



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3500

DATE FILMED 5/29/92 CAMERA NO. 1

CAMERAMAN S.E.G.

22040902578

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

J. Edgar Williams  
P.O. Drawer I  
Carrboro, N.C. 27510

APR 6 8 49 AM '92

MUR 3500

3 April 1992

Office of the General Counsel  
Federal Election Commission  
Washington DC 20463

Ref: my ltr. 2/23/92  
your ltr. 3/02/92

Sirs:

I wish to make a complaint about a matter which I believe to be a violation of Federal Law and/or Commission regulations. The basis of my complaint is that on February 21 and 22, the Raleigh (NC) News and Observer, a daily newspaper, published on its op/ed pages a comic strip known as "Doonesbury" which, on both of those days, prominently featured the toll-free telephone number of the presidential campaign of former Governor Jerry Brown. I personally confirmed that fact by calling the number (1-800-426-1112). A large number of other newspapers also published these strips, the clear purpose of which was to encourage readers to call and make financial pledges to the Jerry Brown campaign. It is my contention that millions of potential donors who might otherwise not have known how to get in touch with the campaign were given the telephone number and encouraged to donate, and that this undoubtedly resulted in a major increase in such donations.

The drawing, distribution, and publication of these comic strips clearly constituted a contribution of valuable publicity services to the Jerry Brown campaign, which can probably be valued in the millions of dollars, by the cartoonist, Mr. G. B. Trudeau; by the distributor, the Universal Press Syndicate; by the Raleigh News & Observer of 215 S. McDowell St, Raleigh NC 27601; and by each and every other newspaper in the United States which published these comic strips. To the best of my belief, these contributions have not been reported as such. It is my belief that these contributions can and should be distinguished from so-called "independent advertising" by the fact that potential contributors were specifically encouraged to call a specific number to make a contribution to Gov. Brown. That it was part of a pre-conceived fund-raising effort (and thus not genuinely "independent") is substantiated by the fact that, in one of the strips, the panel with the 800 number shows the words: "Trained operators are standing by." One possible test would be to investigate whether additional operators were recruited by the Brown Campaign for the days these strips were due to appear. It is also my belief that these contributions in the form of advertising by Mr. Trudeau, by his syndicate, and by many major newspapers have exceeded the limit which individual contributors are legally permitted to make to a candidate. I enclose copies of the strips as they appeared here.

*J. Edgar Williams*

SIGNED AND SWORN TO BEFORE ME THIS 3RD DAY OF APRIL 1992

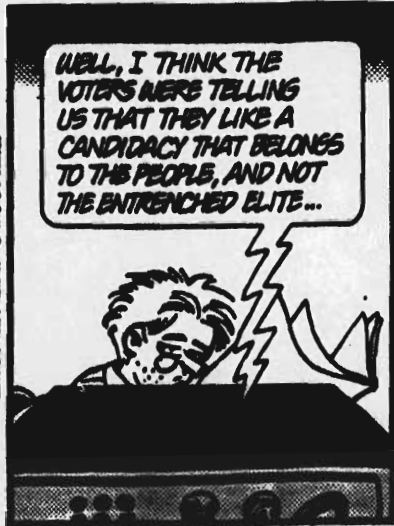
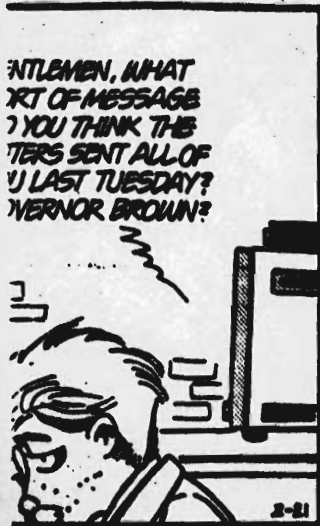
*Jillie Jerese Smith*  
Notary Public EXP 12-8-92  
Orange Co., North Carolina

