



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1786

Date Filmed 2/20/85 Camera No. --- 1

Cameraman JRL

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FEDERAL ELECTION COMMISSION

1786

ROUTING SLIPS; INTERNAL OBJECTION MEMOS; RFAI MEMO
FROM RAD; CIRCULATION MEMOS; COMMENT SHEETS;
12-DAY REPORT; MEMO FROM DOCKET RE: NAMES & ADDRESSES
OF RESIDENTS; MUR ASSIGNMENT FORM.

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

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

Signed

Stephen Lenn

date

1-30-85

85040513588

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Maylon E. Little, Treasurer) MUR 1786
Jim Hunt Committee)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 18, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1786:

1. Find no reason to believe that Joy Products or the Jim Hunt Committee and Maylon E. Little, as treasurer, violated 2 U.S.C. § 441b(a).
2. Approve the letters attached to the General Counsel's report dated December 6, 1984.
3. CLOSE THE FILE.

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

Attest:

12-27-84

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

85040513589



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1984

John R. Wallace, Esquire
Kirby, Wallace, Creech, Sarda & Zaytoun
Post Office Box 12065
Raleigh, North Carolina 27605

RE: MUR 1786
Maylon E. Little, Treasurer
Jim Hunt Committee; and
Ron Beatus, President,
Joy Products

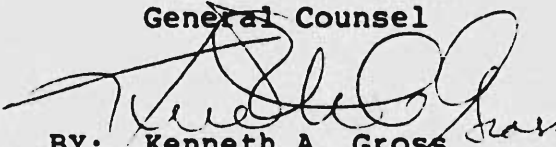
Dear Mr. Wallace:

On September 19, 1984, the Commission notified your clients, Maylon E. Little, Treasurer, and the Jim Hunt Committee, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on December 18, 1984, determined that on the basis of the information in the complaint and information provided by you and the other respondent, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

95040513590



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1984

Ron Beatus
President
Joy Products
25 West 45th Street
New York, New York 10036

RE: MUR 1786
Ron Beatus, President
Joy Products; and
Maylon E. Little, Treasurer,
Jim Hunt Committee

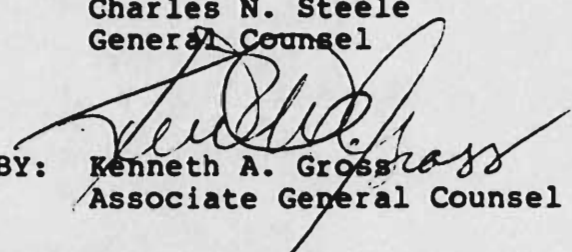
Dear Mr. Beatus:

On September 19, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on December 18, 1984, determined that on the basis of the information in the complaint and information provided by you and the other respondent, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

85040313591



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1984

David T. Flaherty
Chairman
Republican Party of North Carolina
1410 Hillsborough Street
Raleigh, North Carolina 27605

RE: MUR 1786

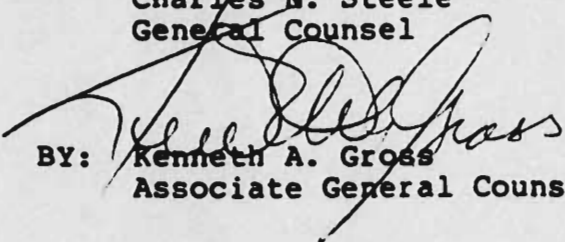
Dear Mr. Flaherty:

The Federal Election Commission has reviewed the allegations of your complaint dated September 5, 1984, and determined that on the basis of the information provided in your complaint and information provided by the respondents there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

85040513592

SENSITIVE

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

RECEIVED

FIRST GENERAL COUNSEL'S REPORT

DEC 6 12:52

DATE AND TIME OF TRANSMITTAL
BY THE OFFICE OF GENERAL COUNSEL
TO THE COMMISSION 12/6/84 - 12:50

MUR 1786
DATE COMPLAINT RECEIVED
BY OGC: September 13, 1984
DATE OF NOTIFICATION TO
RESPONDENT:
September 19, 1984
STAFF MEMBER:
Stephen Levin

COMPLAINANT'S NAME: David T. Flaherty, Chairman
Republican Party of North Carolina

RESPONDENTS' NAMES: Maylon E. Little, Treasurer
Jim Hunt Committee

Ron Beatus, President
Joy Products

RELEVANT STATUTES: 2 U.S.C. § 431(4) (A)
2 U.S.C. § 431(8) (A) (i)
2 U.S.C. § 431(17)
2 U.S.C. § 433(a)
2 U.S.C. § 434(c) (1)
2 U.S.C. § 441b(a)

SUMMARY OF ALLEGATIONS

On September 5, 1984, David T. Flaherty, Chairman of the Republican Party of North Carolina filed a complaint with the Commission alleging that Joy Products, a New York corporation, made an unlawful in-kind corporate contribution (in the form of political buttons) to the Jim Hunt Committee in violation of 2 U.S.C. § 441b(a). The complaint also suggests a concomitant violation of 2 U.S.C. § 441b(a) by the Jim Hunt Committee for accepting such a contribution.

