



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 406

Date Filmed 7/16/79 Camera No. --- 2

Cameraman GPC

Loren A. Smith

ATTORNEY AT LAW

XXXXXXXXXXXXXXXXXXXX
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XXXXXXXXXXXXXXXXXXXX

Lothlorien
Yorklyn, Del. 19736



78 JUL 17 AM 9:46

Hal Ponder, Esq.
Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

70040110

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

OFFICIAL BUSINESS

POSTAGE AND FEES PAID



Mr. Philip J. Hare
Baskin and Sears
105 North Virginia
Falls Church, Virginia 22046

ADDRESSES UNKNOWN

MUR 405
GCH 41264
004888

Citizens ^{for} the Republic

a political action committee

JUL 21 AM 9:33

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

July 11, 1978

The Hon. Joan D. Aikens
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Aikens:

During my time as counsel for Citizens for Reagan and its successor, Citizens for the Republic, I have tried on behalf of my clients and myself to maintain a professional and completely cooperative relationship with the Commission. That is because both my clients and I believed that the integrity and fairness of the electoral process were vital to the very survival of a free nation. We still very strongly believe this. We also believed that the Federal Election Commission, whatever its handicaps, was also committed to a fair and evenhanded and nonpolitical enforcement of a rather confusing law. We would still like to believe this.

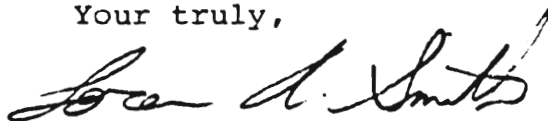
This letter is written to you in your capacity as the chief officer of the Commission, the one person most responsible for setting the tone, the image, the basic direction of the Commission, whether partisan and political or objective and fair. I thus write you on behalf of my client, as well as on behalf of all of those who see the need for the role of an unbiased watchdog to be fulfilled by the Commission.

When the Commission staff communicated to us the refusal of the Commission in MUR 405(77), to accept any conciliation agreement other than one admitting guilt and paying a fine, I was frankly shocked. I was shocked because of the technical nature of the charge, while other committees had conciliation statements accepted with no admission or fine on serious substantive matters. I was shocked because the very nature of the charge, "failure to make best efforts," creates vagueness problems on the one hand and is so totally inconsistent with our committee's relationship with the Commission on the other.

The Hon. Joan Aikens
July 11, 1978
Page Two

I could present our case further, however, this is neither the time nor the place for that. I do write this letter to request one courtesy from the Commission. I ask that this letter be read to the Commission along with the attached copy of a letter we sent the Commission staff on December 4, 1977. After considering this letter if the Commission does not at least feel we are entitled to an oral hearing before the Commission, then my personal faith in the fairness of the Commission will have been greatly shaken, and we both will proceed to air the various political and constitutional issues before the court. I hope for the sake of fundamental fairness we can meet, and at least discuss this issue.

Your truly,



Loren A. Smith
Secretary & Special Counsel
Citizens for the Republic

LAS:jf

Enclosure: 12/5/77 letter to FEC

Citizens ^{for} the Republic

a political action committee

78 JUL 17 AM 9:46

1253-7th Street, Suite 200
 Santa Monica, California 90401
 213/451-8548

804545

July 11, 1978

The Hon. Joan D. Aikens
 Chairman
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

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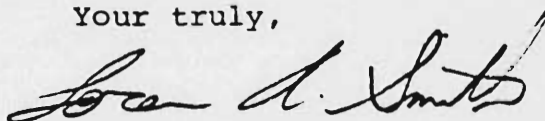
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Your truly,



Loren A. Smith
Secretary & Special Counsel
Citizens for the Republic

LAS:jf
Enclsoure: 12/5/77 letter to FEC

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RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

78 JUL 11 P 3: 44

Citizens ^{for the} Republic

a political action committee

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

804389

July 11, 1978

The Hon. Joan D. Aikens
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Aikens:

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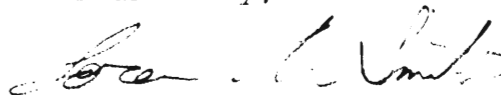
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The Hon. Joan Aikens
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Your truly,



Loren A. Smith
Secretary & Special Counsel
Citizens for the Republic

LAS:jf
Enclsoure: 12/5/77 letter to FEC

Loren A. Smith

ATTORNEY AT LAW

XXXXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXXX
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Lothlorien

Yorklyn, Delaware 19736



19 JUL 27 AM 9:33

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K ST., N.W.
Washington, D.C. 20463

72040101062

Citizens^{for}the Republic

a political action committee

SPECIAL DELIVERY

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

OFFICE OF THE SECRETARY
Post Office Box 98
Yorklyn, Delaware 19736

December 5, 1977

Mr. Randall E. Johnson
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Your Inquiry No. MUR 406 (77)

Dear Mr. Johnson:

This letter is written pursuant to the meeting that Ed Meese and I had with you and Kathryn Kavanagh on October 26, 1977, concerning the Federal Election Commission [FEC] inquiry in regard to the reporting by Citizens For Reagan of the occupation and principal place of business for those contributors who gave more than \$100.

Since our meeting with you we have reviewed this matter with our Executive and Steering Committees and with officials of the Reagan Campaign. We have also worked extensively with our data processing and direct mail contractors to determine the feasibility of obtaining the information requested by your office and to develop a plan and time schedule for such action. Our efforts in this regard, and thus this reply to you, have been delayed considerably because of contractual problems with our vendors, a change in both mailing and computer firms, and the necessity of transferring the campaign mailing list tapes from one company to another.

We have now completed our planning, however, and will take the following additional actions to insure that we have shown "that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b)(14):

Mr. Randall E. Johnson
Page 2
December 5, 1977

- (1) Citizens For The Republic [CFTR], as the legal successor to Citizens For Reagan, will send a letter by first class mail to each Reagan Campaign contributor of more than \$100 whose occupation and principal place of business is not available. This letter will request the necessary information and will have enclosed a response card and a self-addressed envelope. This action has already been commenced and the mailing will be completed within 15 days from the date of this letter. Copies of the materials will be sent to you from our California office.
- (2) CFTR will file an amended report within 90 days from the date of this letter, showing the name, address, amount of contribution(s), and the occupation and principal place of business for each contributor of over \$100. If any of the required information cannot be obtained, the amended report will indicate the reason therefor.
- (3) The cost of these efforts will be borne entirely by CFTR and/or individual contributors who wish to help defray this expense, and will not be charged against matching funds or the share of the remaining campaign funds that is returnable to the U.S. Treasury.

As we discussed at our meeting, Citizens For Reagan, throughout the 1976 primary campaign, made every possible effort to comply with both the letter and the spirit of the Federal election laws. We have enjoyed a good, professional working relationship with the audit and legal staffs of the FEC, and have consistently modified our procedures and complied fully with newly-developed requirements, as we sought to cooperate with your agency in the difficult implementation of a new body of Federal law and regulations.

In the case of obtaining and reporting information concerning contributors' occupations and places of business, we operated in the good faith belief that we were exerting our "best efforts" to carry out our responsibility under the law. In the absence of specific standards as to what constituted "best efforts," we felt that our practice of sending to each contributor of over \$100 a minimum of three, and in many cases seven or more,

Mr. Randall E. Johnson
Page 3
December 5, 1977

letters - each of which requested the required information - was adequate.

It should be noted that in the Fall of 1975, when I testified before the FEC concerning the proposed disclosure regulations, I mentioned the lack of specific standards for the obligation a campaign committee must fulfill in obtaining contributor information, and expressed our willingness to comply with any requirement that would set forth our responsibilities in a clear and timely manner. In the absence of such direction and since our campaign was operated prior to formal adoption of the Commission regulations, we were at a distinct disadvantage.

This disadvantage was intensified in the case of Citizens For Reagan because our Committee had the largest base of direct mail contributors of any campaign, and we raised the largest volume of funds from such small contributors. To insure the availability of full information, we actually sought occupation and place of business data from all contributors, regardless of the amount of their donation.

In addition to the compliance difficulties normally caused by the high volume of mail contributions, we were also hampered during the period of greatest compliance effort by a tremendous cash flow shortage, caused by the suspension of matching funds due to the judicial-legislative-executive stalemate on the revision of the election laws which existed at that time.

I have provided this summary of our compliance efforts, and the difficulties that surrounded them, to show our good faith attempt to respond to the Federal laws and the requirements as they were then known to us. As the Commission has now developed more fully its regulatory procedures and has promulgated definitive standards for "best efforts," we will demonstrate our complete willingness to comply by these further efforts to obtain the necessary information. Likewise we will prepare the amended report, continuing the practice initiated during the campaign of amending our filings whenever an error was discovered (which was inevitable in the first experience with such a massive undertaking) or further information was requested by the FEC staff.

Mr. Randall E. Johnson
Page 4
December 5, 1977

On the basis of the facts set forth above, including our current actions to fully comply with the "best efforts" standard, it is respectfully requested that Inquiry Number MUR 406 (77) be terminated by the FEC.

Thank you for your cooperation in this matter.

Sincerely yours,

Loren A. Smith

LOREN A. SMITH
Secretary and Special Counsel
Citizens For The Republic
(formerly Citizens For Reagan)

79610113927



Citizens^{for} the Republic

a political action committee

1253-7th Street, Suite 200
Santa Monica, California 90401

Hand Delivered

The Hon. Joan D. Aikens
Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

18 JUL 11 P 3:44

RECEIVED
FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

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

May 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Meese
Attorney at Law
4001 Grossmont Boulevard
La Mesa, California 92041

Re: MUR 406

Dear Mr. Meese:

On May 3, 1978, the Commission determined that it cannot accept the proposed conciliation agreement. Specifically, the Commission will not accept the statement: "(CFR) will continue to make best efforts to comply with the provisions of §434(b)(2) in all future mailings" in paragraph 10 because it implies that "best efforts" have been made by the committee from the beginning. Also, the Commission has determined that a civil penalty of \$300 is appropriate and shall be a part of any settlement.

Please respond to these modifications within five days after receipt of this letter. Absent such response, the Commission will file for civil relief in the United States District Court for the District of Columbia.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

cc: Loren Smith
Lothlorien
Yorklyn, Delaware 19736

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

NIB 406

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

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

☐ Show to whom and date delivered. _____

☒ Show to whom, date, and address of delivery. _____

☐ RESTRICTED DELIVERY
Show to whom and date delivered. _____

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$ _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
M. Ed. Muse

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438854</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

[Signature]

4. DATE OF DELIVERY *May 11 1978*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Citizens for Reagan)

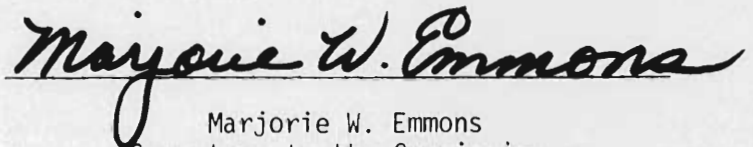
MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 3, 1978, the Commission determined by a vote of 5-0 to approve the conciliation agreement attached to the General Counsel's Memorandum of April 28, 1978, subject to the following amendments:

1. The addition of a civil penalty of \$300 to the agreement.
2. Deletion of the words, "continue to" in the fourth line of paragraph 10 of the agreement.

Voting for this determination were Commissioners Harris, Springer, Staebler, Thomson, and Tiernan. Commissioner Aikens was not present at the time of the vote.



Date: May 5, 1978

Marjorie W. Emmons
Secretary to the Commission

79040113025



FEDERAL ELECTION COMMISSION

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

EXECUTIVE SESSION
May 3, 1978

MEMORANDUM - April 28, 1978

TO: The Commission
FROM: William C. Oldaker *WCO*
RE: MUR 406 - Citizens for Reagan

The attached conciliation agreement is being circulated for Commission approval. Citizens for the Republic (the legal successor to Citizens for Reagan) has complied with the terms of the Commission's first proposed conciliation agreement; however, it was never signed. Although the Commission found probable cause to believe that Citizens for Reagan violated the Act, we recommend that the Commission approve the attached conciliation agreement as satisfactorily resolving this matter. Respondent is prepared to enter into the agreement.



7304012037

In the Matter of)
) MUR 406 (77)
Citizens for Reagan)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission") pursuant to information obtained in the normal course of carrying out its supervisory responsibilities. The Commission conducted an investigation and found reasonable cause to believe that Citizens for Reagan ("Respondent"), a political committee registered pursuant to 2 U.S.C. §433, had violated 2 U.S.C. §434(b).

NOW THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Commission has jurisdiction over Respondent and the subject matter of this proceeding.
2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
3. During the campaign preceding the 1976 presidential election, Respondent failed to report the occupation and principal place of business to the Commission for approximately 35% of those individuals who contributed in excess of \$100 to Respondent.

4. The efforts undertaken by Respondent to obtain the occupation and principal place of business for those individuals who contributed in excess of \$100 to Respondent entailed mailing an additional solicitation letter that included space for the requisite information but did not indicate to recipients that said information had been previously omitted and was required by law.
5. Respondent is required to report, in accordance with 2 U.S.C. §434(b)(2), "the full name and mailing address (occupation and the principal place of business, if any) of each person" contributing in excess of \$100.
6. The Treasurer and candidate of Respondent, having failed to report the occupation and principal place of business for each individual contributing in excess of \$100, must "show that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b)(14).
7. On August 11, 1977, the Commission made a determination that reasonable cause to believe had been found that Respondent had not shown that best efforts were used to obtain and submit the information required by 2 U.S.C. §434(b).

8. On December 20, 1977, Respondent requested the necessary information of those contributors whose occupation and principal place of business were omitted but required to be reported, by sending by first class mail to each such contributor at his/her last address known to Respondent a letter requesting such information. This letter was sent at the expense of Respondent and a copy thereof was furnished to the Commission.
9. On March 7, 1978, Respondent filed a revised report showing name, address, amount of contribution(s), and the occupation and principal place of business for each contributor, which included the information obtained as a result of the action described in paragraph 8, above. In those cases where any of the required information was not obtained, the revised report indicated the reason therefore.
10. Since the Commission's determination of reasonable cause to believe described in paragraph 7 of this agreement, Respondent has taken the action described in paragraph 8 and 9 and will continue to make best efforts to comply with the provisions of §434(b)(2) in all future mailings.

11. It is mutually agreed that this agreement shall become effective as of the date that both parties hereto have executed same and the Commission has approved the entire agreement.

70040112031
Date _____

William C. Oldaker
General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Date _____

Loren A. Smith
Secretary
Citizens for the Republic
(Legal successor to Citizens
for Reagan)

April 26, 1978

)
)
)

MUR 406

Thomas E. Harris
Chairman

William L. Springer
Commissioner

Joan D. Aikens
Vice Chairman

Neil Staebler
Commissioner

Robert O. Tiernan
Commissioner

Vernon W. Thomson
Commissioner

4003255

801828

ED MEESE
ATTORNEY AT LAW
9001 GROSSMONT BOULEVARD
LA MESA, CALIFORNIA 92041
(714) 461-0331

70 APR 14 PM 12:30

8 April 1978

SPECIAL DELIVERY

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Dear Bill:

Pursuant to our telephone conversation yesterday, concerning FEC Inquiry MUR 406 (77) pertaining to Citizens For Reagan, I am enclosing a proposed draft of the conciliation agreement which includes the language that we discussed.

As soon as you advise me that the agreement, in this form, is satisfactory with you, I will have an original prepared and signed by the representative of Citizens For The Republic (as the legal successor to Citizens For Reagan) and forward it to you for signature and such other steps as might be necessary.

If there should be any questions or you wish to propose further changes, please call me at the above number or at my office at the University of San Diego (714/291-6481, ext. 4339).

Thank you for your continued cooperation.

Sincerely,



Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

Citizens for Reagan

Respondent

)
)
)

MUR 406 (77)

CONCILIATION AGREEMENT

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NOW THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. The Commission has jurisdiction over Respondent and the subject matter of this proceeding.
2. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
3. During the campaign preceding the 1976 presidential election, Respondent failed to report the occupation and principal place of business to the Commission for approximately 35% of those

individuals who contributed in excess of \$100 to Respondent.

4. The efforts undertaken by Respondent to obtain the occupation and principal place of business for those individuals who contributed in excess of \$100 to Respondent entailed mailing an additional solicitation letter that included space for the requisite information but did not indicate to recipients that said information had been previously omitted and was required by law.
5. Respondent is required to report, in accordance with 2 U.S.C. §434(b)(2), "the full name and mailing address (occupation and the principal place of business, if any) of each person" contributing in excess of \$100.
6. The Treasurer and candidate of Respondent, having failed to report the occupation and principal place of business for each individual contributing in excess of \$100, must "show that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b)(14).
7. On August 11, 1977, the Commission made a determination that reasonable cause had been found to believe that Respondent had not shown that best efforts were used to obtain and submit the information required by 2 U.S.C. 434 (b).

8. Respondent thereafter replied to such finding that, in the absence of any standards having been promulgated concerning the requirements for such "best efforts," it had substantially complied with the requirements of 2 U.S.C. 434(b)(2). However, as further demonstration of its desire and intent to fully comply with all provisions of the Federal election laws, Respondent has taken the additional actions described below.
9. On December 20, 1977, Respondent requested the necessary information of those contributors whose occupation and principal place of business were omitted but required to be reported, by sending by first class mail to each such contributor at his/her last address known to Respondent a letter requesting such information. This letter was sent at the expense of Respondent and a copy thereof was furnished to the Commission.
10. On March 7, 1978, Respondent filed a revised report showing name, address, amount of contribution(s), and the occupation and principal place of business for each contributor, which included the information obtained as a result of the action described in paragraph 9, above. In those cases where any of the required information was not obtained, the revised report indicated the reason therefore.
11. Respondent will continue to fully comply with the standards established for "best efforts" to obtain the information required by 2 U.S.C. 434(b)(2) and other applicable statutes in all future mailings.
12. It is mutually agreed that this agreement shall become effective as of the date that both parties

72040112003

hereto have executed same and the Commission
has approved the entire agreement.

