report to conform with the appropriate Commission procedures for the reporting of independent expenditures by a political committee. I have enclosed an updated copy of FEC Form 3, Schedule E, and a Notice of Independent Expenditure Reporting to assist you in this regard.

Since the Commission is under a duty to investigate this matter expeditiously, you are requested to complete and return the enclosed forms within five days of the receipt of this letter. If you have any questions, please contact David Anderson (telephone no. 202/382-3153), the attorney assigned to this matter.

Sincerely yours,

cc: John G. Murphy, Jr.
John G. Murphy, Jr.
General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
GENERAL COUNSEL



7704071621

6C

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

1. The following service is requested (check one).
☐ Show to whom and date delivered..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
I. David Lerman, Esq.

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INS. NO.
438135

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
I David Lerman
David Lerman

4. DATE OF DELIVERY *NOV 5 1976* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1976-O-203-456

RECEIVED
OFFICIAL FILE COPY
U.S. DEPARTMENT OF JUSTICE
OFFICE OF GENERAL COUNSEL

DATE AND TIME OF TRANSMITTAL: 11-1-76

NO. MUR 229 (76)

REC'D: 3 30

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Internally Generated by Michael Hershman and Keith Vance

Respondent's Name: Richard A. Viguerie

Relevant Statute: 2 U.S.C. §434(e)

Internal Reports Checked: Review of Registration Statements and Reports

Federal Agencies Checked: None

SUMMARY OF ALLEGATION

An advertisement advocating the defeat of Gerald R. Ford appeared in the Kansas City Times on August 17, 1976. While the advertisement stated that it was paid for by Richard A. Viguerie, a review of Commission records by investigative personnel revealed that the cost of the advertisement had not been reported as an independent expenditure 2 U.S.C. §434(e).

PRELIMINARY LEGAL ANALYSIS

As part of the Commission's preliminary inquiry into this matter, a letter requesting additional information about the reporting of this expenditure was sent on September 16, 1976, to Mr. Viguerie. (Attachment #1) On October 20, 1976, I. David Lerman, an attorney for Mr. Viguerie responded that this expenditure was reported as part of the quarterly report of the Richard Viguerie for Vice President Committee which was filed on October 9, 1976 (Attachment 2)

RECOMMENDATION

1 FILE COPY
OFFICE OF GENERAL COUNSEL

CONTINUATION SHEET

PRELIMINARY LEGAL ANALYSIS

Mr. Lerman also enclosed a completed independent expenditure report in the event that the Commission determines that it is necessary for Mr. Viguerie to file as an individual.

A review of the October 9th report revealed that while the cost of the advertisement was disclosed, the disclosure was not made in accordance with current procedures for the reporting of independent expenditures by a political committee. (See Attachment 3).

7704100000

FEDERAL ELECTION COMMISSION
CENTRAL FILE COPY
OFFICE OF GENERAL COUNSEL

ATTACHMENT #1

4

SEP 16 1976

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard A. Viguerie
1777 Leesburg Pike
Falls Church, Virginia

RE: MUR 229 (76)

Dear Mr. Viguerie:

It has come to the attention of the Federal Election Commission that the attached advertisement ran in the Kansas City Times of August 17, 1976. This letter regarding possible reporting requirements is prompted by our interest in assisting persons and committees which wish to comply with the Federal Election Campaign Act.

Persons or political committees which make an independent expenditure advocating the defeat of a clearly identified candidate which exceed \$1000 or more and which are made after the 15th day, but more than 24 hours prior to the election are required to report the expenditure within 24 hours. I realize that the reporting requirements of the Campaign Act are complex and that you may have been unaware of the filing obligations. However, if you contracted with the Kansas City Times for the attached advertisement after the 15th day, but more than 24 hours before the opening of the convention, a report on the independent expenditure was required. A copy of the independent expenditure form is enclosed.

The Commission will take no further action until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within 10 days of receipt of this letter.

If you have any questions, please do not hesitate to call, the attorney assigned to this matter is Carolyn Reed and her number is 332-4055.

Sincerely yours,

Enclosure

CRreed:pjg:9/14/76
CC file

William C. Oldaker
Assistant General Counsel

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION

MUR 229

LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA
1707 H STREET, N.W.

WASHINGTON, D. C. 20006

SOLOMON GROSSBERG
IRVING B. YOCHELSON
JULIUS I. FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
SHELTON M. BINSTOCK
STEVEN C. FRIEDMAN
DALY D. E. TEMCHINE
I. DAVID LERMAN

ISADORE BRILL (1905-1964)

October 20, 1976

ATTACHMENT #2

AREA CODE 202
208-7600

763079

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

Re: MUR 299 (76)

Dear Ms. Reed:

Enclosed please find a copy of Mr. Viguerie's independent expenditure report (FEC Form 5) respecting the August 17, 1976 advertisements published in the Kansas City Times and Kansas City Star.

