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LAW OFFICES

GROSSBERG, YOCHELSON, FOX & BEYDA

1707 H STREET, N.W.

WASHINGTON, D. C. 20006

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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 (1905-1984)

April 23, 1976

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

Dear Sirs:

Enclosed please find a fully executed copy of
the Richard A. Viguerie Company Political Action Committee's
Statement of Organization for a Political Committee (FEC
Form 1). Please accept the same for filing.

Very truly yours,

GROSSBERG, YOCHELSON, FOX & BEYDA

By I. David Lerman
I. David Lerman

Attorneys for the
Richard A. Viguerie Company

IDL:pat

Enclosure

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

77040013455

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

HAND DELIVERED

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FEDERAL ELECTION COMMISSION
JAN 21 1976

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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, and file separate reports with respect to each election.

| | |
|---|---|
| 1(a) Name of Committee (in full) Richard A. Viguerie Company Political Action Committee ("RAVCO-PAC") | 2 Identification Number N/A at this time |
| (b) Address (number and street) 7777 Leesburg Pike | 3 Date of registration (month, day, year) April 19, 1976 |
| (c) City, State and ZIP code Falls Church, Virginia 22043 | 4 Is this an amended statement <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" fill in only those lines in which there has been a |

5 Check one:

- ☐ (a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)
a candidate for _____ in the _____ Election
(Federal office sought) (General, Primary, Runoff, etc.)
to be held in the State of _____ on _____
(State in which election is held) (Date(s))
(The Principal Campaign Committee will forward to the Commission a copy of the Statement of Organization for each committee required to file with it).
- ☐ (b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate)
to receive contributions and make expenditures with respect to the _____ Election
(General, Primary, Runoff, etc.)
held on _____, and will file all reports and statements with the candidate's principal campaign
(Date(s))
committee, _____
(Full name of principal campaign committee)
(Attach a copy of Candidate's written authorization.) (FEC Form 2a)
- ☐ (c) This committee supports only one candidate _____ but is not an authorized committee.
(Name of Candidate)
- ☒ (d) This committee is a multicandidate committee.
- ☐ (e) This committee is a _____ committee of the _____ Party.
(National, state, county, city) (Democratic, Republican, etc.)

| 6 Name of affiliated or connected organization | Mailing address and ZIP code | Relationship |
|--|------------------------------|--------------|
|--|------------------------------|--------------|

N/A

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Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

Statement of Organization
For a Committee

(Page 2)

Name of Committee

Richard A. Viguerie Company Political Action Committee ("RAVCO-PAC")

7 Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? ☒ Yes ☐ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☒ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

| Full name(s) of candidate(s) | Mailing address and ZIP code | Office sought | Party |
|--|------------------------------|---------------|-------|
| RAVCO-PAC intends to support 5 or more candidates for nomination for election or election to federal office. The identities of these candidates have not as yet been ascertained. At such time as the identities of these candidates are determined, RAVCO-PAC will file an amended statement of organization. | | | |

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless committee is supporting the entire ticket of a party as indicated in line 9)

| Full name(s) of candidate(s) | Mailing address and ZIP code | Office sought | Party |
|--|------------------------------|---------------|-------|
| RAVCO-PAC intends to support candidates for state and local office. The identities of these candidates have not yet been ascertained. At such time as the identities of these candidates are determined, RAVCO-PAC will file an amended statement of organization. | | | |

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9 If this committee is supporting the entire ticket of a party, give name of party ☒ N/A

10 Identify by name, address and position, the person in possession of committee books and records:

| Full name | Mailing address and ZIP code | Title or position |
|--------------------|--|---------------------|
| Mr. James Minarick | 7777 Leesburg Pike Falls Church, Virginia 22043 | Secretary-Treasurer |

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

77040013453

Statement of Organization
For a Committee
(Page 3)

Name of Committee

Richard A. Viguerie Company Political Action Committee ("RAVCO-PAC")

11 List by name, address and position, other principal officers of the committee:

| Full name | Mailing address and ZIP code | Title or position |
|---|---|-------------------------------|
| Morton C. Blackwell | 7777 Leesburg Pike, Falls Church, Virginia 22043 | Chairman |
| Lee McGreager <i>MAC GREGOR</i> | 7777 Leesburg Pike Falls Church, Virginia 22043 | Vice-Chairman |
| Cathy Yost <i>CATHARINE</i> | 7777 Leesburg Pike Falls Church, Virginia 22043 | Assistant Secretary-Treasurer |

- 12 Does this committee plan to stay in existence beyond the current calendar year? ☒ Yes ☐ No
If "Yes" for how long? ☐ Perpetuity
- 13 In the event of dissolution, what disposition will be made of residual funds? In the event of dissolution,
all surplus funds of RAVCO-PAC shall be promptly distributed to candidates or committees,
in accordance with the Articles of Organization of RAVCO-PAC.