FEDERAL ELECTION COMMISSION

DATE: _____ BY: _____
WILLIAM C. OLDAKER
General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

CITIZENS FOR THE REPUBLIC
(Legal successor to Citizens For
Reagan)

DATE: _____ BY: _____
LOREN A. SMITH
Secretary

ED MEESE

ATTORNEY AT LAW

9001 GROSSMONT BOULEVARD
LA MESA, CALIFORNIA 92041

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

13 JUL 14 AM: 02

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



100-3116
Telegram

LLE108 WAB166(1702)(4-054524E089)PD 03/30/78 1702

ICS IPMRNCZ CSP

1978 MAR 30 PM 6:24

2134518548 TDRN SANTA MONICA CA 80 03-30 0502P EST

PMS WILLIAM OLDAKER, GENERAL COUNSEL CARE FEDERAL ELECTION COMMISSION
, RPT DLY BY MGM, DLR

1325 K ST NORTHWEST

WASHINGTON DC 20463

REFERENCES ARE MADE TO YOUR LETTER OF MARCH 22 1978. CITIZENS FOR
THE REPUBLIC, THE LEGAL SUCCESSOR ORGANIZATION OF CITIZENS FOR
REAGAN, FORMERLY DISPUTE THE FINDINGS AND CONCLUSION OF SECTION IIB
OF THE REPORT OF THE AUDIT DIVISION ON CITIZENS FOR REAGAN AS
CONTAINING FALSE INFORMATION, AND HEREBY REQUEST THAT THE AUDIT
REPORT IN ITS PRESENT FORM NOT BE MADE PUBLIC. THIS ENTIRE SUBJECT
IS CURRENTLY UNDER DISCUSSION BY OUR ATTORNEYS AND THE GENERAL
COUNSEL OF THE FEDERAL ELECTION COMMISSION

ED MEESE GENERAL COUNSEL OF CITIZENS FOR THE REPUBLIC (1253



Telegram

1978 MAR 30 PM 6: 24

SEVENTH ST SUITE 200 SANTA MONICA CA 90401)
NNNN



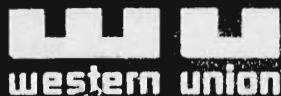
western union

Telegram

78 MAR 31 12:40

RD M

11201101067



Telegram

LLE112 WAF170(1700)(4-054338E089)PD 03/30/78 1700

ICS IPMRNCZ CSP

2134518548 IDRN SANTA MONICA CA 80 03-30 0500P EST

PMS ROBERT J COSTA, ASSISTANT STAFF DIRECTOR AIDIT DIV CARE FEDERAL
ELECTION COMMISSION, RPT DLY BY MGM, DLR

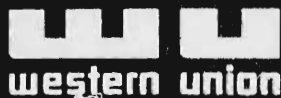
1325 K ST NORTHWEST

WASHINGTON DC 20463

REFERENCES ARE MADE TO YOUR LETTER OF MARCH 22 1978. CITIZENS FOR
THE REPUBLIC, THE LEGAL SUCCESSOR ORGANIZATION OF CITIZENS FOR
REAGAN, FORMERLY DISPUTE THE FINDINGS AND CONCLUSION OF SECTION IIB
OF THE REPORT OF THE AUDIT DIVISION ON CITIZENS FOR REAGAN AS
CONTAINING FALSE INFORMATION, AND HEREBY REQUEST THAT THE AUDIT
REPORT IN ITS PRESENT FORM NOT BE MADE PUBLIC. THIS ENTIRE SUBJECT
IS CURRENTLY UNDER DISCUSSION BY OUR ATTORNEYS AND THE GENERAL
COUNSEL OF THE FEDERAL ELECTION COMMISSION

ED MEESE GENERAL COUNSEL OF CITIZENS FOR THE REPUBLIC (1253

1978 MAR 30 PM 6:23



Telegram

1978 MAR 30 PM 6:23

SEVENTH ST SUITE 200 SANTA MONICA CA 90401)

NNNN



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

March 31, 1977

MEMORANDUM TO: ~~Dan Swillinger~~

FROM:

Charles N. Steele *CNS*

SUBJECT:

Reagan Audit Referral on
Occupation/Principal Place of Business

If the sampling technique used projects $\pm 10\%$ range of occurrences, does that not mean that the difference between Reagan's 40%--referred as a violation--and other candidates 29%--not referred for violation--is not statistically significant, or, at least, that there is an overlap of the confidence intervals? If so, how can we prosecute one, not the other?

Perhaps we should go after others - they did make an effort - Reagan made none

I know that McSorley's original memorandum said 35% of the error rate was occupation and principal place of business. I also know that RFAI's are sent out for not complying with the requirement of the regulations that occupation is not properly reported unless it includes "job title or position" even if it was filled in to say "businessman" or "executive"; similarly, if the address was reported, but not the "full name under which the business is conducted," an RFAI often goes. My question is whether any of the 35% of non-reporting are accounted for by RFAI's of that nature.

McSorley says that the errors reflect complete omission of the information - if the error rate included insufficient description, the rate would be much higher -

*J.S.
1 Apr 77*





FEDERAL ELECTION COMMISSION

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

March 31, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Loren Smith
Lothlorien
Yorklyn, Delaware 19736

Re: MUR 406 (77)

Dear Mr. Smith:

During our meeting on March 12, 1978, both you and Ed Meese indicated that your client, Citizens for Reagan (presently called Citizens for the Republic), would prefer language other than that used in paragraph 7 of the proposed conciliation agreement. At that time you requested also that we send you a copy of the Commission's certification of the reasonable cause to believe finding. This was mailed to you on March 17, 1978.

We have not, however, received any correspondence from you indicating whether a consent decree or a conciliation agreement is preferable to your client. A letter should be sent to us within five (5) days after receipt of this letter including an indication as to which of the two you would like to use and if the conciliation agreement is preferred, any language you propose to substitute for paragraph 7. We would like to conclude this matter shortly. If you have any questions, please contact Michele Brown at 202/523-4026.

Sincerely yours

William C. Oldaker
General Counsel

cc: Ed Meese
Attorney at Law
9001 Grossmont Blvd.
La Mesa, California 92041



Y06 MB

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

1. The following service is requested (check one).
☐ Show to whom and date delivered. _____
☒ Show to whom, date, and address of delivery. _____
☐ RESTRICTED DELIVERY
Show to whom and date delivered. _____
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$ _____
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Loren Smith
Lothlonian
Yorklyn, Delaware 19736

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943434

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs. Loren A. Smith

4. DATE OF DELIVERY
4/6/78

5. ADDRESS (Complete only if requested)
Yorklyn Post Office
Yorklyn, DE 19736

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

YOG MA

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

1. The following service is requested (check one).
- ☐ Show to whom and date delivered\$
- ☒ Show to whom, date, and address of delivery\$
- ☐ RESTRICTED DELIVERY
Show to whom and date delivered\$
- ☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery\$
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Ed Mages - Attorney at Law
9001 Shoosmont Blvd.
La Mesa, Cal. 92041

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943435

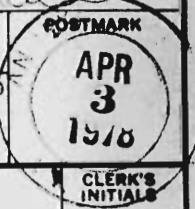
(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
Ruth Wallace

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:



PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

406-118

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

1. The following service is requested (check one).
☐ Show to whom and date delivered. _____
☒ Show to whom, date, and address of delivery. _____
☐ **RESTRICTED DELIVERY**
Show to whom and date delivered. _____
☐ **RESTRICTED DELIVERY.**
Show to whom, date, and address of delivery. \$ _____
(CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**
John A. Smith
Loth Lorian
Yorklyn, Delaware 14734

3. **ARTICLE DESCRIPTION:**
REGISTERED NO. _____ CERTIFIED NO. 943/31 INSURED NO. _____
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
John A. Smith

4. **DATE OF DELIVERY**
3/24/78

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

CLERK'S INITIALS
HC

☆ GPO : 1977-O-234-337

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

446-MB

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

1. The following service is requested (check one).
- ☐ Show to whom and date delivered. _____
 - ☒ Show to whom, date, and address of delivery. _____
 - ☐ RESTRICTED DELIVERY
Show to whom and date delivered. _____
 - ☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$_____
- (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO:**
Ed Huse
9001 Grossmont Blvd.
La Mesa, CA 92041

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943117	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
MAR 23 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:



March 29, 1977

MEMORANDUM TO: Charlie Steele
FROM: Dan Swillinger *DS*
SUBJECT: Reagan-Your Memo of March 22

Your memorandum (copy attached) raised two questions. The first is answered by the attached memo from JoAnn McSorley.

The second question is answered by McSorley's January 25 memo, which was included in the materials attached to my original memo. It shows that 35.18% of error was caused by the failure to list occupation and principal place of business (\$\$110.10 and 100.11), 4.58% by failure to list principal place of business, and .48% for failure to list identification, occupation and principal place of business.

Attachments - 2

cc: Bob Costa

73010112030



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

March 22, 1977

MEMORANDUM TO: Dan Swillinger

FROM: Charles Steele *CS*

SUBJECT: Recommendation for treatment as a compliance
matter--Citizens for Reagan
Your memorandum of March 16, 1977

1. What is the confidence rate in statistical terms on the percentages used here? i.e., 40% of what, and were the same terms used on other candidates? I would be reluctant to open a MUR based on statistical analysis without more knowledge of techniques.

2. Is this total omission, or omission measured by non-compliance with the additional requirement of 100.11 and 100.12?





FEDERAL ELECTION COMMISSION

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

March 17, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren A. Smith
Loth Lorien
Yorklyn, Delaware 19736

Re: MUR 406 (77)

Dear Mr. *Loren* Smith:

Enclosed is a copy of the Commission certification and letter indicating that the Commission determined there was reasonable cause to believe that Citizens for Reagan had violated 2 U.S.C. §434(b), which you requested in our meeting on March 12, 1978. As the attached copy of the letter shows, the letters were mailed on August 17, 1977 and were received by someone at Mr. Buchanan's office on August 22, 1977 and by you on August 24, 1977. A copy should, therefore, appear in your files.

Sincerely yours,

W.C. Oldaker
William C. Oldaker
General Counsel

Enclosure



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren A. Smith
Loth Lorian
Yorklyn, Delaware 19736

Re: MUR 406 (77)

Dear Mr. Smith:

Enclosed is a copy of the Commission certification and letter indicating that the Commission determined there was reasonable cause to believe that Citizens for Reagan had violated 2 U.S.C. §434(b), which you requested in our meeting on March 12, 1978. As the attached copy of the letter shows, the letters were mailed on August 16, 1977 and were received by someone at Mr. Buchanan's office on August 22, 1977 and by you on August 24, 1977. A copy should, therefore, appear in your files.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure
ab 4/11/8

BEFORE THE FEDERAL ELECTION COMMISSION

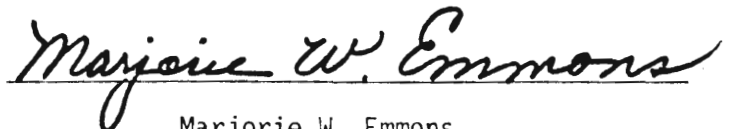
In the Matter of)
)
Citizens for Reagan)

MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 11, 1977, the Commission determined by a vote of 4-0 to find reasonable cause to believe that Citizens for Reagan has not shown that best efforts were used to obtain and submit the information required by 2 U.S.C. Section 434(b) and therefore, that Citizens for Reagan is in violation of 2 U.S.C. Section 434(b).

Commissioners Aikens and Harris were not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

August 17, 1977

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

The Commission has received the response submitted by Citizens for Reagan regarding a possible violation of the Act and has determined that there is reasonable cause to believe that Citizens for Reagan has violated reporting requirements of the Act as set forth in 2 U.S.C. §434(b).

As stated in our letter of June 20, 1977, to Henry Buchanan, 2 U.S.C. §434(b)(2) requires that occupation, address and principal place of business of contributors who give more than \$100 to a candidate or committee be included in the financial reports submitted by that candidate or committee.

The high error rate of the CFR, whereby the occupation and principal place of business was not reported for 35% of contributors giving more than \$100, and the efforts undertaken to obtain this information were the factors taken into consideration by the Commission.

It is provided in 2 U.S.C. §437g(a)(5)(A) that:

If the Commission determines that there is reasonable cause to believe that any person has committed . . . a violation of this Act . . . the Commission shall make every endeavor for a period of not less than 30 days to correct . . . such violation by informal methods of conference, conciliation, and persuasion, and to enter into a conciliation agreement with the person involved.



Therefore, we will be contacting you to arrange a meeting between representatives of the Citizens for Reagan and attorneys from this office. If you have any questions, please telephone Kathryn Kavanagh (202/523-4073), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

cc: Henry Buchanan

PS Form 3811, Mar. 1976

MUR 4016 Kathryn

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

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

2. ARTICLE ADDRESSED TO:
 Loren A. Smith
 4706 Highland Ave.
 Bethesda, Md. 20814

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943884

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
 8/24/77 AUG 24 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GOP: 1976-O-203-456

PS Form 3811, Mar. 1976

MUR 4016 Kathryn

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

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

2. ARTICLE ADDRESSED TO:
 Henry M. Buchanan
 4706 Highland Ave.
 Bethesda, Md. 20814

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943885

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
 AUG 24 1977 AUG 24 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GOP: 1976-O-203-456



FEDERAL ELECTION COMMISSION

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

March 17, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Meese
9001 Grossmont Boulevard
La Mesa, CA 92041

Re: MUR 406 (77)

Dear Mr. Meese:

Enclosed is a copy of the Commission certification and letter indicating that the Commission determined there was reasonable cause to believe that Citizens for Reagan had violated 2 U.S.C. §434(b), which you requested in our meeting on March 12, 1978. As the attached copy of the letter shows, the letters were mailed on August 17, 1977 and were received by someone at Mr. Buchanan's office on August 22, 1977 and by Mr. Smith on August 24, 1977. A copy should, therefore, appear in your files.

Sincerely,

William C. Oldaker
General Counsel

Enclosures





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ed Meese
9001 Grossmont Boulevard
La Mesa, CA 92041

Re: MUR 406 (77)

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Sincerely,

William C. Oldaker
General Counsel

Enclosures

mb 3/17/78





FEDERAL ELECTION COMMISSION

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

August 17, 1977

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

The Commission has received the response submitted by Citizens for Reagan regarding a possible violation of the Act and has determined that there is reasonable cause to believe that Citizens for Reagan has violated reporting requirements of the Act as set forth in 2 U.S.C. §434(b).

As stated in our letter of June 20, 1977, to Henry Buchanan, 2 U.S.C. §434(b)(2) requires that occupation, address and principal place of business of contributors who give more than \$100 to a candidate or committee be included in the financial reports submitted by that candidate or committee.

The high error rate of the CFR, whereby the occupation and principal place of business was not reported for 35% of contributors giving more than \$100, and the efforts undertaken to obtain this information were the factors taken into consideration by the Commission.

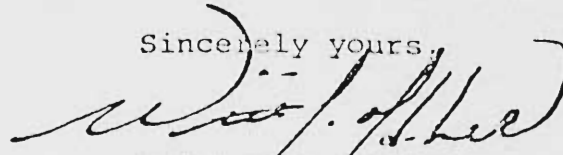
It is provided in 2 U.S.C. §437g(a)(5)(A) that:

If the Commission determines that there is reasonable cause to believe that any person has committed . . . a violation of this Act . . . the Commission shall make every endeavor for a period of not less than 30 days to correct . . . such violation by informal methods of conference, conciliation, and persuasion, and to enter into a conciliation agreement with the person involved.



Therefore, we will be contacting you to arrange a meeting between representatives of the Citizens for Reagan and attorneys from this office. If you have any questions, please telephone Kathryn Kavanagh (202/523-4073), the staff member assigned to this matter.

Sincerely yours,



William C. Oldaker
General Counsel

cc: Henry Buchanan

PS Form 3811, Mar. 1976

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

2. ARTICLE ADDRESSED TO:
Loren A. Smith
1111 N. Highland St.
Washington, D.C. 20014

3. ARTICLE DESCRIPTION:
REGISTERED NO. 943884 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 7/24/77 POSTMARK AUG 24 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GOP: 1976-O-203-456

PS Form 3811, Mar. 1976

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Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Henry M. Buchanan
4766 Highland Ave
Bethesda, Md. 20814

3. ARTICLE DESCRIPTION:
REGISTERED NO. 943885 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY AUG 25 1977 POSTMARK AUG 25 1977

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GOP: 1976-O-203-456

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Citizens for Reagan)

MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 11, 1977, the Commission determined by a vote of 4-0 to find reasonable cause to believe that Citizens for Reagan has not shown that best efforts were used to obtain and submit the information required by 2 U.S.C. Section 434(b) and therefore, that Citizens for Reagan is in violation of 2 U.S.C. Section 434(b).

Commissioners Aikens and Harris were not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

500-2917

Citizens for the Republic

a political action committee

March 7, 1978

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

Mr. Randall E. Johnson
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 406 (77)

Dear Mr. Johnson:

As specified in the December 5, 1977 letter to you, Citizens for the Republic mailed 7,489 letters on December 20, 1977 to individuals who contributed in excess of \$100 to Citizens for Reagan in the years 1975 or 1976, and whose records were missing either occupation or principal place of business. In your October 6, 1977 letter to our counsel, Loren A. Smith, you suggested a format for the letter requesting additional information, as well as particular mailing procedures that should be followed. The recommended paragraphs were incorporated in our letter, and the procedures were specifically followed.

Of the contributors mailed, 23% responded. This additional information has been fed into our computer and the enclosed revised 1975 and 1976 schedule A line 15's have been generated. Citizens for the Republic is filing these 2 reports as updated lists of reportable cash contributors to Citizens for Reagan in the years 1975 and 1976.

In reviewing these reports, please note the following:

1. Citizens for the Republic is the committee named on all but the first pages of both reports. It should read Citizens for Reagan. When Citizens for Reagan changed its name to Citizens for the Republic the computer was programmed to reflect the change.
2. A number of pages are zerox sheets and not computer sheets. Changes were made manually to include information that became available after the reports were printed and to correct errors. Copies of the pages effected were submitted.
3. You will note that a high percentage of our contributors are housewives or retired. Many have listed their occupations as none. In these cases the principal place of business block has been appropriately left blank.

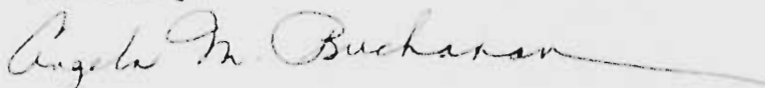
PAGE TWO --

Mr. Randall E. Johnson

The contributors, whose occupation and/or principal place of business are not listed, did not respond and/or did not choose to provide this information on previous requests or on this recent mailing.

The filing of these reports completes those actions set out by us in our December 5, 1977 letter referred to above and constitutes another good faith compliance with the Federal Election Law and the Federal Election Commission requirements.

Sincerely,

A handwritten signature in cursive script that reads "Angela M. Buchanan". The signature is written in dark ink and extends across the width of the letter.

Angela M. Buchanan
Assistant Treasurer

AMB/rcg

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Citizens for Reagan)

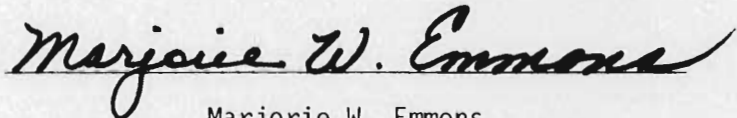
MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 8, 1978, the Commission determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find probable cause to believe that Citizens for Reagan (now know as Citizens for the Republic) violated 2 U.S.C. Section 434(b) by failing to provide occupation and principal place of business information on its disclosure reports.
2. To file a lawsuit in view of Citizens for Reagan's failure to make best efforts to supply the information in a timely fashion.

Voting for this determination were Commissioners Aikens, Harris, Springer, Staebler, and Thomson. Commissioner Tiernan was not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

February 2, 1978

MEMORANDUM TO: Marge Emons
FROM: Elissa T. Garr
SUBJECT: MUR 406 Team #4 Brown

Please have the attached General Counsel's Report on MUR 406 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of February 6, 1978.

Thank you.

Garr

BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

January 31, 1977

8 FEB 1978

In the Matter of)
) MUR 406 (77)
Citizens for Reagan)

GENERAL COUNSEL'S REPORT

On June 15, 1977, the Commission determined that there was reason to believe that Citizens for Reagan had violated §434(b)(2) by failing to make best efforts to provide occupation and principal place of business information on its disclosure reports. Citizens for Reagan ("CFR") responded by explaining the efforts it made to obtain the information missing from its reports. On September 8, 1977, the Commission found reasonable cause to believe the efforts made by CFR did not qualify as "best efforts" and CFR had violated §434(b)(2). At that time, the Commission directed the General Counsel's office to add a paragraph to the proposed conciliation agreement stating that no civil penalty would be sought unless the provisions of the conciliation agreement are violated by the respondent.

We sent the proposed conciliation agreement to CFR on October 6, 1977. A meeting was held on October 26, 1977 between counsel for CFR and two members of the General Counsel's staff. CFR's attorneys said they doubted that their clients would sign

79040142067
a conciliation agreement but they said they would make a written response to our proposed conciliation agreement in about ten days. We received no response and on November 21, 1977, we sent a letter to Loren A. Smith, counsel for CFR, reminding him that the conciliation period set forth in §437g(a)(5) is thirty days. The letter was delivered on November 29, 1977. Mr. Smith called on December 1, 1977, to say his letter was "in the mail" and we should receive it on the 2nd or 3rd of December; on December 8, 1977, the letter from Mr. Smith arrived.