Please note that the aforementioned expenditure was related to Mr. Viguerie's Vice Presidential campaign. For this reason, it was reported by the Richard Viguerie for Vice President Committee in its quarterly report filed with the Federal Election Commission on October 9, 1976.

In the event that it appears necessary for this expenditure to have been reported by Mr. Viguerie as well, please accept the enclosed report for that purpose, and advise us whether amendments to the October Quarterly Reports filed by The Richard Viguerie for Vice President Committee or Richard Viguerie are necessary.

If we may furnish any additional information or be of further assistance in this matter, please feel free to communicate with us.

Very truly yours,

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

David Lerman

mp

Campaign Fundraising, Loans, and Transfers for Lines 20, 21, 22, and/or 23 of FEC Form 3 (See Instructions on back)

Name of Candidate or Committee in full
Richard Viguerie for Vice-President

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Charles Snider 2431 Burkclawn Drive Montgomery, AL 36106	Campaign Management and Consulting; reimbursement of expenses for travel, meals, airline fares, etc.	9/3/76	1,500 1,972
Lewis Jenkins (Baton Rouge Advertising) P. O. Box 52889 Baton Rouge, Louisiana 70805	Campaign Management; Public Relations; reimbursement of expenses of travel; room, newspaper ads; printing, meals, telephone, promotion, etc.	7/30/76 8/12/76 8/12/76 8/24/76 9/10/76 9/20/76	2,000 2,000 5,076 2,647 5,922 209
Monat National Bank 2035 M Street, N.W. Washington, D.C. 20006	Payment of Principal and Interest of loan (see below) bank charges	8/19/76 8/26/76	10,037 13
Metro Printing & Mailing Services, Inc. 2446 Lee Highway Fairfax, Virginia 22030	Postage, printing and mailing of campaign materials and press releases.	8/10/76 8/20/76 9/8/76	301 845 1,097
Richard A. Viguerie Company, Inc. 7777 Leesburg Pike Falls Church, Virginia 22043	Reimbursement for expenses: envelopes, labels, delivery expenses	8/20/76 8/20/76 9/22/76	19 12 64
Bruce Herschensohn 2475 Virginia Avenue, N.W. Washington, D.C. 20037	Consulting and public relations	8/30/76	480
Lee Edwards and Associates, Inc. 1735 DeSales Street, N.W. Washington, D.C. 20036	Reimbursement of luncheon expenses	9/3/76	157
PREP, Inc. 1121 Arlington Boulevard Arlington, Virginia 22209	Printed Letters	9/8/76	118

Printed Letters
OFFICIAL FILE COPY
DIVISION OF FEDERAL COUNSEL

Subtotal of expenditures this page (optional) 34,469

Total of all expenditures (with line number only) --

CC # 197
MUR 229

RECEIVED
FEDERAL ELECTION
COMMISSION

LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.

WASHINGTON, D. C. 20006

SOLOMON GROSSBERG
IRVING B. YOCHELSON
JULIUS I. FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
SHELTON M. BINSTOCK
STEVEN G. FRIEDMAN
DALY D. E. TEMCHINE
I. DAVID LERMAN

ISADORE BRILL (1905-1964)

AREA CODE 202
298-7600

October 20, 1976

763079

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

Re: MUR 299 (76)

Dear Ms. Reed:

Enclosed please find a copy of Mr. Viguerie's independent expenditure report (FEC Form 5) respecting the August 17, 1976 advertisements published in the Kansas City Times and Kansas City Star.

Please note that the aforementioned expenditure was related to Mr. Viguerie's Vice Presidential campaign. For this reason, it was reported by the Richard Viguerie for Vice President Committee in its quarterly report filed with the Federal Election Commission on October 9, 1976.

In the event that it appears necessary for this expenditure to have been reported by Mr. Viguerie as well, please accept the enclosed report for that purpose, and advise us whether amendments to the October Quarterly Reports filed by The Richard Viguerie for Vice President Committee or Richard Viguerie are necessary.

If we may furnish any additional information or be of further assistance in this matter, please feel free to communicate with us.

Very truly yours,



I. David Lerman

FEDERAL ELECTION COMMISSION
OFFICIAL COPY
COUNSEL

mp

7714001322

REPORT OF INDEPENDENT
EXPENDITURES OR CONTRIBUTIONS
BY PERSONS

(Instructions on reverse side)

Note: Every person (other than a political committee or candidate) who makes contributions or expenditures for communications which expressly advocate the election or defeat of a clearly identified candidate for federal office, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year must file this Report. (See reverse side). POLITICAL COMMITTEES do NOT file Reports of Receipts and Expenditures on FEC Form 5. Political committees file Reports on FEC Form 3.