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

| Name of bank, repository, etc. | Mailing address and ZIP code |
|---------------------------------|--|
| First & Merchants National Bank | Tysons Corner Branch 8027 Leesburg Pike McLean, Virginia 22043 |

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

| Report title | Dates required | Name and position of recipient | Mailing address and ZIP code |
|---|---------------------|--|------------------------------|
| Statement of Organization | 4/17/76 | Commonwealth of Virginia State Board of Elections | Richmond, Virginia 23219 |
| Report of Contributions and Expenditures | (See Attachment) | Commonwealth of Virginia State Board of Elections | Richmond, Virginia 23219 |

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

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

James H. Smith
(Signature of Treasurer)

4/19/76
(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the provisions of 2 U.S.C. § 441 (text on reverse side of form).

For further
information
contact: Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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OFFICE OF GENERAL COUNSEL

Sworn before me this 19th day of April 1976

Supplemental Statement to Item 15

Pursuant to Virginia's Fair Elections Practices Act, Code of Virginia §24.1 - 251, et seq., RAVCO-PAC is obligated to report its contributions and expenditures to the Commonwealth of Virginia State Board of Elections according to the schedule set forth in §24.1 - 257, a copy of which is attached hereto and made a part hereof.

77040013460

FEDERAL ELECTION COMMISSION
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...e filed by the committee with dresses, and positions of such

...quired by the State Board of

...submitted in a statement of
...f the State Board of Elections

...one or more statements of
...onger receive contributions or
...a aggregate amount exceeding
...etary of the State Board of

...s approved March 22, 1975, and
...ective July 1, 1975.

...date. — This section is effective

...o treasurer; duties of party
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...r delivered to the candidate's
...reasurer in such detail and
...with this chapter. It shall be
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...or disburses any moneys,
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...to §§ 24.1-253 and 24.1-254
...§§ 24.1-256 and 24.1-257 and
...a county or city committee
...Board of Elections and in the
...Board of Elections.

...ate's campaign committee,
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rendered for which no compensation is asked or given. (1970, c. 462; 1975, c. 515.)

The 1975 amendment, effective July 1, 1975, inserted "over one hundred dollars" following "of value" throughout the section, substituted "in such detail and form as to allow the treasurer to comply fully with" for "and, in turn, reported by him as required by" near the end of the first sentence of the first paragraph, inserted "collecting, receiving" and "collection,

receipt" in the second sentence of the first paragraph, added the language beginning "committee, other than" and ending "receives or disburses" near the beginning of the third paragraph and inserted "maintain records and" and substituted "this chapter" for "§§ 24.1-257 and 24.1-258" near the end of that paragraph, and added the last paragraph.

§ 24.1-256. Books and records of candidate or his treasurer. — Every candidate or his treasurer shall keep detailed, full and accurate accounts of all contributions, money, services or valuable things over one hundred dollars in value, received, promised, loaned or borrowed, or reported, and of all expenditures, disbursements and promises of payment or disbursements of money or valuable things over one hundred dollars in value made by or reported to any candidate or by such treasurer. Such statement and account shall set forth the sum or valuable thing over one hundred dollars in value so received, or disbursed, or promised, loaned or borrowed, or reported, as the case may be, and the date when, the name and address of the person from whom received, promised, loaned or borrowed, or reported, or to whom paid or promised, as the case may be, and the object and purposes for which the money, or other valuable thing, was received, or disbursed, or promised, as the case may be. Such books and records may be destroyed or discarded at any time after one year from the date of filing the final report required by § 24.1-257 unless a court of competent jurisdiction shall order their retention for a longer period. (1970, c. 462; 1975, c. 515.)

The 1975 amendment, effective July 1, 1975, inserted "over one hundred dollars in value" in two places in the first sentence and in one place

in the second sentence and inserted "loaned or borrowed" in one place in the first sentence and in two places in the second sentence.

§ 24.1-257. Report of contributions and expenditures to be filed by treasurer. — (a) The treasurer designated by a candidate or the appropriate person pursuant to § 24.1-255 shall file the report or statement of contributions and expenditures as prescribed in § 24.1-258 with the electoral board where the candidate resides and the State Board of Elections:

(1) (i) In any calendar year in which an individual is a candidate for office and an election for such office is held in such year, such reports shall be filed with the electoral board where the candidate resides not later than the fifth day before the date on which such election is held and shall be complete as of the seventh day before the date of such election; any such report filed with the State Board of Elections may be mailed and must be postmarked not later than the close of the fifth day before the date of such election; and

(ii) Any single contribution knowingly received or reported of one thousand dollars or more for a statewide office and five hundred dollars or more for any other office or offices, by the candidate, or his treasurer, on behalf of his candidacy between the seventh day preceding any election in which the individual is a candidate and election day shall be reported in writing within seventy-two hours to the State Board of Elections; provided, that any such contribution received within the seventy-two hours prior to election day shall be reported no later than the day prior to the election.