In his letter, Mr. Smith outlined the actions which CFR will take to "show that best efforts have been used to obtain and submit the information required, in accordance with 2 U.S.C. §434(b)(14)." A letter will be sent by CFR (now known as Citizens for the Republic) to all persons who had contributed \$100 or more and whose occupation and principal place of business have not been reported. The letter will be sent by first class mail and will include a response card and a self-addressed envelope. Mr. Smith states that CFR has already begun mailing these letters and that within 90 days of December 5,

1977, CFR will file an amended report which will include the name, address, amount of contribution, occupation and principal place of business for those whose occupation and principal place of business had been previously omitted from reports. CFR "and/or individual contributors who wish to help defray this expense" will pay for this mailing (see Exhibit I, p. 2).

29010112069

The actions which CFR says it is taking are similar to those prescribed in our proposed conciliation agreement. However, Mr. Smith did not enclose the conciliation agreement nor did he mention it in his letter. On December 14, 1977, we reached Mr. Smith by telephone in an attempt to see what, if any, changes to the proposed agreement might make it more acceptable to CFR. On December 16, 1977, Mr. Smith telephoned us and said that he had talked with his clients and they had no interest in signing any conciliation agreement because they believed their actions were "sufficient."

Even though CFR has now undertaken to obtain the missing information, CFR made no effort to do so until the Commission found reasonable cause to believe in this compliance action. We believe that the Commission

should file suit in view of CFR's failure to make best efforts to supply the information in a timely fashion.

RECOMMENDATION

1. Find probable cause to believe that Citizens for Reagan (now known as Citizens for the Republic) violated 2 U.S.C. §434(b) by failing to provide occupation and principal place of business information on its disclosure reports.

2. File lawsuit.

1/31/78

Date

William C. Oldaker

William C. Oldaker
General Counsel

79010142069

RECEIVED
FEDERAL ELECTION
COMMISSION

Citizens^{for} the Republic
a political action committee

77 DEC 8 PM 1:30

SPECIAL DELIVERY

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

OFFICE OF THE SECRETARY
Post Office Box 98
Yorklyn, Delaware 19736

December 5, 1977

Mr. Randall E. Johnson
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Your Inquiry No. MUR 406 (77)

Dear Mr. Johnson:

This letter is written pursuant to the meeting that Ed Meese and I had with you and Kathryn Kavanagh on October 26, 1977, concerning the Federal Election Commission [FEC] inquiry in regard to the reporting by Citizens For Reagan of the occupation and principal place of business for those contributors who gave more than \$100.

Since our meeting with you we have reviewed this matter with our Executive and Steering Committees and with officials of the Reagan Campaign. We have also worked extensively with our data processing and direct mail contractors to determine the feasibility of obtaining the information requested by your office and to develop a plan and time schedule for such action. Our efforts in this regard, and thus this reply to you, have been delayed considerably because of contractual problems with our vendors, a change in both mailing and computer firms, and the necessity of transferring the campaign mailing list tapes from one company to another.

We have now completed our planning, however, and will take the following additional actions to insure that we have shown "that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b) (14):

Mr. Randall E. Johnson
Page 2
December 5, 1977

- (1) Citizens For The Republic [CFTR], as the legal successor to Citizens For Reagan, will send a letter by first class mail to each Reagan Campaign contributor of more than \$100 whose occupation and principal place of business is not available. This letter will request the necessary information and will have enclosed a response card and a self-addressed envelope. This action has already been commenced and the mailing will be completed within 15 days from the date of this letter. Copies of the materials will be sent to you from our California office.
- (2) CFTR will file an amended report within 90 days from the date of this letter, showing the name, address, amount of contribution(s), and the occupation and principal place of business for each contributor of over \$100. If any of the required information cannot be obtained, the amended report will indicate the reason therefor.
- (3) The cost of these efforts will be borne entirely by CFTR and/or individual contributors who wish to help defray this expense, and will not be charged against matching funds or the share of the remaining campaign funds that is returnable to the U.S. Treasury.

As we discussed at our meeting, Citizens For Reagan, throughout the 1976 primary campaign, made every possible effort to comply with both the letter and the spirit of the Federal election laws. We have enjoyed a good, professional working relationship with the audit and legal staffs of the FEC, and have consistently modified our procedures and complied fully with newly-developed requirements, as we sought to cooperate with your agency in the difficult implementation of a new body of Federal law and regulations.

In the case of obtaining and reporting information concerning contributors' occupations and places of business, we operated in the good faith belief that we were exerting our "best efforts" to carry out our responsibility under the law. In the absence of specific standards as to what constituted "best efforts," we felt that our practice of sending to each contributor of over \$100 a minimum of three, and in many cases seven or more,

Mr. Randall E. Johnson
Page 3
December 5, 1977

letters - each of which requested the required information - was adequate.

It should be noted that in the Fall of 1975, when I testified before the FEC concerning the proposed disclosure regulations, I mentioned the lack of specific standards for the obligation a campaign committee must fulfill in obtaining contributor information, and expressed our willingness to comply with any requirement that would set forth our responsibilities in a clear and timely manner. In the absence of such direction and since our campaign was operated prior to formal adoption of the Commission regulations, we were at a distinct disadvantage.

This disadvantage was intensified in the case of Citizens For Reagan because our Committee had the largest base of direct mail contributors of any campaign, and we raised the largest volume of funds from such small contributors. To insure the availability of full information, we actually sought occupation and place of business data from all contributors, regardless of the amount of their donation.

In addition to the compliance difficulties normally caused by the high volume of mail contributions, we were also hampered during the period of greatest compliance effort by a tremendous cash flow shortage, caused by the suspension of matching funds due to the judicial-legislative-executive stalemate on the revision of the election laws which existed at that time.

I have provided this summary of our compliance efforts, and the difficulties that surrounded them, to show our good faith attempt to respond to the Federal laws and the requirements as they were then known to us. As the Commission has now developed more fully its regulatory procedures and has promulgated definitive standards for "best efforts," we will demonstrate our complete willingness to comply by these further efforts to obtain the necessary information. Likewise we will prepare the amended report, continuing the practice initiated during the campaign of amending our filings whenever an error was discovered (which was inevitable in the first experience with such a massive undertaking) or further information was requested by the FEC staff.

Mr. Randall E. Johnson
Page 4
December 5, 1977

On the basis of the facts set forth above, including our current actions to fully comply with the "best efforts" standard, it is respectfully requested that Inquiry Number MUR 406 (77) be terminated by the FEC.

Thank you for your cooperation in this matter.

Sincerely yours,

Loren A. Smith

LOREN A. SMITH
Secretary and Special Counsel
Citizens For The Republic
(formerly Citizens For Reagan)

79040142073

CC 2407

Citizens^{for}the Republic

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

December 30, 1977

Federal Election Commission
1235K Street, N. W.
Washington, D. C. 20463

Attention: Mr. Thomas Harris

Gentlemen:

Enclosed please find samples of packet mailed to Citizens for Reagan contributors in 1976, in compliance with your request.

Sincerely,

Rose Marie Monk

Miss Rose Marie Monk
Assistant Secretary

tak
encs.

Citizens^{for}the Republic

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

December 20, 1977

Dear Friend:

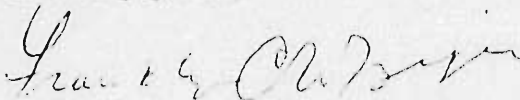
I am writing to you because you are one of the many people who contributed to Ronald Reagan's 1976 campaign for the presidency. Citizens for the Republic, as the legal successor to "Citizens for Reagan", has recently been requested by the Federal Election Commission to renew our efforts to obtain certain information required by federal law.

The Federal Election Campaign Act of 1971, as amended, requires that our committee report to the Federal Election Commission the occupation and principal place of business of each individual who contributed in excess of \$100 to "Citizens for Reagan."

Our records indicate that we do not have such information from you although you contributed in excess of \$100 to the Reagan Campaign. In order for us to make the "best efforts" required by federal statute to obtain this information, we request that you fill out the enclosed card and return it to us within five days, using the enclosed postage paid envelope.

We are sending this letter because we wish to exert every effort to comply with federal law. We greatly appreciate your cooperation.

Sincerely yours,



Franklyn C. Nofziger
Executive Vice Chairman
Citizens for the Republic
(formerly Citizens for Reagan)

P. S. If you wish to help Citizens for the Republic, as the successor organization to "Citizens for Reagan", bear the cost of this effort, please make your check payable to Citizens for the Republic (CFR) and enclose it with the card. Thank you again for your support.

IN RESPONSE TO YOUR REQUEST,

My occupation and principal place of business at the time of my contribution to **CITIZENS FOR REAGAN** was:

• occupation _____

principal place of business _____

business street address _____

city, state, zip _____

YES I want to help defray the cost of this additional effort to comply with Federal Law.

ENCLOSED IS MY CHECK FOR:

\$10.00

\$25.00

\$50.00

OTHER

If necessary,
please correct
address here

All checks and money orders should be made
payable to **CITIZENS FOR THE REPUBLIC — CFTR —**

FIRST CLASS
Permit No. 2836
Santa Monica, CA

BUSINESS REPLY MAIL

No postage stamp necessary if mailed in the United States

Postage will be paid by **RONALD REAGAN**
Suite 200
1253 Seventh Street
Santa Monica, California 90401

Citizens ^{for} the Republic

1253-7th Street, Suite 200
Santa Monica, California 90401

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

Attention: Mr. Thomas Harris



790401
FEDERAL ELECTION COMMISSION
'78 JAN 3 AM

RECEIVED
FEDERAL ELECTION
COMMISSION

Citizens for the Republic
a political action committee

77 DEC 8 PM 1:30

SPECIAL DELIVERY

1253-7th Street, Suite 200
Santa Monica, California 90401
213/451-8548

OFFICE OF THE SECRETARY
Post Office Box 98
Yorklyn, Delaware 19736

December 5, 1977

Mr. Randall E. Johnson
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Your Inquiry No. MUR 406 (77)

Dear Mr. Johnson:

This letter is written pursuant to the meeting that Ed Meese and I had with you and Kathryn Kavanagh on October 26, 1977, concerning the Federal Election Commission [FEC] inquiry in regard to the reporting by Citizens For Reagan of the occupation and principal place of business for those contributors who gave more than \$100.

Since our meeting with you we have reviewed this matter with our Executive and Steering Committees and with officials of the Reagan Campaign. We have also worked extensively with our data processing and direct mail contractors to determine the feasibility of obtaining the information requested by your office and to develop a plan and time schedule for such action. Our efforts in this regard, and thus this reply to you, have been delayed considerably because of contractual problems with our vendors, a change in both mailing and computer firms, and the necessity of transferring the campaign mailing list tapes from one company to another.

We have now completed our planning, however, and will take the following additional actions to insure that we have shown "that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b)(14):

Mr. Randall E. Johnson
Page 2
December 5, 1977

- (1) Citizens For The Republic [CFTR], as the legal successor to Citizens For Reagan, will send a letter by first class mail to each Reagan Campaign contributor of more than \$100 whose occupation and principal place of business is not available. This letter will request the necessary information and will have enclosed a response card and a self-addressed envelope. This action has already been commenced and the mailing will be completed within 15 days from the date of this letter. Copies of the materials will be sent to you from our California office.
- (2) CFTR will file an amended report within 90 days from the date of this letter, showing the name, address, amount of contribution(s), and the occupation and principal place of business for each contributor of over \$100. If any of the required information cannot be obtained, the amended report will indicate the reason therefor.
- (3) The cost of these efforts will be borne entirely by CFTR and/or individual contributors who wish to help defray this expense, and will not be charged against matching funds or the share of the remaining campaign funds that is returnable to the U.S. Treasury.

As we discussed at our meeting, Citizens For Reagan, throughout the 1976 primary campaign, made every possible effort to comply with both the letter and the spirit of the Federal election laws. We have enjoyed a good, professional working relationship with the audit and legal staffs of the FEC, and have consistently modified our procedures and complied fully with newly-developed requirements, as we sought to cooperate with your agency in the difficult implementation of a new body of Federal law and regulations.

In the case of obtaining and reporting information concerning contributors' occupations and places of business, we operated in the good faith belief that we were exerting our "best efforts" to carry out our responsibility under the law. In the absence of specific standards as to what constituted "best efforts," we felt that our practice of sending to each contributor of over \$100 a minimum of three, and in many cases seven or more,

Mr. Randall E. Johnson
Page 3
December 5, 1977

letters - each of which requested the required information - was adequate.

It should be noted that in the Fall of 1975, when I testified before the FEC concerning the proposed disclosure regulations, I mentioned the lack of specific standards for the obligation a campaign committee must fulfill in obtaining contributor information, and expressed our willingness to comply with any requirement that would set forth our responsibilities in a clear and timely manner. In the absence of such direction and since our campaign was operated prior to formal adoption of the Commission regulations, we were at a distinct disadvantage.

This disadvantage was intensified in the case of Citizens For Reagan because our Committee had the largest base of direct mail contributors of any campaign, and we raised the largest volume of funds from such small contributors. To insure the availability of full information, we actually sought occupation and place of business data from all contributors, regardless of the amount of their donation.

In addition to the compliance difficulties normally caused by the high volume of mail contributions, we were also hampered during the period of greatest compliance effort by a tremendous cash flow shortage, caused by the suspension of matching funds due to the judicial-legislative-executive stalemate on the revision of the election laws which existed at that time.

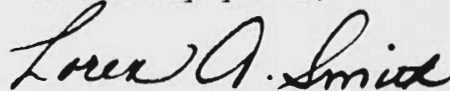
I have provided this summary of our compliance efforts, and the difficulties that surrounded them, to show our good faith attempt to respond to the Federal laws and the requirements as they were then known to us. As the Commission has now developed more fully its regulatory procedures and has promulgated definitive standards for "best efforts," we will demonstrate our complete willingness to comply by these further efforts to obtain the necessary information. Likewise we will prepare the amended report, continuing the practice initiated during the campaign of amending our filings whenever an error was discovered (which was inevitable in the first experience with such a massive undertaking) or further information was requested by the FEC staff.

Mr. Randall E. Johnson
Page 4
December 5, 1977

On the basis of the facts set forth above, including our current actions to fully comply with the "best efforts" standard, it is respectfully requested that Inquiry Number MUR 406 (77) be terminated by the FEC.

Thank you for your cooperation in this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Loren A. Smith".

LOREN A. SMITH
Secretary and Special Counsel
Citizens For The Republic
(formerly Citizens For Reagan)

**SRL
DELIVERY**

Citizens^{for the} Republic

1253-7th Street, Suite 200
Santa Monica, California 90401

Mr. Randall E. Johnson
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

December 9, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 406 Team #3 Brown

Please have the attached Interim Status Report on MUR 406 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of Dec. 15, 1977.

Thank you.

7004011200

December 8, 1977

In the Matter of)
) MUR 406 (77)
Citizens for Reagan)

EXERCISE SESSION
DEC 15 1977

On June 15, 1977, the Commission determined that there was reason to believe Citizens for Reagan had violated §434(b)(2) by failing to make best efforts to provide occupation and principal place of business information on its disclosure reports. Citizens for Reagan ("CFR") responded by explaining the efforts it made to obtain the information missing from its reports. On September 8, 1977, the Commission found reasonable cause to believe the efforts made by CFR did not qualify as "best efforts" and CFR had violated §434(b)(2).

A proposed conciliation agreement was sent to the CFR on October 6, 1977. A meeting was held on October 26, 1977 between counsel for CFR and two members of the General Counsel staff. CFR's attorneys said they would make a written response to our proposed conciliation agreement in about ten days. We received no response and on November 21, 1977, a letter was sent to Loren A. Smith, counsel for CFR, reminding him that the

conciliation period set forth in 437g(a)(5) is thirty days. The letter was delivered on November 29, 1977. Mr. Smith called on December 1, 1977, to say the letter was "in the mail" and we should receive it on the 2nd or 3rd of December. As of December 5, 1977, the letter had not arrived and we are trying to reach Mr. Smith. If we receive no response from Mr. Smith, we intend to recommend that the Commission find probable cause and file a lawsuit.

12/8/77
Date



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

November 21, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Loren A. Smith, Esquire
Box 98
Yorklyn, Delaware 19736

Re: MUR 406

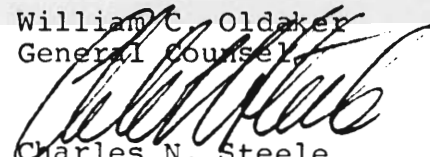
Dear Mr. Smith:

On October 26, 1977, you and Ed Meese met with Kathryn Kavanagh and Randall Johnson of our staff to discuss MUR 406. At that time you stated that you believed Respondent would not sign the conciliation agreement as proposed and you would, within a week, send us a letter outlining Respondent's position.

The conciliation period set forth in §437g(a)(5) is 30 days. Accordingly, we remind you that 2 U.S.C. §437g(a)(5)(B) provides that in the event conciliation fails, the Commission may determine that there is probable cause to believe that a violation has been committed and institute a civil action.

Please submit the materials which you wish the Commission to consider within five days of your receipt of this letter. If you have any questions, please call Kathryn Kavanagh at 202-523-4073.

William C. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Loren A. Smith, Esquire
Box 98
Yorklyn, Delaware 19736

Re: MUR 406

Dear Mr. Smith:

On October 26, 1977, you and Ed Meese met with Kathryn Kavanagh and Randall Johnson of our staff to discuss MUR 406. At that time you stated that you believed Respondent would not sign the conciliation agreement as proposed and you would, within a week, send us a letter outlining Respondent's position.

The conciliation period set forth in §437g(a)(5) is 30 days. Accordingly, we remind you that 2 U.S.C. §437g(a)(5)(B) provides that in the event conciliation fails, the Commission may determine that there is probable cause to believe that a violation has been committed and institute a civil action.

Please submit the materials which you wish the Commission to consider within five days of your receipt of this letter. If you have any questions, please call Kathryn Kavanagh at 202-523-4073.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

MUR 406

KAVANAGH

PS Form 3811, Apr. 1977

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

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

- ☒ Show to whom and date delivered. _____ \$
☐ Show to whom, date, and address of delivery. _____ \$
☐ RESTRICTED DELIVERY
 Show to whom and date delivered. _____ \$
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$ _____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Loren A Smith, Esquire
 Box 98
 Yorklyn, Delaware 19936

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943126	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4.

DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

November 1, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 406 Team #3

Please have the attached Interim Status Report on
MUR 406 distributed to the Commission and placed on the
Compliance Agenda for the Commission meeting of
November 10, 1977.

Thank you.

79040142095

In the Matter of)
) MUR 406 (77)
Citizens for Reagan)

On September 8, 1977, the Commission found reasonable cause to believe that Citizens for Reagan violated the Act by failing to make best efforts to provide the contributor occupation and principal place of business information required by §434(b).

11/1/77

Date _____

Wm. H. H. H.

William C. Oldaker
General Counsel

RE: MUR 406A(77)

Meese said that if we agreed ~~th~~ to not proceed with a formal conciliation agreement, that he "thought" that he could convince the ~~steering~~ steering committee of the CFR to make the mailing, which we ~~suggested~~ suggested in the proposed agreement, ~~vol~~ voluntarily and not out of matching funds. They asked what our estimate of the number of potential recipients of the mailing would be. I said less than 4500 ~~ix~~ (Joanne McSorely had estimated less than 4900). They said that their estimates were anywhere from 5,000 to 10,000 and the cost ~~of each letter letter mailed~~, ~~be~~ counting the costs of amending

the reports on the computer, would run about 25¢ a letter. Meese again said that he thought that the ~~xxxx~~ steering committee could be convinced, but ~~that~~ that he would like to know the Commission's position as soon as possible ~~in~~ because the CFR repayment date was approaching and he would not really want to have to hold money in escrow until ~~it~~ ~~was decided~~ the enforcement issue was decided (presumably if we proceed with demanding a conciliation agreement, ~~they~~ they may ^{have} hold matching funds to pay for the mailing).

