



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 443



1
HUN 443 (77)

FEDERAL ELECTION COMMISSION

Memo from Johnson to Garr, 10-6-77

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

- 7 8 0 4 0 0 6 2 7 7 5
- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

date

Cary W. Ch. L.
8-21-78



FEDERAL ELECTION COMMISSION

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

August 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443(77)

Dear Mr. Thomas:

On August 16, 1978, the Commission voted to terminate its investigation in MUR 443(77). A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosures:

Commission certification
General Counsel's Report

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth St., N.W.
Washington, D. C. 20006

78040062775

88-171
008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Parsons City, Missouri 64601

Re: MUR 443(77)

Dear Mr. Thomas:

On August 1, 1978, the Commission voted to terminate its investigation in MUR 443(77). A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosures:

Commission certification
General Counsel's Report

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth St., N.W.
Washington, D. C. 20006

78040062777

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 16, 1978, the Commission determined by a vote of 5-0 to take the following actions in the above-captioned:

1. Take no further action on the issue of in-kind contributions to Citizens for Reagan by the Florida Friends of Reagan in excess of the limits of 2 U.S.C. §441a.
2. Take no further action on the issue of possible corporate contributions to Citizens for Reagan by Tommy Thomas Chevrolet, Inc.
3. Close the file.
4. Send the letter attached to the General Counsel's Report dated August 11, 1978.

Commissioner Aikens was not present at the time of the vote.

Attest:

8/17/78
Date

Margaret E. Chaney
Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 8-11-78, 3:32
Circulated on 48 hour vote basis: 8-14-78, 9:00

78040062778



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *more by pc*

SUBJECT: Commissioner Tiernan's Comments
Regarding MUR 443, General
Counsel's Report dated August 8,
1979

DATE: AUGUST 16, 1978

Attached is a copy of Commissioner Tiernan's
vote sheet with comments regarding the above-named
document.

Attachment:
Vote Sheet



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FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: 9:00 AUGUST 14, 1978

Commissioner Tierman

RETURN TO OFFICE OF COMMISSION SECRETARY BY: 9:00 AUGUST 18, 1978

MUR No. 443 (78) - General Counsel's Report dated 8-11-78

(☒) I approve the recommendation

() I object to the recommendation

COMMENTS: Exercise of prosecutorial discretion
noting the time of actions.

Date: 8/15/78 Signature: Robert O. Tierman

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



78040062730

August 11, 1977

MEMORANDUM TO: Marge Evans
FROM: William T. Smith
SUBJECT: MUR 443

Please have the attached General Counsel's report
on MUR 443 distributed to the Commission on a 48 hour
daily basis.

Thank you.

78040062781

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan)

MUR 443(77)

General Counsel's Report

I. Allegations

This matter involves the question of whether certain expenditures made by Florida Friends of Reagan ("FFOR") for the purpose of influencing the candidacy of Ronald Reagan were in-kind contributions to the Citizens for Reagan Committee ("CFR") rather than independent expenditures as reported by respondent. Also involved is the question of whether certain expenditures made by Mr. L. E. Thomas on behalf of CFR were initially paid from the corporate checking account of Tommy Thomas Chevrolet, Inc., and later reimbursed by CFR, constituting a violation of 2 U.S.C. 441b.

III. Background

On October 27, 1977, the Commission found reason to believe that FFOR may have violated 2 U.S.C. 441a in making independent expenditures in support of the candidacy of Ronald Reagan. On that date the Commission authorized a subpoena for oral deposition to Mr. Thomas and an Order for production of documents to CFR, pertaining to \$610.57 in reimbursed expenses incurred by Mr. Thomas on behalf of CFR.

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On April 17, 1978, we received from CFR copies of receipts submitted by Mr. Thomas for reimbursement.

III. Investigation and Analysis

1. Independent expenditures made by FFOR

On June 29, 1978, we deposed Mr. L. E. Thomas, Chairman of FFOR and Florida Chairman of CFR. In his deposition and in interrogatories previously submitted to the Commission, Mr. Thomas stated that he became Florida Chairman of CFR on November 20, 1975, the date on which Governor Reagan announced his candidacy. He continued in this role until after the March 9, 1976, Florida primary election. Mr. Thomas stated that following the Florida primary election all Florida offices of CFR were closed with the exception of a small office maintained in Orlando, Florida which was within the office of the Committee's accountant and kept open for the purpose of retiring debts incurred by the committee during the primary campaign. After March 11, 1976, Mr. Thomas had only infrequent conversations with CFR personnel and only with regard to closing Florida offices and retiring debts. National campaign strategy was not discussed and Mr. Thomas was not thereafter involved with the principal campaign committee of Governor Reagan.

Following his involvement with CFR, Mr. Thomas determined that there was need for additional support for Governor Reagan in subsequent primary elections and formed

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the Florida Friends of Reagan Committee. To construct this additional support, Mr. Thomas solicited contributions by telephone from his friends and from supporters of Governor Reagan. He then contacted Long Advertising and instructed them to place advertisements in Wisconsin newspapers advocating the election of Governor Reagan. The only contact between Mr. Thomas and CFR regarding these Wisconsin expenditures appears to be a telephone conversation with David Keene, southern coordinator for CFR, in which Mr. Keene attempted to dissuade Mr. Thomas and FFOR from making such expenditures on the assumption that these newspaper advertisements would be counter-productive to the campaign strategy of CFR.

Mr. Thomas appears to be the sole active member of FFOR, aside from those individuals who contributed to the committee. All contributions to FFOR were solicited by Mr. Thomas in personal or telephone conversations with friends and associates who were supporters of Governor Reagan. All expenditures of the Committee were designed, authorized and implemented by Mr. Thomas. In short, Mr. Thomas was the entire committee.

The question of the independence of FFOR expenditures arises from Mr. Thomas' dual role as chairman of FFOR and Florida Chairman of CFR. While Commission regulation 11 CFR 109.1(b)(4)(i)(B) would now preclude Mr. Thomas from making independent expenditures in support of Ronald Reagan due to his prior activity in connection with CFR, this regulation was not in force at the time of the expenditure. Further, it appears that Mr. Thomas made a reasonable attempt

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to comply with the Act by contacting his local attorney to determine whether such expenditures were prohibited. Upon receiving legal counsel that such action was not prohibited by the Act, Mr. Thomas proceeded to form FFOR and make expenditures in support of Governor Reagan without the cooperation of Mr. Reagan's principal campaign committee, and with complete disregard to the advice given by Mr. Keene of that principal campaign committee.

It is our belief that the activities of Mr. Thomas and FFOR would be prohibited by the Commission's present standards for independent expenditures. However, these standards had not been formulated at the time of the activities of Mr. Thomas and FFOR. Further, Mr. Thomas appears to have attempted substantial compliance with the Act. In light of these circumstances, it is the recommendation of the Office of General Counsel that the Commission take no further action and close the file on the issue of independent expenditures made by FFOR.

2. Expenditures by Mr. Thomas reimbursed by CFR

On July 14, 1976, Mr. Thomas received \$610.57 in reimbursed travel and office expenses from CFR. In response to an Order, CFR sent to the Commission copies of checks and receipts submitted by Mr. Thomas for reimbursement. Information gained from examination of these documents and from the deposition of Mr. Thomas indicates that certain expenses incurred by Mr. Thomas in his role as Florida Chairman of CFR were initially paid from the corporate checking

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account of Tommy Thomas Chevrolet, Inc., and later reimbursed to Tommy Thomas Chevrolet, Inc., through Mr. Thomas, by CFR. Documentation provided to the Commission by CFR shows a total of \$119.78 paid to three companies by Tommy Thomas Chevrolet, Inc. The checks submitted to CFR had the notation "Reagan Comm." printed on the stub.

Information gained from the deposition of Mr. Thomas indicates that Mr. Thomas chose to use his corporate account to pay certain CFR expenses because of his travel schedule. Bills for various expenses would from time to time be received while Mr. Thomas was out of town. When this would occur, they would be paid from the corporate checking account and later reimbursed by Mr. Thomas.

While these transactions appear to constitute a violation of 2 U.S.C. 441b(a) as corporate funds were used to advance payment to certain companies on behalf of CFR, it is the recommendation of the Office of General Counsel that the Commission take no further action with regard to this matter as all funds advanced through Tommy Thomas Chevrolet, Inc. have been reimbursed and the amount of money in question totals only slightly in excess of \$100.

IV. Recommendations

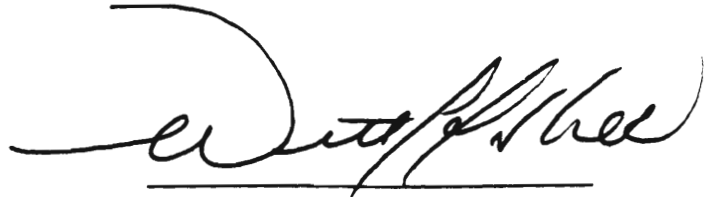
1. Take no further action on the issue of in-kind contributions to Citizens for Reagan

by Florida Friends of Reagan in excess
of the limits of 2 U.S.C. 441a.

2. Take no further action on the issue of
possible corporate contributions to
Citizens for Reagan by Tommy Thomas
Chevrolet, Inc.
3. Close the file.
4. Send the attached letter.

8/11/78

Date



William C. Oldaker
General Counsel

78040062787

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

FEDERAL ELECTION
COMMISSION

805069

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER

(202) 452-6418

1980 AUG 4 PM 12:43
WX: 70-822-0005
TELE: 89-593
CABLE: COVLING

August 2, 1978

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

Dear Mr. Lovejoy:

Enclosed herewith are airline-ticket and taxicab receipts for Mr. L.E. Thomas, incurred for his travel from his home to Washington, D.C., for his deposition at the Commission. Mr. Thomas was able to obtain only one taxicab receipt (in the amount of \$4.50), but his return fare to National Airport was the same amount.

Accordingly, Mr. Thomas' total expenses were his air fares (\$165.00) and taxicab fares (\$9.00) for a total of \$174.00. You may mail the Commission's check directly to Mr. Thomas, or send it to me for forwarding.

Thank you for your cooperation in this matter.

Sincerely yours,

John R. Bolton /af
John R. Bolton

Enclosures

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DRIVER

Yellow Cab

COMPANY OF D. C., INC.

1636 BLADENSBURG ROAD, N.E.
WASHINGTON, D.C. 20002

FOR RADIO DISPATCH 544-1212

CAB NO.

" TIME.

DATE

FROM

TO

FARE

CAB NO.

6/29/74

Wash DC.

N. Airport

\$4.50

4 FLIGHT

005 8450979634 6 □

LOTHIE & THOMAS

2/75

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

730409527

80121

Paul Lovejoy, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006



FEDERAL ELECTION

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20008 JUL 28 4:31

TELEPHONE
(202) 452-8000

WRITER'S DIRECT DIAL NUMBER

July 28, 1978

TWX: 710-822-0008
TELEX: 89-593
CABLE: COVLING

(202) 452-6418

004887

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

Re: MUR 443 (77)

Dear Mr. Oldaker:

Pursuant to your invitation, made at the conclusion of the deposition of Mr. L.E. Thomas in this matter on June 29, 1978, we would like to make some additional comments regarding MUR 443 (77).

We believe that Mr. Thomas' deposition fully supports the answers to the Commission's interrogatories enclosed with my letter to you of January 16, 1978. The June 29 deposition transcript, page after page, demonstrates the independence of the activities of Florida Friends of Reagan (hereafter, "FFOR"). Mr. Thomas explicitly testified that he did not discuss with Governor Reagan, Senator Laxalt or Messrs. Sears or Keene or any State chairmen of Citizens for Reagan any aspects of the Citizens for Reagan national strategy. (Dep. tr. 8, 10, 14-15, 22, 55) In fact, his only discussions with these individuals on any matters apart from the Florida primary were on a casual basis. (Id.) Mr. Thomas testified further that he did not discuss the activities of FFOR with any Citizens for Reagan personnel. (Id. at 29, 42) He had no campaign responsibility for Citizens for Reagan after the Florida primary. (Id. at 18-21, 43)

Moreover, Mr. Thomas made it plain that FFOR was entirely his own idea and that FFOR was financed by contributions from friends and associates. (Id. at 35) No Citizens for Reagan mailing or fund-raising lists were used. (Id.) There was no connection between any advertisements utilized in Florida by Citizens for Reagan and the advertisements run in Wisconsin by FFOR. (Id. at 31) Wisconsin was chosen by FFOR as the primary State in which to run the advertisements because it was the first primary scheduled after Mr. Thomas

78040062793

William C. Oldaker
July 28, 1978
Page 2

conceived the idea of establishing FFOR. (Id. at 36) Mr. Thomas was contacted by only one staff member of Citizens for Reagan to discuss the Wisconsin advertisements, and Mr. Thomas told that person that the advertisements were "none of his damn business." (Id. at 40) Finally, Mr. Thomas once again confirmed that he consulted with an attorney in Florida prior to having the advertisements placed in Wisconsin newspapers. (Id. at 27-28)

As I stated in my letter to you of January 16, the circumstances surrounding the activities of FFOR provide compelling reason for the Commission to find that no violation of the Federal Election Campaign Act, as amended, (hereafter, "FECA") took place. Our views in this regard have been strengthened by the substantial factual differences between this case and the conciliation agreement entered into between the Commission and Mr. Peter F. Secchia (MUR 321(76)):

(1) Mr. Secchia's activities in 1976 on behalf of Friends of the First Family nearly all occurred after the effective date of the FECA Amendments of 1976. Mr. Thomas' activities on behalf of FFOR, by contrast, were undertaken during the period following the Supreme Court's decision in Buckley v. Valeo, 424 U.S. 1 (1976), when the state of the FECA was, to say the least, in turmoil and uncertainty.

(2) After March 22, when the Commission's executive powers were suspended because of the Court's refusal to extend any further its stay of the January 30 decision in Buckley, no advisory opinions could be sought from the Commission. Once again, Mr. Secchia's case is different; his activities took place when he could have requested an advisory opinion on behalf of Friends of the First Family.

(3) At the time of Mr. Thomas' activities, there were no Commission regulations publicly available, even in draft form. Proposed regulations were not available until May, 1976. While Mr. Secchia could have taken these proposed regulations into account, Mr. Thomas did not even have the benefit of draft proposals.

(4) In the General Counsel's report on the MUR involving Mr. Secchia, there is an extensive list of contacts, both written and oral, between Mr. Secchia and personnel of the President Ford Committee. No

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William C. Oldaker
July 28, 1978
Page 3

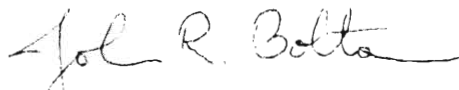
such list could be compiled for Mr. Thomas. His only contact with any CFR personnel after the Florida primary was for the limited purpose of handling matters relating to wrapping up the campaign.

All of these facts demonstrate the uniqueness of Mr. Thomas' situation. In this case, the Commission need not address questions of statutory construction or the interpretation of its regulations. As a matter of fact, Mr. Thomas's actions on behalf of FFOR were completely independent from Citizens for Reagan to the best ability of anyone in March, 1976, to understand and comply with the "independence" requirements.

Moreover, we do not believe that anyone who observed Mr. Thomas' demeanor during his deposition on June 29 could reach any conclusion other than that the activities of FFOR were totally independent of Citizens for Reagan. His credibility is unimpeachable.

There is no warrant on this record to continue this MUR further, and it should be dismissed forthwith. A dismissal on these facts would not establish a precedent that would pose problems for the Commission in future enforcement actions. To the contrary, any result other than a dismissal here would result in a very substantial injustice, and would serve no legitimate law-enforcement purpose. We would be more than happy to consult further with you or your staff if you have any questions.

Sincerely yours,


John R. Bolton

78040062795

79040752796
COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

HAND DELIVER TO:

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

HAND DELIVERED

18 JUL 20 04:31



FEDERAL ELECTION COMMISSION

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

July 18, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: MUR 443 - Interim Report dated 7-14-78
Received in Office of Commission
Secretary: 7-17-78, 12:30

The above-mentioned document was circulated on a 24 hour no-objection basis at 3:30 p.m., July 17, 1978.

As of 4:00 p.m. this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

Commissioners Aikens, Springer, Staebler, and Thomson returned their papers by the deadline.

78040062797

July 17, 1978

MEMORANDUM TO: Marge Evans
FROM: Elissa T. Carr
SUBJECT: MUR #43

Please have the attached Interim Report distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040062798

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan) MUR 443 (77)

Interim Report

78040762799
This matter concerns the question of whether certain expenditures made by Florida Friends of Reagan ("FFOR") were in fact independent as reported by respondent. Also involved in this matter are certain expenses incurred by Mr. L. E. Thomas, Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan, on behalf of Citizens for Reagan. The expenditures in question may have initially been paid by Mr. Thomas through a corporate checking account and later reimbursed by Citizens for Reagan.

On June 29, 1978, the General Counsel's Office deposed Mr. Thomas. Upon receipt of the transcript of this deposition we will submit to the Commission an analysis of this matter and recommendations as to its disposition.

7/14/78
Date

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

June 13, 1978

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS

MWE

SUBJECT:

MUR 443 (77) - Interim Status Report dated 6-12-78
Received in Office of Commission
Secretary: 6-12-78, 3:30

The above-mentioned document was circulated on a 24
hour no-objection basis at 9:00 a.m., June 13, 1978.

There were no objections to the Interim Status Report.

78040062800

June 12, 1978

MEMORANDUM TO: Marge Sammons
FROM: Elissa T. Gery
SUBJECT: MUR 443

Please have the attached Interim Status Report on
MUR 443 distributed to the Commission.

Thank you.

78040062801

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Florida Friends of Reagan

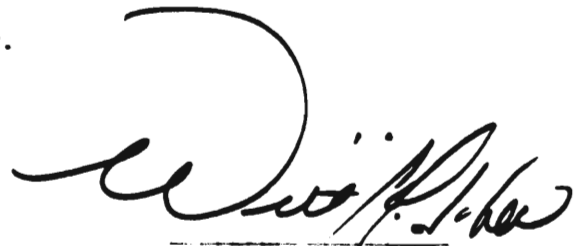
MUR 443 (77)

Interim Status Report

This matter concerns the question of whether \$14,771.40 in expenditures made by Florida Friends of Reagan ("FFOR") for the purpose of supporting the candidacy of Ronald Reagan were in-kind contributions rather than independent expenditures as reported by respondent. An additional question involves the nature of \$610.57 in reimbursed expenses incurred by Mr. L.E. Thomas, Chairman of FFOR, on behalf of the Citizens for Reagan Committee while Mr. Thomas was serving as Florida Chairman of the Citizens for Reagan Committee.

The General Counsel's Office has scheduled the deposition of Mr. Thomas for June 29, 1978. Following that deposition, we shall present to the Commission an analysis of the information received and recommendations as to the disposition of this matter.