92 APR -6 AM 3:23

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

nesbury

# Raleigh NC News + Observer



N+O 21 Feb 92

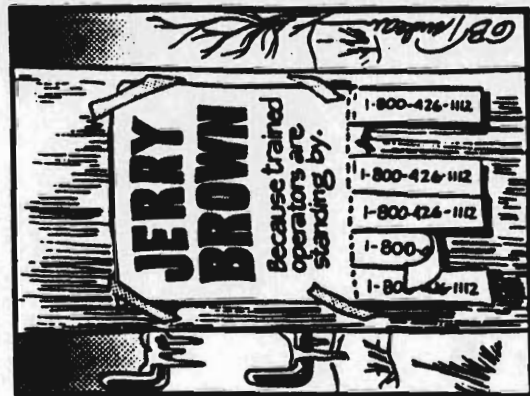
6 APR 92 11 3:23

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Raleigh NC News + Observer

N+O 22 Feb 92

Doonesbury





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April. 10, 1992

Raleigh News & Observer  
215 S. McDowell Street  
Raleigh, NC 27601

RE: MUR 3500

Dear Gentlemen:

The Federal Election Commission received a complaint which alleges that the Raleigh News & Observer may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3500. 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 Raleigh News & Observer in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

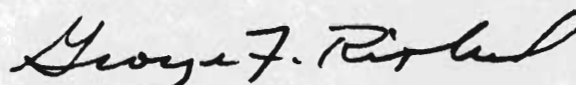
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2040902581



If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



George F. Rishel  
Assistant General Counsel

Enclosures

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

2040902582



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 10, 1992

John P. McMeel, President  
Universal Press Syndicate  
4900 Main Street  
9th Floor  
Kansas City, MO 64112

RE: MUR 3500

Dear Mr. McMeel:

The Federal Election Commission received a complaint which alleges that Universal Press Syndicate may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3500. 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 Universal Press Syndicate in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

2040902583

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

*George F. Rishel*

George F. Rishel  
Assistant General Counsel

Enclosures

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

2040902584



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 10, 1992

Garry B. Trudeau  
c/o Universal Press  
9th Floor  
4900 Main Street  
Kansas City, MO 64112

RE: MUR 3500

Dear Mr. Trudeau:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3500. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

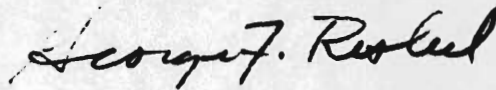
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

2040902585



If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



George F. Rishel  
Assistant General Counsel

Enclosures

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

2040902586



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 10, 1992

Jodie Evans, Treasurer  
Brown for President  
444 Occidental Blvd.  
#421  
Los Angeles, CA 90057

RE: MUR 3500

Dear Ms. Evans:

The Federal Election Commission received a complaint which alleges that Brown for President ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3500. Please refer to this number in all future correspondence.

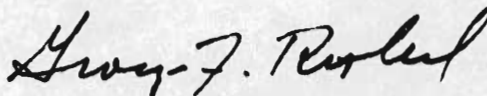
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, 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.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

2040902587

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



George F. Rishel  
Assistant General Counsel

Enclosures

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

2040902588



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 10, 1992

J. Edgar Williams  
P.O. Drawer I  
Carrboro, NC 27510

RE: MUR 3500

Dear Mr. Williams:

This letter acknowledges receipt on April 6, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Brown for President and Jodie Evans, as treasurer, Garry B. Trudeau, Universal Press Syndicate, Raleigh News & Observer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3500. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

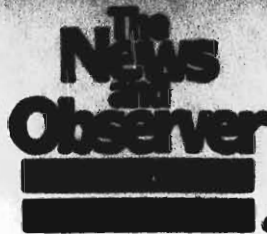
A handwritten signature in cursive script, reading "George F. Rishel", is positioned above the typed name.