1(a) Name of Person (in Full)

Richard A. Viguerie

(b) Address (Number & Street)

6033 Crimson Court

(c) City, State & Zip Code

McLean, Virginia 22101

2 This is a Report of

- ☒ Independent Expenditures
☐ Independent Contributions
☐ Both

3 Type of Report (check appropriate box) Other: 24-hour report following 15th day

☐ April 10 ☐ October 10

☐ Amendment to _____ Report

☐ July 10 ☐ January 31

☐ Tenth day report preceding

election on _____ in the state of _____
(primary, general or convention) (date)

☐ Thirtieth day report following election on _____ in the state of _____
(primary, general or convention) (date)

4 Itemize expenditures and contributions which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
<input type="checkbox"/> expenditure to <input type="checkbox"/> contribution to Louis Jenkins (Baton Rouge Advertising) P. O. Box 52889 Baton Rouge, Louisiana 70805	Payment for creating and arranging for publication of newspaper advertisement in Kansas City Star & Times on 8/17/76	8/12/76	\$5,076	Advocating defeat of Gerald Ford
<input type="checkbox"/> expenditure to <input type="checkbox"/> contribution to				
<input type="checkbox"/> expenditure to <input type="checkbox"/> contribution to				
<input type="checkbox"/> expenditure to <input type="checkbox"/> contribution to				

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

(b) Subtotal of Itemized Expenditures and/or Contributions.....\$ 5,076

(c) Subtotal of Unitemized Expenditures and/or Contributions.....\$

(d) Total Expenditures and/or Contributions.....\$ 5,076

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

Richard A. Viguerie
(Signature)

October 18, 1976
(Date)

77040011227

"Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee, other than Richard Viguerie or the Richard Viguerie for Vice President Committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any broadcast or any written, graphic, or other form of campaign materials prepared by the candidate, his campaign committee or their agents, other than Richard Viguerie or the Richard Viguerie for Vice President Committee."

Richard A. Viguerie
Richard A. Viguerie

Sworn to before me this 19th day of October, 1976.

Eileen B. Pomeroy
Eileen B. Pomeroy, Notary Public

My Commission Expires Dec. 18, 1979

77040011227

LEGAL COUNSEL

GROSSBERG YOCHELSON FOX & BEYDA

1707 H STREET N.W.

WASHINGTON, D.C. 20006



10 OCT 21 P 1:26



ORIGINAL FILE COPY
DATE OF RECEIPT 10/21/78
FBI

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

RETURN RECEIPT REQUESTED

Cardinal CC # 603
RECEIVED
FEDERAL ELECTION COMMISSION

LAW OFFICES
GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.
WASHINGTON, D. C. 20006

76 SEP 27 All: 53

AREA CODE 202
298-7600

SOLOMON GROSSBERG
IRVING B. YOCHELSON
JULIUS I. FOX
C. RICHARD BEYDA
LAWRENCE A. MILLER
GERALD P. GROSSBERG
LEONARD L. ROSENBERG
SHELTON M. BINSTOCK

ISADORE BRILL (1905-1964)

September 24, 1976

William C. Oldaker, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20453

Re: MUR 229 (76)

Dear Mr. Oldaker:

This law firm serves as legal counsel to Mr. Richard A. Viguerie. We have been asked by Mr. Viguerie to cooperate with you with respect to the matters which you discuss in your letter to him of September 16, 1976.

At this time we are reviewing the materials which you forwarded to Mr. Viguerie. We expect that we will be in a position to respond to your letter by early next week and to furnish you with the information which you have requested.

Very truly yours,

C. Richard Beyda

C. Richard Beyda

CRB:ka

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

77040036220

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET N.W.

WASHINGTON D.C. 20006

16 SEP 1970 10:30
FEDERAL ELECTION COMMISSION
COUNSEL

William C. Oldaker, Esq.
Assistant General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D.C. 20453

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 16 1976

Mr. Richard A. Viguerie
1777 Leesburg Pike
Falls Church, Virginia

RE: ENR#229 (76)

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Dear Mr. Viguerie:

It has come to the attention of the Federal Election Commission that the attached advertisement ran in the Kansas City Times of August 17, 1976. This letter regarding possible reporting requirements is prompted by our interest in assisting persons and committees which wish to comply with the Federal Election Campaign Act.

Persons or political committees which make an independent expenditure advocating the defeat of a clearly identified candidate which exceed \$1000 or more and which are made after the 15th day, but more than 24 hours prior to the election are required to report the expenditure within 24 hours. I realize that the reporting requirements of the Campaign Act are complex and that you may have been unaware of the filing obligations. However, if you contracted with the Kansas City Times for the attached advertisement after the 15th day, but more than 24 hours before the opening of the convention, a report on the independent expenditure was required. A copy of the independent expenditure form is enclosed.

The Commission will take no further action until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within 10 days of receipt of this letter.

If you have any questions, please do not hesitate to call, the attorney assigned to this matter is Carolyn Reed and her number is 382-4055.