Johnson asked the CFR representatives if there was anything in the agreement (proposed) which they ~~found particularly~~ ~~difficult~~ ~~with~~ took particular issue with. Meese said yes, he ~~said~~ said that the section which referred to the CFR having not ~~made~~ made best efforts, was a particular problem.

Johnson and I said that we would be expecting a formal statement of their position on this matter as soon as possible. They said that they would try to mail it by Friday. (October 28, 1977)



FEDERAL ELECTION COMMISSION

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

October 6, 1977

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

In accordance with the provisions of 2 U.S.C. §437g(a)(5)(A), I am enclosing a proposed conciliation agreement between the Federal Election Commission and Citizens for Reagan. If you wish to suggest any changes to this agreement, please do so within five working days of your receipt of this letter.

If you have any questions please contact Kathryn Kavanagh (Telephone No. 523-4073).

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

cc: Henry Buchanan



Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

In accordance with the provisions of 2 U.S.C. §437c(a)(3)(A) I am enclosing a proposed conciliation agreement between the Federal Election Commission and Citizens for Reagan. If you wish to suggest any changes to this agreement, please do so within five working days of your receipt of this letter.

If you have any questions please contact Kathryn Kavanaugh (Telephone No. 523-4673).

Sincerely,

William C. Oldaker
General Counsel

cc: Henry Buchanan

KKavanaugh In:9/30/77

(CITIZENS FOR REAGAN LETTERHEAD)

Dear Contributor:

The Federal Election Campaign Act of 1971, as amended, requires that our Committee report to the Federal Election Commission the occupation and principal place of business of each person who contributes in excess of \$100 to our Committee. 2 U.S.C. §434(b)(2).

Our records indicate that we do not have such information from you although you contributed in excess of \$100 to our Committee. In order for us to make the "best efforts" required by federal statute in obtaining this information, we request that you fill out the bottom portion of this letter and return it to us within five days.

Thank you.

Very truly yours,

Treasurer,
Citizens for Reagan

NAME: _____

ADDRESS: _____

OCCUPATION _____

PRINCIPAL PLACE OF BUSINESS: _____

BEFORE THE FEDERAL ELECTION COMMISSION

Citizens for Reagan)
Respondent)

MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 8, 1977, the Commission, by a vote of 6-0, approved the conciliation agreement submitted by the staff in the above-captioned matter, subject to the addition of language stating there would be no civil penalty sought unless the provisions of the conciliation agreement are violated by the respondent.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

September 1, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 406 (77)

Please have the attached Conciliation Agreement on MUR 406 (77) distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of September 8, 1977.

Thank you.

72040142093

BEFORE THE FEDERAL ELECTION COMMISSION

Citizens for Reagan) MUR 406 (77)
)
Respondent)

CONCILIATION AGREEMENT

7 3 0 4 0 1 1 2 0 9 9
This matter was initiated by the Federal Election Commission (hereinafter "the Commission") pursuant to information obtained in the normal course of carrying out its supervisory responsibilities. The Commission conducted an investigation and found reasonable cause to believe that Citizens for Reagan ("Respondent") a political committee registered pursuant to 2 U.S.C. §443, had violated 2 U.S.C. §434(b).

NOW THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. §437g(a)(5), do hereby agree as follows:

1. That the Commission has jurisdiction over Respondent and the subject matter of this proceeding.

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

3. That the pertinent facts in this matter are as follows:

a. During the campaign preceding the 1976 presidential election, Respondent failed to report the occupation and principal place of business to the Commission for approximately 35% of those individuals who contributed in excess of \$100 to Respondent.

b. The efforts undertaken by Respondent to obtain the occupation and principal place of business for those individuals who contributed in excess of \$100 to Respondent entailed mailing an additional solicitation letter that included space for the requisite information but did not indicate to recipients that said information had been previously omitted and was required by law.

4. That Respondent is required to report, in accordance with 2 U.S.C. §434(b)(2), "the full name and mailing address (occupation and the principal place of business, if any) of each person" contributing in excess of \$100.

5. That the treasurer and candidate of Respondent, having failed to report the occupation and principal place of business for each individual contributing in excess of \$100 must "show that best efforts have been used to obtain and submit the information required" in accordance with 2 U.S.C. §434(b)(14).

6. That Respondent, having failed to show that best efforts have been used to obtain the information, did not

comply with the requirements of 2 U.S.C. §434(b)(2).

Accordingly, Respondent will:

a. request the necessary information of those contributors whose occupation and principal place of business was omitted but required to be reported by sending by a first class mail to each such contributor at his/her last address known to Respondent the following letter on Respondent's letterhead within 15 days from the date of this agreement,

101112101
79040112101

b. file an amended report within 90 days from the date of this agreement showing name, address, amount of contribution(s), and the occupation and principal place of business for each contributor. If any of the required information is not available, the amended report shall indicate why it was not obtained.

c. pay a civil penalty in the amount of \$ within 30 days from the date of this agreement.

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

8. It is mutually agreed that this agreement shall become effective as of the date that both parties hereto have executed same and the Commission has approved the entire agreement.

FEDERAL ELECTION COMMISSION

DATE: _____

BY: _____

General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

CITIZENS FOR REAGAN

DATE: _____

BY: _____

Treasurer

[Citizens for Reagan letterhead]

Dear Contributor:

The Federal Election Campaign Act of 1971, as amended, requires that our committee report to the Federal Election Commission the occupation and principal place of business of each person who contributes in excess of \$100 to our committee. 2 U.S.C. §434(b)(2).

Our records indicate that we do not have such information from you although you contributed in excess of \$100 to our committee. In order for us to make the "best efforts" required by federal statute in obtaining this information, we request that you fill out the bottom portion of this letter and return it to us within five days.

Thank you.

Very truly yours,

Treasurer
Citizens for Reagan

Name _____
Address _____
Occupation _____
Principal Place of Business _____



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

August 17, 1977

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

The Commission has received the response submitted by Citizens for Reagan regarding a possible violation of the Act and has determined that there is reasonable cause to believe that Citizens for Reagan has violated reporting requirements of the Act as set forth in 2 U.S.C. §434(b).

As stated in our letter of June 20, 1977, to Henry Buchanan, 2 U.S.C. §434(b)(2) requires that occupation, address and principal place of business of contributors who give more than \$100 to a candidate or committee be included in the financial reports submitted by that candidate or committee.

The high error rate of the CFR, whereby the occupation and principal place of business was not reported for 35% of contributors giving more than \$100, and the efforts undertaken to obtain this information were the factors taken into consideration by the Commission.

It is provided in 2 U.S.C. §437g(a)(5)(A) that:

If the Commission determines that there is reasonable cause to believe that any person has committed . . . a violation of this Act . . . the Commission shall make every endeavor for a period of not less than 30 days to correct . . . such violation by informal methods of conference, conciliation, and persuasion, and to enter into a conciliation agreement with the person involved.



Therefore, we will be contacting you to arrange a meeting between representatives of the Citizens for Reagan and attorneys from this office. If you have any questions, please telephone Kathryn Kavanagh (202/523-4073), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

cc: Henry Buchanan

MUR 406 Kavanagh

PS Form 3811, Mar. 1976

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

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

2. **ARTICLE ADDRESSED TO:**
 Loren A Smith
 1811 N Highland St
 Arlington, VA 22201

3. **ARTICLE DESCRIPTION:**
 REGISTERED NO. 943884 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
 I have received the article described above.
 SIGNATURE ☒ Addressee ☐ Authorized agent
Loren A Smith

4. **DATE OF DELIVERY**
8/24/77

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

★ GSP: 1976-O-203-456

MUR 406 Kavanagh

PS Form 3811, Mar. 1976

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

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

2. **ARTICLE ADDRESSED TO:**
 Henry M Buchanan
 4706 Highland Ave
 Bethesda, Md 20014

3. **ARTICLE DESCRIPTION:**
 REGISTERED NO. 943885 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)
 I have received the article described above.
 SIGNATURE ☐ Addressee ☒ Authorized agent
Henry M Buchanan

4. **DATE OF DELIVERY**
AUG 23 1977

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

★ GSP: 1976-O-203-456

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

The Commission has received the response submitted by Citizens for Reagan regarding a possible violation of the Act and has determined that there is reasonable cause to believe that Citizens for Reagan has violated reporting requirements of the Act as set forth in 2 U.S.C. §434(b).

As stated in our letter of June 20, 1977, to Henry Buchanan, 2 U.S.C. §434(b)(2) required that occupation, address and principal place of business of contributors who give more than \$100 to a candidate or committee be included in the financial reports submitted by that candidate or committee.

The high error rate of the CTR, whereby the occupation and principal place of business was not reported for 35% of contributors giving more than \$100, and the efforts undertaken to obtain this information were the factors taken into consideration by the Commission.

It is provided in 2 U.S.C. §437c(a)(5)(A) that:

If the Commission determines that there is reasonable cause to believe that any person has committed . . . a violation of this Act . . . the Commission shall make every endeavor for a period of not less than 30 days to correct . . . such violation by informal methods of conference, conciliation, and persuasion, and to enter into a conciliation agreement with the person involved.

- 2 -

Therefore, we will be contacting you to arrange a meeting between representatives of the Citizens for Reagan and attorneys from this office. If you have any questions, please telephone Kathryn Kavanagh (202/523-4073) the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Ronald Reagan
Loren A. Smith

KKavanagh:cfb:8/3/77
cc: MUR 406 (77)

MEMORANDUM TO THE FILE

Aug. 23, 1977

FROM KATHRYN KAVANAGH

RE: Citizens for Reagan MUR 406(77)

Carl Hildebrand called me this morning at 9:35 and asked if there was any additional information I could give him regarding this matter. He said Loren Smith, Henry Buchanan and other counsel were meeting to determine CRR's strategy in this matter.

I told him that between the two letters that we had mailed to them, our position was clear. He asked if the percentage or best efforts were more important. I stressed the importance of the efforts since the law demands 100% compliance.

I suggested that the CFR meeting include drawing up a conciliation agreement which, in addition to our draft, would be a working paper for a meeting between FEC and CFR representatives.

He said that ~~Calif~~ "the people in California" had been aware of this potential problem for some time, but had told Buchanan not to worry, that if there was any real issue, they would make another mailing and that would be the end of it. I made no comment.

He said he would be calling me to set up a conciliation agreement meeting.

BEFORE THE FEDERAL ELECTION COMMISSION

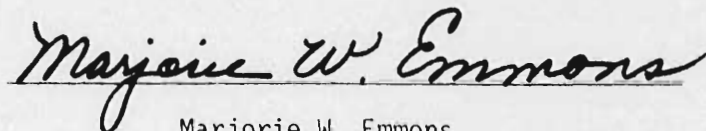
In the Matter of)
)
Citizens for Reagan)

MUR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 11, 1977, the Commission determined by a vote of 4-0 to find reasonable cause to believe that Citizens for Reagan has not shown that best efforts were used to obtain and submit the information required by 2 U.S.C. Section 434(b) and therefore, that Citizens for Reagan is in violation of 2 U.S.C. Section 434(b).

Commissioners Aikens and Harris were not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

August 4, 1977

MEMORANDUM TO: Marjorie Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 406 (77)

Please have the attached General Counsel's Report on MUR 406 (77) distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of August 11, 1977.

Thank you.



FEDERAL ELECTION COMMISSION

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

Mr. Loren A. Smith
1811 N. Highland Street
Arlington, Virginia 22201

Re: MUR 406 (77)

Dear Mr. Smith:

The Commission has received the response submitted by Citizens for Reagan regarding a possible violation of the Act and has determined that there is reasonable cause to believe that Citizens for Reagan has violated reporting requirements of the Act as set forth in 2 U.S.C. §434(b).

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It is provided in 2 U.S.C. §437g(a)(5)(A) that:

If the Commission determines that there is reasonable cause to believe that any person has committed . . . a violation of this Act . . . the Commission shall make every endeavor for a period of not less than 30 days to correct . . . such violation by informal methods of conference, conciliation, and persuasion, and to enter into a conciliation agreement with the person involved.



- 2 -

Therefore, we will be contacting you to arrange a meeting between representatives of the Citizens for Reagan and attorneys from this office. If you have any questions, please telephone Kathryn Kavanagh (202/523-4073) the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Ronald Reagan
Loren A. Smith

7001011211

T. J. & Co. Inc. 1000 1st St. N.W. Washington, D.C. 20001

President Ford Committee

1020 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20035 (202) 457-5100

ATTACHMENT A

January 14, 1977

TO WHOM IT MAY CONCERN:

THIS IS TO CERTIFY THAT DURING THE PERIOD MARCH - OCTOBER, 1976, I SPENT WITH MY ASSISTANT MARY SULLIVAN, AN AVERAGE OF THREE DAYS A WEEK IN RESEARCHING MISSING INFORMATION TO COMPLETE CONTRIBUTION RECORDS. THIS INCLUDED TELEPHONE CALLS TO BOTH INDIVIDUAL CONTRIBUTORS AND TO STATE POLITICAL ORGANIZATIONS. IN ADDITION TO OUR PERSONAL EFFORTS, THE ACKNOWLEDGMENT SYSTEM PROVIDED FOR THANK-YOU LETTERS TO INCLUDE CONTRIBUTION CARDS WHERE ADDITIONAL INFORMATION WAS REQUIRED.

Evelyn Griffin

EVELYNE GRIFFIN

Letter to Wagon via request from Mrs. Hunt, T. J. & Co. PTC

for PRESIDENT

ATTACHMENT B

Jackson

Jackson for President Committee
511 Second Street N.E. Washington, D.C. 20002
(202) 483-7600
Walter T. Skallerup, Jr., Treasurer

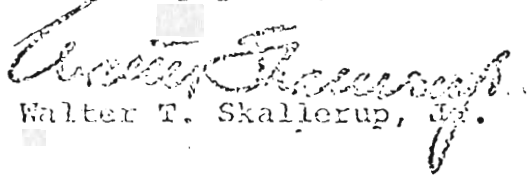
MEMORANDUM FOR CONTRIBUTORS
TO SENATOR JACKSON'S CAMPAIGN

The Federal Election Campaign Act as amended requires the treasurer of a political committee to keep a detailed and exact account of, among other things, the full name of the contributor and full address of his principal place of residence, and the occupation and principal place of business of every person making a contribution in the aggregate in excess of \$100.

Our committee records do not contain all this so I am writing to request that you provide us with this information so we may be in full compliance with the law.

Your filling in the blanks below and returning this sheet to us in the enclosed postage-paid envelope would be deeply appreciated. The term "occupation" means title, if any, or type of work. The term "principal place of business" means the name of the employer, or organization if self-employed, and the city of employment or self-employment.

Sincerely yours,


Walter T. Skallerup, Jr.

NAME:

RESIDENCE ADDRESS:

OCCUPATION:

PRINCIPAL PLACE OF BUSINESS:

B. continued

ELECTION
SECTION
Jackson

'76 TEL 11-11

1:59

Jackson for President Committee
511 Second Street N.E. Washington, D.C. 20002
(202) 488-7600
Walter T. Skallerup, Jr., Treasurer

February 10, 1976

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

Attention: Reports Examining Division

Gentlemen:

This is written in response to an unsigned statement from the Commission on FEC Form 12 dated February 4, 1976. The statement required additional information for our report of receipts and expenditures covering the period 10-1-75 through 12-31-75, and certain other information.

The information deemed inadequate related to occupation descriptions and principal place of business of contributors.

It is our regular practice upon receiving a contribution which does not include the occupation and principal place of business of the contributor when such information is required, to send a first class letter to the contributor requesting this information. A sample copy of our letter is attached. We send with this letter an addressed envelope, stamped with first class postage.

Our experience is that about one half of these inquiries are returned to us with the information we need to complete our report to the Federal Election Commission. In the case of the subject report which was filed January 31, 1976, approximately 400 contributors had not responded to our letter requesting occupation and principal place of business. Over a period of five days utilizing nine people we attempted to reach these individuals by telephone. We were able to reach 285 of these individuals who provided us with the information. Of the remaining 115 some were not available when the call was made; some had unlisted telephone numbers; the telephone lines were in use in the call was made and others were asked to provide the information with a return call and no return call was made.

3/11

Federal Election Commission
February 10, 1976

B continued

This Committee has made every reasonable effort to obtain the information required in the subject report. If you have any suggestions on how we might be able to obtain this information kindly let me know.

The FEC Form 12 also raised a question regarding Schedule C Part 9. Our Controller, Martin Katz, has been in touch with Nancy Davis of the FEC staff. This will be the subject of a letter which follows.

Sincerely yours,

Walter Skallerup
Walter T. Skallerup, Jr.

WTS/ER
Enclosure

10/11



RECEIVED
FEDERAL ELECTION
COMMISSION

ATTACHMENT C

15 NOV 10 PM 5:52

Jimmy Carter

Presidential Campaign

For America's third century, why not our best?

November 6, 1976

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Potter:

Enclosed are thirteen amended reports of Receipts and Expenditures covering the reporting periods commencing in January, 1975 through September, 1976. The reports are filed in response to various Requests for Additional Information for a Report of Receipts and Expenditures Filed Pursuant to the Federal Election Campaign Act of 1971, as Amended. In addition, a number of accounting adjustments (which were generated as a result of an internal audit) are reflected in the amended reports.

We believe that these reports represent the most comprehensive and accurate representation of political campaign financial activity in the history of American politics. Included in the reports is a total of eighty-three bank accounts located in thirty-nine states, the District of Columbia and Puerto Rico. A total of nearly 20,000 checks were issued to 7,500 vendors. Campaign contributions were received from 95,000 individuals and political action committees which represents 130,000 contributions. These statistics dramatically demonstrate the true nature of the Carter Presidential effort -- that of a grassroots operation where decisions (both political and financial) were made at the local level.

Specifically addressed in the amended reports are the following:

1. Full name/mailling address. Schedule B, Lines 20, 21 & 22

Each payee who received a check was researched to identify a correct mailing address. Directory assistance, campaign state coordinators, campaign contributor files, and various other contacts were utilized to obtain the necessary information. As a

result, over 90% of all payees (who received over 98% of all monies disbursed) have a mailing address.

2. Full name/ mailing address/ occupation/ principal place of business.

Schedule A, Lines 15 & 16

Ten thousand letters requesting additional information were mailed to Committee contributors for whom we did not have complete files. Five-thousand-four-hundred responses were received. The remaining 4,600 contributors were called (except those with unlisted telephone numbers) and we have obtained the information from approximately 3,500 contributors. Thus, in total, over 80% of our contributor files whose aggregate contribution exceeded \$100 now have occupations and principal places of business.

3. Purpose of expenditure. Schedule B, Lines 20, 21 & 22

Each disbursement (nearly 20,000 items in total) was reviewed for proper coding for account description and locale and was reviewed a second time by a staff of certified public accountants.

4. Debts and Obligations owed to the Committee. Schedule C, Line 25

Debts and obligations owed to the Committee have been restated to reflect only transportation receivables and monies due the Primary Committee from the General Election Committee.

5. Debts and obligations owed by the Committee. Schedule C, Line 26

Reports as originally filed covering all of 1975 and the months of January, 1976 through March, 1976 did not include a listing of itemized accounts payable. The amended reports include a listing of such payables as best we could reconstruct them.

6. Timely reporting of contributions received and disbursements.

In the past the Commission has questioned the Committee's practice of reporting financial activity in the month the information became available in Atlanta. This procedure was discussed with members of your staff and has been addressed in prior correspondence with the Commission. The amended reports reflect all financial activity (both receipts and disbursements) in the month the transaction occurred.