6/12/78
Date


William C. Oldaker
General Counsel

78040062800



FEDERAL ELECTION COMMISSION

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

June 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443(77)

Dear Mr. Thomas:

After consultation with your attorney, John R. Bolton, we have established the date of your deposition. Enclosed is a subpoena requiring your attendance for oral deposition on June 29, 1978, at 1:00P.M. at the Federal Election Commission.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4175.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosure

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth Street, N.W.
Washington, DC 20006

78040062803

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
Florida Friends of Reagan)	To Appear for Deposition
)	Upon Oral Examination
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at 321 Magnolia Ave., on
Panama City, Florida 32401
February 24, 1978, at 10 AM.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 8th day of Feb, 1978.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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

78040062804

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
)	
Florida Friends of Reagan)	To Appear for Deposition
)	
)	Upon Oral Examination
)	
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463
June 29, 1978, at 1:00 P.M.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day *6th* of June, 1978.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

PS Form 3811, Apr. 1977

PL 443

● 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:
 L. E. Thomas

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943423

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 Steven Solomon

5. ADDRESS (Complete only if requested)
 POSTMARK
 JUN 13 1978

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1977-O-234-337

PS Form 3811, Apr. 1977

PL 443 ✓

● 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 R. Bolton

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943624

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
 Alice Tuchs (Secretary)

5. ADDRESS (Complete only if requested)
 838 16th St. N.W.
 Wash. D.C. 20006

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1977-O-234-337



FEDERAL ELECTION COMMISSION

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

June 6, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: SUBPOENA IN RELATION TO MUR 443

The attached subpoena, approved May 3, 1978, has
been signed and sealed this date.

78040062807

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

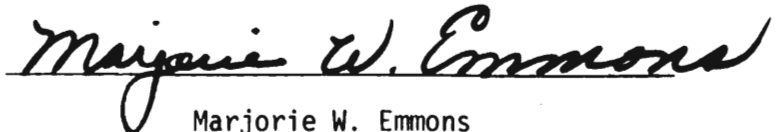
MUR 443 (77)

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 adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Proceed to depose Mr. L. E. Thomas.
2. Defer making a determination on the question of possible violations of 2 U.S.C. Section 441b.

Commissioner Aikens was not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

Date: May 4, 1978

78040062808

April 25, 1978

GENERAL COUNSEL'S REPORT

This matter was internally initiated by the General Counsel's Office. In the course of examining documents submitted during the investigation of an unrelated MUR, it was noted by a member of the staff that one of the documents mentioned that L. E. Thomas and Florida Friends of Reagan had made independent expenditures on behalf of the candidacy of Ronald Reagan.

On October 27, 1977, the Commission found reason to believe that Florida Friends of Reagan may have violated 2 U.S.C. §441a in making independent expenditures in support of the candidacy of Ronald Reagan. On February 9, 1978, the Commission issued a subpoena for oral deposition to Mr. L. E. Thomas, Chairman of Florida Friends of Reagan, and Florida Chairman of Citizens for Reagan, and an Order requiring Citizens for Reagan to produce records pertaining to the activities of Mr. Thomas for which he received \$610.57 in travel reimbursements from Citizens for Reagan on July 14, 1976.

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. On April 17, 1978, the documents were received by the Commission (Attachment I).

Upon review of said documents, it appears that certain expenditures made by Mr. Thomas, and reimbursed by Citizens for Reagan, were drawn from the corporate account of Tommy Thomas Chevrolet, Inc., indicating a possible violation of 2 U.S.C. §441b.

Further, in his answers to the Commission's interrogatories, dated January 16, 1978, Mr. Thomas maintained that all operations of the Florida Citizens for Reagan Committee terminated on or about March 11, 1976.^{1/} However, examination of the subpoenaed documents received from Citizens for Reagan indicates that Mr. Thomas made expenditures, and was reimbursed by Citizens for Reagan, for rental of a car on March 28, 1976, and May 19, 1976, airline tickets on May 18, 1976, and for gasoline and automotive expenses on March 22, April 15, and April 22, of 1976. All of the above expenditures were made after the date of the Florida primary election, the date on which Florida Citizens for Reagan purportedly ceased activity, and on or after the date that Florida Friends of Reagan received its first contribution.

As a result of the information gained from the documents obtained from Citizens for Reagan, it is the recommendation of the General Counsel's Office that we proceed to depose Mr. Thomas regarding his activities as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan. Possible

^{1/} Florida Friends of Reagan received its first contribution on March 28, 1976, according to statements filed with the Commission.

78040352810

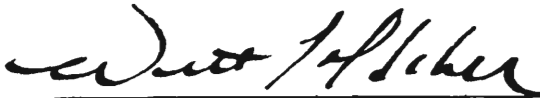
communications between Mr. Thomas and members of Citizens for Reagan staff while Mr. Thomas was serving in his capacity as Chairman of Florida Friends of Reagan, and the nature of the account on which checks were drawn in payment for expenses incurred on behalf of Citizens for Reagan, and later reimbursed by Citizens for Reagan, should also be examined.

Counsel for Mr. Thomas has requested that he be able to see the documents submitted by Citizens for Reagan. This office does not object to the request and intends to make these documents available to respondent. We believe that the Commission should defer making a determination on the question of possible violations of 2 U.S.C. §441b in connection with checks drawn on the Tommy Thomas Chevrolet, Inc. account until after the deposition of Mr. Thomas.

Recommendation

1. Proceed to depose Mr. L. E. Thomas.
2. Defer making a determination on the question of possible violations of 2 U.S.C. §441b.

4/28/78
Date


William C. Oldaker
General Counsel

7 8 0 4 0 0 6 2 8 1 1

801848

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

78 APR 17 AM 8:53

YCC
3269

HENRY M. BUCHANAN, C.P.A.
DAVID L. ZIMMER, C.P.A.
MICHAEL C. REMER, C.P.A.
J. CRAIG DEFIBAUGH, C.P.A.

TELEPHONE
(301) 652-0560

April 12, 1978

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

Re: Citizens for Reagan

Dear Mr. Lovejoy:

In correspondence dated April 4, 1978, Ed Meese, an attorney associated with the Citizens for the Republic, requested that I forward to you documents relating to a check for \$610.57 issued on July 14, 1976 by Citizens for Reagan, to L. E. Thomas.

After a review of papers and documents of Citizens for Reagan, I located the material which I have enclosed concerning the disbursement mentioned above. I am forwarding said material to you at the request of Ed Meese. If you have any questions on this matter, please communicate with me.

Sincerely,

Henry M. Buchanan

Henry M. Buchanan

HMB:pw
Enclosures
cc: Ed Meese

78040362812

NATIONAL CAR RENTAL SYSTEM, INC.

ACCOUNT NUMBER		ACCOUNT TYPE		STATEMENT DATE		YOUR LINE OF CREDIT IS 500.00	
7001-056-1568-1		CENTRAL BILL		06/07/76		QUESTIONS**CALL 612-830-2252	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO.	AMOUNT		
LUTHER E THOMAS	ORLANDO		05/19/76	50333463	15.90		

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

SUMMARY OF ACCOUNT	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.\$)
	.00	15.90	.00 CR	.00	15.90

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 35328, NORMANVILLE BRANCH, MINNEAPOLIS, MINNESOTA 55435

copy sent to you

618229004082

ACCOUNT NUMBER		ACCOUNT TYPE		STATEMENT DATE		YOUR LINE OF CREDIT IS 500.0	
7001-056-1568-1		CENTRAL BILL		04/06/76		QUESTIONS**CALL 612-830-225	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	AGREEMENT NO	AMOUNT		
LUTHER E THOMAS	ST PETERSBURG	ORLANDO	03/28/76	50197420	24.12		
LUTHER E THOMAS					43.08		

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

691- Off to Kasey

SUMMARY OF ACCOUNT	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE
	0.00	67.20	0.00 CR	0.00	67.20

NATIONAL CAR RENTAL SYSTEM, INC.

FOR RENTALS, HOMES, TRAVEL, AND MORE

41879104086

CAMPBELL'S NATIONAL CAR RENTALS
2126 FIRST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712
TELS: 813/522-4101 TAMPA 813/576-3164

81004-00

NE H 245678 0

(12) CAR NO. 2107
MAKE *Catless*
MODEL *3376*
YEAR *1976*
VIN *184281004*

(13) MILES IN 4789
(14) MILES OUT 4705
(15) MILES DRIVEN 84

(16) DATE & TIME IN
A.M. 1976 MAR -3 PM 2:25
(17) DATE & TIME OUT
A.M. 1976 MAR -2 PM 1:55

7001 056 1568 1
CENTRAL BILLING

LUTHER E THORAS

04
78

(18) RECAP NO.

(19) COMPANY NAME
(20) RENTER'S NAME
(21) ADDRESS
(22) CITY

(23) MILES IN
(24) MILES OUT
(25) MILES DRIVEN

FOR SPECIAL RATES
MINIMUM RENTAL \$
EXTRA DAYS \$
EXTRA HOURS \$
MILEAGE ALLOWED \$
EXTRA MILES \$

AMERICAN EXPRESS
CARTER BLANCHE
DINER
HERTZ
EUROPCAR
TILDEN
OTHER

ACCEPTS C.D.W.
COLLISION DAMAGE WAIVER

SUB-TOTAL 1995

EXPIRATION DATE
NAME
ADDRESS
CITY

GASOLINE QUANTITY
IN
OUT

TOTAL TIME AND MILEAGE OR MINIMUM CHARGE 1995

INTER-CITY SETTLEMENT
OWNING CITY
RENTING CITY

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

STAMPS
REPAIRS
TOTAL EXPENSES

NET CHARGE 2412

ACKNOWLEDGE RECEIPT IN TICKETS AND COUPONS FOR RELATED CHARGES DESCRIBED HEREIN PAYMENT TO BE MADE WHEN BILLED OR IN EXTENDED PAYMENTS IN ACCORDANCE WITH STANDARD POLICY OF COMPANY ISSUING CARD AND AS REFLECTED IN AVAILABLE TARIFFS

UNIVERSAL
CREDIT CARD
CHARGE FORM

Southern Airways, Inc.

0384420890476

SOUTHERN AIRWAYS

9 A.O

PANAMA CITY FL

X MEMBER OF AMERICAN EXPRESS

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER		TOUR CODE		DATE		TIME		STATUS		FARE BASIS/TKT. DESIGNATOR		REF. NO. & OTHER		REF. NO. & OTHER		CLASS	
PANAMA CITY		SO		225		S		18MAY		311P		OK		S			
ORLANDO MCCOY		SO		230		S		19MAY		930P		OK		S			
PANAMA CITY																	
VOID																	
VOID																	

IF EXT'D. PAY DSRD. CIRCLE NO. OF MOS. 3 6 9 12

FARE 79.62
TAX 6.36
TOTAL 85.98

015 003 180 5 100AX

VALID 10 75 THRU 09 76

58

LUTHER E THOMAS

038 4420890476 2 0

STATE NO

CONNECTION OF PASSENGER WITH SUBSCRIBER

015 003 180 5 100AX

VALID 10 75

THRU 09 76

58

LUTHER E THOMAS



Approval Code

Check of Bill No

Service Establishment

Date of Charge

Any delayed charges are entered below

4301550 24450 0 11 75
2009918954 40905-
7230570920 20677 1-7 5

Merchandise/Service

Type of Delayed Chg

Taxes

Am't of Delayed Chg

Tips/Misc

Revised Total

Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment Merchandise and/or service purchased on this card. All will be resp'd or returned for cash refund

Cardmember Signature

Total

Amexco Use Only

Invoice Number

Amexco Copy

523800 01500318051100

01000000007491

78040062817

749

8598

9347*

TOMMY THOMAS CHEVROLET, INC.

P.O. BOX 490



PH. 788-8222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

DATE April 15, 1978

No. 5289

PAY

AMOUNT AFTER PD DATE FROM DATE OF ISSUE

TO THE ORDER OF
TOMMY THOMAS CHEVROLET, INC.
P.O. Box 25487
Richmond, Va. 23268

TOMMY THOMAS CHEVROLET, INC.

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC./ Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	PCT.	AMOUNT	NET AMOUNT
	Acct. No. 1188426660					
		220	18.00			
		134	18.37			
		518	32.90			
						69.27

Model 10000 P.O. Box, INC.

31829004087

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490

CHEVROLET

PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 5562 A

DATE April 30, 1976

67 20

PAY

\$ 67.20

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
07 6 2 8 1 7	Acct No. 7001-056-1568-1 Reagan Comm	220				67.20

20683 - BOYD BROS., INC.

TOMMY THOMAS CHEVROLET, INC.

P.O. BOX 490 CHEVROLET PANAMA CITY, FLORIDA PH. 765-5222

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

63-210
1/1/73

PANAMA CITY, FLORIDA

DATE April 22, 1976 No. 5431

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

\$ 25.00

TO THE ORDER OF
Shell Oil Company
Box 160
Tulsa OK 74184

TOMMY THOMAS CHEVROLET, INC.

BY _____
NON-NEGOTIABLE

TWO SIGNATURE REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT PCT. AMOUNT	NET AMOUNT
April 4	89531,2569	Reagan Co 220			25.00

02829004084



FEDERAL ELECTION COMMISSION

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

April 12, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

mwe

SUBJECT: MUR 443 (77) - Interim Report signed by the
General Counsel: 4-7-78
Received in Office of Commission
Secretary: 4-10-78, 11:47

The above-mentioned document was circulated to the
Commissioners on a 24 hour no-objection basis at 12:00,
April 11, 1978.

As of 2:00 p.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim
Report.

78040062821

April 10, 1978

MEMORANDUM TO: Marge Simmons
FROM: Elissa T. Gerr
SUBJECT: MUR 443

Please have the attached Interim Report on MUR 443 distributed to the Commission on a 24 hour no-objection basis.

Thankyou.

78040062822

78040062823

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. Mr. Ed Meese, general counsel of Citizens for the Republic (formerly Citizens for Reagan) telephoned on February 27, 1978 and said the organization had been unable to locate the particular records at its main records storage area and would have to search at several other locations. On April 4, 1978, Mr. Meese, telephoned and said that the information requested from Citizens for Reagan finally had been located and should be received by the Commission by April 7, 1978.

Upon receipt of these records, we will reschedule the deposition of Mr. Thomas.

4/1/18
Date

William C. Oldaker
William C. Oldaker

78040062824

801848

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

78 APR 17 AM 8:58

YCC
3269

HENRY M. BUCHANAN, C.P.A.
DAVID L. ZIMMER, C.P.A.
MICHAEL C. REMER, C.P.A.
J. CRAIG DEFIBAUGH, C.P.A.

TELEPHONE
(301) 652-0580

April 12, 1978

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

Re: Citizens for Reagan

Dear Mr. Lovejoy:

In correspondence dated April 4, 1978, Ed Meese, an attorney associated with the Citizens for the Republic, requested that I forward to you documents relating to a check for \$610.57 issued on July 14, 1976 by Citizens for Reagan, to L. E. Thomas.

After a review of papers and documents of Citizens for Reagan, I located the material which I have enclosed concerning the disbursement mentioned above. I am forwarding said material to you at the request of Ed Meese. If you have any questions on this matter, please communicate with me.

Sincerely,

Henry M. Buchanan

Henry M. Buchanan

HMB:pw
Enclosures
cc: Ed Meese

7804006282

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers for Lines 20, 21, 22, and/or 23 of FEC Form 3

(see instructions on back)

Page 79 of for

LINE NUMBER 20

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

Section B
Election Commission
K Street, N.W.
Washington, D.C. 20463

Name of Candidate or Committee in full

Citizens for Reagan

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Southern Bell 85 Annex Atlanta, GA 30385	Telephone Expense	7/14/76	167.96
Winter Park Telephone Company P. O. Box 4000 Winter Park, Florida 32789	Telephone Expense	7/14/76	267.81
Club Rudo 322 Alexander Street Mt. Dora, Florida 32757	Luncheon Expense	7/14/76	240.03
The Graphics House P. O. Box 1535 Winter Park, Florida 32789	Photocopying Expense	7/14/76	110.24
Jim Blake Office Supply, Inc. P. O. Box 127 Winter Park, Florida 32789	Furniture Rental	7/14/76	41.60
Wintergate Square 1350 Orange Avenue Winter Park, Florida 32789	Office Rent	7/14/76	208.00
L. E. Thomas P. O. Box 490 Panama City, Florida 32401	Reimbursed Traveling and Office Expenses	7/14/76	610.57
Margaret McClure 3892 N. 30th St. Phoenix, Arizona 85016	Xeroxing & Printing	7/17/76 7/28/76	21.74 13.10

Subtotal of expenditures this page (optional) ▶ \$ 1,681.05

Total this period (last page this line number only) ▶ \$

78040062827

LIST SOURCE OF DEPOSITS AND INFORMATION ABOUT EXPENDITURES ON BACK OF CHECKING STUBS

No. 1229			
7-14 '76			
PAY TO <u>Whitman Squares</u>			
FOR			
DEPOSIT			
DEPOSIT			
BALANCE			
AMOUNT THIS CHECK		208	66
BALANCE			51
HARLAND - 2			

No. 1230			
7-14 '76			
PAY TO <u>LE Thomas</u>			
FOR <u>Supplement</u>			
DEPOSIT <u>= 497.1125</u>		208	84
DEPOSIT <u>Capital Supp. pay.</u>		63	7
BALANCE		682	85
AMOUNT THIS CHECK		610	52
BALANCE		72	28
HARLAND - 2			

No. 1231			
19			
PAY TO			
FOR			
DEPOSIT			
DEPOSIT			
BALANCE			
AMOUNT THIS CHECK			
BALANCE			
HARLAND - 2			

FLORIDA CITIZENS FOR REAGAN
CAMPAIGN FINANCE REQUEST

CHECK #

1230

CHECK DATE

7-14-76

AMOUNT

610.57

PAYEE

LE T. Jones

P O Box 490

Panama City, Fla 32401

PURPOSE

Reimburse for expenses

DATE REQUEST RECEIVED

BY

REQUEST BY

PHONE

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490  PH. 785-5222
PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

83-910
832

No. 5431
DATE April 22, 1976

TOMMY THOMAS CHEVROLET, INC.
23 00

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

NON-NEGOTIABLE

BY

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct # 89531,2569 Reagan Co	220	✓			23.00

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 785-3222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 475

DATE March 22, 1976

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMT.
				PCT.	AMOUNT	
	Card # 89531,2569 Reagan Comm.	220 ✓				11.50

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P. O. BOX 490

CHEVROLET

PH. 785-5222

PANAMA CITY, FLORIDA

No. 5289

DATE April 15, 1976

69-27

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

\$ 69.27

TO
THE
ORDER
OF

Texaco, Inc
P O Box 25487
Richmond, Va 23268

TOMMY THOMAS CHEVROLET, INC.