FACTUAL AND LEGAL ANALYSIS

The complainant states that political buttons were handed out at fundraising events held in New York on behalf of the Jim Hunt

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Committee (the principal campaign committee of Governor Jim Hunt, the North Carolina Democratic Party's candidate for the United States Senate). The buttons indicated that they had been manufactured by Joy Products, a New York corporation.

Complainant claims to have reviewed reports filed by the Hunt Committee with the Commission and asserts that those reports do not indicate any payments from the Hunt Committee to Joy Products for the political buttons in question. Therefore, complainant alleges that the buttons represent an unlawful in-kind corporate contribution from Joy Products to the Jim Hunt Committee in violation of 2 U.S.C. § 441b(a). In addition, implicit in the complaint is an alleged violation of 2 U.S.C. § 441b(a) by the Jim Hunt Committee for accepting such a contribution.

Information contained in responses from the Jim Hunt Committee and from Joy Products does not reveal any basis in fact for the complaint. The Hunt Committee indicated that the political buttons in question were not "handed out," as suggested by the complainant, but rather they were offered for sale by vendors who were not "connected or affiliated with the Jim Hunt Committee" in any way. In addition, according to the Hunt Committee, the buttons were being sold for the purpose of making a profit for those vendors, not for the purpose of influencing the election. The Hunt Committee stated further that they had not authorized the manufacture or sale of the buttons and had not received any receipts from the sale of the buttons.

Those assertions made by the Hunt Committee were corroborated by the response received from Joy Products. Copies of the invoice

4
9
3
5
1
3
0
4
0
5
2
8

and receipt from the political buttons in question indicate that they did not represent an in-kind corporate contribution from Joy Products to the Hunt Committee. The buttons were ordered and paid for by Harriet Sugar and the New York Committee to Elect Jim Hunt (hereinafter "NYCEJH"), a group not connected in any way with the Hunt Committee.

Since, according to 2 U.S.C. § 431(8)(A)(i), a "contribution" requires that something of value be given "for the purpose of influencing" an election for Federal office, no such contribution was made in this matter. Joy Products "contributed" nothing to the Hunt Committee. Therefore, this Office recommends that the Commission find that there is no reason to believe that Joy Products violated 2 U.S.C. § 441b(a) by making unlawful in-kind corporate contributions to the Hunt Committee.

Accordingly, since no unlawful contribution occurred, it follows that there was no unlawful acceptance of such a contribution. As such, this Office recommends that the Commission find that there is no reason to believe that the Hunt Committee violated 2 U.S.C. § 441b(a) by knowingly accepting any such prohibited contribution.

It should be noted that while the invoice and receipt obtained from Joy Products as part of its response served to eliminate the possibility that a potential violation had occurred vis-a-vis the Hunt Committee, at the same time it raised the possibility that some type of violation could be alleged involving the group which actually ordered and paid for the political buttons in question, NYCEJH. As has already been mentioned, according to the response

received from the Jim Hunt Committee, NYCEJH is not affiliated in any way with the Jim Hunt Committee or in any way at all connected with the Hunt campaign. An investigation of Commission records, as well as those filed with the New York State Board of Elections, failed to reveal the registration of NYCEJH as a political committee as required by 2 U.S.C. § 433(a). The reason for that very well may be that NYCEJH does not meet the threshold standard of receiving contributions or making expenditures aggregating in excess of \$1,000 during a calendar year, as prescribed in 2 U.S.C. § 431(4)(A), before any group of persons becomes a political committee and, as such, required to register. In fact, if this expenditure for the political buttons in question is any indication of the extent of NYCEJH's level of expenditures, then such a possibility becomes even more likely. (The total cost of the expenditure in question was \$225.14.) As such, this Office recommends that the Commission find that there is no reason to believe that NYCEJH violated 2 U.S.C. § 433(a) by not registering as a political committee.