(2) No later than the thirtieth day after the election to be complete through the twenty-fifth day after such election or prior to taking office, whichever first occurs; and

(3) If any unpaid bills or deficits remain to be paid at the time the report or statement in subsection (2) above is filed, sixty days after the election; and—

(4) If any unpaid bills or deficits remain to be paid at the time the report or

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statement in subsection (3) above is filed, six months after the election; and

(5) If any unpaid bills or deficits remain to be paid at the time the report or statement in subsection (4) above is filed, one year after the election and annually thereafter.

(b) It is the responsibility of the candidate and treasurer, jointly, to file the statement of a candidate and they shall file such report or statement in full and accurate detail. (1970, c. 462; 1972, c. 620; 1973, c. 30; 1975, c. 515.)

The 1973 amendment, effective March 9, 1973, added "No earlier than the fourteenth day and" at the beginning of subdivision (1) of subsection (a).

The 1975 amendment, effective July 1, 1975, inserted "or the appropriate person pursuant to § 24.1-255" near the beginning of the

introductory paragraph in subsection (a) and rewrote subdivision (1), inserted "to be complete through the twenty-fifth day after such election" in subdivision (2) and added "and annually thereafter", in subdivision (5), of that subsection.

§ 24.1-258. Form of report of expenditures and contributions. — The report or statement required by this chapter to be filed shall include all contributions and expenditures and shall set forth the following:

(1) Receipts shall include the total number of contributors, the number of contributions from contributors who have contributed, in the aggregate, one hundred dollars or less each as of the date of the report, and the total amount of contributions from such contributors. For each contributor, who has contributed, in the aggregate, more than one hundred dollars as of the date of the report, give the name of the contributor, listed alphabetically, the address of the contributor, the amount of the contribution included in the schedule of receipts, the aggregate amount of contributions from the contributor to date, and the date of the last contribution; and for each contributor, who has contributed, in the aggregate, five hundred dollars or more, the report shall, in addition to the above-mentioned information, give the occupation and principal place of business of the contributor. The schedule shall list separately those receipts reported to the candidate or his treasurer by any person, committee, association, organization, group of individuals, and political party committees pursuant to § 24.1-255 setting forth in each instance the source of the information reported.

(2) Disbursements shall include the number of disbursements and total amount of those made to persons who have received, in the aggregate, one hundred dollars or less. For all expenditures of more than one hundred dollars, give the name and address of the person paid, a brief description of the purpose of the expenditure, the name of the person contracting for or arranging such expenditure, the amount of expenditures and the date of such expenditures. The schedule shall list separately those expenditures reported to the candidate or his treasurer by any person, committee, association, organization, group of individuals, and political party committees pursuant to § 24.1-255 setting forth in each instance the source of the information reported. The schedule shall also set forth totals of all expenditures as of the date of the report which have been made, reported, or contracted for, including any credit purchases, since the date of the last preceding general election to fill the office for which he is a candidate. (1970, c. 462; 1971, Ex. Sess., c. 247; 1972, c. 620; 1975, c. 515.)

The 1975 amendment, effective July 1, 1975, rewrote this section.

§ 24.1-259: Repealed by Acts 1975, c. 515.

Effective date. — The repeal is effective July 1, 1975.

§ 24.1-262. Penalty for violations of chapter. — Any person who willfully violates, or aids, abets, or participates in the violation of this chapter shall be guilty of a Class 4 misdemeanor. (1975, c. 515.)

Effective date. — This section is effective July 1, 1975.

Sec.

24.1-277. Writings concerning office to identify possible therefor.

§ 24.1-264. Bribery, int

Law Review. — For survey of reform in Virginia, see 12 Wm. & 333 (1970).

§ 24.1-277. Writings c responsible therefor. — written, printed or other class or description, but which is sponsored and broadcasting it.

(2) It shall be unlawful television or radio broadcast elective by the qualified submitted to the election responsible therefor

....., Treas

(Name) candidate serving as his the candidate." Where causing the writing shall It shall be unlawful for appear unless the advertisement plainly identifies the person

(3) It shall be unlawful address on any such writing

(4) Any person violating of a misdemeanor. Viol in the voiding of any 398; 1970, c. 462; 1972,

The 1973 amendment, 1973, substituted "includes the beginning of subsection" "pamphlet, poster, card, circular, flyer, banner, handbill, picture" preceding "written" in subsection the second sentence of subsection

The 1975 amendment, c

§ 24.1-279. Perjury statement or entry subtreasurer in any shall constitute the laws of this Commonwealth

The 1975 amendment substituted "title" for "c

DATE AND TIME OF TRANSMITTAL: _____

3-29-76

NO. MUR 093 (76)

REC'D: 3/3/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Initiated internally by Commissioner Thomson
at March 3, 1976 Commission Meeting.

Respondent's Name: Richard A. Viguerie

Relevant Statute: 2 U.S.C. §434(e)

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Internal Reports Checked: Check made; no reports found.

Federal Agencies Checked: _____

SUMMARY OF ALLEGATION

Assertion in newspaper article that Richard A. Viguerie spent
\$50,000 for write-in campaign for John Connally in New Hampshire;
to date Viguerie has failed to file a report as to these
expenditures.