Sincerely yours,

Enclosure

CRreed:pjg:9/14/76
CC file

William C. Oldaker
Assistant General Counsel

770400231

UNITED STATES COMMISSION
CRIMINAL FILE COPY
OFFICE OF GENERAL COUNSEL

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6C

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

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

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Mr. Richard Viguerie

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438042	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 9/20/76

POSTMARK SEP 30 1976

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

August 30, 1976

MEMORANDUM TO: Bill Oldaker
THRU: Drew McKay *Adm*
FROM: Michael Hershman *myh*
SUBJECT: RICHARD A VIGUERIE ADVERTISEMENT

Attached for your information and action is a newspaper advertisement advocating the defeat of President Gerald R. Ford.

It appears, on face, that Mr. Richard A. Viguerie is in violation of 2 U. S. C. Section 441d(2) and 434 (e).

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
U. S. GENERAL COUNSEL

Attachment 2

? paid for with
PAC money

10 day - 30 day
schedule - not
applicable

48 hour rule applies to
contribution in statute.





FEDERAL ELECTION COMMISSION

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

August 30, 1976

MEMORANDUM

TO: Michael Hershman
FROM: Keith A. Vance *KAV*
SUBJECT: RICHARD A VIGUERIE ADVERTISEMENT

On August 17, 1976, The Kansas City Times newspaper published a political advertisement advocating the defeat of the President, Gerald R. Ford, prepared and paid for by Mr. Richard A. Viguerie.

The advertisement failed to, clearly and conspicuously, state that it was or was not authorized by any candidate as required by 2 U. S. C. Section 441d.

Inquiry revealed that an advertisement similar to the attached would cost \$3,508.08, if prepared in advance by the payer. Advertisement requiring the assistance of the newspaper would cost considerably more.

The advertisement, therefore, at a minimum cost \$3,508.08. Review of Commission records and reports does not show that Mr. Viguerie has reported the expenditure as required by 2 U. S. C. Section 434 (e).

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



IS THERE A REPUBLICAN DEATH WISH?

The Nomination of Gerald Ford Will Destroy the Republican Party!

"History will judge (us)... not by the promises we make, but by the promises we keep."
—Gerald Ford,
August 1, 1975, Helsinki

President Ford has the reputation of being honest and forthright. But after carefully searching the President's record from the day he took office on August 9, 1974 through the spring of 1975, Conservative Digest has concluded that his reputation is not deserved.

The Ford record is a trail of broken promises. Most of the time it broke his promises at the expense of conservatives, but he did not because to abandon a commitment to liberals if it would help him.

We ask you to read the record and then answer this question: Has Jerry Ford earned your trust?

1. Ford's Domestic Policy
Balanced Budget
In his address to the Congress on August 12, 1974, Ford promised:

"I will work to... bring the federal budget into balance by fiscal 1976... I will oppose excessive spending during this inflationary crisis."

Less than six months later, on February 9, 1975, he submitted a \$349.4 billion budget for fiscal '76 with an estimated \$51.9 billion deficit.



Tax Cut
In December 1975, Ford told Congress that any tax cut in 1976 had to be coupled with a commitment to rein spending.

Within days he accepted a tax-cut extension with index and essentially meaningless anti-inflationary language.

Spending
In his 1976 State of the Union speech, Ford said that "the government must stop spending as much and stop borrowing as much of our money. To hold down the cost of living, we must hold down the cost of government."

Ford then submitted a budget for fiscal 1977 of \$395 billion with a planned deficit of \$15 billion. He admitted he preferred \$32 billion deficit for fiscal 1976 was now likely to reach \$26 billion by July 1, the end of the fiscal year.

Gun Tax
On August 28, 1974, President Ford declared that "we must not let lawlessness emerge as a national crisis." He stated his opposition to a gun tax increase, however, "there must be a better way."

But in his January 1975 State of the Union address, he requested a raise in excise taxes on guns.

Domestic
In that same State of the Union address, he converted his domestic plan, stating, "I plan to... decontrol the price of domestic crude oil on April 1." On March 6, he announced postponement of his plan to decontrol oil prices, "all oil will already be decontrolled in production in a country."



On July 11, a 30-day decontrol plan was announced. On September 25, a compromise plan regarding controls retroactive to September 1 was prepared.

Finally, on December 22, he signed a bill which rolled back prices and ended controls—but not for 60 months.

Sen. Henry Jackson of Washington stated, "They've gone from a total decontrol in April to control for 60 months and roll back in prices."

Tariffs
In his 1975 State of the Union message on January 20th, President Ford proposed a personal income tax cut of \$18.4 billion to help fight the recession. On February 26, he said he didn't think "we have reached that point" where a larger cut is warranted.

On March 8, 10 days later, he said a larger cut "is what we need," mentioning \$19 billion, but absolutely no more.

However, on May 13th, two weeks before the vote on the bill, he declared, "President Ford signed a \$21.8 billion tax cut."

Banking
On August 21, 1974, the President signed a bill which allowed accelerated stock buying for the purpose of racial balance.

But during the next 18 months he repeatedly denied the racial motive of forced buying.