The possibility also exists that the purchase by NYCEJH of one of the two different types of political buttons in question constituted an independent expenditure by NYCEJH, as defined in 2 U.S.C. § 431(17). Those buttons read "I'm Helping North Carolina Defeat Jesse Helms", clearly bringing this expenditure within the requirement established in the definition cited above that, in order to be considered an "independent expenditure", such an expenditure must expressly advocate the defeat, in this case, of a clearly identified candidate without consulting with or being in any way

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connected with a candidate, authorized committee or agent of such a candidate. (The other set of buttons in question is distinguishable based on the message which they bore, namely "Hunt is the Hope", which falls short of meeting the express advocacy requirement of all independent expenditures.)

Given then that the former set of buttons could constitute an independent expenditure by NYCEJH, the question arises as to whether or not NYCEJH was required to report to the Commission pursuant to 2 U.S.C. § 434(c)(1). That section requires that every person, other than a political committee, who makes independent expenditures "in an aggregate amount or value in excess of \$250 during a calendar year" must file a statement with the Commission. No such statement was filed by NYCEJH. However, the expenditure by NYCEJH for the one set of political buttons in question was only \$92.01, an amount which in and of itself is insufficient to trigger the filing requirement of 2 U.S.C. § 434(c)(1). Therefore, given the fact that no additional information has been discovered so as to believe that NYCEJH made any additional independent expenditures, and again given the fact that the expenditure in question was insufficient to require NYCEJH to file a statement, this Office recommends the Commission find that there is no reason to believe that NYCEJH violated 2 U.S.C. § 434(c)(1) by not filing a statement of its independent expenditures with the Commission.

RECOMMENDATIONS

1. Find no reason to believe that Joy Products or the Jim Hunt Committee and Maylon E. Little, as treasurer, violated 2 U.S.C. § 441b(a).

8 15 0 4 0 5 1 3 5 9 7

2. Find no reason to believe that the New York Committee to Elect Jim Hunt violated 2 U.S.C. § 433a.
3. Find no reason to believe that the New York Committee to Elect Jim Hunt violated 2 U.S.C. § 434(c) (1).
4. Approve attached letters.
5. Close the file.

Charles N. Steele
General Counsel

Dec 6, 1984
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

Letters to Respondents (2)
Letter to Complainant

85040513598



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John R. Wallace, Esquire
Kirby, Wallace, Creech, Sarda & Zaytoun
Post Office Box 12065
Raleigh, North Carolina 27605

RE: MUR 1786
Maylon E. Little, Treasurer
Jim Hunt Committee; and
Ron Beatus, President,
Joy Products

Dear Mr. Wallace:

On September 19, 1984, the Commission notified your clients, Maylon E. Little, Treasurer, and the Jim Hunt Committee, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on _____, 1984, determined that on the basis of the information in the complaint and information provided by you and the other respondent, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

85040513599



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ron Beatus
President
Joy Products
25 West 45th Street
New York, New York 10036

RE: MUR 1786
Ron Beatus, President
Joy Products; and
Maylon E. Little, Treasurer,
Jim Hunt Committee

Dear Mr. Beatus:

On September 19, 1984, the Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1984, determined that on the basis of the information in the complaint and information provided by you and the other respondent, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David T. Flaherty
Chairman
Republican Party of North Carolina
1410 Hillsborough Street
Raleigh, North Carolina 27605

RE: MUR 1786

Dear Mr. Flaherty:

The Federal Election Commission has reviewed the allegations of your complaint dated September 5, 1984, and determined that on the basis of the information provided in your complaint and information provided by the respondents there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Report

(3)

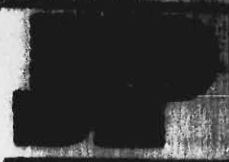
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ADVERTISING SPECIALTIES

BUTTONS, BADGES, POLITICAL SUPPLIES

GCC#4886

INVOICE



JOY PRODUCTS

25 West 45th St.

New York, N.Y. 10036

(212) 669-3743

Order number: 4547

Invoice number 4654

Date received: 1/16/84

Invoice date: 1/25/84

Customer order: OFFICE

Terms: NET 30

Approx. ship. date: 1/27/84

Date shipped

Ship via: PICK UP

1/25/84

Sold by: RON BEATUS

H.Y. COMMITTEE TO ELECT JIM HUNT
 620 HARRIET SUGAR
 230 PARK AVE.
 NEW YORK, N.Y. 10169

SHIP TO

ORDERED	RECEIVED	DESCRIPTION	PRICE	AMOUNT
250	250	2-1/8" DIAM. BUTTONS/STRT. PINS BLUE ON WHITE	NYTAX	85.00 7.01
		I'M HELPING NORTH CAROLINA DEFEAT JESSE HELMS		92.01
		DEPOSIT	\$50.00	
		BALANCE		\$42.01