PRELIMINARY LEGAL ANALYSIS

If Viguerie made expenditures alleged, he would be obligated to
file a statement with the Commission [2 U.S.C. §434(e)]. The
statement was due on or before February 14, 1976, for expenditures
in excess of \$100 made prior to February 9, 1976; however, for
expenditures over \$100 made after February 9, 1976, the statement
is not due until March 25, 1976.

RECOMMENDATION

Close the file; further review should be conducted by the Reports
Examining Division; the accompanying letter should be sent if no



FEDERAL ELECTION COMMISSION

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

Mr. Richard A. Viguerie
6033 Crimson Court
McLean, Virginia 22101

Dear Mr. Viguerie:

Memoranda which you issued to the news media on February 19, 1976, and February 21, 1976, has come to the attention of the Federal Election Commission. This information discloses that you made expenditures on behalf of former Governor John Connally for the promotion of write-in votes on his behalf for the New Hampshire Presidential Primary.

2 U.S.C. §434(e) requires each person who makes contributions or expenditures advocating the election or defeat of a clearly identified candidate, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year to file a statement containing the information required by 2 U.S.C. §434(b) with the Commission. This provision of the Federal Election Campaign Act of 1971, as amended, was upheld as constitutional by the Supreme Court in Buckley v. Valeo.

If expenditures in excess of \$100 were made prior to February 9, 1976, the closing date of books for pre-election reports on behalf of New Hampshire, such statement was due on or before February 14, 1976. Expenditures made between February 10 and March 15, 1976, the closing date of books for the thirty day post election report, must be reported on or before March 25, 1976.

In the spirit of promoting full and timely disclosure, you are urged to fulfill your reporting obligations under the Act.

If you have any questions concerning this matter, please do not hesitate to write or call Mr. Neal Janey, who has been assigned this case, at (202) 382-4055.

Sincerely yours,

FEDERAL ELECTION COMMISSION
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OFFICE OF GENERAL COUNSEL

John G. Murphy, Jr.
General Counsel



77040013461

RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

MEMORANDUM

February 19, 1976

TO: Selected News Media
FROM: Richard A. Viguerie
RE: John Connally Write In Effort

Since my effort to generate votes for former Texas Governor John Connally in the New Hampshire Democratic Presidential primary has received such wide publicity, I have had dozens of contacts from the news media.

Networks, newspapers, columnists, wire services, magazines and freelance reporters have phoned or dropped by to visit. Frankly, I've made an effort to respond fully in each case, but it's been very time consuming.

You may have previously received a press release I issued which I hoped would satisfy most inquiries. But still the requests come for information in greater depth.

Since many good questions recur, I have prepared a set of questions and my answers which may be useful to you.

If you require additional information, I'm still available. You can reach me at my home -- area code 703/790-0118.

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OFFICE OF GENERAL COUNSEL

RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

For Release Saturday Morning, February 21, 1976

Question & Answers by Richard A. Viguerie

Re: New Hampshire Democratic Primary write-in
effort for John Connally.

Q. Why are you doing this?

A. John Connally has impressive capabilities and courage. I think he would provide the kind of strong leadership America needs to get us back on track at home and defend the interests of liberty abroad. "Big John" looks very good when compared with the "seven dwarfs" running in the Democratic primary.

Q. Why aren't you backing your fellow conservative, Ronald Reagan? Why aren't you backing your client, George Wallace?

A. I would like to see George Wallace, Ronald Reagan, and John Connally all receive serious consideration. Why put all the eggs in one basket? Why should conservatives be limited to the GOP. Liberals are running as Democrats, Republicans and Independents (Gene McCarthy). Why shouldn't conservatives have a whole stable of candidacies from which to select?

Q. Do you regard Connally as a conservative?

A. John Connally is not an ideological conservative. But he's right on defense. Right on energy. Right on busing. Right on balanced budgets. And right on social program reform. Most important he's got the guts to take on the whole Washington special interest establishment and make it say "uncle."

Q. Connally is not a Democrat -- he's not interested in the Democratic nomination -- he has no chance for the Democratic nomination -- why should the Democrats waste their votes on him?

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-more- OFFICE OF GENERAL COUNSEL

A. I recognize the chances of John Connally being the Democrat nominee are slim, but a good show of support from New Hampshire Democrats would disrupt the liberal Democrats' plans. It would attract attention to his "availability," help advance Connally as either an independent if Ford is re-nominated or Republican if Reagan drops out before the convention. A Connally threat could move the eventual Democrat result in a more conservative direction.

Q. Are you using corporate funds?

A. No corporate funds have been used, are being used or will be used. I'm using my own personal money.

Q. Why not urge Democrats to write in Reagan?

A. He is making a fine race in the Republican primary, and I wish him well. Many conservatives have placed the same kind of faith in Ronald Reagan that they once placed in Richard Nixon and Barry Goldwater. I reject the notion that any one man, Reagan, Connally or anyone else can singlehandedly save Western Civilization. We really need many strong spokesmen to give us conservative majority thinking in the country.