Gun Control
On June 19, 1975, Ford said he was "unambiguously opposed to full registration of guns on the licensing of gun owners."

But in his 1974 State of the Union address, he said:

"The way we are doing so the criminal use of guns is not to take guns away from the law-abiding citizen... that is the harder to obtain the guns for criminal purposes, and to encourage gun ownership, enforce more strictly gun laws."

Administration sources have confirmed that Ford was referring to registration of so-called "Saturday Night Specials."

New York City Budget
At a press conference on October 9, 1975, Ford said, "I do not think it's a healthy thing for the federal government to bail out a city that has landed in fiscal affairs as irresponsibly over a long period of time as New York has."

On November 5, in the National Press Club in Washington, D.C., President Ford agreed to veto any legislation that would provide for a guarantee on New York City before it defaulted.

The New York Daily News



headlined its story about the speech: "Ford To City Drop Deal."

However, on November 26, he said, "I have decided to ask the Congress... for authority to provide \$2.8 billion in direct loans to New York City."

Common Sense
Early in 1975, President Ford told then Labor Secretary John D. Dingell he would sign a common sense package bill, thereby giving any single union boss at a unionization the power to clear down the entire project.

But Henry placed common sense by wide margins. Then the National Right to Work Committee launched an effective campaign that resulted in 720,000 letters being received by the White House. Ronald Reagan came out against common sense.

On January 2, 1976, Ford vetoed common sense.

Legal Services
Early in 1975, President Ford named Sen. James McClellan of Idaho and other conservatives on the Senate and the House that there would be a bill to the right in the newly created Legal Services Corporation.

The corporation sprang lawyers who specialize in the advocacy of forced busing, liberalized abortion laws and other radical causes.

Therefore, congressional conservatives were stunned when the Corporation Board turned out to be overwhelmingly liberal and when on October 17, 1975, two radically oriented law school deans were named to head the corporation staff.



The new president was Thomas F. Kelly, Dean of Stanford University Law School. Kelly acted as chairman for Sen. John Tunney of California and was the principal organizer of a series of "meetings" around the country intended to make the national legal system more "radically responsive."

Even more disturbing was the appointment of P. Clinton Ross by the Senate of Catholic University Law School, an avowed neo-Marxist of the Legal Services Corporation. Ross began a wide

hard McGovern in 1972, signing a statement in the university paper headlined, "McGovern Only Hope."

5. Ford's Foreign Policy
Democracy
Democracy was the keystone of Ford's foreign policy from his first day in office.

He told Time in July 1975 that "on balance, (democracy) has been a relationship that has given both sides enough benefits to justify its continuation... SALT II would be much more significant."

In his trip to the Soviet Union in 1974 and Communist China in 1975, Ford continued to pursue a policy of détente.

As recently as January 8, 1976, in an interview with NBC, he said:

"I think it would be unwise for a President—or anybody else—to abandon détente. It is in the best interests of world stability, world peace... and possibly I think any candidate who says abandon détente will be the loser in the long run."

But as Reagan continued to push him in the primaries, Ford decided to change his mind and endorse détente.

"Détente is only a word," he said on March 1, 1976, of a policy which he had single-mindedly pursued for nearly 18 months. "I don't think it is applicable anymore."

National Defense
Gerald Ford pines himself on being a staunch supporter of a strong national defense. His theme as President has been constant and predictable.

"A strong defense is the sure way to peace... America's strength will be used to make it so." —August 12, 1974

"Weakness would be folly for the U.S... there is no other nation in the free world capable of stepping into our role." —April 15, 1975

"The military forces are capable and ready; our military power is without equal. And I intend to keep it that way." —His 1974 State of the Union speech

But serious critics ranging from Senators Henry Jackson and James Buckley to former Secretary of Defense James Schlesinger and AFL-CIO head George Meany contend that the U.S. has slipped from its position as the world's leading military power.

Panama
In 1967 as House minority leader, Ford strongly opposed any withdrawal of U.S. sovereignty over the Canal. With Cuba under command of the Soviet Union via Castro and increased communist influence in Latin America, he said that "a communist threat to the Canal is a real danger."

Today the puppet Henry Kissinger's plan, unveiled in 1974, promises an overruling and com-

mand of the Canal and the Canal Zone to Panama, which remains a pro-Moscow and pro-Castro dictatorship.

Cuba
In July 1975, the U.S. cut the \$75 million which the U.S. State Department of American State (DIA) policy of making communist Cuba.

But this past February, while campaigning in Florida, Ford told a cheering Cuban-American audience that Fidel Castro was an "international outlaw" and that "my administration will have nothing to do with the Cuba of Fidel Castro."

The Helsinki Agreement
In July, 1975, he proclaimed: "I have seen my policy over more I courted public life to support the restoration of freedom... of the peoples of Eastern Europe, by every proper and peaceful means."

However, on August 1, 1975, Ford signed the Helsinki Agreement with the Soviet Union which legitimized communist domination of Eastern Europe.