LATE CHARGE PER MONTH ON PAST DUE INVOICES

PAID 1/26/84

SPEED MEMO

Buttons • Badges
Advertising Specialties
Political and Convention Supplies

14 SEP 28 AIO: 18

ATTN: STEVE LEVIN
 FEDERAL ELECTION COMMISSION

RON BEATUS
 JOY PRODUCTS

9/25/84

DEAR MR. LEVIN:

ABOVE, PLEASE FIND A PHOTOCOPY OF THE ORIGINAL INVOICE, PERSUANT
 TO THE BUTTONS IN QUESTION. THESE BUTTONS WERE ORDERED & PAID FOR
 BY THE AFOREMENTIONED RECIPIENT.

IF I MAY BE OF ANY FURTHER ASSISTANCE, PLEASE DON'T HESITATE
 TO CONTACT ME.

CORDIALLY,

RON BEATUS

INVOICE

JOY PRODUCTS
25 West 45th St.
New York, N.Y. 10036
(212) 869-3743

Order number: 4603

Invoice number: 4701

Date received: 2/14/84

Invoice date: 2/28/84

Customer order: OFFICE

Terms: NET

Approx. ship. date: 2/27/84

Date shipped:

Ship via: PICK UP

2/28/84

Sold by: RON BEATUS

HARRIET SUGAR
250 PARK AVE.
NEW YORK, N.Y. 10169

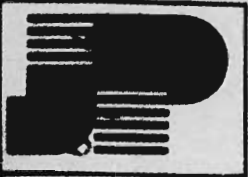
NOTE

QUANTITY		DESCRIPTION	PRICE	AMOUNT
ORDERED	RECEIVED			
500	500	1-3/4" DIAM. BUTTONS/STRT. PINS RED REVERSE ON WHITE HUNT IS THE HOPE	PLATE NYTAX TOTAL	108.00 15.00 123.00 10.13 \$133.13
PAID			2/28/84	
DEPOSIT			\$50.00	
BALANCE				\$83.13

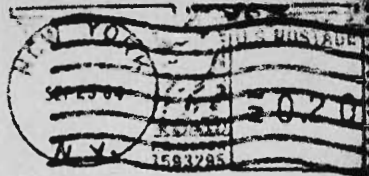
LATE CHARGE PER MONTH ON PAST DUE INVOICES

We warrant satisfaction at the factory price. If not, we will refund the purchase price. A 5% discount will be given on all orders placed before 3/31/84. In the United States only, no cash on delivery. Goods shipped by air include shipping charges or any applicable taxes. Please allow 10 days after receipt of invoice for return. The return can be made without our permission.

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JOY PRODUCTS
24 West 45th St.
New York, N.Y. 10036



FEDERAL ELECTION COMMISSION
1325 K ST. N.W.
WASH. D.C. 20463

ATTN: STEVE LEVIN

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RECEIVED AT THE FEC
GCC#4921
84 OCT 1 AM: 01

KIRBY, WALLACE, CREECH,
SARDA & ZAYTOUN

DAVID F. KIRBY
JOHN R. WALLACE
PAUL P. CREECH
PETER J. SARDA
ROBERT E. ZAYTOUN

ATTORNEYS AT LAW
WASHINGTON SQUARE
1080 WASHINGTON STREET
RALEIGH, NORTH CAROLINA 27605

P. O. BOX 18085
(919) 681-4416

September 26, 1984

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

Attention: Mr. Stephen Levin

Re: MUR 1786

Dear Mr. Gross:

The Jim Hunt Committee and its Treasurer, Maylon E. Little, (hereafter Committee), respectfully request that the Federal Election Commission dismiss the complaint of David T. Flaherty, Chairman of the Republican Party of North Carolina. After careful review of the allegations in the complaint, the Committee concludes that it is not in violation of the Federal Election Campaign Act and that the complaint is politically motivated.

The complaint in the above referenced matter alleges that political buttons bearing the disclaimer "Joy Products of New York" were "handed out" at New York City fundraising events on behalf of the Committee and that these represented unlawful in-kind corporate contributions in violation of 2 USC §441b.

The Committee denies that there has been a violation of the cited statute.