Q. Who else is involved? How closely are you cooperating with William Loeb, he denies that he is helping Connally. What does Governor Thomson think of this?

A. No one else is directly involved, I've sought the thinking of many people, including Bill Loeb, Gov. Thomson and others. But I take full responsibility for the success or failure of the effort. Certainly, Gov. Connally has had nothing to do with it.

Q. When did you last speak to John Connally?

A. I last spoke with Governor Connally in early January. During a recent trip to Texas a few friends and I were the Governor's guests at his Floresville ranch. We discussed many things, including the great weakness of the Republican Party among the voters.

-more-

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Viguerie - Page Three

Q. How well do you think Connally will do? What if he runs behind Reagan? Wallace? All announced candidates?

A. I don't know how well Connally will do. He has never run for national office. He is probably not very well known to the voters in New Hampshire. If he should beat any of the active candidates, those he beats should withdraw. He may not get a single vote. In 1952 Adlai Stevenson -- another draft candidate -- got 40 write-in votes in New Hampshire and went on to capture the Democratic nomination. I expect Connally will top Adlai Stevenson's showing.

-end-

77040013463

FEDERAL BUREAU OF INVESTIGATION
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OFFICE OF RECORDS MANAGEMENT

Summary of 1976 New Hampshire
Democratic Primary Write In
Effort for John Connally

1. Political Advertising supplement ran February 19 in ten New Hampshire newspapers with 202,000 total circulation.

Contents: Four page letter, six panel brochure; photo of Gov. and Mrs. Connally; three sample ballots with write-in instructions.

2. Letters mailed February 19 to 12,700 New Hampshire conservative activists.

Contents: two page letter; ten sample ballots with write-in instructions.

3. Full page advertisement to run either Saturday, February 21 or Sunday, February 22 in New Hampshire daily papers with 167,000 total circulation.

Contents; hard hitting quiz comparing Gov. Connally with the five national liberals on Democrat ballot.

Approximate cost to Richard A. Viguerie: \$35,000

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By Jack W. Germond and James R. Dickenson
Washington Star Staff Writers

CONCORD, N.H. — President Ford's political managers are watching with fear and trembling the potential political impact of television news accounts of Richard M. Nixon's trip to China on the eve of the New Hampshire primary.

Political Notebook

They have reason to be concerned. One public opinion survey taken here after the China trip was announced found that 5 percent of those supporting Ronald Reagan mentioned the pardon Ford gave Nixon as a reason. That was the first time the pardon had surfaced in polls.

The hostility toward Nixon in the Ford operation is being fanned by another factor — frequent and authoritative reports that Nixon has still not given up on the notion of making John B. Connally Jr. the Republican presidential nominee. According to people in a position to know, Nixon has been telling Republicans in telephone conversations to stay loose until they see how the Ford-Reagan contest shakes down. And he is making it clear privately he still feels hostile toward Reagan, who tried to wrest the 1968 nomination from him, and no better than lukewarm toward President Ford.

Loeb Takes Aim at Jimmy Carter

Although he has been strident in his praise of Ronald Reagan and denigration of President Ford, publisher William Loeb of the Manchester Union Leader has been uncharacteristically silent on the Democratic competition here this year. However, in the last few days his newspaper has begun taking swipes at one of the Democratic front-runners, Jimmy Carter.

One day last week the paper reprinted on its front page a week-old story from the Macon, Ga., Telegraph that was headlined "Carter Calls for Gun Registration" and recounted the former Georgia governor's long-established position on gun controls — that is, registration of handguns only and a ban on "Saturday Night Specials." The next day a front page box purporting to quote Democrats on busing quoted Carter as saying "I do believe" busing will work when his statement had been that "I do not believe" in busing.

The Loeb newspapers make no bones about their partisanship. When Reagan toured the newspaper Friday his guide wore a big Reagan button. And Joel McWilliams, managing editor of the Sunday edition, told him: "I hope you win on Tuesday."

5 + 9 + 2 Equals Primary Pressure ...

The five serious candidates in the Democratic primary here Tuesday probably will have no more than 85 percent of the vote to divide up among themselves. There are nine other candidates on the ballot, including evangelist Billy Joe Clegg, anti-abortion leader Ellen McCormack and Robert L. Kelleher, who advocates a parliamentary system and is running radio spots urging votes for "the parliament man from Montana."

In addition there are two write-in campaigns, for Hubert H. Humphrey and John Connally. The Humphrey campaign, lacking resources, is almost invisible, but conservative leader Richard Viguerie is spending \$30,000 to \$35,000 of his own money in behalf of Connally. He distributed 200,000 flyers as inserts in all nine daily newspapers in the state, and he is running full-page ads again this weekend.

What these other candidates' presence means is that enough votes will be drained off so that the winner Tuesday night probably won't get even 30 percent of the vote and might win with as little as 25 percent.