The Cuban Problem
When asked during his non-presidential confirmation hearings about the possibility of his granting a pardon to Richard Nixon, Ford replied, "I don't think the public would stand for it."

But on September 8, 1974, one month after he took office, Ford gave Nixon a "full, free and absolute pardon."

Campaign 1976
In his 1976 State of the Union address, Ford told the Congress, "We must be more honest with the American people."

However, a few weeks later in New Hampshire and Florida, candidate Ford was distancing himself from his position on actual security and his proposed transfer of some \$90 billion in federal resources to local governments.

For the most part, the media did not point out that Ford was in effect giving "dirty tricks" to his job.

They did not pick up, for example, the negative reaction of Sen. Barry Goldwater, who even

though he leans to Ford as the 1976 presidential nominee was not happy with his man's tactics.

Goldwater told columnist John D. Ichniowski, Jr.: "This is the same type of thing that got me in 1964... I lost me 6 to 8 million Republican votes."

How the Invasion of Czechoslovakia Office in 1976
On November 5, 1975, under oath at his own presidential confirmation hearings before the U.S. Senate Rules Committee, Gerald Ford was pressed down on the subject of training for the invasion.

When Ford testified he would not run, Senator James Allen (D-Ala) asked: "Do you think you might be subject to a draft?"

Still under oath, Gerald Ford replied, "Well, the answer is still no. I have no intention to run, and I can foresee no circumstances where I would change my mind. I have no intention of seeking public office in 1976."

But James Brown, a close friend of Kissinger and columnist for the New York Times, revealed the true story on January 30, 1976: "Myra Ford and Kissinger support (Nixon) in public, and deplore him in private."

And on February 2, 1976, Morahan announced, pointing the growing ranks of administration officials—including Vice President Nelson Rockefeller, ex-

Secretary of Defense James Schlesinger and ex CIA Director William Miller—who had been discarded for political reasons.

A Ford's Policies
The Case of Panama Resolution
As conservatives across the country in 1975 Ford was in August that Rockefeller "has revealed any experience that I have had. He has done a good job. He has been a good team player. I don't dump good team players."

Barry two months later, Ford quickly accepted Kissinger's announcement that he would not run with Ford in 1976.

Alexander Solzhenitsyn
Ford promised an "open" administration.

But he refused to meet Russian novelist Alexander Solzhenitsyn, one of the great moral leaders of our time.

The Nixon Pardon
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If Gerald Ford is nominated, a new majority party will emerge to replace the Republican Party. The National Conservative Coalition, with brilliant positions in nearly forty states, will meet August 25-29 at the Conrad Hilton Hotel in Chicago. Conservative Republicans, Wallace Democrats, conservative independents and members of the American Independent and American Independence parties will be in attendance. The Republican Party must nominate a conservative this week or face a united conservative coalition which will replace the Republican Party as the nation's second major party.

FEDERAL ELECTION COMMISSION
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Richard A. Viguier
Publisher
Conservative Digest

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Richard A. Viguier

RAVED PPS

In his 1976 State of the Union speech, Ford said that "the government must stop spending so much and stop borrowing so much of our money. . . . We hold down the cost of living, we must hold down the cost of government."

Ford then submitted a budget for fiscal 1977 of \$895 billion with a planned deficit of \$43 billion. He admitted his predicted \$52 billion deficit for fiscal 1976 was now likely to reach \$76 billion by July 1, the end of the fiscal year.

Gas Tax

On August 28, 1974, President Ford declared that "we must not let last winter's energy crisis happen again." He stated his opposition to a gas tax increase, however, asserting, "there must be a better way."

But in his January, 1975 State of the Union address, he requested a raise in excise taxes on gasoline.

"The way to cut down on the criminal use of guns is not to take guns away from the law-abiding citizen . . . (but) make it harder to obtain cheap guns for criminal purposes and concentrate gun control enforcement in high crime areas."

Administration sources have confirmed that Ford was referring to registration of so called "Saturday Night Specials."

New York City Bailout

At a press conference on October 9, 1975, Ford said, "I do not think it's a healthy thing for the federal government to bail out a city . . . that has handled its fiscal affairs as irresponsibly over a long period of time as New York has."

On November 5, at the National Press Club in Washington, D.C., President Ford vowed to veto any legislation that would provide loans or guarantees to New York City before it defaulted.

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The new president was Thomas E. Fitch, dean of Stanford University Law School. Fitch served as a law partner for Sen. John Tunney of California and was the general organizer of a series of "assemblies" around the country intended to make the nation's legal system more "socially responsive."

Even more disturbing was the appointment of F. Clifton Bamberger, dean of Catholic University Law School, as executive vice president of the Legal Services Corporation. Bamberger was a die-

"Our military forces are capable and ready; our military power is without equal. And I intend to keep it that way."—His 1976 State of the Union speech.

But serious critics ranging from Senators Henry Jackson and James Buckley to former Secretary of Defense James Schlesinger and AFL-CIO head George Meany contend that the U.S. has slipped from its position as the world's leading military power.