To the best of our knowledge and belief, the buttons in question were offered for sale by vendors in no way connected or affiliated with the Jim Hunt Committee, for profit and not for the purpose of influencing the election. The Jim Hunt Committee had not authorized the manufacture or sale of the buttons and did not receive any receipts from the sale of such buttons. Under the definition in 2 USC §431(8)(i), no contribution was made, and 2 USC §441b has not been violated.

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14 OCT 1 1984
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

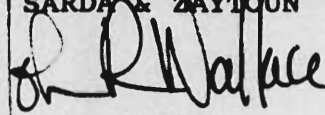
Mr. Kenneth A. Gross
September 26, 1984
Page Two

Additionally, it is highly unlikely that any "in-kind" contribution could be made at a New York event by the use of Jim Hunt's name. Only North Carolina voters will vote in the North Carolina Senate election. In any event, any such incidental "in-kind contribution" would be de minimus in value.

Wherefore, the Committee respectfully requests that the Commission find no reason to believe that there has been a violation of 2 USC §441b. Please contact us should you need any additional information.

Sincerely,

KIRBY, WALLACE, CREECH
SARDA & ZAYTOUN



John R. Wallace

JRW/efc

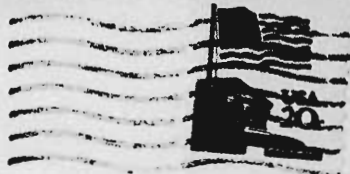
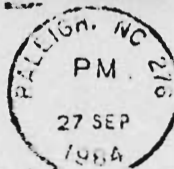
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RBY, WALLACE, CREECH,
SARDA & ZAYTOUN

ATTORNEYS AT LAW

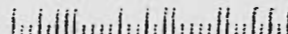
POST OFFICE BOX 12065

RALEIGH, NORTH CAROLINA 27605



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

Attention: Mr. Stephen Levin



84 OCT 1 10:01

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC

GCC #4851

84 SEP 26 9:05

MUR 1786

NAME OF COUNSEL: David F. Kirby/John R. Wallace

ADDRESS: Kirby, Wallace, Creech, Sarda & Zaytoun

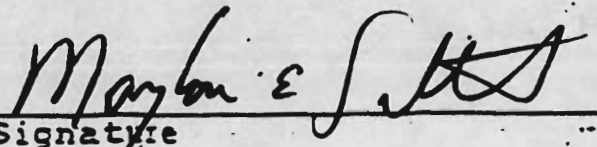
Post Office Box 12065.

Raleigh, North Carolina 27605

TELEPHONE: (919) 821-4416

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

September 24, 1984
Date


Signature

RESPONDENT'S NAME: Maylon E. Little, CPA, Treasurer/Jim Hunt Committee

ADDRESS: Maylon E. Little, Incorporated

Post Office Box 12547

Raleigh, NC 27605

HOME PHONE: (919) 782-1158

BUSINESS PHONE: (919) 821-4011

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

14 SEP 28 1984

AD: 60

85040513608

AYLON E. LITTLE
INCORPORATED

Cost Public Accountants
Post Office Box 12547
Raleigh, North Carolina 27605



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

84 SEP 26 09:05

FEDERAL ELECTION COMMISSION

40513609



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1984

David T. Flaherty
Chairman
Republican Party of North Carolina
P.O. Box 12905
Raleigh, North Carolina 27605

Dear Mr. Flaherty:

This letter is to acknowledge receipt of your complaint which we received on September 13, 1984, against Jim Hunt Committee, Maylon E. Little, and Joy Products, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By 
Kenneth A. Gross
Associate General Counsel

Enclosure

85040513610



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Maylon E. Little
Treasurer
Jim Hunt Committee
P.O. Box 25937
Raleigh, North Carolina 27611

Re: MUR 1786

Dear Mr. Little:

This letter is to notify you that on September 13, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1786. Please refer to this number in all future correspondence.

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

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

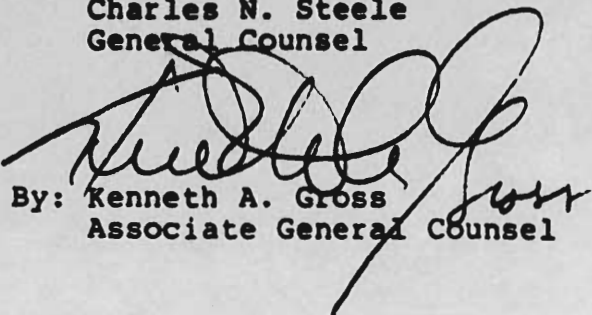
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

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

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

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

85040513612



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ron Beatus
President
Joy Products
25 West 45th Street
New York, New York 10036

Re: MUR 1786

Dear Mr. Beatus:

This letter is to notify you that on September 13, 1984 the Federal Election Commission received a complaint which alleges that Joy Products may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1786. Please refer to this number in all future correspondence.