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct No 1188426660 Reagan	220	18.00			
		13A	18.37			
		513	32.90			
						69.27

1500

7804006281

Check Card Call

5

				1	2	3	4
				Number	Amount		
1	2	28	To Tampa, FL	813-877-7953	1.15		
2			From Cambridge, MS	617-547-5257			
3							
4	2	28	To Panama City, FL	785-5221	1.85		
5			From Cambridge, MS	617-547-5257			
6							
7	2	29	To Tampa, FL	813-877-7953	1.85		
8			From Cambridge, MS	617-547-5257			
9							
10	3	28	To Panama City, FL	785-5221	3.72		
11			From Cambridge, MS	617-547-5257			
12							
13	3	01	To Panama City, FL	785-7834	4.49		
14			From Cambridge, MS	617-547-5257			
15							
16	3	01	To New York, NY	212-686-3477	1.105		
17			From Cambridge, MS	617-547-5257			
18							
19	3	03	To Dathan, AL	205-792-4422	2.75		
20			From Panama City, FL				
21							
22	3	04	From Atlanta, GA	404-351-5923	1.675		
23			From Cambridge, MS	617-547-5257			
24							
25	3	05	To Panama City, FL	769-4402	3.16		
26			From Pontiac, FL	813-639-0000			
27							
28	3	06	To Birmingham, AL	205-822-4350	2.02		
29			From Pontiac, FL	813-639-2167			
30							
31	3	06	To Panama City, FL	796-4402	1.95		
32			From Birmingham, AL	205-822-4350			
33							
34	3	06	To Panama City, FL	785-5221	3.48		
35			From Atlanta, FL	305-571-6000			
36							
37	3	08	To San Antonio, TX	512-342-4584	2.15		
38			From Dallas Park, FL	305-644-6100			
39							
40							

OVER

World Travel Costs

4

			Number	Amount
1	3 08	To Tampa, FL	813-8777953	1.35
2		From Winter Park, FL	305-6446104	
3				
4	3 09	To Panama City, FL	766-4402	1.55
5		From Winter Park, FL	305-644-6100	
6				
7	2 10	To Panama City, FL	785-7834	1.22
8		From Cambridge, MS	601-5475257	
9				
10				
11				
12				179.85
13				
14	8	State Tax 4%	719	
15	2	Post Fed Tax 4% (per State)	719	
16	5			
17	0			194.23
18	0			
19	0			
20	4			
21	0			
22	0			
23	7			
24	3			
25	0			
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40				

0.00
 1.92 +
 2.30 +
 2.48 +
 8.36 +
 3.80 +
 3.95 +
 2.14 +
 11.78 +
 3.42 +
 2.21 +
 5.39 +
 1.95 +
 3.42 +
 6.45 +
 2.93 +
 1.32 +
 7.46 +
 2.80 +
 5.12 +
 17.84 +
 0.71 +
 10.04 +
 1.45 +
 1.60 +
 2.80 +
 1.25 +
 1.70 +
 1.85 +
 1.85 +
 1.85 +
 3.72 +
 4.49 +
 11.65 +
 2.75 +
 6.75 +
 3.16 +
 2.02 +
 1.95 +
 3.48 +
 2.15 +
 1.39 +
 1.99 +
 12.21 +
 179.85
 179.85
 4.
 7.19

STAT REC'D 3/2
 \$1952.48

		1	2	3	4
		Number	Amount		
1	2 13	To Panama City, FL	785-5221	1646	1
2		From Jett PR, FL	—		
3					
4	2 13	To Dothan, AL	205-792-7233	293	
5		From Windsor Park, FL	305-647-7070		
6					
7	2 13	To Tampa, FL	813-877-7953	132	
8		From Orlando, FL	305-351-2421		
9					
10	2 16	To Panama City, FL	785-5221	746	
11		From Cambridge, MS	601-547-5257		
12					
13	2 17	To Tulsa, OK	918-838-0315	280	
14		From Panama City, FL	904-763-9627		
15					
16	2 17	To Panama City, FL	785-7854	512	
17		From Cambridge, MS	601-547-5257		
18					
19	2 18	To Ocean, AL	205-353-7221	1784	
20		From Forest, AL	LOCAL TAX	71	
21					
22	2 18	To Birmingham, AL	205-251-6674	1004	
23		From Cambridge, MS	601-547-5257		
24					
25	2 19	Panama City, FL	785-5221	145	
26		From Forest, AL	205-925-9201		
27					
28	2 20	To Panama City, FL	785-5221	160	
29		From Atlanta, GA	404-577-1234		
30					
31	2 20	To Tulsa, OK	918-838-3335	260	
32		From Panama City, FL	—		
33					
34	2 24	To Dothan, AL	205-792-4432	125	
35		From Panama City, FL	—		
36					
37	2 24	To Dothan, AL	205-792-4432	170	
38		From Panama City, FL	—		
39					
40					

RONALD REAGAN CAMPAIGN

TELEPHONE

1/30-3/12/76

3

		Number	Amount
1	1 30 To: Panama City, FL	745-4687	192
2	From: St. Petersburg, FL	813-3607051	
3			
4	2 02 To Dothan, AL	205-792-4422	230
5	From: St. Petersburg, FL		
6			
7	2 02 To: Panama City, FL	785-5221	248
8	From: St. Petersburg, FL		
9			
10	2 05 To: Panama City, FL	785-5221	836
11	From: Las Vegas, NV	702-739-4111	
12			
13	2 05 To: Panama City, FL	785-5221	380
14	From: Las Vegas, NV	702-739-4111	
15			
16	2 05 To Jacksonville, FL	791-3782	395
17	From: Las Vegas, NV	702-739-4111	
18			
19	2 05 To: Panama City, FL	783-9607	214
20	From: Las Vegas, NV	702-739-4111	
21			
22	2 06 To: Panama City, FL	785-5221	1178
23	From: Las Vegas, NV	702-739-4111	
24			
25	2 06 To: Panama City, FL	785-5221	342
26	From: Las Vegas, NV	702-739-4111	
27			
28	2 06 To: Cambridge, MA	617-547-5257	221
29	From: Las Vegas, NV	702-739-4111	
30			
31	2 07 To: Panama City, FL	785-5221	635
32	From: Las Vegas, NV	702-739-4111	
33			
34	2 07 To: Miami, FL	305-591-3957	195
35	From: Las Vegas, NV	702-739-4111	
36			
37	2 07 To: Panama City, FL	785-5221	342
38	From: Las Vegas, NV	702-739-4111	
39			
40			

(10/10)

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490

CHEVROLET

PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 5562 A

DATE April 30, 1976

67 20

\$ 67.20

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

AMOUNT

TO
THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
7 8 0 4 0 7 6 2 8 3 3	Acct No. 7001-056-1568-1 Reagan Comm	220 ✓				67.20

NATIONAL

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 06/07/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-2252	
CARD HOLDER NUMBER	NAME OF RENTER LUTHER E THOMAS	CITY OF RENTAL ORLANDO	DATE OF TRANSACTION 05/19/76	RENTAL AGREEMENT NO 50333463	AMOUNT 15.90

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

SUMMARY OF ACCOUNT	.00	15.90	.00 CR	.00	15.90
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.\$)

NATIONAL CAR RENTAL SYSTEM, INC.

P.O. BOX 36728 - NORMANDALE BRANCH
MINNEAPOLIS, MINNESOTA 55438

C. O. A. 3/1/76

7 8 0 4 0 6 2 8 3 7

CAMPBELL'S NATIONAL CAR RENTALS
2126 FIRST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712
TELS: 813/322-4101 TAMPA 813/876-3164

81004-00

NO. 04 NC H 245678 0

(2) CAR NO. 2107
CAR WILL BE RETURNED BY 5378
OWNING CITY TAMPA FL
RENTING CITY TAMPA FL
DATE 1976 MAR -3 PM 2:25
MILES IN 4789
MILES OUT 4705
MILES DRIVEN 84

7001 056 1568 1
CENTRAL BILLING

LUTHER E THORAS

04
78

(16) RECAP NO.

(10) COMPANY NAME
(11) RENTER'S NAME
(12) ADDRESS
(13) CITY

(14) STATE

MAJOR C.B. AMERICAN EXPRESS A.X. CARTE BLANCHE B.L. DINER D.N. BANK AMERICA B.A. T.W.A. T.G. AVIS A.V.

MASTER CHARGE M.C. LOCAL REC. L.C. AIR TRAVEL A.T. HERTZ H.Z. LURDE CAR TILDEN T.L. OTHER

MO. DAY YR. HEIGHT. WEIGHT EYES HAIR

DRIVER LICENSE NO. 1520525 25 2473734

EXPIRATION DATE HOME PHONE NO.

NAME Luther Edwin Thoras

ADDRESS P.O. BOX 490

CITY Panama City FL

LOCAL ADDRESS PHONE NO.

I HAVE READ THE TERMS AND CONDITIONS ON BOTH SIDES OF THIS RENTAL AGREEMENT AND AGREE THERE TO.

ADDITIONAL DRIVER

INTER-CITY SETTLEMENT

OWNING CITY RENTING CITY

TIME & MILEAGE % TAX

C.D.W. LESS GAS, ETC. () LESS DEPOSIT ()

TOTAL P.A.I.

RECEIVING CITY

GAS TO FILL GAL.

REPAIRS

STAMPS

TOTAL EXPENSES \$

AMOUNT COLLECTED OR REFUNDED

NET AMOUNT \$

MILEAGE DETERMINED BY READING FACTORY INSTALLED ODOMETER
(13) MILES IN 4789
(14) MILES OUT 4705
(15) MILES DRIVEN 84
(16) MILES ALLOWED
(17) MILES CHARGED
ALTERNATE CAR AND DATE
MILES IN
MILES OUT
MILES DRIVEN

(18) DATE & TIME IN A.M. 1976 MAR -3 PM 2:25
(19) DATE & TIME OUT A.M. 1976 MAR -2 PM 1:55
FOR SPECIAL RATES
MINIMUM RENTAL EXTRA DAYS EXTRA HOURS WEEKEND ALLOWED (10% ADV.) EXTRA MILES
DATE MILES (41)
DATE MILES (42)
WEEKS (43)
HOURS (44)
VAC. WE. SPC. MO. (45)
SUB-TOTAL (46) 1995
TOTAL TIME AND MILEAGE OR MINIMUM CHARGE (47) 1995
INTER-CITY FEE (48)
C. DAYS WEEKS D. V. (49)
GAS TO FILL TAXABLE (50)
SUB-TOTAL (51) 19445
GAS TO FILL NON TAXABLE (52) 337
P. DAYS WEEKS (53)
TOTAL CHARGES (54) 2412
LESS GAS, ETC. (55)
NET CHARGE (56) 2412
LESS DEPOSIT (57)
AMOUNT DUE (U.S.) (58) 2412
PAID BY (59)
CASH OR CHECK (60)
BANK DIRECT (61)
CREDIT CARD (62)
OTHER INITIALS (63)
DATE RECEIVED BY (64)
DATE (65)
STAMPS (66)
ISSUED TO BE MAILED (67)
DATE (68)

COLLISION DAMAGE WAIVER
In consideration of the collision damage waiver rate (C.D.W.) shown upon hereof, lessor agrees to release lessor from liability for damages caused by collision, fire, theft, or any other cause, provided lessor is not negligent. If lessor is negligent, lessor shall be liable for all damages. The vehicle described herein shall be operated in violation of any of the provisions of this agreement.
Customer agrees to decline coverage of C.D.W. at rate specified. C.D.W. is applicable only if accepted.

GASOLINE QUANTITY
IN
OUT

STAMPED
BELOW
INSTEAD

(10) CASH COUPON
(11) UNUSUED DEPOSIT
(12) GAS, ETC.
(13) TOTAL REFUND
(14) STAMPED
(15) BELOW
(16) INSTEAD

\$15.00 DROP CHARGES BETWEEN

81004-00 \$10.00 DROP BETWEEN

ST. PETERSBURG - CLEAR

P.O. BOX 10837

ST. PETERSBURG, FLORIDA 33712

MAKE CHECK PAYABLE TO NATIONAL CAR RENTAL

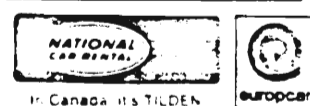
MILEAGE CHARGE

NO. H 245678 0

RENTAL AGREEMENT NO.

RENTAL AGREEMENT NO. MUST APPEAR ON ALL PAYMENTS AND CORRESPONDENCE

PAGE 1 INVOICE WHITE - HOME OFFICE 2



PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT.

7 8 0 4 0 0 6 2 8 4 0

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 04/06/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-2252	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO	AMOUNT
	LUTHER E THOMAS	ST PETERSBURG	03/03/76	H2456780	24.12
	LUTHER E THOMAS	ORLANDO	03/28/76	50197420	43.08

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

Pay - Charge to Rental

SUMMARY OF ACCOUNT	.00	67.20	.00 CR	.00	67.20
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.)

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 35224 - NORMANDALE BRANCH
MINNEAPOLIS, MINNESOTA 55435

015 003 120 5 100

VALID 10/75

THRU 09/76
58



Approval Code

Check or Bill No

Service Establishment COFFEE SHOP 1425 75	—Date of Charge—	Any delayed charges are entered below	
Cardmember Signature X <i>[Signature]</i>	Merchandise/Services 20.01	Type of Delayed Chg	
Invoice Number	Taxes	Amt of Delayed Chg	
	Tips/Misc	Revised Total	
	Total 20.01	Amexco Use Only	
		Equivalent Amt	

Establishment agrees to transfer to American Express Company (Amexco) or Authorized Representative for payment. Merchandise and/or service purchased on this card shall not be resold or returned for cash refund.

Amexco Copy

001676

0.000000 200 1.1

78040062841

Gov. REAGAN
CAMPAIGN

0.00	T
20.28	+
35.65	+
84.00	+
20.01	+
27.25	+
187.19	T
187.19	+
187.19	T

ACKNOWLEDGE RECEIPT OF TICKET(S) AND/OR COUPON(S) RELATED CHARGES DISCLOSED HEREON PAYMENT(S) FULL TO 91 MONTH WHEN BILLED FOR IN EXTENDED PAYMENT PLAN. COMPANY'S POLICY OF COMPANY ISSUING CARD AND AS REFLECTED IN APPLICABLE TERMS.

UNIVERSAL CREDIT CARD CHARGE FORM

ISSUED BY Southern Airways Inc.

0384420890476
SOUTHERN AIRWAYS
9 A.O
PANAMA CITY FL

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER	NOT GOOD FOR PASSAGE	CARRIER	FLIGHT	CLASS	DATE	TIME	STATUS	FARE BASIS/TKT. DESIGNATOR	NOT VOID OTHER	NOT VOID OTHER	ALIAS
PANAMA CITY		SO	225	S	18MAY	311P	OK	S			
ORLANDO MCCOY		SO	230	S	19MAY	930P	OK	S			
PANAMA CITY											
VOID											
VOID											

FARE	79.62
TAX	6.36
	85.98

015 003 180 5 100AX

VALID 10 75 THRU 09 76

038 4420890476 20 LUTHER E THOMAS

015 003 180 5 100AX

VALID 10 75 THRU 09 76

LUTHER E THOMAS

Service Establishment: Date of Charge: Any delayed charges are entered below

Merchandise/Service: Type of Delayed Chg

Taxes: Amt. of Delayed Chg

Tips/Misc: Revised Total

Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment. Merchandise and/or service purchased on this card shall be returned or cash refund.

Cardmember Signature: Total: Amexco Use Only

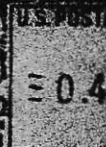
Invoice Number: Amexco Copy

749
8598
9347*

523800 01500318051100 0,000000007491

73040062842

7 8 0 4 0 0 6 2 8 4 3



RECEIVED
FEDERAL ELECTION
COMMISSION

'78 APR 17 AM 8:58

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

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

SCC 3210
NRN

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

RECEIVED
FEDERAL ELECTION
COMMISSION

78 APR 10 PM 1:56

4 April 1978

Mr. Henry M. Buchanan
Certified Public Accountant
4706 Highland Avenue
Bethesda, Maryland 20014

Dear Hank:

As we discussed on the telephone yesterday, it is my understanding that you have located and have in your possession the invoice and supporting documents relating to the Citizens For Reagan check, dated 14 July 1976, in the amount of \$610.57, issued to L. E. Thomas.

Please send a photocopy of these documents as soon as possible to Mr. Paul Lovejoy, Federal Election Commission, 1325 K. Street, N.W., Washington, D.C. 20463, as they are needed by the Commission in regard to its inquiry number MUR 443 (77). Please also send a copy of the materials, and any accompanying communication sent to the FEC, to me at the above address.

I am informed that time is of the essence on this matter for the FEC, so your immediate action on this will be greatly appreciated.

Thank you for your assistance in this matter.

Sincerely,



cc: ✓ Paul Lovejoy
Federal Election Commission

CERTIFIED MAIL
Return Receipt Requested

78040062844

ED MEESE

ATTORNEY AT LAW

9001 GROSSMONT BOULEVARD
LA MESA, CALIFORNIA 92041



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

7804036284



FEDERAL ELECTION COMMISSION

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

March 15, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

more by pc

SUBJECT: MUR 443 (77) - Interim Report dated 3-7-78
Signed by General Counsel 3-10-78
Received in Commission Secretary's
Office - 3-10-78, 3:16

The above-mentioned document was circulated to the
Commission on a 24 hour no-objection basis at 12:30,
March 13, 1978.

No objections were received in this office to the Interim
Report on MUR 443 (77).

78040062846



March 10, 1972

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
FROM: MUR 443

Please have the attached Interim Report on MUR 443 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040062847

Before the Federal Election Commission

March 7, 1978

In the Matter of)
) MUR 443 (77)
Florida Friends of Reagan)

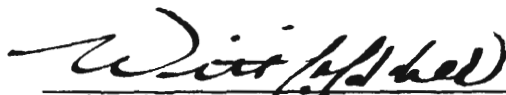
Interim Report

On February 8, 1978, the Commission issued a subpoena for oral deposition to Mr. L. E. Thomas, Chairman of Florida Friends of Reagan, and an Order requiring Citizens for Reagan to produce records pertaining to the activities of Mr. Thomas for which he received \$610.57 in travel reimbursements on July 14, 1976.

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. In a subsequent telephone conversation with Ed Meese, General Counsel to Citizens for the Republic (formerly Citizens for Reagan), Mr. Meese indicated that the Committee was attempting to locate the required information, but because the records were maintained in storage in several different locations, it would require searching through numerous boxes of materials to find the appropriate documents. Mr. Meese indicated that he anticipated that the subpoenaed documents would be forwarded to the Commission by March 8, 1978.

Upon receipt of this information, the General Counsel's Office will reschedule the deposition of Mr. Thomas.