Panama

In 1967, as House minority leader, Ford strongly opposed any surrender of U.S. sovereignty over the Canal. "With Cuba under control of the Soviet Union via Castro and increased communist subversion in Latin America," he said then, "a communist threat to the Canal is a real danger."

Today he supports Henry Kissinger's plan, revealed in 1974, to turn over sovereignty and con-

U.N. Ambassador Moynihan

The readiness of Daniel Patrick Moynihan, our ambassador to the United Nations, to call Third World leaders like Uganda's Idi Amin a "racist murderer" upset Henry Kissinger and his policy of detente. Kissinger began a not so subtle campaign of damaging leaks and innuendo.

Twice, Moynihan threatened to resign—once in November and again in January—and each time the President and his secretary of state were forced to give the U.N. ambassador public votes of confidence.

But James Reston, a close friend of Kissinger and columnist for the New York Times, revealed the true story on January 30, 1976.

Messrs. Ford and Kissinger support Moynihan in public and deplore him in private.

And so on February 2, 1976, Moynihan resigned, joining the growing ranks of administration officials—including Vice President Nelson Rockefeller, ex-

1976 presidential nominee was not happy with his man's tactics.

Goldwater told columnist John D. Lofton, Jr., "This is the same type of thing that got me in 1964—it lost me 6 to 8 million Republican votes."

"I Have No Intention of Seeking Public Office in 1976"

On November 5, 1975, under oath at his vice presidential confirmation hearings before the U.S. Senate Rules Committee, Gerald Ford was pinned down on the subject of running for president.

When Ford indicated he would not run, Senator James Allen (D-Vt.) asked, "Do you think you might be subject to a draft?"

Still under oath, Gerald Ford replied, "Well, the answer is still no. I have no intention to run, and I can foresee no circumstances where I would change my mind. I have no intention of seeking public office in 1976."



Richard A. Viguerie

If Gerald Ford is nominated, a new majority party will emerge to replace the Republican Party. The National Conservative Coalition, with ballot position in nearly forty states, will meet August 25-29 at the Conrad Hilton Hotel in Chicago. Conservative Republicans, Wallace Democrats, conservative independents and members of the American Independent and American Independence parties will be in attendance. The Republican Party must nominate a conservative this week or face a united conservative coalition which will replace the Republican Party as the nation's second major party.

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IS THERE A REPUBLICAN DEATH WISH?

The Nomination of Gerald Ford Will Destroy the Republican Party!

"History will judge (us) . . . not
by the promises we make,
but by the promises we keep."

—Gerald Ford

August 1, 1975, Helsinki

President Ford has the reputation of being honest and forthright. But after carefully researching the President's record from the day he took office on August 8, 1974 through the spring of 1976, *Conservative Digest* has concluded that his reputation is not deserved.

The Ford record is a trail of broken promises. Most of the time he broke his promises at the expense of conservatives, but he did not hesitate to abandon a commitment to liberals if it would help him.

We ask you to read the record and then answer this question: Has Jerry Ford earned your trust?

1. Ford's Domestic Policy

Decontrols

In that same State of the Union address, he unveiled his decontrol plan, stating, "I plan to decontrol the price of domestic crude oil on April 1." On March 4, he announced postponement of his plans to decontrol so-called "old" oil—oil already discovered and in production in this country.

On July 14, a 30-day decontrol



headlined its story about the speech "Ford To City: Drop Dead."

However, on November 26, he said, "I have decided to ask the Congress . . . for authority to provide \$2.5 billion in di-

hard McGovernite in 1972, signing a statement in the university paper headlined, "McGovern Only Hope."

2. Ford's Foreign Policy

Detente

"Detente with the Russians"

trol of the Canal and the Canal Zone to Panama, which remains a pro-Moscow and pro-Castro dictatorship.

Cuba

In July 1975, the U.S. cast the key vote ending the 11-year-old Organization of American States (OAS) policy of isolating communist Cuba.

But this past February, while campaigning in Florida, Ford told a cheering Cuban-American audience that Fidel Castro was an "international outlaw" and that "my administration will have nothing to do with the Cuba of Fidel Castro."

The Helsinki Agreement

In July, 1975, he emphasized: "It has been my policy ever since I entered public life to support the aspirations of freedom . . . of the peoples of Eastern Europe . . . by every proper and peaceful means."

However, on August 1, 1975,

Secretary of Defense James Schlesinger and ex-CIA Director William Colby—who had been discarded for political reasons.

3. Ford's Politics

The Case of Nelson Rockefeller

As conservative dissent grew within the GOP in 1975, Ford said in August that Rockefeller "has exceeded any expectations that I have had. He has done a good job. He has been a good teammate. I don't dump good teammates."

Barely two months later, Ford quietly accepted teammate Rockefeller's announcement that he would not run with Ford in 1976.