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

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

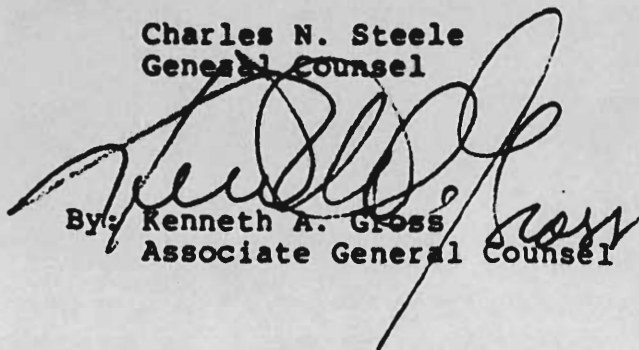
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Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosures

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

85040513614

GCC#4677

CHAIRMAN
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VICE CHAIRMAN
Audrey McBane

SECRETARY
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Ed Shufelt

919-828-8423
919-828-1838
1-800-882-8849



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THE OFFICE OF THE REC
COMMISSION SECRETARY
REPUBLICAN
PARTY
84 SEP 13 10:58

North Carolina's Conservative Voice

.mur
1786

September 5, 1984

Mrs. Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Chairman Elliott:

I am writing to ask you to investigate the following facts regarding what I believe are violations of the Federal Election Campaign Act by the Jim Hunt Committee and by Joy Products of New York.

The Jim Hunt Committee is the principal campaign committee of Governor Jim Hunt, the North Carolina Democratic Party's candidate for United States Senator.

Attached are photocopies of political buttons handed out at fundraising events held in New York City on behalf of the Jim Hunt Committee. These same buttons may have been used by the Jim Hunt Committee at other fundraisers and political events.

On the back of the buttons, is a disclaimer indicating that the buttons were made by "Joy Products of New York." We have reviewed the disclosure reports filed by the Hunt Committee with the FEC and have been unable to locate any payments by the Hunt Committee to Joy Products of New York. It would therefore seem that the Hunt Committee has received an unlawful in-kind corporate contribution from Joy Products of New York in violation of 2 U.S.C. § 441b. 1

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OFFICE OF THE
GENERAL COUNSEL

34 SEP 13 4:30

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Mrs. Lee Ann Elliott
Page 2
September 5, 1984

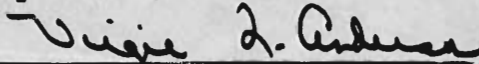
I look forward to your attention to my request, and
await your timely response.

Sincerely,



David T. Flaherty
Chairman
Republican Party of North Carolina
1410 Hillsborough Street
P. O. Box 12905
Raleigh, North Carolina 27605

Subscribed and sworn to
before me this 11 day of
September, 1984.

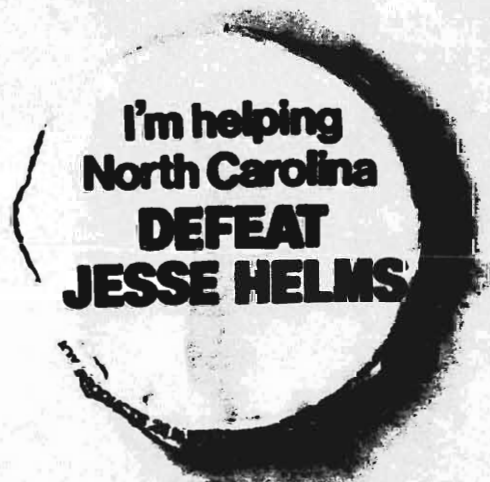

Notary Public

My Commission Expires: 4-27-86

B/TUE/A1

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85040513618

Blown Up

I'm helping
North Carolina
DEFEAT
JESSE HELMS

JOY PRODUCTS 25 W. 45th ST. NE. NEW YORK N.Y. 10036

HUNT
IS THE
HOPE

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h, NC



Mrs. Lee Ann Elliott
Chairman
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

85040313620



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1786

Date Filmed 2/28/85 Camera No. --- 1

Cameraman JRL