3/10/78
Date


William C. Oldaker
General Counsel

PROFESSIONAL REPORTING SERVICE

*Official and General Shorthand Reporting
Secretarial Services*

200 2714
RECEIVED
FEDERAL ELECTION
COMMISSION

321 MAGNOLIA AVE.
PANAMA CITY, FLORIDA

78 FEB 16 PM 12:40
(904) 763-8948

MUR 443

February 13, 1978

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

ATTN: Office of General Counsel

This will confirm that the Counsel for the Federal Election Commission has scheduled a deposition to be taken on the 24th of February, 1978, at 10:00 A.M., in the conference room of the Professional Reporting Service, 321 Magnolia Avenue, Panama City, Florida, 32401.

PROFESSIONAL REPORTING SERVICE.


James J. Giles

78040062847

PROFESSIONAL REPORTING SERVICE

OFFICIAL AND GENERAL SHORTHAND REPORTING

321 MAGNOLIA AVENUE

PANAMA CITY, FLORIDA 32401



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

ATTN: OFFICE OF GENERAL CONSEL
MR. ROTRUCK

7 8 0 4 9 7 6 2 8
:21 W 91 83J 8L
78 FEB 16 PM 12:40
SECTION

1-1-34 0



FEDERAL ELECTION COMMISSION

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

February 16, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
888 Sixteenth Street N.W.
Washington, DC 20006

Re: MUR 443

Dear Mr. Bolton:

This letter is to confirm your telephone conversation with Paul Lovejoy of our staff on February 14, 1978, in which we agreed to a possible change in the date of Mr. Thomas' deposition pending receipt of documents from Citizens for the Republic, formerly Citizens for Reagan, pertaining to a \$610.57 travel reimbursement paid to Mr. Thomas by Citizens for Reagan on July 14, 1976.

In the event that these documents have not been received at the Commission by February 22, 1978, we will contact you and arrange another date for Mr. Thomas' deposition.

Sincerely,

William C. Oldaker
General Counsel



7 8 0 4 0 0 6 2 8 5 2

MUR 443 *Laver, Jay*

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:
John R. Bolton, Esq.
8FF 16th St NW
Wash DC 20006

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 438165

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY POSTMARK
12/21/78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

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

February 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ronald Reagan, Chairman
Citizens for the Republic
1253 Seventh Street, Suite 200
Santa Monica, California 90401

Re: MUR 443

Dear Mr. Reagan:

The Federal Election Commission is conducting an investigation of the "independent expenditures" of Florida Friends of Reagan in connection with your presidential candidacy in 1976.

In furtherance of our investigation, the Commission has issued an Order requiring your committee to produce all documents, records and information pertaining to the dates, location and nature of Mr. L. E. Thomas' activities on behalf of Citizens for Reagan for which he received payment totaling \$610.57 on July 14, 1976.

The Commission is required to conduct its investigation expeditiously. Therefore, your response should be sent to the Federal Election Commission within ten days of your receipt of the enclosed Order.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



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:**
Ronald Reagan, Chrmn.
Citizens for the Republic

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438038	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Roger Mahon

4. **DATE OF DELIVERY**
2-16

5. **ADDRESS** (Complete only if requested)
1253 7th #200

6. **UNABLE TO DELIVER BECAUSE:**

POSTMARK: SAN FRANCISCO FEB 16 1978
POSTOFFICE CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443

TO: Citizens for the Republic
formerly, Citizens for Reagan
1253 7th Street, Suit 200
Santa Monica, California 90401

ORDER

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(1), requires that you produce for inspection by the Commission all documents, records and information relating to payment in the amount of \$610.57 made by Citizens for Reagan on or about July 14, 1976, to Mr. L.E. Thomas, including the nature, place and date of services provided by Mr. Thomas in connection with such payment. These materials shall be submitted to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel, within ten days of your receipt of this Order.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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

78040062855

8 0 4 0 0 6 2 8 5 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan)

MUR 443

TO: Citizens for the Republic
formerly, Citizens for Reagan
1253 7th Street, Suit 200
Santa Monica, California 90401

ORDER

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(1), requires that you produce for inspection by the Commission all documents, records and information relating to payment in the amount of \$610.57 made by Citizens for Reagan on or about July 14, 1976, to Mr. L.E. Thomas, including the nature, place and date of services provided by Mr. Thomas in connection with such payment. These materials shall be submitted to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel, within ten days of your receipt of this Order.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

February 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443

Dear Mr. Thomas:

On January 16, 1978, we received your response to the Commission's interrogatories in the above matter. After careful review, the Commission has determined that it will be necessary to take your deposition.

Therefore, the Commission has issued the enclosed subpoena requiring your appearance for deposition.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

cc: John R. Bolton, Esq.



78040062838

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 443 HARTJAY

● 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:

Mr. L. E. THOMAS

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>438033</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Steven Schow
4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:



CLERK'S INITIALS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
Florida Friends of Reagan)	To Appear for Deposition
)	Upon Oral Examination
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at 1325 K Street, N.W.
Washington, DC 20463
June 29, 1978, at 1:00 P.M.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day 6th of June, 1978.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

78040062859

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
Florida Friends of Reagan)	To Appear for Deposition
)	Upon Oral Examination
)	MUR 443 (77)
)	

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

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The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at Professional Reporting Services
321 Magnolia Ave. on
Panama City, Florida 32401
February 24, 1978, at 10 AM.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 8th day of Feb, 1978.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443 (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. Issue a subpoena pursuant to 2 U.S.C. Section 437d(a)(3) requiring the attendance of Mr. L. E. Thomas for oral deposition.
2. Issue an order pursuant to 2 U.S.C. Section 437d(a)(1) requiring Citizens for Reagan to produce records and/or information pertaining to the activities of Mr. L. E. Thomas for which Mr. Thomas received \$610.57 in travel expense reimbursement on July 14, 1976.

Voting for these determinations 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

78040062851



FEDERAL ELECTION COMMISSION

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

February 9, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *more by fe*

SUBJECT: Subpoena an Order in Relation to MUR 443 (77)

The attached Subpoena and Order, approved February 8,
1978, have been signed and sealed.

78040062862

ATTACHMENTS:
Subpoena
Order



February 2, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 Team #3 Loyalty

7 8 0 4 0 0 6 2 8 6 3
Please have the attached General Counsel's Report
on MUR 443 distributed to the Commission and placed on
the Compliance Agenda for the Commission meeting of
February 8, 1978.

Thank you.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan) MUR 443 (77)

GENERAL COUNSEL'S REPORT

I. Allegation

78040062864
A review of independent expenditures made on behalf of presidential candidates showed that Florida Friends of Reagan ("Florida Friends") made \$14,771.40 in independent expenditures for Ronald Reagan during April 1976. Mr. L. E. Thomas served as Chairman of Florida Friends; and as Florida Chairman of Citizens for Reagan, Mr. Reagan's principal campaign committee. Also, Mr. Thomas received travel expense reimbursements from Citizens for Reagan. This information suggests that the \$14,771.40 spent by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan and as such would be considered a contribution to Citizens for Reagan in excess of the limitations set forth in 2 U.S.C. § 441a(a)(1).

II. Background

On October 27, 1977, the Commission found reason to believe that Florida Friends may have violated 2 U.S.C. 441a(a)(1). A letter notifying Florida Friends of such action was received by Mr. L. E. Thomas on November 8, 1977, requesting that Mr. Thomas provide the Commission with

information regarding his actions and responsibilities as Chairman of Florida Friends, and as Florida Chairman of Citizens for Reagan.

After receiving no response from Mr. Thomas, 1/ the Commission issued an order on December 21, 1977, requiring Mr. Thomas to answer interrogatories relating to his involvement with Florida Friends and Citizens for Reagan.

On January 16, 1978, the General Counsel's Office received a response to the interrogatories (see Attachment I). We believe that this response is incomplete. Despite our specific questions, the information provided by Mr. Thomas fails to establish the date on which he terminated his activities with Citizens for Reagan; the date on which Mr. Thomas began his involvement with Florida Friends; and the date on which Florida Friends terminated its activities.2/ Also, Mr. Thomas failed to provide the Commission with information regarding the dates, nature and location of his activities on behalf of Citizens of Reagan for which he received \$610.57 in travel reimbursements on July 14, 1976. Additionally, we believe that further clarification is

1/ Mr. David Keene, regional coordinator of Citizens for Reagan, wrote to the Commission at Mr. Thomas' request and set forth an explanation of the relationship between Florida Friends and Citizens for Reagan.

2/ In his response to the Commission's interrogatories Mr. Thomas states that Florida Friends terminated its operations on April 6, 1976. However, Commission records indicate that Florida Friends received contributions through July 7, 1976.

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needed on possible communications between Mr. Thomas and Citizens for Reagan during the time Mr. Thomas was serving as Chairman of Florida Friends. Attachment II is a summary chronology of events based on our present information.

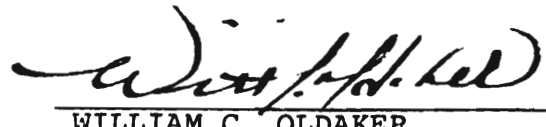
III. Recommendation

1. Issue a subpoena pursuant to 2 U.S.C. 437d(a)(3) requiring the attendance of Mr. L. E. Thomas for oral deposition.

2. Issue an order pursuant to 2 U.S.C. 437d(a)(1) requiring Citizens for Reagan to produce records and/or information pertaining to the activities of Mr. L. E. Thomas for which Mr. Thomas received \$610.57 in travel expense reimbursement on July 14, 1976.

2/1/78

DATE



WILLIAM C. OLDAKER
GENERAL COUNSEL

78040062866

INTERROGATORIES AND ANSWERS BY MR. L.E. THOMAS
MUR 443

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

The 1976 Florida primary was held on March 9 of that year, and we began closing our field offices throughout the State the next day. By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary.

4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.

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4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a candidate, and I indicated I would be. Within a week or two of that date, I met in Washington, D.C., with Mr. Keene, Mr. John Sears, and Senator Paul Laxalt. We discussed the subject of the Florida primary, and we agreed that I would become the Florida Chairman should Governor Reagan decide to announce his candidacy for the Republican presidential nomination.

6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

6. Your question asks that I list the names of "other" officials and employees of Citizens for Reagan with whom I spoke while I was Chairman of FFOR. If the question is meant to imply that I spoke with Mr. Sears and Senator Laxalt while I was Chairman of FFOR, the implication is inaccurate. If the question is meant to imply that I was an official or employee of Citizens for Reagan while I was chairman of FFOR, the implication is likewise inaccurate.

I did speak with Mr. Keene at least once. The substance of that conversation is detailed accurately in his letter to Mr. Oldaker, dated November 30, 1977.

I spoke a few times by telephone with Mr. Neal Peden, Mr. Keene's secretary, subsequent to the Florida

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primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).

7. Not applicable.

8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

9. State the date on which Florida Friends of Reagan was terminated.

9. FFOR engaged in no activities after April 6, 1976, the date of the 1976 Wisconsin primary, and it was terminated in fact as of that date. FFOR filed its notice of termination with the Federal Election Commission on December 10, 1976.

10. State the date on which Florida Citizens for Reagan was terminated.

10. Within forty-eight hours of the March 9 Florida primary, all of the field offices in Florida had been closed. One small office remained open in Orlando, staffed by one person, to handle matters relating to wrapping up the campaign. I do not know whether there was any official termination of the Florida Citizens for Reagan, because all such matters were handled by the main Citizens for Reagan Headquarters in Washington, D.C.

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11. Describe the methods used by Florida Friends of Reagan to solicit contributions.

11. All contributions, other than my own and my wife's, were solicited by telephone calls.

12. Describe any contractual agreements made between Florida Friends of Reagan and Long Advertising Agency, 20 S.E. 8th Street, Miami, Florida, or attach copies of such agreements to your answers to these interrogatories. State the dates and amounts of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

12. The Long Advertising Agency (hereafter, "Long") does commercial work for my businesses in Florida. I asked them orally to help me in preparation of a newspaper advertisement. There was no written contract.

Long contacted various newspapers in Wisconsin to ascertain the rates at which those newspapers sold advertising space, they prepared one newspaper advertisement, and they placed the advertisement in fourteen Wisconsin newspapers.

FFOR made one payment to Long for its work in the amount of \$14,771.40. That payment was made on April 5, 1976.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.

13. Long was responsible for the advertisement's copy and layout. The photograph of the White House was obtained from H. Armstrong Roberts Stock Photo Supplier in Philadelphia, Pennsylvania. The typeface was obtained from the Wrightson Typesetting Company in Miami, Florida. The picture of Governor Reagan was copied from the Wall Street Journal. None of the components of the advertisement had any origin in any materials prepared by Citizens for Reagan.

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14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.

14. I did.

15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.

15. Mr. Keene was the only person who indicated that there might be problems under the FECA with FFOR's project in Wisconsin.

At the time, of course, the Supreme Court had recently declared parts of the FECA unconstitutional, and there was great uncertainty about the effect of the Court's ruling. I was aware that during the Florida primary several individuals and groups who were not part of Citizens for Reagan had taken out advertisements on behalf of the Governor. I consulted with my local attorney in Florida, and he indicated to me that he saw no legal problems in connection with FFOR's activities in Wisconsin.

16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

16. I do not now have records which indicate what services were performed (or where they were performed) for which I received the travel reimbursement you identify. When the field offices of Florida Citizens for Reagan were closed, the great bulk of our records were transferred to the main Citizens for Reagan headquarters in Washington, D.C. A smaller amount of records was left with the local Republican Party headquarters in Orlando. I do not have access to those records.

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L.E. THOMAS MUR 443

Activities as

Date	Chairman, Florida CFR	Chairman, FFOR
August 20 1975	-Date Thomas met with Keene, Sears and Laxalt and agreed to become Florida Chairman.	
November 20 1975	-Date Reagan announced candidacy; date Thomas became Florida Chairman.	
March 9 1976	-Date of Florida Primary	
March 11 1976	-Date Thomas says by which all but one CFR office in Florida closed; date Thomas says he completed his official duties as Florida Chairman, except in wrapping up obligations remaining from Primary	-Date of receipt of first contribution
March 28 1976		
April 5 1976		-Date FFOR paid Long Advertising \$14,771.40
April 6 1976		-Date Thomas says FFOR terminated; date of Wisconsin Primary
May 7 1976		-Date Thomas says FFOR received last contribution
July 7 1976		-Date of receipt of last contribution
July 14 1976	-Date Thomas received \$610.57 in travel reimbursements from CFR	
December 16 1976		-FFOR filed notice of termination with Commission

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COVINGTON & BURLINGAME
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

RECEIVED
FEDERAL ELECTION
COMMISSION

HAND DELIVERED

McC. 2460

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER

78 JAN 16 P2: 01
710-822-0005
TELEX: 89-593
CABLE: COVLING

HAND DELIVERED

January 16, 1978

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

200102

Re: MUR 443(77)

Dear Mr. Oldaker:

Enclosed herewith are the answers, under oath, of Mr. L.E. Thomas to Interrogatories propounded to him and enclosed in your letter of December 22, 1977.

Mr. Thomas firmly believes that both he and Florida Friends of Reagan (hereafter, "FFOR") have at all times acted in strict compliance with all applicable Federal statutes. Mr. Thomas will, therefore, endeavor to assist in resolving this matter as expeditiously as possible. Certain preliminary points should, however, be made clear at the outset.

First, neither of your letters has stated with any specificity what it is about Mr. Thomas's activities that leads you to assert that there is "reason to believe" that there has been any violation of the Federal Election Campaign Act, as amended (hereafter, "FECA"). In the absence of a specific articulation of the supposed violation, and even though we believe the answers to the Interrogatories to be a complete response, we are necessarily left unsure. In such circumstances, and despite the statement in your November 2 letter to the contrary, Mr. Thomas cannot be deemed to have been afforded a "reasonable opportunity to demonstrate that no action should be taken" against him. 2 U.S.C. § 437g(a)(4).

Second, the enclosed materials do not in any way constitute a waiver, express or implied, of any procedural or substantive rights or arguments that Mr. Thomas may

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William C. Oldaker, Esq.
January 16, 1978
Page Two

ultimately desire to assert. We trust that if you disagree with this or the foregoing point, you will so notify us forthwith.

Third, we would like to know whether the Commission has received any complaints from anyone not on the Commission staff regarding this matter. This request is not limited to complaints which comply with standards set forth in 2 U.S.C. § 437g(a)(1), but applies as well to complaints which are not in compliance with that section. We ask that we be supplied, at your earliest convenience, with copies of any such complaints and with any correspondence between the Commission and the complainant.

Fourth, you state in your letter of December 22 that the Commission received no information from Mr. Thomas in response to your November 2 letter. Your December 22 letter does not acknowledge receipt of a letter, dated November 30, 1977, from Mr. David A. Keene to Mr. David Stein. Mr. Keene, a former field director for Citizens for Reagan, demonstrated convincingly in his letter that Mr. Thomas' activities in connection with FFOR were totally independent of both former Governor Reagan and his principal campaign committee.

It is significant that Mr. Thomas consulted with an attorney before he undertook any activities in connection with FFOR. Especially considering the period during which FFOR undertook its one and only project (i.e., when the Commission was unable to provide Advisory Opinions), Mr. Thomas took every possible step he could to remain in strict compliance with the FECA.

The enclosed responses by Mr. Thomas corroborate the fact that there has been no violation of the FECA. Accordingly, there is no present need to consider issues of Commission regulations, statutory interpretation or constitutional law. Since there is no indication of any violation of the law, this Matter Under Review should be promptly closed.

Sincerely yours,


John R. Bolton

cc: Mr. Lovejoy

Enclosures

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ANSWERS OF L.E. THOMAS

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

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4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a

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2.

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I spoke a few times by telephone with Ms. Neal Peden, Mr. Keene's secretary, subsequent to the Florida primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

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3.

7. Not applicable.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

9. FFOR engaged in no activities after April 6, 1976, the date of the 1976 Wisconsin primary, and it was terminated in fact as of that date. FFOR filed its notice of termination with the Federal Election Commission on December 10, 1976.

10. Within forty-eight hours of the March 9 Florida primary, all of the field offices in Florida had been closed. One small office remained open in Orlando, staffed by one person, to handle matters relating to wrapping up the campaign. I do not know whether there was any official termination of the Florida Citizens for Reagan, because all such matters were handled by the main Citizens for Reagan Headquarters in Washington, D.C.

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4.

space, they prepared one newspaper advertisement, and they placed the advertisement in fourteen Wisconsin newspapers.

FFOR made one payment to Long for its work in the amount of \$14,771.40. That payment was made on April 5, 1976.

13. Long was responsible for the advertisement's copy and layout. The photograph of the White House was obtained from H. Armstrong Roberts Stock Photo Supplier in Philadelphia, Pennsylvania. The typeface was obtained from the Wrightson Typesetting Company in Miami, Florida. The picture of Governor Reagan was copied from the Wall Street Journal. None of the components of the advertisement had any origin in any materials prepared by Citizens for Reagan.