George F. Rishel  
Assistant General Counsel

Enclosure  
Procedures

2040902589





APR 20 9 37

Frank Daniels, Jr.  
President and Publisher  
(919) 829-4695

April 15, 1992

Mr. George F. Rishel  
Assistant General Counsel  
Federal Election Commission  
Washington, DC 20463

Dear Mr. Rischel:

Re: MUR 3500

We received your letter dated April 10 enclosing correspondence from Mr. Williams about the Doonesbury cartoon. We agree with the position taken by Lee Salem, editorial director of U.P.S., the company from which we purchase the Doonesbury cartoon strip. A copy of Mr. Salem's letter to you is enclosed.

We do not believe that we have violated federal election laws and would prefer not to have to employ an attorney to represent us. Doonesbury is carried by hundreds of newspapers around the country.

If it appears that more action than this is necessary on our part, we would appreciate your notifying us.

Cordially,

92 APR 20 11 3:17

2040902590

**UNIVERSAL  
PRESS  
SYNDICATE**

4500 Main Street • Kansas City, Missouri 64112 • 816/932-8800

April 15, 1992

Mr. George F. Rishel  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

92 APR 22 AM 10:47

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

Re: MUR3500

Dear Mr. Rishel:

We do not know if the Doonesbury in question violated the Federal Election Campaign Act of 1971, but it certainly was not a form of advertising.

The phone number cited is, indeed, the phone number for Jerry Brown's presidential effort. It was used in the context of making fun of both the news coverage of the Brown campaign and Brown's insistence on reciting it on every opportunity. No one was "encouraged" to call, and if readers read another Doonesbury strip (of April 11), they would have a clearer understanding of where the Brown candidacy stands in the context of the comic strip.

Best regards.

Sincerely,

*Lee Salem*

Lee Salem  
Editorial Director

Apr 21 9 10 PM '92

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FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

LS:bt

ups

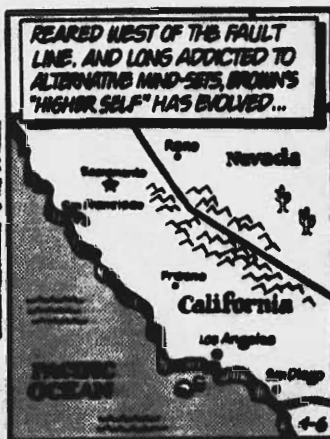
# Doonesbury

BY G.B. TRUDEAU

92 APR 22

## Doonesbury

BY GARRY TRUDEAU



## Doonesbury

BY GARRY TRUDEAU



## Doonesbury

BY GARRY TRUDEAU



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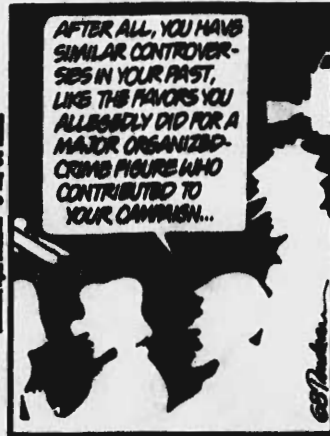
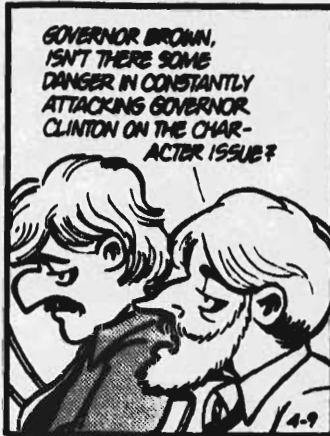
# UNIVERSAL PRESS SYNDICATE