—United Press International

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Plutonium Tests o

United Press International

Scientists in a secret government project injected 18 men, women and children with overdoses of bomb-grade plutonium three decades ago without telling their human guinea pigs what they were being given, federal researchers said yesterday.

Dr. James Liverman of the Energy Research and Development Administration said the World War II-era experiment was forgotten for about 20 years and records are sketchy today. But, he said, there is no evidence any of the 18 suffered ill effects from their injections.

A science newsletter,

in Science Trends: "These cases serve to demonstrate the plutonium does not appear to be more carcinogenic than expected and, as far as bone (cancer) is concerned, may actually be less carcinogenic than expected."

Liverman expressed hope the rediscovery and renewed study of the 18 injection subjects, plus the cancer-free records of 25 persons exposed to plutonium in preparing early hydrogen bombs at Los Alamos, N.M., will help reduce fears about the danger of plutonium fuel in proposed nuclear breeder power reactors.

The injections were con

DATE AND TIME OF TRANSMITTAL: _____

NO. MUR 093 (76)

REC'D: 3
1/10/76

FEDERAL ELECTION COMMISSION
Washington, D. C.

Complainant's Name: Initiated internally by Commissioner Thomson at
March 3, 1976 Commission Meeting.

Respondent's Name: Richard A. Viguerie

Relevant Statute: 2 U.S.C. sections 434(e) and 431(b)

Internal Reports Checked: Richard A. Viguerie Company Political Action Committee
Statement of Organization

Federal Agencies Checked: _____

SUMMARY OF ALLEGATION

Assertion in newspaper article that Richard A. Viguerie spent \$50,000
for write-in campaign for John Connally in New Hampshire; to date Viguerie
has failed to file a report as to these expenditures.

PRELIMINARY LEGAL ANALYSIS

At present, John Connally is not a candidate, nor was he at the time of the
alleged violation. Pursuant to section 100.2(c) of the Commission's Proposed
Regulations, Mr. Connally should be notified by the Commission that expenditures
were made on his behalf, and Mr. Connally would have 30 days in which to
disavow this activity. If Mr. Connally is not a candidate, then Mr. Viguerie
is not required to report under 2 U.S.C. section 434(e).

RECOMMENDATION

Notification letter should be sent to Mr. Connally.

Date of Next Commission Review: _____

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7 0 4 0 0 1 3 4 7
MARCH 12, 1976**Rules of the Game**

The Federal Election Commission will live again thanks to strong congressional sentiment that it would be unwise politically to let the Supreme Court decision result in a reduction in campaign reform. The key was the change of course by Rep. Wayne Hays. At the same time, some much needed improvements will be made. Corporate PACs will not be able to solicit from employees (thus overturning an FEC decision) and will not be able to set up 50 state committees (will this apply ex post facto to those already in existence?) and FEC members will not be able to hold other jobs. Ford supports continuation of the FEC, but is not happy about the PAC reforms. He plans to rename all six current members, although many on Capitol Hill would rather see more prestigious people....In a recent advisory opinion (Congress will probably require that such opinions be submitted for its consideration under the new law), the FEC said that DNC financial aid to delegates would come out of its \$2 million allocation for the National Convention and must be private, not public, money. But, if state parties aid delegates, their spending does not count against the limit....The FEC says the law "prohibits across-the-board the solicitation of contributions by utilizing information copied from campaign reports and statements."....You can't use a corporation's typewriter for campaign business, unless normal rent is paid. Otherwise, it's an illegal campaign contribution....The FEC says that a Member of Congress can produce a television report to constituents in a nonelection year without the costs being counted as a campaign expense....If a former candidate declares personal bankruptcy, campaign debts remain payable unless they have been discharged by the adjudication of bankruptcy.

There had been some concern that the large Federal matching payments to Wallace would discourage people from using the presidential election fund check-off on their tax returns. But first early reports show that, through the end of January, a higher percentage of taxpayers have used the check-off in 1976 than in 1975. That's as it should be in an election year. The fund may turn out to be sufficient to cover matching costs, conventions and the presidential campaign, if candidates keep dropping out. Matching fund allocations are being fully paid by the FEC in the belief there will be enough money.

Although the Supreme Court decision allowing unlimited individual spending for a candidate, provided the funds did not pass through the campaign treasury, was regarded as a victory for liberal Stewart Mott, one of the plaintiffs, the first to use the provision was a conservative. Richard Viguerie, the Virginia conservative direct-mail expert, spent about \$50,000 on behalf of a Connally write-in in the N.H. Dem primary (200,000 letters, newspaper inserts). He was told that some would vote for Connally on the GOP line, thus cutting into Reagan's vote, but shrugged it off. PI can confirm that Connally had nothing to do with Viguerie's move.

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UPI 3-3-76

BAYH 3-3

INSERT BAYH WASHINGTON A234 AFTER 2ND PGH XXX SUPPORT.