14. I did.

15. Mr. Keene was the only person who indicated that there might be problems under the FECA with FFOR's project in Wisconsin.

At the time, of course, the Supreme Court had recently declared parts of the FECA unconstitutional, and there was great uncertainty about the effect of the Court's ruling. I was aware that during the Florida primary several individuals and groups who were not part of Citizens for Reagan had taken out advertisements on behalf of the Governor. I consulted with my local attorney in Florida,

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I hereby certify that the foregoing answers are true and correct to the best of my knowledge.


L. E. Thomas

Subscribed and sworn to before me
this 11th day of January, 1978.


Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES MAY 9, 1981
BONDED BY RESERVE INSURANCE CO.

7 8 0 4 0 0 6 2 8 8 0

78 JAN 16 P2:00

COVINGTON & BURLING

HAND DELIVERY

888 SIXTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

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

HAND DELIVERED

COVINGTON & BURLING

888 SIXTEENTH ST., N. W.

WASHINGTON, D. C. 20006

7 8 0 4 0 0 6 2 8 8 1

78 JAN 16 P2:00

COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

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

HAND DELIVERY

COVINGTON & BURLING

888 SIXTEENTH ST., N. W.
WASHINGTON, D. C. 20006

100 2897

RECEIVED
FEDERAL ELECTION
COMMISSION

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

MUR 443

18 JAN 6 All: 40

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER

(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

January 6, 1978

HAND DELIVERED

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

Dear Mr. Lovejoy:

This letter is to inform you that I am serving
as counsel to Mr. Tommy Thomas in the MUR relating to
him currently pending at the Federal Election Commission.

I appreciate your assistance in this matter.

Sincerely yours,


John R. Bolton

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John R. Bolton
COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

HAND DELIVER

Paul Lovejoy, Esquire
Federal Election Commission
1325 K Street, N.W.

6 AM - 40

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FEDERAL ELECTION COMMISSION

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

MUR 443
1/6/78

Given to John Bolton Esq.:

- A. Copy of Order to answer interrogatories
- B. Copy of Interrogatories
- C. Copy of 12/21/77 letter from Commission to L.E.

Thomas

Received: *Robert E. Hagan*

1/6/78

78040062884



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of) MUR 443
Reagan) Interrogatories

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?
6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

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of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.
14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.
15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.
16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

780400062836



FEDERAL ELECTION COMMISSION

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

December 22, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

Re: MUR 443(77)

Dear Mr. Thomas:

On November 8, 1977, you received notification that the Federal Election Commission found reason to believe that Florida Friends of Reagan may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. In that notification the Commission requested that you set forth any legal or factual material relevant to this matter, specifically including information pertaining to your responsibilities and activities as Chairman of Florida Friends of Reagan and as Chairman of Florida Citizens for Reagan.

We received no information from you. The Commission, pursuant to 2 U.S.C. §437d(a)(1), has issued the attached Order requiring you to answer the enclosed interrogatories within ten days of your receipt of this letter.

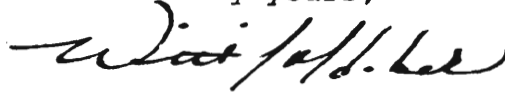
In a telephone conversation on November 21, 1977, with attorney David Stein of this office, you stated your intention to retain Mr. David Keene as counsel. Please be advised that in a telephone conversation on December 8, 1977, Mr. Keene told staff member Paul Lovejoy that he had not been retained as counsel for you or Florida Friends of Reagan. If you intend to retain Mr. Keene or another attorney as counsel, please have such counsel so notify the Commission in writing.



- 2 -

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at (202) 523-4001.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure
Interrogatories
Order

7 8 0 4 0 0 6 2 8 8 8

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

Re: MJR 443(77)

Dear Mr. Thomas:

On November 8, 1977, you received notification that the Federal Election Commission found reason to believe that Florida Friends of Reagan may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. In that notification the Commission requested that you set forth any legal or factual material relevant to this matter, specifically ~~including~~ information pertaining to your responsibilities and activities as Chairman of Florida Friends of Reagan and as Chairman of Florida Citizens for Reagan.

We received no information from you. The Commission, pursuant to 2 U.S.C. §437d(a)(1), has issued the attached Order requiring you to answer the enclosed interrogatories within ten days of your receipt of this letter.

In a telephone conversation on November 21, 1977, with attorney David Stein of this office, you stated your intention to retain Mr. David Keene as counsel. Please be advised that in a telephone conversation on December 8, 1977, Mr. Keene told staff member Paul Lovejoy that he had not been retained as counsel for you or Florida Friends of Reagan. If you intend to retain Mr. Keene or another attorney as counsel, please have such counsel so notify the Commission in writing.

Paul Lovejoy
12/22/77

78040062889

For any questions, please contact
the staff member assigned this
(2) 304001

And now you...

William E. Olden
General Counsel

1. Mr. J. Edgar Hoover
 2. Director
 3. Federal Bureau of Investigation
 4. Washington, D. C.
 5. Dear Sir:
 6. I am writing to you to inform you
 7. that I have received your letter of
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 443(77)
Florida Friends of Reagan)

TO: Mr. L.E. Thomas
Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 34201

ORDER

7 8 0 4 0 0 6 2 8 1
The Federal Election Commission pursuant to its power set forth in 2 U.S.C. §437d(a)(1), and in furtherance of its investigation in the above entitled matter, requires that you, on behalf of the Florida Friends of Reagan, submit in writing and under oath, answers to the attached interrogatories within ten (10) days of your receipt of this Order to:

The Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Thomas E. Harris

THOMAS E. HARRIS
CHAIRMAN
FEDERAL ELECTION COMMISSION

December 16, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 Team #3 Lovejoy

Please have the attached Interim Report on MUR 443 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of December 21, 1977.

Thank you.

78040062892

In the Matter of)
) MUR 443 (77)
Florida Friends of Reagan)

On October 27, 1977, the Commission found reason to believe that Florida Friends may have violated 2 U.S.C. §441a(a)(1). A letter notifying Florida Friends of this matter was received by Mr. Thomas on November 8, 1977.

On November 21, 1977, Mr. Thomas telephoned the General Counsel's Office and said that he had just returned from a trip abroad, intended to retain counsel in this matter, and his attorney would contact us shortly.

7 8 0 4 The General Counsel's Office received a letter from Mr. David Keene, former southern coordinator of Citizens for Reagan, on December 6, 1977 (Attachment I). Mr. Keene states that following the Florida primary election, Citizens for Reagan removed its authorization from Florida Citizens for Reagan. Mr. Keene further states that he learned of Mr. Thomas' intention to place advertisements in Wisconsin newspapers only a day or so before the primary election in Wisconsin. Mr. Keene says that at the time he was concerned that the actions of Mr. Thomas and Florida Friends would possibly be in violation of the Act and counter-productive to the Citizens for Reagan Wisconsin campaign.

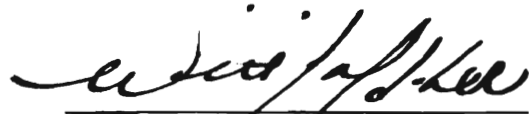
According to Mr. Keene, Mr. Thomas replied by saying he had a right to do as he pleased.

7 8 0 4 On December 8, 1977, the General Counsel's Office contacted Mr. Keene to inquire whether Mr. Keene was representing Mr. Thomas or Florida Friends. Mr. Keene replied that he had not been retained as counsel for Florida Friends and that his letter of November 30, 1977, had been written to explain the situation from his perspective as southern coordinator of Citizens for Reagan.

III. RECOMMENDATION:

Issue an order pursuant to 2 U.S.C. §437d(a)(1) requiring Mr. L.E. Thomas to answer interrogatorities about his involvement with Florida Friends of Reagan and Citizens for Reagan and send attached letter.

12/14/77
DATE


WILLIAM C. OLDAKER
GENERAL COUNSEL

78040062895

David A. Keene
Suite 600
One Thousand Connecticut Avenue, N. W.
Washington, D. C. 20036
(202) 452-1377

RECEIVED
FEDERAL ELECTION
COMMISSION

ATTACHMENT I

DEC 6 AM 11:54

Stein

November 30, 1977

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

7007

Dear Mr. Stein:

Re: MUR 443 (77)

I had tried to reach you earlier in the week without success, so I thought it best to write you concerning the possibility that Mr. L. E. Thomas may have been acting in "cooperation, consultation or concert with the Citizens For Reagan" when he purchased advertisements in a number of Wisconsin newspapers following the 1976 Florida primary.

The possibility that Mr. Thomas was acting in concert with the CFR is obvious given the fact situation. He was our Florida chairman, and we were running an active campaign in Wisconsin. However, in this instance, I can assure you that there was no coordination.

I was at the time a field director working for the CFR, and it was I who selected Mr. Thomas to head our Florida campaign. After that primary, we closed up our Florida operation and instructed Mr. Thomas and others not to spend any of the funds remaining in our Florida account or incur any new debts on our behalf. We, in effect, removed our authorization as we did in other primary states after their primaries were held.

Mr. Thomas followed these instructions, but proceeded on his own--and without our knowledge--to put together a newspaper ad and buy space to run it in Wisconsin. We only learned of this effort a day or so before the ads ran, when our people began to pick up rumors from people at the newspapers themselves. By that time, there was little we could do, though I did call Mr. Thomas to tell him that he shouldn't do anything.

He informed me that he had a right to do what he wanted to do and said he wasn't using our money to do it. He told me he was upset by the tone of the President's effort in Florida and wanted others to know just what went on. I informed him that he could conceivably get into trouble because of his position with us and told him that we didn't want him to do anything. After a rather heated conversation, he told me he had already spent his own money and intended to run the ads.

78040062896

Mr. David Stein
November 30, 1977
Page Two

Our concern at the time went beyond the question of whether Mr. Thomas' action would be viewed as a coordinated act. We were also worried about the substance of his ads in a state far different from his own. We frankly learned that his effort would be counter-productive at a time when we were deemphasizing our campaign there in preparation for a bigger effort in the later primaries.

I give you these facts in the hope that they will help clarify your picture of what actually happened. I will add only one other thing. Mr. Thomas is a very good friend of mine, and I respect him; but as any reporter who knows him or any politician who has worked with him can tell you, he is not a man who can be controlled by anyone.

If I can be of any further assistance, please don't hesitate to contact me.

With best regards, I remain

Sincerely yours,



David A. Keene

DAK:md

78040062807



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

Re: MUR 443(77)

Dear Mr. Thomas:

On November 8, 1977, you received notification that the Federal Election Commission found reason to believe that Florida Friends of Reagan may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. In that notification the Commission requested that you set forth any legal or factual material relevant to this matter, specifically involving information pertaining to your responsibilities and activities as Chairman of Florida Friends of Reagan and as Chairman of Florida Citizens for Reagan.

We received no information from you. The Commission, pursuant to 2 U.S.C. §437d(a)(1), has issued the attached Order requiring you to answer the enclosed interrogatories within ten days of your receipt of this letter.

In a telephone conversation on November 21, 1977, with attorney David Stein of this office, you stated your intention to retain Mr. David Keene as counsel. Please be advised that in a telephone conversation on December 8, 1977, Mr. Keene told staff member Paul Lovejoy that he had not been retained as counsel for you or Florida Friends of Reagan. If you intend to retain Mr. Keene or another attorney as counsel, please have such counsel so notify the Commission in writing.



- 2 -

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at (202) 523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure
Interrogatories
Order

78040062899

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of) MUR 443
Reagan) Interrogatories

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?
6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

78040052900

of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.

14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.

15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.

16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

78040062901

ACC # 2337
RECEIVED
FEDERAL ELECTION
COMMISSION NR11

77 DEC 23 AM 11:01

P. O. Box No. 490
Panama City, Fla. 32401
December 20, 1977

Re: MUR 443 (77)

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

Dear Mr. Stein:

I have received a copy of Mr. David Keene's letter of
November 30, 1977, addressed to you, and tried to call
Mr. Keene to see exactly where I stood in this matter.
(I am not an attorney.)

Mr. Keene is out of his office until this Thursday, and
I do not want to be in violation of any time limit, etc.

Will you please advise me of any further action necessary
on my part.

Sincerely,



L. E. "Tommy" Thomas

LET:lpr

cc: Mr David A Keene, Suite 600
1000 Connecticut Ave., N.W.
Washington, D. C. 20036

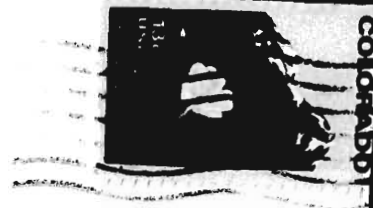
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E. Thomas
P.O. Box 490
Panama City, Fla

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COMMISSION

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



LCC 2193

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COMMISSION
David A. Keene
Suite 600
One Thousand Connecticut Avenue, N. W.
Washington, D. C. 20036
(202) 452-1577 DEC 6 AM 11:54

November 30, 1977

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

7000

Dear Mr. Stein:

Re: MJR 443 (77)

I had tried to reach you earlier in the week without success, so I thought it best to write you concerning the possibility that Mr. L. E. Thomas may have been acting in "cooperation, consultation or concert with the Citizens For Reagan" when he purchased advertisements in a number of Wisconsin newspapers following the 1976 Florida primary.

The possibility that Mr. Thomas was acting in concert with the CFR is obvious given the fact situation. He was our Florida chairman, and we were running an active campaign in Wisconsin. However, in this instance, I can assure you that there was no coordination.

I was at the time a field director working for the CFR, and it was I who selected Mr. Thomas to head our Florida campaign. After that primary, we closed up our Florida operation and instructed Mr. Thomas and others not to spend any of the funds remaining in our Florida account or incur any new debts on our behalf. We, in effect, removed our authorization as we did in other primary states after their primaries were held.

Mr. Thomas followed these instructions, but proceeded on his own--and without our knowledge--to put together a newspaper ad and buy space to run it in Wisconsin. We only learned of this effort a day or so before the ads ran, when our people began to pick up rumors from people at the newspapers themselves. By that time, there was little we could do, though I did call Mr. Thomas to tell him that he shouldn't do anything.

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78040062904

Mr. David Stein
November 30, 1977
Page Two

Our concern at the time went beyond the question of whether Mr. Thomas' action would be viewed as a coordinated act. We were also worried about the substance of his ads in a state far different from his own. We frankly learned that his effort would be counter-productive at a time when we were deemphasizing our campaign there in preparation for a bigger effort in the later primaries.

I give you these facts in the hope that they will help clarify your picture of what actually happened. I will add only one other thing. Mr. Thomas is a very good friend of mine, and I respect him; but as any reporter who knows him or any politician who has worked with him can tell you, he is not a man who can be controlled by anyone.

If I can be of any further assistance, please don't hesitate to contact me.

With best regards, I remain

Sincerely yours,



David A. Keene

DAK:md

78040062905

David A. Keene

Suite 600

One Thousand Connecticut Avenue, N. W.

Washington, D. C. 20036



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

RECEIVED
FEDERAL ELECTION
COMMISSION

'77 DEC 6 AM 11:59

7 8 0 4FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

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

November 2, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

Please be advised that the Federal Election Commission (the "Commission") has found reason to believe that the Florida Friends of Reagan ("Florida Friends") may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. We have numbered this matter MUR 443 (77).

Specifically, the Commission has found reason to believe that \$14,771.40 in "independent expenditures" by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan, the candidate's principal campaign committee, as a result of your apparent dual role as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan during the 1976 primary campaign. Additionally, you are reported as having received reimbursement for travel expenses from Citizens for Reagan.

If Florida Friends' expenditures were not independent expenditures within 2 U.S.C. §431(p), they would be considered a contribution to Citizens for Reagan under 2 U.S.C. §441a(a)(7)(B)(i). Such a contribution would be in excess of the contribution limitation applicable to Florida Friends at the time of the contribution. 2 U.S.C. §441a(a)(1).



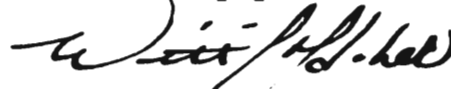
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Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within 10 days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan, and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,



William C. Oldaker
General Counsel

MAR 443 Stein

● 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): <input checked="" type="checkbox"/> Show to whom and date delivered25¢ <input type="checkbox"/> Show to whom, date, & address of delivery45¢ <input type="checkbox"/> RESTRICTED DELIVERY85¢ <input type="checkbox"/> RESTRICTED DELIVERY\$1.05 (Fees shown are in addition to postage charges and other fees).	
2. ARTICLE ADDRESSED TO: Mr. L. E. Thomas, Chmn FLORIDA FRIENDS OR REAGAN 705 W. 15th St. NORTH MIAMI CITY, FL 334201	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>438454</i>	CERTIFIED NO. _____ INSURED NO. _____
(Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <i>Bob Barker</i> <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent	
4. DATE OF DELIVERY	POSTMARK <i>NOV 1977</i>
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	
CLERK'S INITIALS	



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

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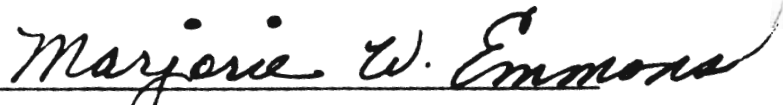
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)
L. E. Thomas, Chairman)
Citizens for Reagan)

MUR 443 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 27, 1977, the Commission determined by a vote of 6-0 that there was Reason to Believe that Florida Friends of Reagan had violated 2 U.S.C. Section 441a(a).


Marjorie W. Emmons
Secretary to the Commission

78040062



FEDERAL ELECTION COMMISSION

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

October 18, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MAJRORIE W. EMMONS *mwe*
SUBJECT: MUR 443 (77) - First General Counsel's Report

The above-mentioned document was transmitted to the
Commissioners on October 17, 1977.

Commissioner Thomson has submitted an objection to the report.

MUR 443 (77) will be placed on the Compliance Agenda for
the week of October 24. You will be notified as soon as the
date is set.

78040062911





FEDERAL ELECTION COMMISSION

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

October 14, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 (77)

Please have the attached 7 Day Report on MUR 443 (77)
distributed to the Commission on a 24 hour no-objection
basis.

Thank you.

78040062912



October 7, 1967

MEMORANDUM TO: Marge Hanson
FROM: Elisea T. Carr
SUBJECT: MUR 443 (77)

Please withdraw from 24 no-objection circulation
the 7 Day Report on MUR 443 (77).

Thank you.

78040062913

October 6, 1957

MEMORANDUM TO: Marge Eubank
FROM: Elissa F. Carr
SUBJECT: MUR 443 (77)

Please have the attached 7 Day Report on MUR 443 (77) distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040062914



FEDERAL ELECTION COMMISSION

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

Oldaker

October 7, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 (77)

Please withdraw from 24 no-objection circulation
the 7 Day Report on MUR 443 (77).

Thank you.