4900 Main Street • Kansas City, Missouri • 64112 • (816) 932-6600

FOR RELEASE WEEK OF APRIL 6, 1992

## Doonesbury

BY GARRY TRUDEAU



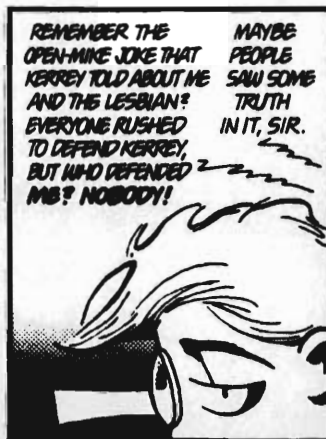
## Doonesbury

BY GARRY TRUDEAU



## Doonesbury

BY GARRY TRUDEAU





DOONESBURY

RECEIVED  
FEDERAL ELECTION  
COMMISSION

APR 23 10 11 PM '92

Mr. George F. Rishel  
Assistant General Counsel  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 3500

Dear Mr. Rishel:

I am writing in response to your letter of April 11, 1992.

In regards to the Doonesbury strips of February 21 and February 22 of this year, it was not my intention to contribute any publicity services of value to the Jerry Brown campaign. Indeed, I referred to Governor Brown's toll-free number in a disparaging and satiric context. As readers of the many Brown strips I have created (dating back to 1978) would no doubt confirm, I am anything but a supporter of the governor.

If any benefits were accrued to the Brown campaign as a result of my discussing a prominent and newsworthy feature of that campaign, I can assure you that they were completely unintended. The display of the 800 number was in no way part of a pre-conceived fund-raising effort, as charged in the complaint.

Thank you very much for your attention.

Sincerely,

  
Garry Trudeau

April 23, 1992

22040902594

92 APR 24 PM 4:08

RECEIVED  
F.E.C.  
SECRETARIAT

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

02 MAY -4 PM 5:23

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

MUR 3500  
DATE COMPLAINT RECEIVED  
BY OGC April 7, 1992  
DATE OF NOTIFICATION TO  
RESPONDENTS April 10, 1992  
STAFF MEMBERS George F. Rishel  
Jeffrey D. Long

COMPLAINANT:

J. Edgar Williams

RESPONDENTS:

Brown for President and Jodie Evans,  
as treasurer

Garry B. Trudeau

Universal Press Syndicate

Raleigh News & Observer

RELEVANT STATUTES:

2 U.S.C. § 431(9)(B)(1)

INTERNAL REPORTS CHECKED:

None

FEDERAL AGENCIES CHECKED:

None

I. GENERATION OF MATTER

This matter was generated by a complaint filed on April 7, 1992, by J. Edgar Williams against Brown for President and Jodie Evans, as treasurer, ("Brown Committee"), Garry B. Trudeau, Universal Press Syndicate, and the Raleigh News & Observer. Notification was mailed to the Respondents on April 10, 1992. A response was received from the Raleigh News & Observer on April 20, from Universal Press Syndicate on April 22, and from Garry Trudeau on April 23.

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## II. FACTUAL AND LEGAL ANALYSIS

The complainant alleges that the Respondents have violated the Federal Election Campaign Act of 1971, as amended ("the Act"), by the publication of the "800" line number for the Brown Committee in the "Doonesbury" comic strip that is authored by Garry B. Trudeau, distributed by Universal Press Syndicate, and published in the Raleigh News & Observer (and other newspapers). The complainant contends that the publication of this number constituted something of value to the Brown Committee and assisted in its fundraising. The complainant attached copies of two strips that ran on February 21 and 22, 1992, in the Raleigh News & Observer.

The Act places a limitation on the aggregate contributions an individual can make to a presidential candidate at no more than \$1,000. 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(6). The Act prohibits corporations from making any contribution or expenditure in connection with any election. 2 U.S.C. § 441b. Candidates and political committees are prohibited from knowingly accepting any impermissible contribution or expenditure. 2 U.S.C. §§ 441a(f) and 441b.