7. Aggregation of contributions. Schedule A, Lines 15 & 18

A review was made of all contributions to determine whether duplicate contributor files were established in error. When identified, all such duplicate files were purged from the records and the computer reports of contributions were rerun.

Continued

Special attention was given to the aggregation of contributions received from political action committees. As we have discussed with members of your staff, the Committee is not always aware of the extent to which various political action committees are organizationally related. Any assistance the Commission can provide in this area would be appreciated.

8. Itemization of loans, loan repayments and contribution refunds. Schedule B, Line 21

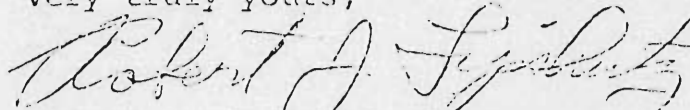
As requested, the amended reports itemize all expenditures on Schedule B, Line 21.

9. Excess contributions. Schedule A, Lines 15 & 18

All contributors who have contributed in excess of the legal maximum have been issued rebate checks. The Committee, upon receipt of a number of contributions, attributed the entire contribution to the signor of the check. We were later informed by the contributor that the contribution was in fact a donation from both the signor and his or her spouse. In the September 10, 1976 report, we have included a listing of allocations of contributions between spouses.

I would like to thank the members of your staff for the assistance they provided over the past months in aiding the Committee in our efforts to comply with the oftentimes complex and complicated Federal Election Laws.

Very truly yours,



Robert J. Lipshutz, Treasurer
Committee for Jimmy Carter

CHURCH

For President

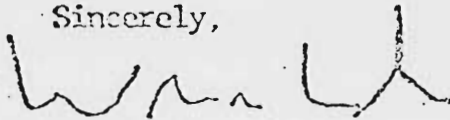
ATTACHMENT D

The Federal Election Commission requires certain information on all donors to political campaigns.

The items listed below are still required and I would appreciate if you would fill in the information and send it back to me in the enclosed self-addressed envelope.

Thank you for your prompt attention in handling the above request.

Sincerely,



William M. Landau
Treasurer
Church for President Committee

- ☐ Home Address _____
- ☐ Name of Business _____
- ☐ Title _____
- ☐ Business Address _____
- ☐ Signature _____

MGHLSAT HSB

2-044723E157002 06/05/76

ICS IPNRMCZ CSP

1 2135521087 MGM TDRN LOS ANGELES CA 06-05 1014P EST

Western Union

Mailgram

ATTACHMENT E

BROWN FOR PRESIDENT COMMITTEE D.B.
2049 CENTURY PARK EAST
LOS ANGELES CA 90067

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2135521087 MGM TDRN LOS ANGELES CA 100 06-05 1014P EST

ZIP

GEORGE JACOBS

8716 6TH AVE

INGLEWOOD CA 90304

WE VERY MUCH APPRECIATE YOUR CONTRIBUTION TO THE BROWN FOR PRESIDENT
COMMITTEE WE ALL THANK YOU WE ARE MISSING SOME VERY SIMPLE ADDITIONAL
PERSONAL INFORMATION ABOUT YOU FOR OUR CAMPAIGN REPORTS WHICH MUST BE
OBTAINED IMMEDIATELY PLEASE CALL LARRY SMITH, COLLECT, AT AREA CODE 213
5521087, SO THAT THE REPORT CAN BE COMPLETED

MARIANA R PFAELZER

TREASURER BROWN FOR PRESIDENT COMMITTEE

01:07 EST

MGHLSAT HSB

E continued

Name Mrs Albe Lipsey
Telephone 274-6781
Occupation Housewife
Employer (or Firm) _____
(If self-employed, check block) ☐
Business Address 815 No Camden Dr.
City Beverly Hills State Calif. Zip 90210

PLEASE FOLD, SEAL AND MAIL. NO POSTAGE REQUIRED

#51165-22

Name ALVARO DEEN
Residence Address 342 B-ST.
City BRAWLEY Zip 92227 Phone 344-1260
Title or Occupation FARMER
Business Address SALE
City _____ Zip _____ Phone _____

200.00

Please fill out. Federal law requires the above information. A copy of our report is filed with the Federal Election Commission, Washington, D.C. 20543, ID # C022835.

Honorable Leo T. McCarthy, Chairman

Marlana R. Placher, Treasurer, P. O. Box 67157, Los Angeles 90067.

(We may not accept corporate, labor union, or government contractor contributions.)

BROWN FOR PRESIDENT COMMITTEE
P.O. BOX 67457
LOS ANGELES, CALIFORNIA 90067

E continued

Thank you for your contribution to the BROWN FOR PRESIDENT COMMITTEE.

The FEDERAL ELECTIONS COMMISSION is now reviewing our contributions. In order for both the BROWN FOR PRESIDENT COMMITTEE and YOU to meet the requirements imposed by the 1976 Amendments to Title II and Title XXVI of the U.S. Codes, we need the following information:

☐ Contribution amount \$ _____ ☐ Check ☐ Cash

☐ Name _____

☐ Home Address _____

☐ Employer _____ ☐ Self-employed?

☐ Business address _____

☐ Joint contribution? Yes ☐ Amount \$ _____ No ☐

☐ Signature of spouse or joint contributor(s) _____

☐ Address of joint contributor(s) if different:

☐ The signature appearing on my check is that of _____,
who is authorized to sign for me, _____ (contributor).

☐ The contribution was a personal contribution. The name appearing on the
check, _____, is not a corporation. It is a
partnership ☐ or sole proprietorship ☐.

☐ SIGNATURE OF CONTRIBUTOR _____

The time to qualify with the FEDERAL ELECTIONS COMMISSION is limited;
therefore, your immediate attention to this request will be appreciated.

Sincerely,

This is a self-mailer. |
Please fold and return

Jeff Beaumont
Jeff Beaumont
Controller

ATTACHMENT F

FRONT OF ENVELOPE

Dear Governor Reagan:

I agree, you must have the funds to buy radio and TV time in order that you may speak directly to the American people on the issues of the day. My check, to help with this important project is enclosed:

☐ \$1,000 ☐ \$750 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50 ☐ \$20 ☐ \$_____ Other

A federal statute requires us to request the following information:

Please make your check payable to REAGAN MEDIA FUND and return in this postage-paid envelope.

Occupation _____

Business Address _____

City, State, Zip _____

MORE FEDERAL REGULATIONS: I certify that this check is a purely and personal contribution even though it may be made on a business, partnership, or other type of account. (If more than one individual is contributing, please specify the percentage attributable to each.)

Signature of contributor(s)

A Special Message from Governor Reagan...

In addition to your own contribution to my campaign, you can help by writing the names and addresses of two friends below who you think might be interested in making a donation. (Be sure to indicate whether Mr., Mrs., Miss, etc.). I'll make it a point to send them a letter also. Thanks.

NAME _____

NAME _____

ADDRESS _____

ADDRESS _____

CITY, STATE, ZIP _____

CITY, STATE, ZIP _____

INDIVIDUAL POLITICAL CONTRIBUTIONS ARE TAX-Deductible UP TO A TOTAL OF \$100 PER YEAR OR \$500 ON A JOINT RETURN.

In accordance with Federal legislation, we are not able to accept either (a) any corporate checks whatever, or (b) any personal contributions over \$1000. Citizens for Reagan may accept individual contributions up to \$1000 (for example, a husband and wife may each give \$1000) prior to a nominating convention; this may be repeated following the convention. A copy of our report will be filed with the Federal Election Commission and will be available for purchase from that office in Washington, D.C.

Henry M. Buchanan, Treasurer

BACK OF ENVELOPE

DID YOU RECEIVE MORE THAN ONE COPY OF THIS APPEAL?

Please forgive us if you did. We use hundreds of mailing lists containing millions of names. We try to unduplicate as much as possible, but the cost of unduping must be weighed against the cost of sending several copies to some individuals. If you did receive a duplicate, PLEASE pass it along to a friend so that we can make our dollars go as far as possible. Thank you for your kind understanding.

Make necessary corrections in address shown below

50638000AGTR RM

MR ROY AGETER

H7

DES MOINES IA 50638

MAIL YOUR CHECK TODAY!

BUSINESS REPLY MAIL

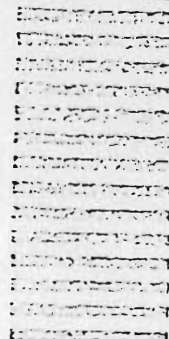
No Postage Stamp Necessary if Mailed in the United States

Postage Will Be Paid By:

Governor Ronald Reagan
Citizens for Reagan
Suite 800
1835 K Street, N.W.
Washington, D.C. 20006

FIRST CLASS

Permit No.
72124
Wash. D.C.



LOREN A. SMITH
ATTORNEY AT LAW
1811 N. HIGHLAND ST.
ARLINGTON, VIRGINIA 22201
PHONE: (703) 524-1113

RECEIVED
FEDERAL ELECTION
COMMISSION

77 JUL 7 AM 10:44
July 5, 1977

772031

ATTACHMENT G

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

Attn.: David Spiegel, Esq. or Kathryn Kavanagh, Esq.
Re.: MUR 406 (77)

Dear Mr. Oldaker:

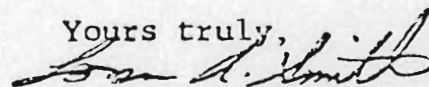
This letter is to officially inform you that as Counsel to Citizens for the Republic (formerly Citizens for Reagan) for election law purposes I will be representing the Committee and its former Treasurer, Henry M. Buchanan, in this matter. Please address all further correspondence to me with a copy to Mr. Buchanan.

During the period of the presidential primary campaign our Committee complied with all available Commission regulations and guidelines. To date our good faith efforts in this respect have not been questioned by any member of the Commission's audit staff. It is our strong belief that our two follow-up mailings, noted in your letter of the 20th of June, fully complied with our legal obligation.

During my testimony before the Commission on its Disclosure Regulations in 1975 I raised the question of a committee's affirmative duty in this area. I suggested some affirmative guidance or rule would be helpful. I think the question is still an important one. In view of the unsettled state of the regs on this subject I believe it should be addressed in a proceeding other than a complaint.

I would therefore request the dismissal of MUR 406 (77). Pursuant to this I would request an opportunity to meet with the staff to discuss the matter, should you or they feel it necessary. I would further suggest, and offer to help in, the establishment of a Commission task force to study this issue. Members of the staff and members of the staffs of various campaigns might together formulate workable suggestions. This approach worked well in other areas in past Commission practices.

Yours truly,


Loren A. Smith

cc: Henry M. Buchanan, C.P.A.

ATTACHMENT H

CITIZENS FOR REAGAN

~~XXXXXXXXXXXX~~ XXXXX Washington, D.C. 20006 ~~XXXXXXXXXXXX~~ 202/452-767X

4706 Highland Avenue, Bethesda, Maryland 20014

772233

July 26, 1977

Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20001

Re: MUR 406(77)

Dear Mr. Oldaker:

Per my letter of July 11, 1977 I am sending you copies of letters that were mailed to contributors. These represent only a sample of the thousands that were sent to contributors for various reasons in order to comply with Federal Election Commission regulations.

I have also enclosed a copy of the letter, which you have on file, sent to contributors requesting their occupation and business address. In your correspondence of June 20th you stated there were two follow-up mailings; however, I was informed by Eberly and Associates, the company responsible for the distribution, that there were seven mailings of this request. The dates of these are listed on the enclosed copy.

Please contact my office if you need further information on this matter.

Sincerely,

Thy on 30.10.1919

Henry M. Buchanan

HMB:pw
Enclosures

DID YOU RECEIVE MORE THAN ONE COPY OF THIS APPEAL?
Please forgive us if you did. We use hundreds of mailing lists containing millions of names. We try to unduplicate as much as possible, but the cost of unduping must be weighed against the cost of sending several copies to some individuals. If you did receive a duplicate, PLEASE pass it along to a friend so that we can make our dollars go as far as possible. Thank you for your kind understanding.

H continued

Make necessary corrections in address shown below

MAIL YOUR CHECK TODAY!

BUSINESS REPLY MAIL

No Postage Stamp Necessary if Mailed in the United States

Postage Will Be Paid By:

Governor Ronald Reagan
Citizens for Reagan
Suite 800
1835 K Street, N.W.
Washington, D.C. 20006

FIRST CLASS

Permit No.
72124
Wash. D.C.

Dates mailed.

11-10-75

1-10-76

2-29-76

3-29-76

4-15-76

5-15-76

6-25-76

H continued

Dear Governor Reagan:

I agree, you must have the funds to buy radio and TV time in order that you may speak directly to the American people on the issues of the day. My check, to help with this important project is enclosed:

☐ \$1,000 ☐ \$750 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50 ☐ \$20 ☐ \$_____ Other

✓ A federal statute requires us to request the following information:

Please make your check payable to REAGAN MEDIA FUND and return in this postage-paid envelope.

- ✓ Occupation _____
✓ Business Address _____
✓ City, State, Zip _____

MORE FEDERAL REGULATIONS I certify that this check is a purely and personal contribution even though it may be made on a business, partnership, or other type of account. (If more than one individual is contributing, please specify the percentage attributable to each.)

Signature of contributor(s)

A Special Message from Governor Reagan...

In addition to your own contribution to my campaign you can help by writing the names and addresses of two friends below who you think might be interested in making a donation (be sure to indicate whether Mr., Mrs., Miss, etc.). I'll make it a point to send them a letter also. Thanks.

NAME _____

NAME _____

ADDRESS _____

ADDRESS _____

CITY, STATE, ZIP _____

CITY, STATE, ZIP _____

INDIVIDUAL POLITICAL CONTRIBUTIONS ARE TAX-DEDUCTIBLE UP TO A TOTAL OF \$100 PER YEAR OR \$200 ON A JOINT RETURN.

In accordance with federal legislation, we are not able to accept either (a) any corporate checks whatever, or (b) any personal contributions over \$1000. Citizens for Reagan may accept individual contributions up to \$1000 (for example, a husband and wife may each give \$1000) prior to a nominating convention; this may be repeated following the convention. A copy of our report will be filed with the Federal Election Commission and will be available for purchase from that office in Washington, D.C.

Henry M. Buchanan, Treasurer

CITIZENS FOR REAGAN
1855 K Street, N.W., Suite 8
Washington, D. C. 20006

9/3/76

Hollie J. Suist
119 N. Fourth St.
Oregon, Ill. 61061

H continued

Dear Reagan Contributor:

Thank you for your contribution of \$ 50- written on
check # 6168 which we received 7/12/76.

In order for our committee to comply with Federal Election
Commission regulations we need your help. PLEASE CHECK THE APPROPRIATE
ITEM BELOW AND RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED
ENVELOPE.

My check headed Operating Account is a :

- ☒ personal check and should be attributed to: (Fill in information
below.)
- ☐ partnership check (If so, please complete the attached form.)
- ☐ corporate check

Hollie A. Suist 9/7/76
SIGNATURE OF CONTRIBUTOR (IN INK) DATE

Home Address: 201 Clay St
Oregon Ill 61061

We thank you for your generous contribution to our campaign.
We also thank you for helping us to meet these federal requirements.
The very close fight we were able to make was in large part due to
the many generous contributors like yourself. Thank you.

Sincerely,

Loren A. Smith
Loren A. Smith
General Counsel

BB

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D.C. 20006

H continued

AUG 15, 1976

ROBERT D. GUARINO

334 SMITH WRENCH ST

HIGH POINT, N.C. 27260


Dear Reagan Contributor:

Thank you for your contribution of \$ 25⁰⁰ written on check # 727
which we received 5-10-76.

In order for your contribution to be matched with Presidential Election Campaign Funds we need your help. PLEASE CHECK THE APPROPRIATE ITEM BELOW AND RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED ENVELOPE.

My check headed P.E. & ASSOCIATES is a:

- ☒ personal check and should be attributed to: (Fill in information below.)
☐ partnership check (If so, please complete the attached form.)
☐ corporate check (If so, we will refund your contribution since we cannot accept corporate contributions.)

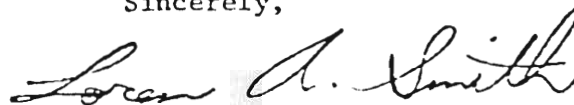

SIGNATURE OF CONTRIBUTOR (IN INK)

8/9/76
DATE

Home Address: 506 EMERY WOOD DRIVE
HIGH POINT, N.C. 27260

We thank you for your generous contribution to our campaign. We also thank you for helping us to meet these federal requirements. With your help we will elect Governor Reagan President in 1976.

Sincerely,



Loren A. Smith
General Counsel

continued

Go Get 'em!

August 5, 1976

I. Guerke
917 Naudain Ave
Claymont, DE. 19703

Dear Reagan Contributor:

Thank you for your contribution of \$ 25.00 written on check # 2655
which we received May 17.

In order for your contribution to be matched with Presidential Election Campaign Funds we need your help. PLEASE CHECK THE APPROPRIATE ITEM BELOW AND RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED ENVELOPE.

My check headed Special is a:

- ☒ personal check and should be attributed to: (Fill in information below.)
☐ partnership check (If so, please complete the attached form.)
☐ corporate check (If so, we will refund your contribution since we cannot accept corporate contributions.)

I. Guerke
SIGNATURE OF CONTRIBUTOR (IN INK)

8/13/76
DATE

Home Address: 917 Naudain Ave
Claymont, Delaware 19703

We thank you for your generous contribution to our campaign. We also thank you for helping us to meet these federal requirements. With your help we will elect Governor Reagan President in 1976.

Sincerely,

Loren A. Smith

Loren A. Smith
General Counsel

CITIZENS FOR REAGAN
2021 "L" Street, NW Suite 340
Washington, D.C. 20036
202-223-8560

\$15.00

perd

May 25, 1976

Eugene Guazzo, M.D.

It continued

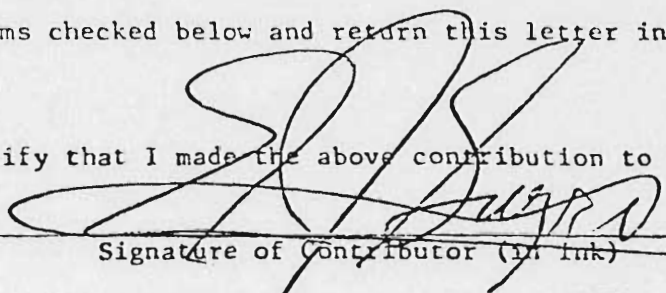
Chaptico, Md. 20621

Dear Reagan Contributor:

Thank you for your check of \$20.⁰⁰ which
we received on 1/22/76

The bureaucratic regulations from Washington are still flowing freely.
On October 30, 1975 the Federal Election Commission imposed more requirements on our
campaign. In order to comply with these additional regulations we need your help.
Please complete the items checked below and return this letter in the enclosed enve-
lope.

☒ I certify that I made the above contribution to Citizens for Reagan

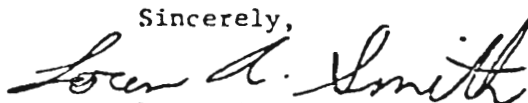

Signature of Contributor (in ink)

☒ My present home address is correct above ☐

My present home address is _____

We thank you for your generous contribution to our campaign. We also
thank you for helping us to meet these new Commission regulations. With your help
we will elect Governor Reagan President in 1976.