IN INDIANAPOLIS, A CLOSE FRIEND OF BAYH'S TOLD UPI THAT BAYH PLANNED TO DECLARE HIMSELF AN "INACTIVE CANDIDATE" ON THURSDAY. THE FRIEND ASKED NOT TO BE IDENTIFIED. DEMOCRATIC NATIONAL CHAIRMAN ROBERT S. STRAUSS, WHO HELD A NEWS CONFERENCE THERE, SAID SUCH AN APPROACH WOULD KEEP BAYH ELIGIBLE FOR FEDERAL MATCHING FUNDS LATER ON SHOULD HE WANT TO RESUME ACTIVE CANDIDACY.

PICKUP 3RD PGH: BAYH-MET

UPI 03-03 08:14 PES

INTERNAL REFERRAL

Possible violation re:
Viguerie's campaign for
Conradly.

FROM AUDIT AND INVESTIGATION DIVISION

TO: Patricia Schering

FROM: Michael Hershman

DATE OF REFERRAL: 2/25/76

PURPOSE: It appears this matter should be handled by your section.

FILED
OFFICE
MARCH 3 1976

PLEASE RESPOND BY: March 3, 1976

RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

MEMORANDUM

February 19, 1976

TO: Selected News Media
FROM: Richard A. Viguerie
RE: John Connally Write In Effort

Since my effort to generate votes for former Texas Governor John Connally in the New Hampshire Democratic Presidential primary has received such wide publicity, I have had dozens of contacts from the news media.

Networks, newspapers, columnists, wire services, magazines and freelance reporters have phoned or dropped by to visit. Frankly, I've made an effort to respond fully in each case, but it's been very time consuming.

You may have previously received a press release I issued which I hoped would satisfy most inquiries. But still the requests come for information in greater depth.

Since many good questions recur, I have prepared a set of questions and my answers which may be useful to you.

If you require additional information, I'm still available. You can reach me at my home -- area code 703/790-0118.

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RICHARD A. VIGUERIE
6033 Crimson Court
McLean, Virginia 22101

For Release Saturday Morning, February 21, 1976

Question & Answers by Richard A. Viguerie

Re: New Hampshire Democratic Primary write-in
effort for John Connally.

Q. Why are you doing this?

A. John Connally has impressive capabilities and courage. I think he would provide the kind of strong leadership America needs to get us back on track at home and defend the interests of liberty abroad. "Big John" looks very good when compared with the "seven dwarfs" running in the Democratic primary.

Q. Why aren't you backing your fellow conservative, Ronald Reagan? Why aren't you backing your client, George Wallace?

A. I would like to see George Wallace, Ronald Reagan, and John Connally all receive serious consideration. Why put all the eggs in one basket? Why should conservatives be limited to the GOP. Liberals are running as Democrats, Republicans and Independents (Gene McCarthy). Why shouldn't conservatives have a whole stable of candidacies from which to select?

Q. Do you regard Connally as a conservative?

A. John Connally is not an ideological conservative. But he's right on defense. Right on energy. Right on busing. Right on balanced budgets. And right on social program reform. Most important he's got the guts to take on the whole Washington special interest establishment and make it say "uncle."

Q. Connally is not a Democrat -- he's not interested in the Democratic nomination -- he has no chance for the Democratic nomination -- why should the Democrats waste their vote on him?

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-more-

This material is not authorized by Governor Connally, and he is not responsible for this activity.

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- A. I recognize the chances of John Connally being the Democrat nominee are slim, but a good show of support from New Hampshire Democrats would disrupt the liberal Democrats' plans. It would attract attention to his "availability," help advance Connally as either an independent if Ford is re-nominated or Republican if Reagan drops out before the convention. A Connally threat could move the eventual Democrat result in a more conservative direction.
- Q. Are you using corporate funds?
- A. No corporate funds have been used, are being used or will be used. I'm using my own personal money.
- Q. Why not urge Democrats to write in Reagan?
- A. He is making a fine race in the Republican primary, and I wish him well. Many conservatives have placed the same kind of faith in Ronald Reagan that they once placed in Richard Nixon and Barry Goldwater. I reject the notion that any one man, Reagan, Connally or anyone else can singlehandedly save Western Civilization. We really need many strong spokesmen to give us conservative majority thinking in the country.
- Q. Who else is involved? How closely are you cooperating with William Loeb, he denies that he is helping Connally. What does Governor Thomson think of this?
- A. No one else is directly involved, I've sought the thinking of many people, including Bill Loeb, Gov. Thomson and others. But I take full responsibility for the success or failure of the effort. Certainly, Gov. Connally has had nothing to do with it.
- Q. When did you last speak to John Connally?
- A. I last spoke with Governor Connally in early January. During a recent trip to Texas a few friends and I were the Governor's guests at his Floresville ranch. We discussed many things, including the great weakness of the Republican Party among the voters.

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Q. How well do you think Connally will do? What if he runs behind Reagan? Wallace? All announced candidates?

A. I don't know how well Connally will do. He has never run for national office. He is probably not very well known to the voters in New Hampshire. If he should beat any of the active candidates, those he beats should withdraw. He may not get a single vote. In 1952 Adlai Stevenson -- another draft candidate -- got 40 write-in votes in New Hampshire and went on to capture the Democratic nomination. I expect Connally will top Adlai Stevenson's showing.