The Act, however, excludes from the definition of expenditure "any news story, commentary, or editorial distributed through the facilities of any broadcasting station, newspaper, magazine, or other periodical publication, unless such facilities are owned or controlled by any political party, political committee, candidate." 2 U.S.C. § 431(9)(B)(i). Commission regulations

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also apply this exemption to the definition of contribution. 11 C.F.R. § 100.7(b)(2). This exemption has been found to include "only those kinds of distribution that fall broadly within the press entity's legitimate press function." Reader's Digest Association v. FEC, 509 F. Supp. 1210 (D. N.Y. 1981).

Both Universal Press Syndicate and the Raleigh News & Observer note that the inclusion of the "800" number was a satire on the news coverage of the Brown campaign and Governor Brown's insistence on reciting it at every opportunity. Mr. Trudeau also describes the strip as referring to "Governor Brown's toll-free number in a disparaging and satiric context." He adds that the display of the "800" number "was in no way part of a pre-conceived fund-raising effort." The "Doonesbury" comic strip would clearly fall within the "news story, commentary, or editorial" exemption and its distribution and publication would clearly fall within the legitimate press function for Garry B. Trudeau, the Universal Press Syndicate and the Raleigh News & Observer.

Moreover, there is no evidence that the Universal Press Syndicate or the Raleigh News & Observer are owned or controlled by any political party, political committee, or candidate. Therefore, the inclusion of the "800" number for the Brown Committee in the comic strip and its subsequent distribution and publication would not be a contribution or expenditure under the Act. There is no evidence that the Brown Committee knew in advance the number would be included in the comic strip or participated in creating the strip. Thus, the Brown Committee

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does not appear to have knowingly accepted any excessive or prohibited contribution.

Accordingly, this Office recommends that the Commission find no reason to believe the Respondents have violated any provision of the Act on the basis of the complaint in MUR 3500.

III. RECOMMENDATIONS


1. Find no reason to believe the following violated any provision of the Federal Election Campaign Act of 1971, as amended, on the basis of the complaint filed in MUR 3500:
  - a. Brown for President and Jodie Evans, as treasurer;
  - b. Garry B. Trudeau;
  - c. Universal Press Syndicate; and
  - d. Raleigh News & Observer.
2. Approve the appropriate letters.
3. Close the file.

Lawrence M. Noble  
General Counsel

Date

5/1/92

BY:

  
Lois G. Lerner  
Associate General Counsel

Attachments

1. Raleigh News & Observer response
2. Universal Press Syndicate response
3. Garry Trudeau's response

2040902598



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH *DR*  
COMMISSION SECRETARY

DATE: MAY 7, 1992

SUBJECT: MUR 3500 - FIRST GENERAL COUNSEL'S REPORT  
DATED MAY 1, 1992

The above-captioned document was circulated to the  
Commission on TUESDAY, MAY 5, 1992 at 4:00 p.m..

Objection(s) have been received from the  
Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	<u>XXX</u>
Commissioner Thomas	_____

This matter will be placed on the meeting agenda  
for TUESDAY, MAY 12, 1992.

Please notify us who will represent your Division before  
the Commission on this matter.

2040902599

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Brown for President and  
Jodie Evans, as treasurer;  
Garry B. Trudeau;  
Universal Press Syndicate;  
Raleigh News & Observer

)  
) MUR 3500  
)  
)  
)  
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session on May 12,  
1992, do hereby certify that the Commission decided by a  
vote of 5-0 to take the following actions in MUR 3500:

1. Find no reason to believe the following  
violated any provision of the Federal  
Election Campaign Act of 1971, as amended,  
on the basis of the complaint filed in  
MUR 3500:
  - a) Brown for President and Jodie  
Evans, as treasurer;
  - b) Garry B. Trudeau;
  - c) Universal Press Syndicate; and
  - d) Raleigh News & Observer.
2. Approve the appropriate letters as  
recommended in the General Counsel's  
report dated May 1, 1992.