Sincerely,



Loren A. Smith
General Counsel

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D. C. 20006

H continued

Don Van Horn
456 West Alameda St
Harmond, Ca 94541

Dear Reagan Contributor:

check # 215 Partnership contribution of \$76 written on
received _____

No partnership
Partnership Check _____ should
be attributed to partners: add nothing here

Name: Wesley Henry Name: _____

Home Address: 677 Jan Ave Home Address: Hayward, California 94541

INK
SIGNATURE: _____
*PERCENTAGE OF INTEREST
IN PARTNERSHIP: _____

INK
SIGNATURE: _____
*PERCENTAGE OF INTEREST
IN PARTNERSHIP: _____

Name: _____ Name: _____

Home Address: _____ Home Address: _____

INK
SIGNATURE: _____
*PERCENTAGE OF INTEREST
IN PARTNERSHIP: _____

INK
SIGNATURE: _____
*PERCENTAGE OF INTEREST
IN PARTNERSHIP: _____

P.S. Please return this to our committee as soon as possible.
Thank you.

THIS FORM TO BE COMPLETED
FOR PARTNERSHIP CHECKS

Citizens for Reagan For President

Copy

H continued

October 28, 1975

Mr. Paul Laxalt
Chairman

John P. Sears
Exec. Vice Ch.

George Cook

R. Gross

Guie B. Nunn

Mr. Stanhope C. Ring

Henry Buchanan
Treasurer

Dear Mr. Henderson:

Thank you for your generous contribution to our efforts to elect Governor Reagan as our next President. With your help and support we will win.

The contribution we received from you was on a business check. Under federal election laws corporate contributions to any federal campaign are illegal and must not be accepted and must be returned to the contributor. We assume that your check was non-corporate and have deposited it. If it was a corporate check please let us know and we will return it to you. (We can, of course, accept personal contributions in amounts of up to \$1,000 in total from any individual).

A new federal regulation also requires us to obtain certain information from any partnership contributor. If you are a partnership we would also appreciate your helping us comply with the federal regulations by forwarding that information to us.

Your help in meeting the requirements of these sometime complicated federal legal requirements is greatly appreciated. Thank you so much.

Sincerely,

Loren A. Smith
General Counsel

Mr. Clifford W. Henderson
Founder Properties, Inc.
Post Office Box 1 - 73-651 El Paseo
Palm Desert, California 92260

Citizens for Reagan

For President

H continued

February 5, 1976

Sen. Paul Laxalt
Chairman

John P. Sears
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan
Treasurer

5/12/76 *751210 B*
Mr. and Mrs. D. C. Heyl
6 Peacock Lane
Rolling Hills Estates, California 90274

Dear Reagan Contributor:

Thank you for your generous contribution of \$1,000.00.

The bureaucratic regulations from Washington are still flowing freely. In order for our committee to receive matching funds of up to \$250.00 per person, we need both the husband's and the wife's signatures for joint account checks. In order to comply with these new regulations, would you both please sign below:

David C. Heyl
Doreen S. Heyl

We thank you for your generous contribution to our campaign, and for your helping us to meet these new regulations. With your help we will elect Governor Reagan President in 1976.

Sincerely,

Loren A. Smith

Loren A. Smith
General Counsel

H continued

CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

June 28, 1976

Dear Mrs. Parks:

Thank you very much for your contribution to Citizens for Reagan. We earnestly believe that you and other contributors will make it possible for Ronald Reagan to become the next President of the United States.

Under federal election law we can only accept contributions from United States citizens. Since your residence is in a foreign country, we must have a certification from you in writing that you are a United States citizen living in a foreign country or we must return your contribution to you. This is required by the Federal Election Commission.

If you are a United States citizen, please sign this letter on the line indicated below and return it to us in the enclosed envelope.

Thank you for your cooperation in meeting these regulations.

Sincerely,

Loren A. Smith
General Counsel

Mrs. H. R. Parks
Signature

CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

June 11, 1976

H continued

Attn: OPERATIONS

We have received a contribution from a customer of your bank. In order to properly comply with regulations set up by the Federal Election Commission, it is necessary that we have an address with the contribution. We realize that your bank's policy prohibits you from giving us this information directly, however, we would appreciate your forwarding this letter and the enclosed envelope to:

JANIS H. CROWHURST

Account #: 1222 1726 149 090 493

Dear Contributor:

Thank you for your contribution of \$ 2500 written on
check # dated JUNE 5, 1976.

We apologize for contacting you through your bank, however, the Federal Election Commission requires us to have your home address in order to match your contribution with Presidential Election Campaign Funds. Please write your correct address in the space provided and return this letter in the enclosed envelope.

Janis H. Crowhurst Mrs. Janis H. Crowhurst
1585 Riverside Drive
Providence 91107, Calif. 213-419-1000
BS16503
Janis H. Crowhurst June 1976
Signature Date

Thank you again for your contribution and your help in meeting these federal requirements.

Sincerely,

Paul A. Russo

Paul A. Russo
Finance Division

PR/tn

Citizens for Reagan - Senator Paul Craig, Chairman, Henry M. E. B. Treasurer
A copy of our report is filed with and available to the public from the Federal Election Commission, Washington, D.C. 20046



2001003

CITIZENS FOR REAGAN

~~1325 K Street, N.W., Washington, D.C. 20006~~
4706 Highland Avenue, Bethesda, Maryland 20014

772223

July 26, 1977

Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20001

Re: MUR 406(77)

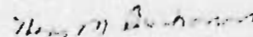
Dear Mr. Oldaker:

Per my letter of July 11, 1977 I am sending you copies of letters that were mailed to contributors. These represent only a sample of the thousands that were sent to contributors for various reasons in order to comply with Federal Election Commission regulations.

I have also enclosed a copy of the letter, which you have on file, sent to contributors requesting their occupation and business address. In your correspondence of June 20th you stated there were two follow-up mailings; however, I was informed by Eberly and Associates, the company responsible for the distribution, that there were seven mailings of this request. The dates of these are listed on the enclosed copy.

Please contact my office if you need further information on this matter.

Sincerely,



Henry M. Buchanan

HMB:pw
Enclosures

DID YOU RECEIVE MORE THAN ONE COPY OF THIS APPEAL?

Please forgive us if you did. We use hundreds of mailing lists containing millions of names. We try to unduplicate as much as possible, but the cost of unduping must be weighed against the cost of sending several copies to some individuals. If you did receive a duplicate, PLEASE pass it along to a friend so that we can make our dollars go as far as possible. Thank you for your kind understanding.

Make necessary corrections in address shown below

MAIL YOUR CHECK TODAY!

BUSINESS REPLY MAIL

No Postage Stamp Necessary if Mailed in the United States

Postage Will Be Paid By:

Governor Ronald Reagan
Citizens for Reagan
Suite 800
1835 K Street, N.W.
Washington, D.C. 20006

FIRST CLASS

Permit No.
72124
Wash. D.C.

Dates mailed

11-10-75

1-10-76

2-29-76

3-29-76

4-15-76

5-15-76

6-25-76

79040142140

Dear Governor Reagan:

I agree, you must have the funds to buy radio and TV time in order that you may speak directly to the American people on the issues of the day. My check, to help with this important project is enclosed:

☐ \$1,000 ☐ \$750 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50 ☐ \$20 ☐ \$_____ Other

✓ A federal statute requires us to request the following information:

Please make your check payable to REAGAN MEDIA FUND and return in this postage-paid envelope.

- ✓ Occupation _____
✓ Business Address _____
✓ City, State, Zip _____

MORE FEDERAL REGULATIONS I certify that this check is a purely and personal contribution even though it may be made on a business, partnership, or other type of account. (If more than one individual is contributing, please specify the percentage attributable to each.)

Signature of contributor(s)

A Special Message from Governor Reagan...

In addition to your own contribution to my campaign you can help by writing the names and addresses of two friends below who you think might be interested in making a donation (be sure to indicate whether Mr., Mrs., Miss, etc.). I'll make it a point to send them a letter also. Thanks.

NAME _____

NAME _____

ADDRESS _____

ADDRESS _____

CITY, STATE, ZIP _____

CITY, STATE, ZIP _____

INDIVIDUAL POLITICAL CONTRIBUTIONS ARE TAX-DEDUCTIBLE UP TO A TOTAL OF \$100 PER YEAR OR \$200 ON A JOINT RETURN.

In accordance with federal legislation, we are not able to accept either (a) any corporate checks whatever, or (b) any personal contributions over \$1000. Citizens for Reagan may accept individual contributions up to \$1000 (for example, a husband and wife may each give \$1000) prior to a nominating convention; this may be repeated following the convention. A copy of our report will be filed with the Federal Election Commission and will be available for purchase from that office in Washington, D.C.

Henry M. Buchanan, Treasurer

7 9 0 4 0 1 4 2 1 4 1

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D. C. 20006

9/3/76

Hollie J. Quist
119 N. Toward St.
Oregon, Ill. 61061

Dear Reagan Contributor:

Thank you for your contribution of \$ 50- written on
check # 6168 which we received 7/12/76.

In order for our committee to comply with Federal Election
Commission regulations we need your help. PLEASE CHECK THE APPROPRIATE
ITEM BELOW AND RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED
ENVELOPE.

My check headed Operating Account is a :

- ☒ personal check and should be attributed to: (Fill in information
below.)
- ☐ partnership check (If so, please complete the attached form.)
- ☐ corporate check

Hollie A. Quist 9/7/76
SIGNATURE OF CONTRIBUTOR (IN INK) DATE

Home Address: 201 Clay St
Oregon, Ill. 61061

We thank you for your generous contribution to our campaign.
We also thank you for helping us to meet these federal requirements.
The very close fight we were able to make was in large part due to
the many generous contributors like yourself. Thank you.

Sincerely,

Loren A. Smith
Loren A. Smith
General Counsel

BB

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D.C. 20006

AUG 5, 1976

ROBERT D GUARINO

334 SOUTH WRENN ST

HIGH POINT, N.C. 27260

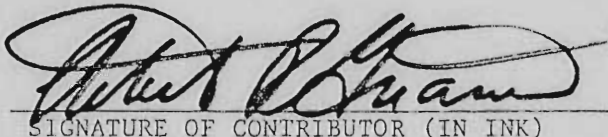
Dear Reagan Contributor:

Thank you for your contribution of \$ 25.00 written on check # 737
which we received 5-10-76.

In order for your contribution to be matched with Presidential Election
Campaign Funds we need your help. PLEASE CHECK THE APPROPRIATE ITEM BELOW AND
RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED ENVELOPE.

My check headed R E & ASSOCIATES is a:

- ☒ personal check and should be attributed to: (Fill in information below.)
☐ partnership check (If so, please complete the attached form.)
☐ corporate check (If so, we will refund your contribution since we cannot
accept corporate contributions.)

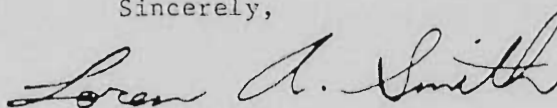

SIGNATURE OF CONTRIBUTOR (IN INK)

8/9/76
DATE

Home Address: 506 EMERY WOOD DRIVE
HIGH POINT, N.C. 27260

We thank you for your generous contribution to our campaign. We also thank
you for helping us to meet these federal requirements. With your help we will elect
Governor Reagan President in 1976.

Sincerely,



Loren A. Smith
General Counsel

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D.C. 20006

Go Get 'em!

August 5, 1976

I Guerke
917 Naudain Ave
Claymont, DE. 19703

Dear Reagan Contributor:

Thank you for your contribution of \$ 25.00 written on check # 365
which we received May 17.

In order for your contribution to be matched with Presidential Election
Campaign Funds we need your help. PLEASE CHECK THE APPROPRIATE ITEM BELOW AND
RETURN THIS LETTER WITH ANY ATTACHMENTS IN THE ENCLOSED ENVELOPE.

My check headed Special is a:

- ☒ personal check and should be attributed to: (Fill in information below.)
☐ partnership check (If so, please complete the attached form.)
☐ corporate check (If so, we will refund your contribution since we cannot
accept corporate contributions.)

I Guerke
SIGNATURE OF CONTRIBUTOR (IN INK)

8/13/76
DATE

Home Address: 917 Naudain Ave
Claymont, Delaware 19703

We thank you for your generous contribution to our campaign. We also thank
you for helping us to meet these federal requirements. With your help we will elect
Governor Reagan President in 1976.

Sincerely,

Loren A. Smith

Loren A. Smith
General Counsel

CITIZENS FOR REAGAN
2021 "L" Street, NW Suite 340
Washington, D.C. 20036
202-223-8560

Hand \$15.00
May 25, 1976

Eugene Guazzo, M.D.

Chaptice, Md 20621

Dear Reagan Contributor:

Thank you for your check of \$20.00 which
we received on 1/22/76

The bureaucratic regulations from Washington are still flowing freely.
On October 30, 1975 the Federal Election Commission imposed more requirements on our
campaign. In order to comply with these additional regulations we need your help.
Please complete the items checked below and return this letter in the enclosed enve-
lope.

☒ I certify that I made the above contribution to Citizens for Reagan

Eugene Guazzo
Signature of Contributor (in ink)

☒ My present home address is correct above ☐

My present home address is _____

We thank you for your generous contribution to our campaign. We also
thank you for helping us to meet these new Commission regulations. With your help
we will elect Governor Reagan President in 1976.

Sincerely,

Loren A. Smith

Loren A. Smith
General Counsel

79040142145

CITIZENS FOR REAGAN
1835 K Street, N.W., Suite 800
Washington, D. C. 20006

Wesley Henry
456 West Ardmore Rd
Harmond Ca 94544

Dear Reagan Contributor:

check # 215 Partnership contribution of \$76 written on
received _____.

No partnership
Partnership Check _____ should
be attributed to partners: Wesley Henry

Name: Wesley Henry Name: _____

Home Address: 677 Jan Ave Home Address: _____

INK SIGNATURE: _____ INK SIGNATURE: _____
*PERCENTAGE OF INTEREST IN PARTNERSHIP: _____ *PERCENTAGE OF INTEREST IN PARTNERSHIP: _____

Name: _____ Name: _____

Home Address: _____ Home Address: _____

INK SIGNATURE: _____ INK SIGNATURE: _____
*PERCENTAGE OF INTEREST IN PARTNERSHIP: _____ *PERCENTAGE OF INTEREST IN PARTNERSHIP: _____

P.S. Please return this to our committee as soon as possible.
Thank you.

THIS FORM TO BE COMPLETED
FOR PARTNERSHIP CHECKS

Citizens for Reagan For President

Copy

October 28, 1975

Sen. Paul Laxalt
Chairman

John P. Sears
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan
Treasurer

Dear Mr. Henderson:

Thank you for your generous contribution to our efforts to elect Governor Reagan as our next President. With your help and support we will win.

The contribution we received from you was on a business check. Under federal election laws corporate contributions to any federal campaign are illegal and must not be accepted and must be returned to the contributor. We assume that your check was non-corporate and have deposited it. If it was a corporate check please let us know and we will return it to you. (We can, of course, accept personal contributions in amounts of up to \$1,000 in total from any individual).

A new federal regulation also requires us to obtain certain information from any partnership contributor. If you are a partnership we would also appreciate your helping us comply with the federal regulations by forwarding that information to us.

Your help in meeting the requirements of these sometime complicated federal legal requirements is greatly appreciated. Thank you so much.

Sincerely,

Loren A. Smith
General Counsel

Mr. Clifford W. Henderson
Founder Properties, Inc.
Post Office Box 1 - 73-651 El Paseo
Palm Desert, California 92260

Citizens for Reagan

For President

February 5, 1976

Sen. Paul Laxalt
Chairman

John P. Sears
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan
Treasurer

Mr. and Mrs. D. C. Heyl

6 Peacock Lane

Rolling Hills Estates, California 90274

Dear Reagan Contributor:

Thank you for your generous contribution of \$1,000.00.

The bureaucratic regulations from Washington are still flowing freely. In order for our committee to receive matching funds of up to \$250.00 per person, we need both the husband's and the wife's signatures for joint account checks. In order to comply with these new regulations, would you both please sign below:

Loren A. Smith
D. C. Heyl

We thank you for your generous contribution to our campaign, and for your helping us to meet these new regulations. With your help we will elect Governor Reagan President in 1976.

Sincerely,

Loren A. Smith

Loren A. Smith
General Counsel



CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

June 28, 1976

Dear Mrs. Parks:

Thank you very much for your contribution to Citizens for Reagan. We earnestly believe that you and other contributors will make it possible for Ronald Reagan to become the next President of the United States.

Under federal election law we can only accept contributions from United States citizens. Since your residence is in a foreign country, we must have a certification from you in writing that you are a United States citizen living in a foreign country or we must return your contribution to you. This is required by the Federal Election Commission.

If you are a United States citizen, please sign this letter on the line indicated below and return it to us in the enclosed envelope.

Thank you for your cooperation in meeting these regulations.

Sincerely,

Loren A. Smith
General Counsel

Mrs. H. P. Parks

Signature

CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7676

June 11, 1976

Attn: OPERATIONS

We have received a contribution from a customer of your bank. In order to properly comply with regulations set up by the Federal Election Commission, it is necessary that we have an address with the contribution. We realize that your bank's policy prohibits you from giving us this information directly, however, we would appreciate your forwarding this letter and the enclosed envelope to:

JANE H. CROWHURST

Account #: 122 2 1726 149 090 493

Dear Contributor:

Thank you for your contribution of \$ 2500 written on
check # dated JUNE 5, 1976.

We apologize for contacting you through your bank, however, the Federal Election Commission requires us to have your home address in order to match your contribution with Presidential Election Campaign Funds. Please write your correct address in the space provided and return this letter in the enclosed envelope.

Jane H. Crowhurst Mt. Airy, NC
1585 Riverside Drive
Reading 91107, Conn (213-Telephone)
BS10503

Jane H. Crowhurst
Signature

June 11, 1976
Date

Thank-you again for your contribution and your help in meeting these federal requirements.

Sincerely,

Paul A. Russo

Paul A. Russo
Finance Division

PR/tn

Citizens for Reagan - Senator Paul Everett Chairman, Henry M. Buchanan, Treasurer
A copy of our report is filed with and available to the public from the Federal Election Commission, Washington, D.C. 20460

Citizens for Reagan For President

Sen. Paul Laxalt
Chairman

John P. Sears
Exec. Vice Ch.

George Cook

H. R. Gross

Louie B. Nunn

Mrs. Stanhope C. Ring

Henry Buchanan
Treasurer

December 17, 1975

Dear Sir:

Thank you for the generous contribution to Citizens for Reagan received by us on

However, under federal law our campaign cannot accept corporate campaign contributions or contributions received on corporate checks. Therefore, we have to return the enclosed check to you.

If you still wish to personally contribute to our efforts to elect Governor Reagan as our next President, and we sincerely hope you do, we can accept individual contributions of \$1,000 or less. (No single individual may contribute more than \$1,000 to a federal campaign under current federal law). These must be on individual checks. If a husband and a wife each want to give the maximum amount they must use separate checks.

Again, thank you for your support and please bear with us in trying to comply with the requirements of the new federal election laws.

Sincerely,

Loren A. Smith
General Counsel

Esco Incorporated
Post Office Box 268
Cuyahoga Falls, Ohio 44222

Enclosure

CITIZENS FOR REAGAN

~~1325 K Street N.W. x Washington, D.C. 20006~~

4706 Highland Avenue

Bethesda, Maryland 20014

Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20001

ATTN: Kathryn Kavanagh



CITIZENS FOR REAGAN

1835 K Street, N.W. Washington, D.C. 20006 • 202/462-7678
4706 HIGHLAND AVENUE, BETHESDA, MARYLAND 20014

400 934

772154

July 11, 1977

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20001


Attn: Kathryn Kavanagh, Esq.

Dear Mr. Oldaker:

This letter is to confirm that Loren Smith will represent Citizens for Reagan with respect to MUR40-(77), however, this office will continue to assist your staff with the same cooperation as we have demonstrated in the past.

At the present time, we are investigating other follow-up mailings and direct phone communication to contributors who did not furnish their occupation or business address. When this information is document, it will be forwarded to your office.