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But he refused to meet Russian novelist Alexander Solzhenitsyn, one of the great moral leaders of our time.

The Nixon Pardon

When asked during his vice-

We return to read the record and then answer this question: Has John Ford changed you in 1976?

1. Ford's Domestic Policy

Balanced Budget

In his address to the Congress on August 12, 1974, Ford promised:

"I will work to . . . bring the federal budget into balance by fiscal 1976 . . . I will oppose excessive funding during this inflationary crisis."

Less than six months later, on February 3, 1975, he submitted a \$349.4 billion budget for fiscal '76 with an estimated \$51.9 billion deficit.



Tax Cut

In December 1975, Ford told Congress that any tax cut in 1976 had to be coupled with a commitment to trim spending.

Within days he accepted a tax-cut extension with token and essentially meaningless antispending language.

Spending

In his 1976 State of the Union speech, Ford said that "the government must stop spending so much and stop borrowing so much of our money . . . To hold down the cost of living, we must hold down the cost of government."

Ford then submitted a budget



plan was announced. On September 25, a compromise plan restoring controls retroactive to September 1 was proposed.

Finally, on December 22, he signed a bill which rolled back prices and ended controls—but not for 40 months.

Sen. Henry Jackson of Washington crowed: "They've gone from a total decontrol in April to control for 40 months and rollback in prices."

Taxes

In his 1975 State of the Union message on January 20th, President Ford proposed a personal income tax cut of \$16.6 billion to help fight the recession. On February 26, he said he didn't think "we have reached that point" where a larger cut is warranted.

On March 6, 10 days later, he said a larger cut "is what we need," mentioning \$19 billion, but also saying "no more."

However, in late March, two weeks before the income tax filing deadline, President Ford signed a \$24.8 billion tax cut.

Busing

On August 21, 1974, the President signed a bill which allowed court-ordered school busing for the purpose of racial balance.

But during the next 18 months he frequently criticized the social blight of forced busing.

Gun Control

On June 19, 1975, Ford said he was "unambiguously opposed to federal registration of guns or the licensing of gun owners."

But in his 1976 State of the Union address, he said:

"The way to cut lawlessness is the criminal use of guns is not to take guns away from the law-abiding citizen . . . but make it harder to obtain cheap guns for criminal purposes, and concentrate gun-control enforcement in high crime areas."

However, on November 20, he said: "I have decided to ask the Congress . . . for authority to provide" \$2.3 billion in direct loans to New York City.

Common Situs

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Both Houses passed common situs by wide margins. Then the National Right to Work Committee launched an eleven-hour campaign that resulted in 720,000 letters being received by the White House. Ronald Reagan came out against common situs.

On January 2, 1976, Ford vetoed common situs.

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Hopes

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Detente was the keystone of Ford's foreign policy from his first day in office.

He told *Time* in July, 1975 that "on balance, [detente] has been a relationship that has given both sides enough benefits to justify its continuation . . . SALT I was a step forward, potentially SALT II would be much more significant."

In his trips to the Soviet Union in 1974 and Communist China in 1975, Ford continued to pursue a policy of detente.

As recently as January 8, 1976, in an interview with NBC, he said:

"I think it would be unwise for a President—me or anybody else—to abandon detente . . . It is in the best interest of world stability, world peace . . . and politically I think any candidate who says abandon detente will be the loser in the long run."

But as Reagan continued to press him in the primaries, Ford decided to "throw overboard some suddenly expendable baggage."

"Detente is only a word," he said on March 1, 1976, of a policy which he had single-mindedly pursued for nearly 18 months. "I don't think it is applicable anymore."

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Gerald Ford prides himself on being a staunch supporter of a strong national defense. His rhetoric as President has been consistent and predictable:

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The Republic of China on Taiwan

On April 16, 1975, at the annual convention of the American Society of Newspaper Editors, Ford said: "We have excellent relations with the Republic of China. We are concerned, of course, and will continue to be concerned about the Republic of China's security and stability."

On December 1, 1975, in Honolulu, while outlining his new Pacific Doctrine, Ford said: "I reaffirmed (in Peking) the determination of the United States to complete the normalization of relations with the People's Republic of China on the basis of the Shanghai Communiqué."

Secretary Kissinger revealed to newsmen in Peking that completing the normalization of relations with the PRC would ultimately mean the severing of relations with our present ally, the Republic of China.

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FEDERAL ELECTION COMMISSION

1. Memo to Oldaker from Emmons - 11/4/76

2. Memo to file from D. Anderson - 10/22/76

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):

- | | |
|---|--|
| ___ (1) Classified Information | ___ (6) Personal privacy |
| ___ (2) Internal rules and practices | ___ (7) Investigatory files |
| ___ (3) Exempted by other statute | ___ (8) Banking Information |
| ___ (4) Trade secrets and commercial or financial information | ___ (9) Well Information (geographic or geophysical) |
| ___ (5) Internal Documents | |

Signed

Kurt Burkhardt

date

9/27/77