8040062915

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 443(77)
DATE COMPLAINT RECEIVED
BY OGC _____

ATTORNEY D. Stein

COMPLAINANT'S NAME: Information ascertained in the normal
course of carrying out the Commission's
supervisory responsibilities

RESPONDENT'S NAME: Florida Friends of Reagan
L. E. Thomas, Chairman
Citizens for Reagan

RELEVANT STATUTE: 2 U.S.C. §441a(a)

INTERNAL REPORTS CHECKED: Respondent Committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Florida Friends of Reagan made \$14,771.40 in "independent expenditures" for Ronald Reagan during April 1976. Mr. L. E. Thomas was Chairman of Florida Friends of Reagan and also appears to have been Florida Chairman of Citizens for Reagan.¹ In addition, Mr. Thomas received \$610.57 from Citizens for Reagan, Mr. Reagan's principal campaign committee, as reimbursement for travel expenses. The \$14,771.40 was not an independent expenditure within §431(p) if made in concert with or at the request or suggestion of any authorized agent of a candidate's principal campaign committee.

¹ According to Sharon Synder, Branch Chief, Presidential Branch, Disclosure Division, "Florida Citizens for Reagan" was assigned a Committee Identification number, but no reports were received from the Committee; the organization never materialized as an affiliate or independent committee of Citizens for Reagan; and individuals working in Florida on behalf of Mr. Reagan were, for reporting purposes, not part of the CFR (Citizens for Reagan) organization.

PRELIMINARY LEGAL ANALYSIS

The allegations stated above are from the records of the respondent committees and suggest that the \$14,771.40 spent by Florida Friends was spent in cooperation, consultation or concert with the candidate's authorized political committee and should be considered to be a contribution to that candidate. 2 U.S.C. §441a(a)(B)(i). Such a contribution would exceed the contribution limitation of Section 441a(a)(1) applicable to Florida Friends.

RECOMMENDATION

Find Reason to Believe that Florida Friends of Reagan violated 2 U.S.C. §441a(a). Send attached letter.

78040062917



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

Please be advised that the Federal Election Commission (the "Commission") has found reason to believe that the Florida Friends of Reagan ("Florida Friends") may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. We have numbered this matter MUR 443 (77).

Specifically, the Commission has found reason to believe that \$14,771.40 in "independent expenditures" by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan, the candidate's principal campaign committee, as a result of your apparent dual role as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan during the 1976 primary campaign. Additionally, you are reported as having received reimbursement for travel expenses from Citizens for Reagan.

If Florida Friends' expenditures were not independent expenditures within 2 U.S.C. §431(p), they would be considered a contribution to Citizens for Reagan under 2 U.S.C. §441a(a)(7)(B)(1). Such a contribution would be in excess of the contribution limitation applicable to Florida Friends at the time of the contribution. 2 U.S.C. §441a(a)(1).



73040062918

Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within fifteen (15) days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,

William C. Oldaker
General Counsel

78040062919

Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within 10 days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan, and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,

William C. Oldaker
General Counsel

78040062920

PS
11/17/77

Florida Friends of Reagan
P. O. Box 490
Panama City, Florida

Dear Treasurer,

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you may know, many and sometimes complex provisions. 2 U.S.C. 431 (d) defines a "political committee" to mean "any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1000 during a calendar year." The definition of contributions and expenditures further clarifies that such receipts and expenditures are those received or expended for the purpose of influencing the nomination for election, or election of any person to Federal office or for the purpose of influencing the results of a primary held for the selection of delegates to a national nominating convention of a political party.

7 8 0 4 0 0 6 2 1
A review of the Report of Independent Expenditures of Contributions by Persons (FEC Form 5) intended for the use of persons other than political committees or candidates) filed by your committee reveals that contributions in excess of \$1000 have been received. Therefore, it would appear that your organization would qualify as a "political committee."

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and if you agree that your organization is a political committee please submit a Statement of Organization on FEC Form 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U. S. C. 434 on FEC Form 3. If your committee no longer supports candidates for Federal office and has no outstanding debts or obligations, then a single report when accompanied by a statement of disposition of residual funds, may be designated a notice of termination from reporting requirements.

If you believe that your organization does not qualify as a "political committee" please provide within ten days to the Commission a statement detailing the reason for this position.

If you have any questions concerning this matter, please do not hesitate to contact Ron Ewalt (202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Gordon Andrew McKay
Assistant Director for
Disclosure and Compliance

[illegible]

ctions on reverse side)

2 p1:25

Name of Person (in Full)

2 This is a Report of

□ Independent Contributions

35g Both

P. O. Box 490. 705 W. 15th Street

Panama City, Florida 32401

☐ April 10 ☐ October 10 ☐ Amendment to _____ Report☒ July 10: ☐ January 31

☒ Tenth day report preceding

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

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

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

Subtotal of Itemized Expenditures and/or Contributions.....	\$14,771.40
---	-------------

14,771.40

Subtotal of Unitemized Expenditures and/or Contributions.....\$

Total Expenditures and ~~Donor~~ Contributions

11,771.40

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

EXPENDITURES OR CONTRIBUTIONS

BY PERSONS

78 JUL 12 P 1:25

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

Person (in Full)

FLORIDA FRIENDS OF REAGAN

Address (Number & Street)

P. O. Box 490. 705 W. 15th Street

City, State & Zip Code

Panama City, Florida 32401

2 This is a Report of

☐ Independent Expenditures☐ Independent Contributions☒ Both

Type of Report (check appropriate box).

☐ April 10 ☐ October 10☐ Amendment to _____ Report☐ July 10 ☐ January 31☐ Tenth day report preceding

(primary, general or convention)

election on _____ in the state of _____

(date)

☐ Thirtieth day report following

(primary, general or convention)

election on _____ in the state of _____

(date)

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

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
Expenditure to <input checked="" type="checkbox"/> Contribution to e complete list attached	Newspaper Ads in Wisconsin	4/5/76	\$14,771.40	Ronald Reagan
Expenditure to <input checked="" type="checkbox"/> Contribution to Long Advertising Co. S. E. 8th Street Miami, Florida 33131	Payment for newspaper ads in Wisconsin	4-5-76	\$14,771.40	Ronald Reagan
Expenditure to <input type="checkbox"/> Contribution to				
Expenditure to <input type="checkbox"/> Contribution to				

Subtotal of Itemized Expenditures and/or Contributions.....\$ 14,771.40

Subtotal of Unitemized Expenditures and/or Contributions.....\$

Total Expenditures and/or Contributions.....\$ 14,771.40

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

(Signature)

July 9, 1976

(Date)

	Amount	Mailing Address
Herbert Stockham	\$ 300.00	2940 Argyle Road
W. D. Malone, Jr.	300.00	P. O. Box No. 2554
Jeanne D. Rodriguez	100.00	409 Melanie Way
Robert H. Shedd, MD	200.00	460 W. Marion Ave.
Robert Q. Borland, DMD	100.00	211 W. Main Street
Robert A. Rosasco	100.00	11830 S. W. 92nd Ave.
J. D. Danielson	100.00	1320 So. Dixie Hwy
Thomas L. Wolfe	100.00	6330 Cellini
Shirley P. Greene	100.00	3574 So. Moorings Way
Russell Wittenberg	100.00	8070 S.W. 140 Terrace
B. J. Guider	100.00	795 N. E. 94th St.
E. N. Claughton	100.00	34 S.E. 2nd Ave.
C. Salman-Ferro	50.00	2977 Coral Way
Charles V. Bradley	100.00	12855 Hickory Road
Pamela G. Cadman	50.00	9768 S.W. 106 Terrace
Hugh O. Rosser	50.00	7360 S.W. 130 St.
Ellen K. Ogle	1,000.00	518 Lido Drive
Gwyneth L. Cordiner	1,000.00	155 Bayview Dr, Bellair,
Frederick W. Guardabassi	3,000.00	915 Middle River Dr.
Richard D. Pope, Sr.	100.00	5325 So. Orange Blossom
W. M. Funk	100.00	1625 W. Grant
Mack Fulmer	100.00	Raley Groves
William L. Raley	100.00	Box 37
Ben R. Adams	100.00	2921 Island View Cir.
Herman Russell	100.00	527 No. Palo Alto Ave.
Mrs. Donald H. Anderson	100.00	23 Isla Bahia Dr
Sally M. Lambert	150.00	346 Turtle Grass, Bay Point,
F. E. Busby	300.00	Box 24203
George R. Gish	5.00	13365 Marquette Ave.
Terry Garrick	7.00	914 Magellan Drive
Lucille M. Stickle	25.00	177 Ocean Lane Drive
Vernice K. Baxter	50.00	1401 3rd Ave., West
Lonnie Russell	500.00	118 Spring Valley Loop
Audrey Holloway	100.00	Langford Resort Hotel
Robert L. Langford	200.00	2814 Canal Drive
L. E. Thomas	5,784.40	

Birmingham, Ala. 35211
Birmingham, Ala. 35211
Maitland, Fla. 32751
Punta Gorda, Fla. 33571
Dothan, Ala. 36301
Miami, Fla. 33176
Coral Gables, Fla. 33134
Coral Gables, Fla. 33134
Coconut Grove, Fla. 33134
Miami, Fla. 33158
Miami Shores, Fla. 33131
Miami, Fla. 33131
Miami, Fla. 33142
No. Miami, Fla. 33181
Miami, Fla. 33176
Miami, Fla. 33156
Ft Lauderdale, Fla. 33301
Clearwater, Fla. 33761
Ft Lauderdale, Fla. 33301
Cypress Gardens, Fla. 33811
Orlando, Fla. 32809
Orlando, Fla. 32805
Winter Haven, Fla. 33891
Auburndale, Fla. 33823
Panama City, Fla. 32401
Panama City, Fla. 32401
Ft Lauderdale, Fla. 33301
Ft Lauderdale, Fla. 33301
Tampa, Fla. 33623
Elm Grove, Wis. 53122
Sarasota, Fla. 33580
Key Biscayne, Fla. 33147
Birmingham, Ala. 35207
Altamonte Sprgs, Fla. 32701
Winter Park, Fla. 32789
Panama City, Fla. 32402

Total..... \$11,771.40

L. E. Thomas
7-9-76

SHOULD WE SELL THE WHITE HOUSE?

FL...
(73 Day-Card...)

GERALD FORD IS OUT TO BUY IT... WITH YOUR HARD-EARNED MONEY!

No American President in history has so blatantly used taxpayers' money (your money) to buy an election. This is not a mere allegation—it's a fact.

FACT: Six days before the Florida Republican Primary, Mr. Ford revealed that he would pour \$33 million of new federal contracts into the Orlando plant of Martin-Marietta Corp.

FACT: Five days before the election, Mr. Ford dispatched his Secretary of Transportation to Miami to announce that up to \$60 million would be available for a local rapid-transit program.

FACT: A week before the election, more than \$2 million was granted to subsidize Cuban exile lobster fishermen (there are 27,000 Cuban Republicans in Miami).

FACT: In vote-rich and elderly St. Petersburg, Mr. Ford promised a new VA hospital.

FACT: Despite the sharply curtailed spending for the space program, Mr. Ford said he'd create 150 new civilian jobs at Patrick Air Force Base, in heavily Republican Brevard County.

FACT: Jerry Thomas, the 1974 GOP nominee for Governor of Florida, made a surprise announcement of support for Mr. Ford; four weeks later, Ford added Thomas to the federal payroll as an undersecretary of the Treasury.

And after Mr. Ford was asked by a Florida voter when Interstate 75 would be finished in that state (from Tampa to Naples), he replied with laughter, "When do you want it finished?"

Is it really funny? Is it a joke that the money we taxpayers turn over to the Washington machine should be used primarily not for the good of the people, but for the good of politicians?

Is it a joke that with this year's federal deficit—at least \$100 billion—Mr. Ford should put us deeper into debt in order to bribe the voters?

(The irony of all this is that while Gerald Ford plays "Santa Claus" before the Florida election, after the election he ordered massive cutbacks at two Florida military bases... went from Santa to Scrooge, once the votes were counted.)

We Florida Republicans witnessed the tragic spectacle of Mr. Ford's vote-buying just a few weeks ago. And the same thing has happened, or is happening, in other states where there are elections. We are sorry for our nation that the presidency has been so degraded. And as Republicans, trying to survive in a hostile national climate, we are equally grieved for our Party.

We pray that our fellow Republicans in Wisconsin will rebuke this raw abuse of power.

If a Republican President wishes to buy votes and thus imitate porkbarrel politicians... then it is time for Republican voters to say, "NO!"... time for Republican voters to insist on a higher standard for the highest office in the land.

We sincerely believe that Ronald Reagan, as evidenced by his record of reelection as Governor, represents that higher standard which America needs in The White House.

IMPORTANT!

Democrats, Independents and Republicans... ALL can vote for Ronald Reagan in the Wisconsin Primary. And YOU'll vote counts! For example, in Florida, if fewer than six extra voters per precinct had decided to vote for Ronald Reagan, he would have carried the entire state... instead of the impressive 48% that he did carry. So, VOTE TUESDAY!



And should we give away the Panama Canal?

WISCONSIN'S REVERED SENATOR SPOONER, WHOSE LEGISLATION CREATED THE CANAL, WOULD TURN OVER IN HIS GRAVE IF HE KNEW OF THE FORD-KISSINGER SCANDAL.

The Panama Canal is ours... is sovereign American property fully paid for and legally recognized as U.S. territory. Yet, Gerald Ford and Henry Kissinger are fully committed to give it away to the Panamanian dictator, Gen. Omar Torrijos, who is an avowed Marxist and ally of Cuba's Fidel Castro.

Republican U.S. Senator John C. Spooner of Wisconsin introduced in 1902 the legislation which eventually created the Panama Canal. The mural in the Capitol at Madison pays homage to Senator Spooner's vision for linking the Atlantic and the Pacific to foster world commerce.

What would Senator Spooner, if he were living say to Gerald Ford today in response to this fantastic scheme to give away America's canal?

We believe that Senator Spooner, and most Americans, would reject the frightening and illegal Ford-Kissinger plan. What do you think?

YES! I WANT REPUBLICANS IN OTHER PRIMARY STATES TO KNOW THE FACTS ABOVE.
HERE'S MY CONTRIBUTION TO HELP PUBLISH YOUR MESSAGE ELSEWHERE.

NAME: _____ ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

AMOUNT OF CONTRIBUTION: \$ _____
(Personal check or money order payable to Florida Friends of Reagan)

OCCUPATION: _____

BUSINESS ADDRESS: _____

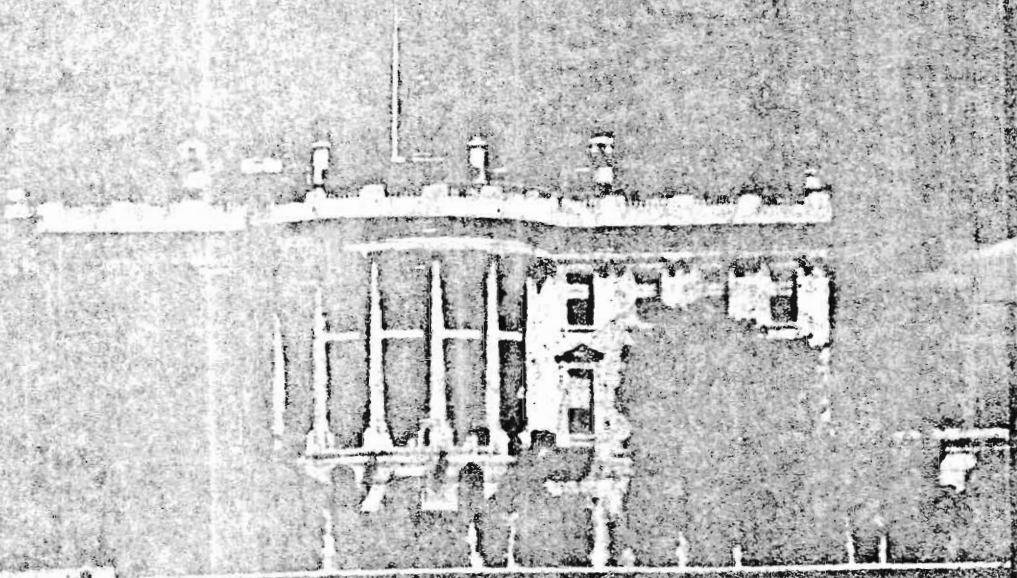
(All above information is required by federal law. NO corporate contributions may be accepted.)

MAIL TODAY TO: FLORIDA FRIENDS OF REAGAN, 1704 WEST 15th STREET, PANAMA CITY, FLORIDA 32001

Florida Friends of Reagan is a 501(c)(3) non-profit organization. All contributions are for the purpose of publishing information about the Florida Friends of Reagan Bill. All contributions to the Federal Election Commission.

78040062925

SHOULD WE SELL THE WHITE HOUSE?



FO.
(78 Bay-Contestant Special)

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HERE'S MY CONTRIBUTION TO HELP PUBLISH YOUR MESSAGE ELSEWHERE.

NAME: _____ ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

AMOUNT OF CONTRIBUTION: \$ _____
(Personal check or money order payable to: Florida Friends of Reagan)

OCCUPATION: _____

BUSINESS ADDRESS _____
(All above information is required by federal law. NO corporate contributions may be accepted.)