Sincerely,


Henry M. Buchanan

HMB/aet

CITIZENS FOR REAGAN

1835 X 9544 N XXX WASHINGTON XXX 20006

4706 Highland Ave, Bethesda, Md. 20014-0000 15 JUL 1977



CERTIFIED

No. 826265

MAIL

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20001

Attn: Kathryn Kavanagh, Esq.

A handwritten signature in ink, possibly reading "J. C. Oldaker", written over a rectangular area.

400831
Loren A. Smith

ATTORNEY AT LAW

1811 N. HIGHLAND ST.
ARLINGTON, VIRGINIA 22201

PHONE: (703) 524-1113

77 JUL 7 AM 10:44
July 5, 1977

772031
William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

Attn.: David Spiegel, Esq. or Kathryn Kavanagh, Esq.
Re.: MUR 406 (77)

Dear Mr. Oldaker:

This letter is to officially inform you that as Counsel to Citizens for the Republic (formerly Citizens for Reagan) for election law purposes I will be representing the Committee and its former Treasurer, Henry M. Buchanan, in this matter. Please address all further correspondence to me with a copy to Mr. Buchanan.

During the period of the presidential primary campaign our Committee complied with all available Commission regulations and guidelines. To date our good faith efforts in this respect have not been questioned by any member of the Commission's audit staff. It is our strong belief that our two follow-up mailings, noted in your letter of the 20th of June, fully complied with our legal obligation.

During my testimony before the Commission on its Disclosure Regulations in 1975 I raised the question of a committee's affirmative duty in this area. I suggested some affirmative guidance or rule would be helpful. I think the question is still an important one. In view of the unsettled state of the regs on this subject I believe it should be addressed in a proceeding other than a complaint.

I would therefore request the dismissal of MUR 406 (77). Pursuant to this I would request an opportunity to meet with the staff to discuss the matter, should you or they feel it necessary. I would further suggest, and offer to help in, the establishment of a Commission task force to study this issue. Members of the staff and members of the staffs of various campaigns might together formulate workable suggestions. This approach worked well in other areas in past Commission practices.

Yours truly,

Loren A. Smith
Loren A. Smith

cc: Henry M. Buchanan, C.P.A.

Loren A. Smith

ATTORNEY AT LAW

1911 N. HIGHLAND ST.
ARLINGTON, VIRGINIA 22201



PROCLAIM LIBERTY THROUGH
USA 13



William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K. St., N.W.
Washington, D.C. 20463

Attn.: David Spiegel, Esq.
Kathryn Kavanagh, Esq.



CITIZENS FOR REAGAN

2100 746

~~1335 K Street N.W. • Washington D.C. 20006 • 202/452-7676~~

4706 Highland Avenue, Bethesda, Maryland 20014

MUR 406

June 23, 1977

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Dear Mr. Oldaker:

In reply to your letter of June 20, 1977, I would like to inform you that I have initiated steps which will enable me to give you a reply to the questions and problems raised in your letter, within the next few days. I am writing this letter to assure you that I wish to cooperate with you to resolve any problems or differences.

The two employees who performed most of the work on the books and records of the Citizens for Reagan Committee have resigned from my firm. In fact, neither of them is now in the Washington, D.C. area. I mention this in order to demonstrate why my reply will take several days.

I request your patience and understanding in this matter. If you feel that a conference would be beneficial, I will be glad to meet you at your convenience. In any event, within the next few days I will be corresponding with you again.

Sincerely,

Henry M. Buchanan

Henry M. Buchanan

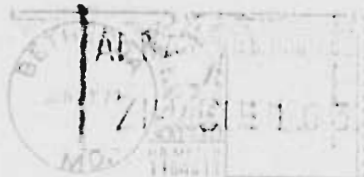
HMB:pw

Kavanaugh

35XXSNTFHKTNXXKXWASDTHAKUXXZCXZDTHX

ELIASSON

JUN 24 PM 4:03



CERTIFIED

No. 826263

MAIL



FEDERAL ELECTION COMMISSION

1117 K STREET, N.W.
WASHINGTON, D.C. 20541

June 20, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry M. Buchanan
Treasurer
Citizens for Reagan
4706 Highland Avenue
Bethesda, Maryland 20814

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Re: NUR 406(77)

Dear Mr. Buchanan:

This is to notify you that in the course of carrying out its normal supervisory responsibilities, the Federal Election Commission has encountered certain information which suggests that your committee may have violated a provision of the Federal Election Campaign Act, as amended (the Act). The Commission has found reason to believe that the matters, as outlined below, state a violation of 2 U.S.C. §434.

§434(b)(2) of the Federal Election Campaign Laws requires that occupation, address and principal place of business of contributors who give more than \$100 to a candidate or committee be included in the financial reports submitted by that candidate or committee.

The Commission auditors have noted that the CFR failed, in 40.24% of the cases involving contributors who gave over \$100, to meet the requirements of §434. According to the auditors, 35% of the omissions were in regard to occupation and principal place of business.

§434(b)(14) states that committee treasurers and candidates will be in compliance with the reporting

obligations when they "show that best efforts have been used to obtain and submit the information required." In this connection we note that you have advised Commission auditors that you made two follow-up mailings to correct the error rate (see attachments). Please advise us of any other attempts that were made to obtain missing information; please also advise us of the number of errors corrected as a result of the mailings.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials (other than those noted above) which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact David Spiegel (202-523-4038) or Kathryn Kavanagh, the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,



William C. Oldaker
General Counsel

Enclosures

79040142130

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 406

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

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

- ☐ Show to whom and date delivered..... 15¢
☒ Show to whom, date, & address of delivery.. 35¢
☐ RESTRICTED DELIVERY.
Show to whom and date delivered..... 65¢
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:

Mr. Henry M. Buchanan, Treas.
Citizens for Reagan
4706 Highland Ave
Bethesda, Md

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943387	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY

JUN 21 1977

5. ADDRESS (Complete only, if requested)

4706 Highland Ave

6. UNABLE TO DELIVER BECAUSE:

CLERK'S
INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

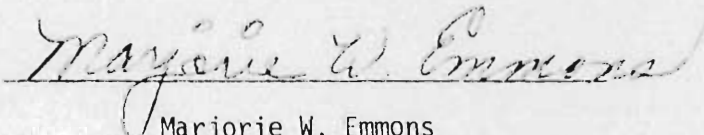
In the Matter of)
)
Citizens for Reagan)

MJR 406 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 15, 1977, the Commission determined by a vote of 4-1 that there was Reason to Believe that a violation of 2 U.S.C. sections 434(b)(2) and 434(b)(14) had been committed in the above-captioned matter.

Voting for this finding were Commissioners Aikens, Harris, Springer, and Tiernan; Commissioner Staebler cast the dissenting vote; Commissioner Thomson was not present at the time of the vote.


Marjorie W. Emmons
Secretary to the Commission

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

June 13, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 406 (77)

The above-mentioned document was transmitted to the Commissioners on June 13, 1977 at 9:30 a.m.

Commissioner Springer submitted an OBJECTION at 10:15, June 13, 1977.

MUR 406 (77) has been placed on the Compliance Agenda for June 15, 1977.

RECEIVED
JUN 15 1977
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.



MEMORANDUM TO: Marge Emmons
FROM: Charles Steele
SUBJECT: MUR 406 (77)

Please have the attached General Counsel's Report distributed to the Commission on a 24-hour no objection basis.

Thank you.

ln:6/7/77

sent

STANDARD INFORMATION SYSTEM

FILE

For the Central Committee in Memory of Dr. Ford - B-8 + B-9 and ship

President Ford Committee

1020 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20035 (202) 457-5400

ATTACHED A

January 14, 1977

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

TO WHOM IT MAY CONCERN:

THIS IS TO CERTIFY THAT DURING THE PERIOD MARCH - OCTOBER, 1976, I SPENT WITH MY ASSISTANT MARY SULLIVAN, AN AVERAGE OF THREE DAYS A WEEK IN RESEARCHING MISSING INFORMATION TO COMPLETE CONTRIBUTION RECORDS. THIS INCLUDED TELEPHONE CALLS TO BOTH INDIVIDUAL CONTRIBUTORS AND TO STATE POLITICAL ORGANIZATIONS. IN ADDITION TO OUR PERSONAL EFFORTS, THE ACKNOWLEDGMENT SYSTEM PROVIDED FOR THANK-YOU LETTERS TO INCLUDE CONTRIBUTION CARDS WHERE ADDITIONAL INFORMATION WAS REQUIRED.

Evelyn Griffin
EVELYNE GRIFFIN

79040112105

Encl. 8 1/2 pages - via request from Rev. Mr. T. J. P. C.

for PRESIDENT

ATTACHMENT B

Jackson

Jackson for President Committee
511 Second Street N.E. Washington, D.C. 20002
(202) 488-7800
Walter T. Skallerup, Jr., Treasurer

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

MEMORANDUM FOR CONTRIBUTORS
TO SENATOR JACKSON'S CAMPAIGN

The Federal Election Campaign Act as amended requires the treasurer of a political committee to keep a detailed and exact account of, among other things, the full name of the contributor and full address of his principal place of residence, and the occupation and principal place of business of every person making a contribution in the aggregate in excess of \$100.

Our committee records do not contain all this so I am writing to request that you provide us with this information so we may be in full compliance with the law.

Your filling in the blanks below and returning this sheet to us in the enclosed postage-paid envelope would be deeply appreciated. The term "occupation" means title, if any, or type of work. The term "principal place of business" means the name of the employer, or organization if self-employed, and the city of employment or self-employment.

Sincerely yours,

Walter T. Skallerup, Jr.
Walter T. Skallerup, Jr.

NAME:

RESIDENCE ADDRESS:

OCCUPATION:

PRINCIPAL PLACE OF BUSINESS:

Jackson

Jackson for President Committee
611 Second Street N.E. Washington, D.C. 20002
(202) 488-7600
Walter T. Skallerup, Jr., Treasurer

February 10, 1976

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

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Attention: Reports Examining Division

Gentlemen:

This is written in response to an unsigned statement from the Commission on FEC Form 12 dated February 4, 1976. The statement required additional information for our report of receipts and expenditures covering the period 10-1-75 through 12-31-75, and certain other information.

The information deemed inadequate related to occupation descriptions and principal place of business of contributors.

It is our regular practice upon receiving a contribution which does not include the occupation and principal place of business of the contributor when such information is required, to send a first class letter to the contributor requesting this information. A sample copy of our letter is attached. We send with this letter an addressed envelope, stamped with first class postage.

Our experience is that about one half of these inquiries are returned to us with the information we need to complete our report to the Federal Election Commission. In the case of the subject report which was filed January 31, 1976, approximately 400 contributors had not responded to our letter requesting occupation and principal place of business. Over a period of five days utilizing nine people we attempted to reach those individuals by telephone. We were able to reach 285 of those individuals who provided us with the information. Of the remaining 115 some were not available when the call was made; some had unlisted telephone numbers; the telephone lines were in use in the call was made and others were asked to provide the information with a return call and no return call was made.

Federal Election Commission
February 10, 1976

This Committee has made every reasonable effort to obtain the information required in the subject report. If you have any suggestions on how we might be able to obtain this information kindly let me know.

The FEC Form 12 also raised a question regarding Schedule C Part 9. Our Controller, Martin Katz, has been in touch with Nancy Davis of the FEC staff. This will be the subject of a letter which follows.

Sincerely yours,

Walter T. Skallerup, Jr.
Walter T. Skallerup, Jr.

WTS/ER
Enclosure

79040112130

Ref 11

ATTACHMENT C

'76 NOV 10 PM 5:52



Jimmy Carter

Presidential Campaign

For America's third century, why not our best?

November 6, 1976

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
OFFICIAL FILE COPY
OFFICE OF GENERAL COUNSEL

Dear Mr. Potter:

Enclosed are thirteen amended reports of Receipts and Expenditures covering the reporting periods commencing in January, 1975 through September, 1976. The reports are filed in response to various Requests for Additional Information for a Report of Receipts and Expenditures Filed Pursuant to the Federal Election Campaign Act of 1971, as Amended. In addition, a number of accounting adjustments (which were generated as a result of an internal audit) are reflected in the amended reports.

We believe that these reports represent the most comprehensive and accurate representation of political campaign financial activity in the history of American politics. Included in the reports is a total of eighty-three bank accounts located in thirty-nine states, the District of Columbia and Puerto Rico. A total of nearly 20,000 checks were issued to 7,500 vendors. Campaign contributions were received from 95,000 individuals and political action committees which represents 130,000 contributions. These statistics dramatically demonstrate the true nature of the Carter Presidential effort -- that of a grassroots operation where decisions (both political and financial) were made at the local level.

Specifically addressed in the amended reports are the following:

1. Full name/mailling address. Schedule B, Lines 20, 21 & 22

Each payee who received a check was researched to identify a correct mailing address. Directory assistance, campaign state coordinators, campaign contributor files, and various other contacts were utilized to obtain the necessary information. As a

result, over 90% of all payees (who received over 98% of all monies disbursed) have a mailing address.

2. Full name/mailling address/occupation/principal place of business.

Schedule A, Lines 15 & 16

Ten thousand letters requesting additional information were mailed to Committee contributors for whom we did not have complete files. Five-thousand-four-hundred responses were received. The remaining 4,600 contributors were called (except those with unlisted telephone numbers) and we have obtained the information from approximately 3,500 contributors. Thus, in total, over 80% of our contributor files whose aggregate contribution exceeded \$100 now have occupations and principal places of business.

3. Purpose of expenditure. Schedule B, Lines 20, 21 & 22

Each disbursement (nearly 20,000 items in total) was reviewed for proper coding for account description and locale and was reviewed a second time by a staff of certified public accountants.

4. Debts and Obligations owed to the Committee. Schedule C, Line 25

Debts and obligations owed to the Committee have been restated to reflect only transportation receivables and monies due the Primary Committee from the General Election Committee.

5. Debts and obligations owed by the Committee. Schedule C, Line 26

Reports as originally filed covering all of 1975 and the months of January, 1976 through March, 1976 did not include a listing of itemized accounts payable. The amended reports include a listing of such payables as best we could reconstruct them.

6. Timely reporting of contributions received and disbursements.

In the past the Commission has questioned the Committee's practice of reporting financial activity in the month the information became available in Atlanta. This procedure was discussed with members of your staff and has been addressed in prior correspondence with the Commission. The amended reports reflect all financial activity (both receipts and disbursements) in the month the transaction occurred.

7. Aggregation of contributions. Schedule A, Lines 15 & 18

A review was made of all contributions to determine whether duplicate contributor files were established in error. When identified, all such duplicate files were purged from the records and the computer reports of contributions were rerun.

Special attention was given to the aggregation of contributions received from political action committees. As we have discussed with members of your staff, the Committee is not always aware of the extent to which various political action committees are organizationally related. Any assistance the Commission can provide in this area would be appreciated.

8. Itemization of loans, loan repayments and contribution refunds. Schedule B, Line 21

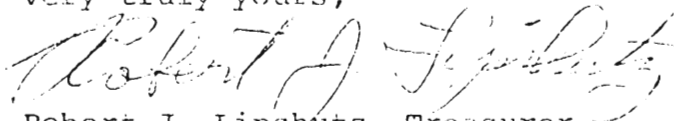
As requested, the amended reports itemize all expenditures on Schedule B, Line 21.

9. Excess contributions. Schedule A, Lines 15 & 18

All contributors who have contributed in excess of the legal maximum have been issued rebate checks. The Committee, upon receipt of a number of contributions, attributed the entire contribution to the signor of the check. We were later informed by the contributor that the contribution was in fact a donation from both the signor and his or her spouse. In the September 10, 1976 report, we have included a listing of allocations of contributions between spouses.

I would like to thank the members of your staff for the assistance they provided over the past months in aiding the Committee in our efforts to comply with the oftentimes complex and complicated Federal Election Laws.

Very truly yours,



Robert J. Lipshutz, Treasurer
Committee for Jimmy Carter

CHURCH

For President

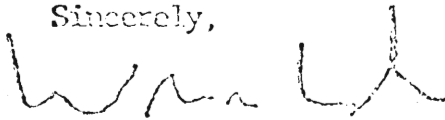
ATTACHMENT B

The Federal Election Commission requires certain information on all donors to political campaigns.

The items listed below are still required and I would appreciate if you would fill in the information and send it back to me in the enclosed self addressed envelope.

Thank you for your prompt attention in handling the above request.

Sincerely,



William M. Lander
Treasurer
Church for President Committee

- ☐ Home Address _____
- ☐ Name of Business _____
- ☐ Title _____
- ☐ Business Address _____
- ☐ Signature _____

MGHLSAT HSB

2-044723E157002 06-06/76

ICS IPNRMCZ CSP

1 2135521087 MGM TDRN LOS ANGELES CA 06-05 1014P EST

WESTERN UNION

Mailgram®



ATTACHMENT

E

BROWN FOR PRESIDENT COMMITTEE D.B.,
2049 CENTURY PARK EAST
LOS ANGELES CA 90067

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2135521087 MGM TDRN LOS ANGELES CA 100 06-05 1014P EST

ZIP

GEORGE JACOBS

8716 6TH AVE

INGLEWOOD CA 90304

WE VERY MUCH APPRECIATE YOUR CONTRIBUTION TO THE BROWN FOR PRESIDENT
COMMITTEE WE ALL THANK YOU WE ARE MISSING SOME VERY SIMPLE ADDITIONAL
PERSONAL INFORMATION ABOUT YOU FOR OUR CAMPAIGN REPORTS WHICH MUST BE
OBTAINED IMMEDIATELY PLEASE CALL LARRY SMITH, COLLECT, AT AREA CODE 213
5521087, SO THAT THE REPORT CAN BE COMPLETED

MARIANA R PFAELZER

TREASURER BROWN FOR PRESIDENT COMMITTEE

01:07 EST

MGHLSAT HSB

Name Mrs Elbe Lipsey
Telephone 274-6781
Occupation Housewife
Employer (or Firm) _____
(If self-employed, check block) ☐
Business Address 815 No Camden Dr.
City Beverly Hills State Calif. Zip 90210

PLEASE FOLD, SEAL AND MAIL. NO POSTAGE REQUIRED

#51185-22

Name ALVARO DEEN
Residence Address 342 B-ST.
City BRAWLEY Zip 92227 Phone 344-1260
Title or Occupation FARMER
Business Address SAME
City _____ Zip _____ Phone _____

200.00

Please fill out. Federal law requires the above information. A copy of our report is filed with the Federal Election Commission, Washington, D.C. 20543, ID # C152533.

Honorable Leo T. McCarthy, Chairman

Marlana R. Pfaltzer, Treasurer, P. O. Box 67157, Los Angeles 90067.

(We may not accept corporate, labor union, or government contractor contributions.)

BROWN FOR PRESIDENT COMMITTEE
P.O. BOX 67457
LOS ANGELES, CALIFORNIA 90067

Thank you for your contribution to the BROWN FOR PRESIDENT COMMITTEE.

The FEDERAL ELECTIONS COMMISSION is now reviewing our contributions. In order for both the BROWN FOR PRESIDENT COMMITTEE and YOU to meet the requirements imposed by the 1976 Amendments to Title II and Title XXVI of the U.S. Codes, we need the following information:

☐ Contribution amount \$ _____ ☐ Check ☐ Cash

☐ Name _____

☐ Home Address _____

☐ Employer _____ ☐ Self-employed?

☐ Business address _____

☐ Joint contribution? Yes ☐ Amount \$ _____ No ☐

☐ Signature of spouse or joint contributor(s) _____

☐ Address of joint contributor(s) if different: _____

☐ The signature appearing on my check is that of _____,
who is authorized to sign for me, _____ (contributor).