-end-

77040016477

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Summary of 1976 New Hampshire
Democratic Primary Write In
Effort for John Connally

1. Political Advertising supplement ran February 19 in ten New Hampshire newspapers with 202,000 total circulation.

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7
4
3
Contents: Four page letter, six panel brochure; photo of Gov. and Mrs. Connally; three sample ballots with write-in instructions.

2. Letters mailed February 19 to 12,700 New Hampshire conservative activists.

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0
Contents: two page letter; ten sample ballots with write-in instructions.

A
3. Full page advertisement to run either Saturday, February 21 or Sunday, February 22 in New Hampshire daily papers with 167,000 total circulation.

Contents; hard hitting quiz comparing Gov. Connally with the five national liberals on Democrat ballot.

Approximate cost to Richard A. Viguerie: \$35,000

FEDERAL BUREAU OF INVESTIGATION
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OFFICE OF GENERAL COUNSEL

NIXON IN CHINA

By Jack W. Germond and James R. Dickenson
Washington Star Staff Writers

CONCORD, N.H. — President Ford's political managers are watching with fear and trembling the potential political impact of television news accounts of Richard M. Nixon's trip to China on the eve of the New Hampshire primary.

Political Notebook

They have reason to be concerned. One public opinion survey taken here after the China trip was announced found that 5 percent of those supporting Ronald Reagan mentioned the pardon Ford gave Nixon as a reason. That was the first time the pardon had surfaced in polls.

The hostility toward Nixon in the Ford operation is being fanned by another factor — frequent and authoritative reports that Nixon has still not given up on the notion of making John B. Connally Jr. the Republican presidential nominee. According to people in a position to know, Nixon has been telling Republicans in telephone conversations to stay loose until they see how the Ford-Reagan contest shakes down. And he is making it clear privately he still feels hostile toward Reagan, who tried to wrest the 1968 nomination from him, and no better than lukewarm toward President Ford.

Loeb Takes Aim at Jimmy Carter

Although he has been strident in his praise of Ronald Reagan and denigration of President Ford, publisher William Loeb of the Manchester Union Leader has been uncharacteristically silent on the Democratic competition here this year. However, in the last few days his newspaper has begun taking swipes at one of the Democratic front-runners, Jimmy Carter.

One day last week the paper reprinted on its front page a week-old story from the Macon, Ga., Telegraph that was headlined "Carter Calls for Gun Registration" and recounted the former Georgia governor's long-established position on gun controls — that is, registration of handguns only and a ban on "Saturday Night Specials." The next day a front page box purporting to quote Democrats on busing quoted Carter as saying "I do believe" busing will work when his statement had been that "I do not believe" in busing.

The Loeb newspapers make no bones about their partisanship. When Reagan toured the newspaper Friday his guide wore a big Reagan button. And Joel McWilliams, managing editor of the Sunday edition, told him: "I hope you win on Tuesday." 4/5/77 2/22

5 + 9 + 2 Equals Primary Pressure ...

The five serious candidates in the Democratic primary here Tuesday probably will have no more than 85 percent of the vote to divide up among themselves. There are nine other candidates on the ballot, including evangelist Billy Joe Clegg, anti-abortion leader Ellen McCormack and Robert L. Kelleher, who advocates a parliamentary system and is running radio spots urging votes for "the parliament man from Montana."

In addition there are two write-in campaigns, for Hubert H. Humphrey and John Connally. The Humphrey campaign, lacking resources, is almost invisible, but conservative leader Richard Viguerie is spending \$30,000 to \$35,000 of his own money in behalf of Connally. He distributed 200,000 flyers as inserts in all nine daily newspapers in the state, and he is running full-page ads again this weekend.

What these other candidates' presence means is that enough votes will be drained off so that the winner Tuesday night probably won't get even 30 percent of the vote and might win with as little as 25 percent.

But Does 'No Preference' Equal 100?



—United Press International

OH, NUTS — Democratic presidential candidate Jimmy Carter, his face covered by a bull horn, campaigns in Boston's famous outdoor marketplace yesterday. Carter who once billed himself as a peanut farmer, appropriately stands behind a push cart loaded with peanuts. The Massachusetts primary election will be held on March 2.

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The injections were conducted between 1945 and 1947 — 17 by the Army dur

FEDERAL ELECTION COMMISSION

1. Memo from Kent Cooper to the General Counsel, 5-13-77
2. Memo from S. Katz to Kent Cooper, 5-17-77
3. Memo from Spiegel to the File - no date
4. Memo from Spiegel to the File, 3-29-76
5. Memo from K. Cooper to McKay, 2-23-76
6. Memo from Spiegel to the File, 3-5-76
7. Memo from Brylinski to Al Keema, no date.
8. Draft of letter to Viquerie - no date

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

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

Signed

Kurt Bruckhart

date

10/4/77

FEC 9-21-77

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