20040902600

Federal Election Commission  
Certification for MUR 3500  
May 12, 1992

Page 2

3. Close the file.

Commissioners Aikens, Elliott, McGarry, Potter, and  
Thomas voted affirmatively for the decision; Commissioner  
McDonald did not cast a vote.

Attest:

5-12-92  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

102040902601





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 20, 1992

Jodie Evans, Treasurer  
Brown for President  
444 Occidental Blvd.  
#421  
Los Angeles, CA 90057

RE: MUR 3500  
Brown for President and Jodie  
Evans, as treasurer

Dear Mr. Evans:

On April 10, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On May 12, 1992, the Commission found, on the basis of the information in the complaint, that there is no reason to believe Brown for President and Jodie Evans, as treasurer, violated any provision of the Act. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
GC Report

2040902602



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 20, 1992

Garry Trudeau  
c/o Universal Press Syndicate  
9th Floor  
4900 Main Street  
Kansas City, Missouri 64112

RE: MUR 3500  
Garry Trudeau

Dear Mr. Trudeau:

On April 10, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On May 12, 1992, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe Garry Trudeau violated any provision of the Act. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", is written over a horizontal line.

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
GC Report

2040902603



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 20, 1992

Frank Daniels, Jr., President  
Raleigh News & Observer  
215 South McDowell Street  
P.O. Box 191  
Raleigh, NC 27602

RE: MUR 3500  
Raleigh News & Observer

Dear Mr. Daniels:

On April 10, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On May 12, 1992, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe Raleigh News & Observer violated any provision of the Act. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. G. Lerner", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
GC Report

2040902604



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 20, 1992

Lee Salem, Editorial Director  
Universal Press Syndicate  
4900 Main Street  
Kansas City, Missouri 64112

RE: MUR 3500  
Universal Press Syndicate

Dear Mr. Salem:

On April 10, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act").

On May 12, 1992, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe Universal Press Syndicate violated any provision of the Act. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

Sincerely,

Lawrence M. Noble  
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", is written over the typed name of Lois G. Lerner.

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
GC Report

2040902605





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 20, 1992

CLOSED

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J. Edgar Williams  
P.O. Drawer I  
Carrboro, NC 27510

RE: MUR 3500

Dear Mr. Williams:

On May 12, 1992, the Federal Election Commission reviewed the allegations of your complaint dated April 3, 1992, and found that on the basis of the information provided in your complaint, and information provided by the respondents, there is no reason to believe Brown for President, Universal Press Syndicate, Raleigh News & Observer, and Garry Trudeau violated any provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, on May 12, 1992, the Commission closed the file in this matter.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
General Counsel's Report

2040902606



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3500

DATE FILMED 5/29/90 CAMERA NO. 1

CAMERAMAN SE.G

2040902607



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO  
THE PUBLIC RECORD IN CLOSED MUR 3500.

6/8/92

92040910140



RECEIVED  
FEDERAL ELECTION  
COMMISSION  
JUL 1 1992

JUN 4 11 18 AM '92

FRANK DANIELS, JR.  
President and Publisher  
(919) 829-4695

**CLOSED**

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
92 JUN -4 PM 1:06

June 2, 1992

(MUR 3500)

Ms. Lois G. Lerner  
Associate General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Dear Ms. Lerner:

Thank you for the appropriate disposal of  
the complaint by J. Edgar Williams. We  
see no need for further comment by us.

Sincerely, ✓

Frank Daniels, Jr.

215 South McDowell Street / P.O. Box 191 / Raleigh, North Carolina 27602

92040910141





**FEDERAL ELECTION COMMISSION**  
**WASHINGTON, D.C. 20463**

June 12, 1992

**MEMORANDUM**

**TO: PUBLIC RECORDS**  
**FROM: DOCKET-OGC** *KCS*  
**SUBJECT: CLOSED MUR FILES**

Attached are the following closed MUR files ready for microfilming:

**Additional Material**

**MUR 3321**

92040910142