☐ The contribution was a personal contribution. The name appearing on the
check, _____, is not a corporation. It is a
partnership ☐ or sole proprietorship ☐.

☐ SIGNATURE OF CONTRIBUTOR _____

The time to qualify with the FEDERAL ELECTIONS COMMISSION is limited;
therefore, your immediate attention to this request will be appreciated.

Sincerely,

This is a self-mailer.
Please fold and return

Jeff Beaumont
Jeff Beaumont
Controller

FRONT OF ENVELOPE

Dear Governor Reagan:

I agree, you must have the funds to buy radio and TV time in order that you may speak directly to the American people on the issues of the day. My check, to help with this important project is enclosed:

☐ \$1,000 ☐ \$750 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50 ☐ \$20 ☐ \$_____ Other

A federal statute requires us to request the following information:

Please make your check payable to REAGAN MEDIA FUND and return in this postage-paid envelope.

Occupation _____

Business Address _____

City, State, Zip _____

MORE FEDERAL REGULATIONS: I certify that this check is a purely and personal contribution even though it may be made on a business, partnership, or other type of account. (If more than one individual is contributing, please specify the percentage attributable to each.)

Signature of contributor(s) _____

A Special Message from Governor Reagan...

In addition to your own contribution to my campaign you can help by writing the names and addresses of two friends below who you think might be interested in making a donation (be sure to indicate whether Mr., Mrs., Miss, etc.). I'll make it a point to send them a letter also. Thanks.

NAME _____

NAME _____

ADDRESS _____

ADDRESS _____

CITY, STATE, ZIP _____

CITY, STATE, ZIP _____

INDIVIDUAL POLITICAL CONTRIBUTIONS ARE TAX-DEDUCTIBLE UP TO A TOTAL OF \$100 PER YEAR OR \$200 ON A JOINT RETURN.

In accordance with Federal legislation, we are not able to accept either (a) any corporate checks whatever, or (b) any personal contributions over \$1,000. Citizens for Reagan may accept individual contributions up to \$1,000 (for example, a husband and wife may each give \$1,000) prior to a nomination convention; this may be repeated following the convention. A copy of our report will be filed with the Federal Election Commission and will be available for purchase from that office in Washington, D.C.

Henry M. Buchanan, Treasurer

BACK OF ENVELOPE

DID YOU RECEIVE MORE THAN ONE COPY OF THIS APPEAL?

Please forgive us if you did. We use hundreds of mailing lists containing millions of names. We try to unduplicate as much as possible, but the cost of unduping must be weighed against the cost of sending several copies to some individuals. If you did receive a duplicate, PLEASE pass it along to a friend so that we can make our dollars go as far as possible. Thank you for your kind understanding.

Make necessary corrections in address shown below

50638000AGTR RM

MR ROY AGETER

H7

DES MOINES IA 50638

MAIL YOUR CHECK TODAY!

BUSINESS REPLY MAIL

No Postage Stamp Necessary if Mailed in the United States

Postage Will Be Paid By:

Governor Ronald Reagan
Citizens for Reagan
Suite 800
1335 K Street, N.W.
Washington, D.C. 20003

FIRST CLASS

Permit No.
72124
Wash. D.C.



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20461

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry M. Buchanan
Treasurer
Citizens for Reagan
4706 Highland Avenue
Bethesda, Maryland 20014

Re: MUR 406(77)

Dear Mr. Buchanan:

This is to notify you that in the course of carrying out its normal supervisory responsibilities, the Federal Election Commission has encountered certain information which suggests that your committee may have violated a provision of the Federal Election Campaign Act, as amended (the Act). The Commission has found reason to believe that the matters, as outlined below, state a violation of 2 U.S.C. §434.

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The Commission auditors have noted that the CFR failed, in 40.24% of the cases involving contributors who gave over \$100, to meet the requirements of §434. According to the auditors, 35% of the omissions were in regard to occupation and principal place of business.

§434(b)(14) states that committee treasurers and candidates will be in compliance with the reporting



obligations when they "show that best efforts have been used to obtain and submit the information required." In this connection we note that you have advised Commission auditors that you made two follow-up mailings to correct the error rate (see attachments). Please advise us of any other attempts that were made to obtain missing information; please also advise us of the number of errors corrected as a result of the mailings.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials (other than those noted above) which you believe are relevant to the Commission's analysis of this matter.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within 15 days after receipt of this notification. If you have any questions, please contact David Spiegel (202-523-4038) or Kathryn Kavanagh, the staff member assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

T. J. & Michael Carter letters missing Info - T. J. B-8 + B-7 Audit Ship

President Ford Committee

1020 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-5400

ATTACHMENT A

January 14, 1977

TO WHOM IT MAY CONCERN:

THIS IS TO CERTIFY THAT DURING THE PERIOD MARCH - OCTOBER, 1976, I SPENT WITH MY ASSISTANT MARY SULLIVAN, AN AVERAGE OF THREE DAYS A WEEK IN RESEARCHING MISSING INFORMATION TO COMPLETE CONTRIBUTION RECORDS. THIS INCLUDED TELEPHONE CALLS TO BOTH INDIVIDUAL CONTRIBUTORS AND TO STATE POLITICAL ORGANIZATIONS. IN ADDITION TO OUR PERSONAL EFFORTS, THE ACKNOWLEDGMENT SYSTEM PROVIDED FOR THANK-YOU LETTERS TO INCLUDE CONTRIBUTION CARDS WHERE ADDITIONAL INFORMATION WAS REQUIRED.

Evelyn Griffin
EVELYNE GRIFFIN

Encl. & Supp. via request from Mr. Mott, Texas, PTC

for PRESIDENT

ATTACHMENT 3

Jackson

Jackson for President Committee
511 Second Street N.E. Washington, D.C. 20002
(202) 485-7600
Walter T. Skallerup, Jr., Treasurer

MEMORANDUM FOR CONTRIBUTORS
TO SENATOR JACKSON'S CAMPAIGN

The Federal Election Campaign Act as amended requires the treasurer of a political committee to keep a detailed and exact account of, among other things, the full name of the contributor and full address of his principal place of residence, and the occupation and principal place of business of every person making a contribution in the aggregate in excess of \$100.

Our committee records do not contain all this so I am writing to request that you provide us with this information so we may be in full compliance with the law.

Your filling in the blanks below and returning this sheet to us in the enclosed postage-paid envelope would be deeply appreciated. The term "occupation" means title, if any, or type of work. The term "principal place of business" means the name of the employer, or organization if self-employed, and the city of employment or self-employment.

Sincerely yours,


Walter T. Skallerup, Jr.

NAME:

RESIDENCE ADDRESS:

OCCUPATION:

PRINCIPAL PLACE OF BUSINESS:

Jackson 1:59
76 FEB 11 1976
Jackson for President Committee
611 Second Street N.E. Washington, D.C. 20002
(202) 488-7600
Walter T. Skallerup, Jr., Treasurer

February 10, 1976

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

Attention: Reports Examining Division

Gentlemen:

This is written in response to an unsigned statement from the Commission on FEC Form 12 dated February 4, 1976. The statement required additional information for our report of receipts and expenditures covering the period 10-1-75 through 12-31-75, and certain other information.

The information deemed inadequate related to occupation descriptions and principal place of business of contributors.

It is our regular practice upon receiving a contribution which does not include the occupation and principal place of business of the contributor when such information is required, to send a first class letter to the contributor requesting this information. A sample copy of our letter is attached. We send with this letter an addressed envelope, stamped with first class postage.

Our experience is that about one half of these inquiries are returned to us with the information we need to complete our report to the Federal Election Commission. In the case of the subject report which was filed January 31, 1976, approximately 400 contributors had not responded to our letter requesting occupation and principal place of business. Over a period of five days utilizing nine people we attempted to reach these individuals by telephone. We were able to reach 285 of these individuals who provided us with the information. Of the remaining 115 some were not available when the call was made; some had unlisted telephone numbers; the telephone lines were in use in the call was made and others were asked to provide the information with a return call and no return call was made.

Federal Election Commission
February 10, 1976

This Committee has made every reasonable effort to obtain the information required in the subject report. If you have any suggestions on how we might be able to obtain this information kindly let me know.

The FEC Form 12 also raised a question regarding Schedule C Part 9. Our Controller, Martin Katz, has been in touch with Nancy Davis of the FEC staff. This will be the subject of a letter which follows.

Sincerely yours,

Walter Skallerup, Jr.
Walter T. Skallerup, Jr.

WTS/ER
Enclosure

7/11



'76 NOV 10 PM 5:52

Jimmy Carter

Presidential Campaign

For America's third century, why not our best?

November 6, 1976

Mr. Orlando B. Potter, Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Potter:

Enclosed are thirteen amended reports of Receipts and Expenditures covering the reporting periods commencing in January, 1975 through September, 1976. The reports are filed in response to various Requests for Additional Information for a Report of Receipts and Expenditures Filed Pursuant to the Federal Election Campaign Act of 1971, as Amended. In addition, a number of accounting adjustments (which were generated as a result of an internal audit) are reflected in the amended reports.

We believe that these reports represent the most comprehensive and accurate representation of political campaign financial activity in the history of American politics. Included in the reports is a total of eighty-three bank accounts located in thirty-nine states, the District of Columbia and Puerto Rico. A total of nearly 20,000 checks were issued to 7,500 vendors. Campaign contributions were received from 95,000 individuals and political action committees which represents 130,000 contributions. These statistics dramatically demonstrate the true nature of the Carter Presidential effort -- that of a grassroots operation where decisions (both political and financial) were made at the local level.

Specifically addressed in the amended reports are the following:

1. Full name/mailling address. Schedule B, Lines 20, 21 & 22

Each payee who received a check was researched to identify a correct mailing address. Directory assistance, campaign state coordinators, campaign contributor files, and various other contacts were utilized to obtain the necessary information. As a

ceived over 98% of all
SS.

on/principal place of
business.

Additional information were
Five-thousand responses were received. The
obtained the information
Thus, in total, over 80%
contribution exceeded
places of business.

Purpose of expenditure. Schedule B, Lines 20, 21 & 22

Each disbursement (nearly 20,000 items in total) was re-
proper coding for account description and locale and
of certified public

Schedule C, Line 25

The Committee have been restated
debts and monies due the
Collection Committee.

Schedule C, Line 26

Filed during all of 1975 and the
through March, 1976 did not include a
The amended reports in-
files as best we could reconstruct

revenue received and disbursements.

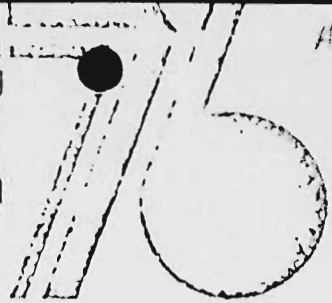
questioned the Committee's
activity in the month the infor-
This procedure was discussed
has been addressed in prior corres-
the amended reports reflect all
(and disbursements) in the month

Schedule A, Lines 15 & 18

was done of all contributions to determine whether
are established in error. When iden-
were purged from the records and
were rerun.

CHURCH

For President



The Federal Election Commission requires certain information on all donors to political campaigns.

The items listed below are still required and I would appreciate if you would fill in the information and send it back to me in the enclosed self-addressed envelope.

Thank you for your prompt attention in handling the above request.

Sincerely,

William M. Lendau
Treasurer
Church for President Committee

☐ Home Address _____

☐ Name of Business _____

☐ Title _____

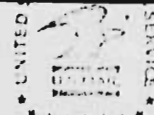
☐ Business Address _____

☐ Signature _____

MGMLSAT HSB
2-044723E157002 06/76
ICS IPMRNCZ CSP

western union

Mailgram®



1 2135521087 MGM TDRN LOS ANGELES CA 06-05 1014P EST

ATTACHMENT

E

BROWN FOR PRESIDENT COMMITTEE D.B.
2049 CENTURY PARK EAST
LOS ANGELES CA 90067

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2135521087 MGM TDRN LOS ANGELES CA 100 06-05 1014P EST

ZIP

GEORGE JACOBS

8716 6TH AVE

INGLEWOOD CA 90304

WE VERY MUCH APPRECIATE YOUR CONTRIBUTION TO THE BROWN FOR PRESIDENT
COMMITTEE WE ALL THANK YOU WE ARE MISSING SOME VERY SIMPLE ADDITIONAL
PERSONAL INFORMATION ABOUT YOU FOR OUR CAMPAIGN REPORTS WHICH MUST BE
OBTAINED IMMEDIATELY PLEASE CALL LARRY SMITH, COLLECT, AT AREA CODE 213
5521087, SO THAT THE REPORT CAN BE COMPLETED

MARIANA R PFAELZER

TREASURER BROWN FOR PRESIDENT COMMITTEE

01:07 EST

MGMLSAT HSB

Name Mrs Elbe Lipsey
Telephone 274-6781
Occupation Housewife
Employer (or Firm) _____
(If self-employed, check block) ☐
Business Address 815 No Camden Dr.
City Beverly Hills State Calif. Zip 90210

PLEASE FOLD, SEAL AND MAIL. NO POSTAGE REQUIRED

#51105-22

Name ALVARO DEEN
Residence Address 342 B-ST.
City BRAWLEY Zip 92227 Phone 344-1260
Title or Occupation FARMER
Business Address SAME
City _____ Zip _____ Phone _____

200.00

Please fill out. Federal law requires the above information. A copy of our report is filed with the Federal Election Commission, Washington, D.C. 20543. ID # C0003838.

Honorable Leo T. McCarthy, Chairman

Marlana R. Pfelzer, Treasurer, P. O. Box 67457, Los Angeles 90067.

(We may not accept corporate, labor union, or government contractor contributions.)

BROWN FOR PRESIDENT COMMITTEE
P.O. BOX 67457
LOS ANGELES, CALIFORNIA 90067

Thank you for your contribution to the BROWN FOR PRESIDENT COMMITTEE.

The FEDERAL ELECTIONS COMMISSION is now reviewing our contributions. In order for both the BROWN FOR PRESIDENT COMMITTEE and YOU to meet the requirements imposed by the 1976 Amendments to Title II and Title XXVI of the U.S. Codes, we need the following information:

☐ Contribution amount \$ _____ ☐ Check ☐ Cash

☐ Name _____

☐ Home Address _____

☐ Employer _____ ☐ Self-employed?

☐ Business address _____

☐ Joint contribution? Yes ☐ Amount \$ _____ No ☐

☐ Signature of spouse or joint contributor(s) _____

☐ Address of joint contributor(s) if different:

☐ The signature appearing on my check is that of _____,
who is authorized to sign for me, _____ (contributor).

☐ The contribution was a personal contribution. The name appearing on the
check, _____, is not a corporation. It is a
partnership ☐ or sole proprietorship ☐.

☐ SIGNATURE OF CONTRIBUTOR _____

The time to qualify with the FEDERAL ELECTIONS COMMISSION is limited;
therefore, your immediate attention to this request will be appreciated.

Sincerely,

This is a self-mailer.
Please fold and return

Jeff Beaumont
Jeff Beaumont
Controller

FRONT OF ENVELOPE

Dear Governor Reagan:

I agree, you must have the funds to buy radio and TV time in order that you may speak directly to the American people on the issues of the day. My check, to help with this important project is enclosed:

☐ \$1,000 ☐ \$750 ☐ \$500 ☐ \$250 ☐ \$100 ☐ \$50 ☐ \$20 ☐ \$_____ Other

A federal statute requires us to request the following information:

Please make your check payable to REAGAN MEDIA FUND and return in this postage-paid envelope.

Occupation _____

Business Address _____

City, State, Zip _____

MORE FEDERAL REGULATIONS: I certify that this check is a purely and personal contribution even though it may be made on a business, partnership, or other type of account. (If more than one individual is contributing, please specify the percentage attributable to each.)

Signature of contributor(s)

A Special Message from Governor Reagan...

In addition to your own contribution to my campaign, you can help by writing the names and addresses of two friends below who you think might be interested in making a donation. (Be sure to indicate whether Mr., Mrs., Miss, etc.). I'll make it a point to send them a letter also. Thanks.

NAME _____ NAME _____

ADDRESS _____ ADDRESS _____

CITY, STATE, ZIP _____ CITY, STATE, ZIP _____

INDIVIDUAL POLITICAL CONTRIBUTIONS ARE TAX-DEDUCTIBLE UP TO A TOTAL OF \$100 PER YEAR OR \$500 ON A JOINT RETURN.

In accordance with federal legislation, we are not able to accept either (a) any corporate checks whatever, or (b) any personal contributions over \$1000. Citizens for Reagan may accept individual contributions up to \$1000 (for example, a husband and wife may each give \$1000) prior to a nominating convention; this may be repeated following the convention. A copy of our report will be filed with the Federal Election Commission and will be available for purchase from that office in Washington, D.C.

Henry M. Buchanan, Treasurer

BACK OF ENVELOPE

DID YOU RECEIVE MORE THAN ONE COPY OF THIS APPEAL?

Please forgive us if you did. We use hundreds of mailing lists containing millions of names. We try to unduplicate as much as possible, but the cost of unduping must be weighed against the cost of sending several copies to some individuals. If you did receive a duplicate, PLEASE pass it along to a friend so that we can make our dollars go as far as possible. Thank you for your kind understanding.

Make necessary corrections in address shown below

50638000AGTR RM

MR ROY AGETER

H7

DES MOINES IA 50638

MAIL YOUR CHECK TODAY!

BUSINESS REPLY MAIL

No Postage Stamp Necessary if Mailed in the United States

Postage Will Be Paid By:

Governor Ronald Reagan
Citizens for Reagan
Suite 800
1835 K Street, N.W.
Washington, D.C. 20006

FIRST CLASS

Permit No.

72124

Wash. D.C.

EM 001

MEMORANDUM TO: Robert Costa

May 11, 1977

FROM: Charles Steele

RE: Citizens for Reagan

This office is in the process of determining whether the error rate for the reports filed by Citizens for Reagan is sufficiently high, and whether the "best efforts" of that committee are sufficiently low, to initiate enforcement action. In this regard, I would appreciate it if you could provide us with the following information:

1. The error rates for all other primary presidential candidates (Joanne McSorley has already transmitted the figures on Ford, Jackson, Carter, Udall, Church and Brown).
2. The confidence level used in reaching the statistics in each case.
3. A brief description of the "best efforts" which were made by all of the primary presidential candidates (Joanne already described the efforts undertaken by Ford, Jackson and Carter).
4. Copies of the two solicitation letters which were mailed by CFR to their contributors and which were claimed by CFR as best efforts to comply with the law.

We would like to settle this issue as soon as possible, and therefore would appreciate receiving within the next few days, any of the information that is available.

KK
Ravanagh:caw: 5/11/77



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

March 28, 1977

MEMORANDUM

TO: DAN SWILLINGER
THROUGH: BOB COSTA *RJC*
FROM: JOANN MCSORLEY *Joann*
SUBJECT: CITIZENS FOR REAGAN

The statistical sample was based on a universe of 15,000, which approximates the total number of contributors whose aggregate contributions exceeded \$100 (The actual number of contributors was 14,365). We used a sample size for sampling attributes based on a 95% confidence level, expected rate of occurrence not to exceed 10% and a reliability of + 3%. The resulting error rate of 40% indicates that 40% of the sample size (375) lacked an attribute being tested for, namely occupation and principle place of business. This percentage within a range of + 10% (i.e. the error rate may range from a minimum of 30% to a maximum of 50%) can then validly be projected to the entire universe of 14,365 contributors and thus state that from 30% to 50% of that universe does not contain the required information. It should be noted, however, that the most likely error rate should be near 40%.

After discussion with other supervisors, it appears that where statistical sampling was used, usually a confidence level of 90% was used and in some cases a confidence level of 95%. The attributes should have been similar, if not the same, in all cases.





FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 406

Date Filmed 7-16-79 Camera No. --- 2

Cameraman GPC