MAIL TODAY TO: FLORIDA FRIENDS OF REAGAN / 705 WEST 10th STREET / PANAMA CITY, FLORIDA 32401

Print for the Florida Friends of Reagan. P. 17-18-19. 1974-1975. 1976-1977. 1978-1979. 1980-1981. 1982-1983. 1984-1985. 1986-1987. 1988-1989. 1990-1991. 1992-1993. 1994-1995. 1996-1997. 1998-1999. 2000-2001. 2002-2003. 2004-2005. 2006-2007. 2008-2009. 2010-2011. 2012-2013. 2014-2015. 2016-2017. 2018-2019. 2020-2021. 2022-2023. 2024-2025. 2026-2027. 2028-2029. 2030-2031. 2032-2033. 2034-2035. 2036-2037. 2038-2039. 2040-2041. 2042-2043. 2044-2045. 2046-2047. 2048-2049. 2050-2051. 2052-2053. 2054-2055. 2056-2057. 2058-2059. 2060-2061. 2062-2063. 2064-2065. 2066-2067. 2068-2069. 2070-2071. 2072-2073. 2074-2075. 2076-2077. 2078-2079. 2080-2081. 2082-2083. 2084-2085. 2086-2087. 2088-2089. 2090-2091. 2092-2093. 2094-2095. 2096-2097. 2098-2099. 2100-2101. 2102-2103. 2104-2105. 2106-2107. 2108-2109. 2110-2111. 2112-2113. 2114-2115. 2116-2117. 2118-2119. 2120-2121. 2122-2123. 2124-2125. 2126-2127. 2128-2129. 2130-2131. 2132-2133. 2134-2135. 2136-2137. 2138-2139. 2140-2141. 2142-2143. 2144-2145. 2146-2147. 2148-2149. 2150-2151. 2152-2153. 2154-2155. 2156-2157. 2158-2159. 2160-2161. 2162-2163. 2164-2165. 2166-2167. 2168-2169. 2170-2171. 2172-2173. 2174-2175. 2176-2177. 2178-2179. 2180-2181. 2182-2183. 2184-2185. 2186-2187. 2188-2189. 2190-2191. 2192-2193. 2194-2195. 2196-2197. 2198-2199. 2200-2201. 2202-2203. 2204-2205. 2206-2207. 2208-2209. 2210-2211. 2212-2213. 2214-2215. 2216-2217. 2218-2219. 2220-2221. 2222-2223. 2224-2225. 2226-2227. 2228-2229. 2230-2231. 2232-2233. 2234-2235. 2236-2237. 2238-2239. 2240-2241. 2242-2243. 2244-2245. 2246-2247. 2248-2249. 2250-2251. 2252-2253. 2254-2255. 2256-2257. 2258-2259. 2260-2261. 2262-2263. 2264-2265. 2266-2267. 2268-2269. 2270-2271. 2272-2273. 2274-2275. 2276-2277. 2278-2279. 2280-2281. 2282-2283. 2284-2285. 2286-2287. 2288-2289. 2290-2291. 2292-2293. 2294-2295. 2296-2297. 2298-2299. 2300-2301. 2302-2303. 2304-2305. 2306-2307. 2308-2309. 2310-2311. 2312-2313. 2314-2315. 2316-2317. 2318-2319. 2320-2321. 2322-2323. 2324-2325. 2326-2327. 2328-2329. 2330-2331. 2332-2333. 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Section 1
Instruction
Form 100
Rev. 12-10-77

Statement of Organization For a Political Committee

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

(See Reverse Side For Instructions.)

SECTION
100

100 00 10 20 104 01

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

1(a) Name of Committee (or full) ☐ Check if name or address is changed

2. For Political Party Number

100- Friends of Reagan

(b) Address (number and street)

205 West 15th Street

3. Date

10-10-78

(c) City, State and ZIP code

San Francisco, Fla. 32101

4. Is this committee a "political committee" as defined in 2 U.S.C. 4312(a)(1)? ☐ Yes ☒ No
If "Yes," please check the appropriate box:
☐ For the election of a Representative or Delegate
☐ For the election of a Senator
☐ For the election of a Presidential elector

5. Check one

☒ (a) This committee has been designated as the principal campaign committee for

any candidate for

Federal office sought

or to be the State of

State in which election is held

any campaign committee will be required to
submit a statement of financial interest to the
Federal Election Commission

to all 2000-2001 campaign and election activity

Report must be filed with the Commission

Report must be filed with the Commission

any campaign committee will be required to

submit a statement of financial interest to the

to all 2000-2001 campaign and election activity

Report must be filed with the Commission

For more information

1

action Committee
 reg. No.
 n. O. C. 20453

Statement of Organization For a Committee

(Page 2)

Area of Committee

Area, Type and Jurisdiction of Committee

(a) Will this committee operate in more than one State?

☐ Yes ☐ No

(b) Will this committee have a headquarters in one State?

☐ Yes ☐ No

(c) Will this committee support candidates seeking State or local office?

☐ Yes ☐ No

(d) Will this committee support candidates supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year?

☐ Yes ☐ No

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

Full name of representative	Address, office and ZIP code	Office	Party
Richard Goodwin	1575 S. Alameda, N. W.	Washington, D. C.	Rep. 11th Dist.

780406592

U.S. GOVERNMENT
 PRINTING OFFICE
 1967 O - 350-000

U.S. GOVERNMENT
 PRINTING OFFICE
 1967 O - 350-000

Non-Commitment
FL, N.W.
D.C. 20463

Statement of Organization For a Committee

(Page 3)

is of Committee

Florida Friends of Reagan

List by name and home address, other principal officers of the committee include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee:

Full name	Mailing address and ZIP code	Title or position
Arthur E. Thomas	P O Box 490, Panama City, Fla. 32401	Chairman
James P. Russell	P O Box 490, Panama City, Fla. 32401	Treasurer

Does the committee have a history in existence beyond the current calendar year? ☒ Yes ☐ No
If "Yes" for how long? _____
In the past 12 months, what position will be made of residual funds? None

List the names of the persons to which the committee has deposited, or will deposit, contributions or other funds:

to, committee, etc.	to, _____
Panama City	1980 Year 1980 P O Box 490 Panama City, Fla.

State the name of the committee, organization, or person to whom the committee has deposited, or will deposit, contributions or other funds:

Committee _____

Signature of the person to whom the committee has deposited, or will deposit, contributions or other funds:

Signature of the person to whom the committee has deposited, or will deposit, contributions or other funds:

Form 3
B76
U.S. Election Commission
11 Street, N.W.
Washington, D.C. 20543

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

20
SECTION
1967

1967 DEC 16 PM 11:01

Note: Every state authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records, books, etc. for each election.

1(a) Name of Candidate or Committee (in full) - Check if name or address is changed

Charles E. DeLoach of Reagan

1(b) Address (in full) (in full)

Box 100, 505 West 27th Street

1(c) City, State and Zip Code

Spring Hill, Florida 32191

2 Identification Number

3(a) Is this a report of receipts and expenditures for only one election? ☒ Yes ☐ No

(b) If Yes, for which election?

1-6-76

(c) If Yes, for which election? (date)

4 Types of Report (Check appropriate box and complete, if applicable)

(a) ☐ Amendment For

Which report?

(b) ☐ July 10 Quarterly Report

(c) ☐ October 10 Quarterly Report

(d) ☐ All 10 Quarterly Report

(e) ☐ January 31 Year End Report

(f) ☐ Monthly Report

(g) ☐ Termination

(h) ☐ Termination report preceding election on _____ at _____

Termination report on election _____

(i) ☐ Termination report preceding election on _____ at _____

Termination report on election _____

Candidate or Committee Summary of Receipts and Expenditures

1967

Charles E. DeLoach Summary

U.S. Election Commission
Washington, D.C. 20543

1804075293

Detailed Summary Schedule of Receipts and Expenditures (Page 2)

Commission
F.W.
20463

Candidate or Committee

REPORT COVERING THE PERIOD
FROM TO

I. RECEIPTS

Column A
This Period

Column B
Other Receipts

Contributions and other income

Unrestricted (Schedule A)

\$ 21,531.

Union dues

\$ 100.

Sales and Service (Schedule A)

Unrestricted (Schedule A)

\$ 1,000.

Gifts and Loan (Schedule A)

Unrestricted (Schedule A)

\$

Unrestricted (Schedule A)

\$

Unrestricted (Schedule A)

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Unrestricted (Schedule A)

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Unrestricted (Schedule A)

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

Page 1 of 5 for

LINE NUMBER 15 A

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

A
Commission
N.W.
128453

Candidate or Committee (Full)

WALTER BOWEN OF REAGAN

Date	Amount of each contribution
10-1-78	100.00

For: George H. Bush
2400 Apple Road
Princeton, Ala. 35901

Signature: Industrialist

Date: 10-1-78

4000

B

For: W. B. Wilcox, Jr.
P.O. Box 2504
Princeton, Ala. 35901

Signature: W. B. Wilcox, Jr.

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Rule A

Section 101.01
 Fed. Reg.
 41, D.C. 2040

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

Page 2 of 5 for

LINE NUMBER 15 a

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

FLORIDA FRIENDS OF REAGAN

Full name, title, address and ZIP code

J. D. Danielson
 1320 So. Dixie Highway
 Coral Gables, Florida 33146

Date (month/year) Amount of each
 transaction (check or cash)

12/31/80

Director, Art Museum

Full name, title, address and ZIP code

Thomas L. Wolfe
 6320 Bellini
 Coral Gables, Fla. 33146

Date (month/year) Amount of each
 transaction (check or cash)

12/31/80

Attorney

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File A

Election Commission
 West, N.W.
 P. O. C. 20453

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

Page 3 of 5 for

LINE NUMBER 15 A

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

Name of Candidate or Committee in full

FLORIDA FRIENDS OF REAGAN

Full Name, including address and ZIP code

Charles W. Bradley
 10855 Hickory Road
 No. Miami, Fla. 33171

Date received
 12-1-79

Amount of cash
 received in period

100.00

Print name and address of donor

Occupation

Salesman

12-1-79

Check "Contribution" or "Transfer" or "Loan"

Approximate amount

\$ 100.00

Full Name, including address and ZIP code

Allen W. Cole
 18 Lido Drive
 * Lauderdale, Fla. 33371

Date received
 12-1-79

Amount of cash
 received in period

\$1,000.00

Print name and address of donor

Occupation

Retired

12-1-79

Check "Contribution" or "Transfer" or "Loan"

Approximate amount

\$ 1,000.00

Full Name, including address and ZIP code

Joseph H. Ford
 151 Broadway Avenue, Tallahassee
 Tallahassee, Florida 32304

Date received
 12-1-79

Amount of cash
 received in period

100.00

Print name and address of donor

Occupation

250

250

73040762935

File A

Section 101-100000
FEC Form 3
11-1-79

Name of Candidate or Committee in full

FLORIDA FRIENDS OF REAGAN

Address of Candidate or Committee in full

Wack Fulmer
1625 W. Grant
Orlando, Fla. 32804

Phone

Exchange Dealer

Signature of Candidate or Committee in full

William L. Haley
Haley Groves
Winter Haven, Fla. 33894

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Itemized Rec.'pts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 1 of 5 for

LINE NUMBER 15 a

(Use separate schedule for each numbered line)

73040762936

File A

Section 5 (Instructions)
FEC Form 3
Rev. 10-19-83

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

Page 5 of 5 for

LINE NUMBER 15 a

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

Name of Candidate or Committee in full

FLORIDA FRONTIER OF REAGAN

Full name, mailing address and ZIP code

P. E. Busby
216 Turtle Grass, Bay Point
Gainesville, Fla. 32601

Occupation
TV Station Manager

Check if Contributor is self-employed

Approximate Year(s) of Service

Date(s) of receipt Amount of each receipt for this period

8/2 2,500.00

Fla.

15 for 15

Donnie Russell
1101 3rd Avenue, West
Birmingham, Ala. 35207

Occupation
Automobile Dealer

Check if Contributor is self-employed

Approximate Year(s) of Service

Date(s) of receipt Amount of each receipt for this period

8/2 1,000.00

Print or type name

Print name, Fla.

Full name, mailing address and ZIP code

Bay Point
Fla.

Occupation

Check if Contributor is self-employed

Approximate Year(s) of Service

Check if Contributor is self-employed

Approximate Year(s) of Service

Check if Contributor is self-employed

Approximate Year(s) of Service

Check if Contributor is self-employed

Approximate Year(s) of Service

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Id. No.

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 In the Matter of: :
 :
 FLORIDA FRIENDS OF REAGAN : MUR 443 (77)
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Thursday, June 29, 1978

LUTHER EDWIN THOMAS

a witness in the above-entitled matter, called for examination by counsel for the Federal Election Commission, taken at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D. C., beginning at 1:10 p.m., before Bobbie C. Lake, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

(NOTARY: D.C.-VA.-MD.)
OFFICIAL REPORTERS
1028 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036
Phones: (202) 833-3598
833-3599

For the Federal Election Commission

WILLIAM C. ORRICK, ESQ.
and
GARY JOHANNSEN, ESQ.
1325 K Street, N.W.
Washington, D. C. 20005

For Luther Edwin Thomas

JOHN R. BOLTON, ESQ.
COVINGTON & BOLTON
888 16th Street, N.W.
Washington, D. C. 20005

Also Present:

PAUL LOVEJOY

C O N T E N T S

EXAMINATION BY COUNSEL FOR:

FEDERAL ELECTION COMMISSION
(Mr. Johannsen)

WITNESSES:

LUTHER EDWIN THOMAS

3

LUTHER EDWIN THOMAS
(Mr. Bolton)

55

E X H I B I T S

Marked for identification and attached:

Government Exhibit No. 1 - National Car Rental Invoice 45
Government Exhibit No. 2 - National Car Rental Invoice 46
Government Exhibit No. 3 - Southern Airways ticket stub 48
Government Exhibit No. 4 - American Express bill 49

EXHIBITS - cont'd

Index for identification and attached:

Government Exhibit No. 1 - check stub record for \$11.57 50	252
Government Exhibit No. 2 - check stub record for \$55.27 50	253
Government Exhibit No. 3 - check stub record for \$25 50	254
Government Exhibit No. 4 - check stub record for \$21.25 50	255
Government Exhibit No. 5 - Interrogatories 56	256
Government Exhibit No. 10 - answers to interrogatories 56	257

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Thereupon

LUTHER EDWIN THOMAS

a witness, was called for examination by counsel for the Federal Election Commission and, after having been sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. JOHNSON:

Q I might start as an introduction by saying that my name is Gary Johnson. I am here today representing the Federal Election Commission, and accompanying me is William Glusker who is the General Counsel of the Federal Election Commission, and Paul Lovejoy who is a paralegal for the Office of General Counsel.

This is a deposition of L. E. Thomas, which is in furtherance of the Commission's investigation into possible violations of the Federal Election Campaign Act by the Florida Friends of Reagan, and the matter has been designated as ROR 443 (77).

The deposition is being conducted pursuant to the Commission's powers as stated in 2 U.S.C. Section 437d(a)(3). Mr. Thomas is represented by counsel, John R. Bolton, who is present here today.

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Q Could you tell us your full name, please?

A Luther Edwin Thomas.

Q What is your home address?

A 2914 Canal Drive, Panama City, Florida.

Q How long have you been a resident of Florida?

A Thirteen years.

Q Are you married?

A Yes.

Q What is your wife's name?

A Virginia.

Q What is your occupation?

A Automobile dealer.

Q What is the occupation of your wife?

A Housewife.

Q Do you have a business address?

A 705 West 15th Street, Panama City, Florida.

Q You said your occupation is automobile dealer. Do you own an automobile dealership?

A Yes.

Q What is the name of your dealership?

A Tommy Thomas Chevrolet.

Q Is it incorporated?

7 8 0 4 0 0 6 2 9 4
A Yes. It is incorporated.

Q Were you involved in Governor Reagan's campaign for president?

A Yes.

Q When did you first begin supporting Governor Reagan?

MR. BOLTON: Excuse me. Could I just ask a question? Do you intend to cover in this deposition matters that have been answered in response to questions elicited with Mr. Oldaker's letter from earlier in this year?

MR. JOHANSEN: The interrogatories?

MR. BOLTON: That is correct.

MR. JOHANSEN: Yes. Those matters will be covered.

MR. BOLTON: You are going to ask --

MR. JOHANSEN: Not specifically verbatim, but those matters could be touched upon again.

BY MR. JOHANSEN:

Q I am sorry; what time did you say you first became involved in Governor Reagan's campaign for president?

A When he announced. I think it was initially November 20, 1975. I had been a Reagan supporter before that, but that is the official time.

Q When did you become involved in an official capacity?

A I became his Florida chairman when he announced.

Q So you were selected or appointed as chairman at the time he announced for the presidency?

A Yes.

Q How did the selection come about?

A I had been the former Republican state chairman, and everybody knew I was a Reagan supporter. Philosophically, so I guess, as far as I know, they never talked to anybody else about doing it. They asked me to do it, and I was more than willing.

Q You say, "they;" did you talk to anybody else? Who did you speak to?

A Senator Laxalt and David Keene, and I think maybe John Sears.

Q What were their involvements in the campaign?

A Senator Laxalt was, I guess, the honorary chairman, and he was the chairman. John Sears, I guess, was called the campaign manager, and I assume he was paid. And David Keene was a field director.

Q What did you discuss at this meeting you had with those three individuals? Generally, what did you discuss?

A I don't think I met with them all at the same

time. I talked with them at different times, and we discussed what you would normally discuss. We knew when the date of the primary would be, and we had to have a state-wide organization, and had a very limited budget and things like that.

Q During the period of time they initially contacted you, to become chairman, what did you discuss during that period?

MR. BOLTON: Are you referring to the period of time in November, 1975?

MR. JOHANSEN: When he was first contacted in regard to becoming chairman?

THE WITNESS: I can't specifically tell you what we discussed.

BY MR. JOHANSEN:

Q Just generally.

A Discussions about how many people I could afford to hire; how many volunteers we had to have; and how many people we could afford to hire; where we would put the state office; dates.

Q Did you discuss the national campaign at all?

A I can't say because I really -- I am sure we talked about it vaguely, what his chances were against Ford, et cetera, but I can't remember anything specific that we

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talked about.

Q Do you remember when you first set up office as chairman of Citizens for Reagan in Florida?

A Yes.

Q What was that date?

A Well, I can't tell you exactly but it was immediately thereafter. I would say we opened our first office some time in December; maybe it was January. But, you know, as soon as possible -- practical -- after we announced.

Q This first discussion that you had was that a telephone conversation, or did you meet with one or all three individuals in person?

A At one time or another I met with them individually.

Q Did those meetings take place in Florida?

A They took place in Washington. I might have met with David Keene in Florida, and then I also met him in Washington. But I met John Sears and Senator Laxalt up here.

Q Who was your main contact with the Citizens for Reagan campaign people?

A David Keene.

Q What was his function with Citizens for Reagan?

A I guess you would call him the field director, he was the main one we had any contact with, and I know all the other states were the same way.

Q What kind of assistance did he give you? Did he give you any assistance?

A Well --

MR. BOLSON: Maybe you could be a little more specific.

BY MR. JOHANSEN:

Q Did you discuss strategy for the Florida campaign? Did you discuss how many offices would be set up? Did you discuss finances?

A Yes.

Q Did you discuss any national strategy?

A I don't think we discussed any national strategy.

Q Did you discuss the role of Florida and how that fit in with the other states in the national program?

A No. Not that I know of. I don't remember everything we talked about, but I can't see why we would.

Q How about with Mr. Sears or Senator Harrell? Did you have any discussions with them?

A None.

Q Your conversations with Mr. Sears, were they usually telephone conversations?

A He came to Florida some, but usually it was on the phone.

Q Did you ever go to see him?

MR. SULTON: In Washington?

BY MR. JOHNSON:

Q Where was Mr. Sears located?

A Mr. Sears was located in Washington, but during the primary he was down in Florida several times. I didn't always see him, and didn't always see Rosen. They were doing their jobs, and I was doing mine. Sometimes our paths would cross.

Q During this period how often did you come to Washington to see Mr. Sears?

A I don't think I came to Washington specifically to see him. I met him in Washington one time.

Q That one time was when they first contacted you about becoming chairman?

A Yes.

Q Where did that meeting take place in Washington?

A Some hotel. It was a social activity. It wasn't

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A called meeting or something like that. There was Sears and maybe Davis at the same time, and I don't remember whether Sears was there when Senator Leavitt was there, but it was not a business-type meeting in an office. It was -- I can't remember -- in some hotel, but I don't remember which one.

Q It was a reception or a casual occasion?

A No. No, just -- I can't remember even whose room it was in.

Q Where were other people being solicited to become campaign chairmen in their states at that meeting?

A No. I don't think so.

Q During the time that you were chairman, did you have occasion to talk with Governor Reagan about the campaign?

A Sure.

Q Many times?

A During the primary year, because I rode with him a lot of the time when he was making his speeches.

Q Did you talk about national strategy?

A Well, no. I had enough problems in Florida. That was my only concern, and that was the major concern. Florida

was the first big primary with the exception of New Hampshire, and we didn't discuss New Hampshire except for how are things going; something like that.

Q Maybe you have told us this before, but how often did you talk with Mr. Sears, who was your contact.

A He wasn't my contact. David Keene was the field man.

Q I am sorry. With Mr. Keene?

A I talked to him fairly often. Every time I wanted to talk to him I could after I found him.

Q Once a day?

A Maybe twice a week and sometimes once a week. I don't know, but I would say on an average twice a week.

Q Could you describe your duties as Florida chairman of Citizens for Reagan?

A Mainly I recruited people; recruited people in the counties; county chairman; field people.

Q How many people did you have underneath you; any idea?

A Volunteers I knew personally and contacted personally; I would say 150 that I dealt directly with, and there were thousands coming in and out I may have spoken to.

but didn't know and wouldn't know if I saw them again.

Q How many field offices were there?

A Well the headquarters were in Orlando, and we had an office in Tampa. We had an office in Winter Haven, St. Petersburg, Miami, Fort Lauderdale, probably too.

Q What's good for you to remember all those?

A Well, that's the biggest cities. There are not many Republicans in Florida. We are congregated in several counties.

Q Outside of Mr. Keane is there anyone else in the Citizens for Reagan Committee who you had much contact with while you were chairman?

A Well, Neal Peden; she was one of David's secretaries, and she was kind of a coordinator. I talked to her more than anybody.

Q Once a day?

A Probably on an average sometimes three or four times, and other days maybe none. I had a lot of contact with her.

Q What did you talk to her about?

A Where is David? They are going to change the schedule and blah, blah, blah; you know.

Q In your discussions with Mr. Keane or his secretary did you ever talk about strategy in other states, what other states were doing in relation to what you were doing in Florida?

A Not really because we were the number two primary. In fact, I thought we were the most important primary and still think we were. I cried when we lost, because we should have won, and it was bad when we didn't win. I think the Florida primary was important.

Q Did you ever discuss possible future plans that the Citizens for Reagan Committee had?

A I wasn't interested in anything except Florida. I didn't want any job; nothing else.

Q Did you talk about finance as to how the Citizens for Reagan Committee was being financed?

A No. We did talk about finance, not specifically that, but when I took the job, they told me they had the money for the Florida campaign, and afterward I found out they didn't. I guess that's par for the course.

Q And you raised money in Florida for the campaign in Florida?

A We did; yes.

Q Did you ever speak to other state chairmen of the Citizens for Reagan Committee?

A Yes.

Q Do you recall what other states possibly?

A Yes. The New Hampshire chairman. Just by a quirk the New Hampshire chairman opened a restaurant in Sarasota during the primary time. I didn't know him really, but when he opened the restaurant, I went by there and saw him.

I talked to the North Carolina chairman. I talked to other people that didn't have primaries like Mississippi that I can think of; and Alabama. I don't think either one of them had a primary.

Q What did you talk about; what did you discuss?

A I guess they called me about how the campaign was going in Florida.

Q Did you ask about their states?

A They didn't have a primary campaign. In Mississippi they have a caucus-type deal. In Alabama they don't have a primary. Anyway I don't know how they select their delegates. I think they have a state convention.

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Q How about New Hampshire?

A What do you mean?

Q You said you talked to the state chairman for New Hampshire.

A We didn't talk about anything specific -- how is it going to go? Are you going to win? And they assured us they were.

Q You talked generally about Governor Reagan and his campaign?

A Yes.

Q Did the national committee provide you with campaign material like posters or buttons?

MR. BOLTON: Excuse me. The national Reagan committee or the Republican National Committee?

MR. JOHANSEN: The national Reagan committee.

THE WITNESS: Sure. We didn't have any.

BY MR. JOHANSEN:

Q How about newspaper layouts?

A Yes.

Q Contributor lists for people you might want to contact in Florida?

A They forwarded us the letters of people who

wrote in. And here again -- remember this was the second primary, a week after the New Hampshire primary. At that time we didn't have a big contributor list.

Q But you used the letters from contributors that were supplied by the --

A Sure. I separated them and gave them to the county chairmen for contacts. They returned all contributor money; they said they would like to work, et cetera.

Q When did the Florida Citizens for Reagan Committee terminate?

A Are you talking technically or actually? The day after the primary I closed the big office in Orlando, the state office. And we had a CPA who was the treasurer, and he had some space in his office which we rented. We moved everything we could to his small office. We still had bills, telephone deposits, things like that that had to be paid. But the morning after the primary, as soon as I woke up, we tore down all the partitions and things like that that we had put in this place. It took nearly all day to do that. I guess it did take all day.

The next morning I drove to Tampa. We already had a plan to get all these things done because I needed to get

back to work. I went to Tampa. The Tampa office was already closed. I think when I got there, there was maybe one volunteer there, and they were waiting to get the phone.

I drove to St. Petersburg where we had a major office, because St. Petersburg has a major Republican party, a big one. They already had everything torn down and boxed up. I took the people there to lunch and drove on home, 400 or 500 miles, and that was the end of it.

I still had to contact these people by phone. We had telephone problems, things like that which I had to do, not of major significance, but they were important.

Q You said you contacted these people by phone. What people?

A The people who had been in charge of the counties all over the state, and they called me, or I called them. Or they wrote me about, you know, we have a bill that hasn't been paid. And at the time there were quite a few Reagan bills that had not been paid. Some of them were clerical errors; bills didn't get in on time, little things like that.

If you have ever been in a campaign, you know advance men went around and contracted for the bills, and somebody had to pay them. So that is why we kept one girl in the

CRA's office in Orlando with the checkbook, and as soon as we had the money we paid them, and if we didn't have the money they were forwarded to Washington for payment.

Q Who were the advance men?

A They were professionals. Most of them were from California. I think they had worked for the Governor out there.

Q I believe the primary was on March 9; is that correct? So these activities would have been on the 10th of March?

A Yes. Was the 9th the right day?

MR. BOLTON: I think the 9th was right.

THE WITNESS: I don't know why, I thought it was the 6th.

BY MR. JOHANSEN:

Q So technically you would say that you terminated them on the day after the primary?

A Well, I tried to. I felt I had to go back down there the one time and turn the records over to the county Republican office because we had no place to put them, what was left. Of course, it all pertained to Florida, so we gave them what records we had left.

Q In your January, 1978 response to the Commission's interrogatories you stated you were involved with the Citizens for Reform Committee until termination on March 11, 1978. I think this would be two days after the primary. And then you said, "By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary." Is that what you meant by wrapping up obligations?

A Yes.

Q How long did it take you to wrap things up?

A When we closed the office in Orlando at the end of the month I think, as well as I can remember, that really put the finishing touches to it. All the little telephone deposits and things like that had been returned by that time.

Q You say when you closed the Orlando office when?

A The second office. We closed the big Orlando office the day after the primary. We moved the books to the Tampa office.

I was up here when they formed the Federal Election Commission. They had a briefing up here, and they gave us all the guidelines, everything you can do and can't do, and

I tried in the hardest way, particularly after Watergate, to make damn sure that every "I" was dotted and every "T" was crossed, and that is why we had a CPA for treasurer, and we thought we were doing everything just exactly.

Q You said you closed up the little Orlando office in November?

A No. We closed the big office and moved it to the little office the day after the primary. Then it was sometime in April I went back down there and took the girl to lunch and gave all the documents and all to the Republican county committee, gave the landlord back the keys to his office, and that was the end of it.

Q So in April sometime you officially terminated and wrapped things up?

A In the meantime I talked to her on the phone, but I wasn't down there, and I can't remember -- I think that was the only time I went down there. I might have gone one other time. I don't think I went but one other time. It is a long way from Panama City to Orlando, and air service isn't good, so --

Q So it was approximately a month?

A Yes.

Q During this wrap-up period of time, when you were

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travelling up the offices in Florida, how often did you speak with people from the Citizens for Moore Committee?

A Yes, talking about the people outside of the State of Florida.

Q Yes.

A Very, very seldom.

Q Did you have any meetings with them?

A No, not that I remember. I didn't have any reason to have a meeting.

Q When you spoke with them, you spoke with Keene or his secretary?

A Yes.

Q Anyone else you can remember?

A Not that I can think. We were mainly concerned with telephone deposits being returned and things like that.

Q Did you discuss the national campaign at all during these conversations?

A I probably asked how it was going, but that is all, not anything in depth, not specifically. How does it look? et cetera?

Q Did you discuss any other states in particular that you can remember?

A No. Not that I can remember.

Q Did you talk about campaign strategies in other states or what states might be crucial?

A There was one we probably discussed. We probably discussed Mississippi because the guy in Mississippi was a good friend of mine, and he turned out to be not a good friend of mine, and we could see it coming. Mrs. Peden, this lady, is from Mississippi, that worked for Dave Keene.

Q When you dismantled the Florida office did anyone from the Citizens for Reagan Committee help you in doing that?

A No.

Q They were mainly concerned about getting bills paid and those types of things?

A As quickly as the primary was over in Florida, there were two or three guys -- I can't remember who was there. The next morning they were gone. There was somebody down there that night, but they took off. We didn't see any of them.

Q While you were chairman, did you have any discussions with the national treasurer for the Citizens for Reagan campaign committee?

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A. I don't know who the national chairman was. Who was it? I could think who it was -- I don't want to say I didn't, but I don't know who it was. Do you know who it was? I ought to be able to remember that, but I can't tell you.

MR. BOLTON: That is all.

BY MR. BOLTON:

Q. Can you describe the inscription of the Rangan Committee of Rangan Committee?

A. Do you want it in detail?

Q. Yes. In detail.

A. I woke up one night and we had.

Q. What was that?

A. I think it was right after the North Carolina primary.

Q. Do you remember the approximate date for that?

A. Sometime in the latter part of March. And it would take me an hour to tell you what brought it about. Do you want to know it?

Q. Sure. You don't have to take an hour.

MR. BOLTON: Take whatever time you feel you need.

THE WITNESS: I can understand why I am like I am -- and

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I never met this man until an hour ago -- I am sure a lot of people can't understand why I am like I am, why I did it, and I would do it again. Maybe I shouldn't say that, but I will. And all you fellows are much younger than I am, and you probably have a hard time understanding this.

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I was born in New York a rock-ribbed Republican. And you have heard of dropping out of school. I didn't drop out of high school, I jumped out. The day after I was 17 I joined the marines. By the time I was 19 I was a combat veteran. I married a girl from Alabama when I was in the marines, and when I was discharged, I went down there. I had been overseas, and I was still not 21. I went to the courthouse the day I was 21 to register to vote because these things are important to me. I found out that I couldn't register as a Republican and I raised all kinds of hell in the courthouse, because it is important to me to vote. It is very important to me. And I had an uphill struggle in Alabama for all those intervening years because I was a Republican.

The first automobile dealership I had -- I started out as a salesman, did very well, got a small dealership in a small town where Auburn University is. It's a small town.

and I was the only Republican in town. So I took abuse for years, professional abuse, and the only damn thing that protected me was the wildlife laws, I guess, because I was an endangered species.

I was very active in the formation of the Republican Party in Alabama. After the '64 election I was lucky enough to get a Chevrolet dealership in Florida. I became active in the Republican Party in Florida. I became the state chairman and served four years.

And Jerry Ford is a very good friend of mine. I think he was a wonderful man, but I was opposed to the buddy system, and Governor Reagan spoke my language. And in all the time I rode with Governor Reagan during the Florida primary I kept trying to get him to break the 11th commandment, to quit being too much of a gentleman. He is still too much of a gentleman. If you are going to take someone's job away from them, you have to give them a reason to vote for you.

The reason we lost in Florida was because Reagan wouldn't break the 11th commandment. He couldn't criticize President Ford, and because the last week before the Florida primary, Ford came to Florida and unashamedly just spent

millions of dollars. St. Petersburg, in the biggest Republican county, got a hospital which several other states were in contention for. Martin Marietta got a \$33 million defense contract in Orlando. The Secretary of Transportation came to Miami and gave \$15 million for a rapid transit system.

I was incensed. And Florida has five Republican congressmen, and those five Republican congressmen came back to Florida a week before the primary and told their constituents that they had all kinds of goodies for them; they had to support the President; otherwise I am convinced in my heart we would have won the Florida primary.

The people in North Carolina had told the Citizens for Reagan people here, David Keene, John Sears, to stay the hell out of North Carolina, they wanted to run the campaign their way and got a little tough and were critical of President Ford, and they won.

Okay, so after the North Carolina primary, I woke up in the middle of the night and thought, you know, damn it, Reagan will never win anything unless he does become more critical.

BY MR. JOHANSEN:

Q Did you talk to people in North Carolina about this?

Q Yes.

Q This was before the North Carolina primary or afterward?

A Before, I think.

Q And you discussed strategy with them?

A Not in depth. But basically, they told me that they wouldn't let anyone and that's about what was in. They were running it their way.

So I called this advertising friend of mine, a local advertising agency who does commercial advertising who works for us, and we discussed it. And the Wisconsin primary was coming up in no time. We just had no time to get ready, and he got on the phone and found out how many agencies there were that could run an ad on the Sunday before the Wisconsin primary, which was on Tuesday.

Q Let me interrupt. Did you discuss this with any other people aside from the advertising person?

A Yes. I took the brochure that was given to me by a Republican state chairman to my lawyer and said -- now in Florida -- he wasn't aware of this because in the northern part of the state our papers don't carry like in the southern part. But the Conservative Union had run an ad in the

Florida papers for Reagan; he had Joseph Coors from Colorado. So I went to him and said here are the guidelines. Would you study them, and is there any reason why I can't set up a deal called, "Florida Friends of Reagan?"

He kept the booklet and called me the next day and said there was no reason why you can't as long as you file the forms, and I tried to do that.

Q Did you solicit other people's help or solicit other people to become members of Florida Friends of Reagan?

A Yes.

Q How many people?

A The ones I reported there.

Q Reported where?

A In the reports I filed with you all. The people who sent in money, I reported it all.

Q With the Federal Election Commission?

A Yes.

Q Did any of them help you organize the committee?

A No. Some might have called somebody else. Some that gave maybe a thousand dollars might have called somebody else, but I think everybody on there is a friend of mine that gave money. One guy may have called somebody

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side for no reason.

Q Did you discuss your idea with anyone from the Citizens for Reagan Committee?

A No. Not until -- in fact, when Dave Keene called me, I told him you had asked me not to. That was about two or three days before, and he told me it was going to be counterproductive and not to do anymore. I intended to do it in other states, but after he said don't do it, I didn't.

Q Did you discuss the idea with anyone in other states about placing advertisements in other newspapers in other states?

A No.

Q Did you ever talk to Governor Reagan after the primary in Florida?

A Not until the convention.

Q You attended the convention?

A Yes.

Q Were you a delegate?

A Yes. I was a delegate.

Q Maybe you said this, but approximately how many people would you say were involved in Florida Friends of

Reagan, say the first that of people, not people who gave contributions?

A No.

Q It was basically your committee?

A Yes. Me and my wife, and of course, I had to have an advertising agency.

Q Now about some of the individuals that worked on the Citizens for Reagan Committee that had different offices throughout the state? Were any of those people involved at all?

A No. Except, I can't remember all the people that gave money now, but some of the people that were Reagan workers in the primary and Citizens for Reagan contributed to Friends of Reagan. Is that what you mean?

Q Yes. They gave contributions?

A Yes.

Q Could we go back to Long Advertising again?

How did you make the decision to contact them?

A They do advertising work for me.

MR. BOLTON: For your company?

THE WITNESS: Yes.

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BY MR. JOHANSEN:

Q Did they do any advertising work for the Citizens for Reagan Committee?

A I wouldn't think so. I think all their advertising was totally out of Washington.

Q Did the Long Advertising Agency -- were they the ones who made the decision as to which newspapers to put ads in in Wisconsin?

A Yes.

Q Were those similar to ones in the Florida primary?

A No. They had nothing to do with them.

Q Who made them up?

MR. BOLTON: Which ones?

MR. JOHANSEN: Wisconsin.

THE WITNESS: Long Advertising took my ideas and made ads. I didn't see the ads until after they were typed to send to me for proofing. I had to trust them.

BY MR. JOHANSEN:

Q In your interrogatories I think you said you used a picture of Governor Reagan, and Mr. Bolton has a copy of the interrogatories. Maybe you would like to look at them. You said you got it from the Wall Street Journal.

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MR. BOLTON: The answers to the interrogatories identified the source of the copy, layout and design of the advertising paid for by Florida Friends of Reagan, and that was the response.

THE WITNESS: Long did it. They say the picture of the Governor was copied from the Wall Street Journal.

BY MR. JOHANSEN:

Q You don't know how they got it from the Wall Street Journal?

A No.

Q It wasn't from Citizens for Reagan, the picture?

A I don't think so. I have seen that. I guess it is one they mailed to newspapers and all, and they used it, but I don't know.

Q You also used a photograph of the White House, which you said was obtained from H. Armstrong Roberts Stock Photo Supplier. Do you know how Long Advertising obtained it from Mr. Stock?

MR. BOLTON: I think the person's name is H. Armstrong Roberts, and I think his business is Stock Photo Supplier.

BY MR. JOHANSEN:

Q Do you know how they obtained his name to get the

picture of the White House?

A When I called Mike Thompson about it, he said they got them. It is like an office supply place, I assume.

Q Do you know if Long contacted anyone from the Citizens for Reagan Campaign committee?

A I don't know. I couldn't say definitely. I don't know.

Q When were the ads actually placed in the Wisconsin newspapers?

A What day?

Q Yes. Do you remember in relation to the Wisconsin primary?

A Yes. They were on Sunday, and the primary was on Tuesday.

Q Do you know in how many papers the ads were placed?

A Ten or twelve I would guess; ten or twelve.

MR. BOLTON: It says in the interrogatories' answers 14.

THE WITNESS: Fourteen.

BY MR. JOHANSEN:

Q How did you raise money for the placement of these ads? You said you solicited contributions earlier. How did you do that?

A Called some of these friends of mine, people in Florida. Most of them that contributed I called. I didn't have time to write letters.

Q So they were either made by word of mouth or in a telephone conversation?

A Yes.

Q Who did the calling?

A I did.

Q Did your wife help you?

A No.

Q Did anyone else do any calling?

A No.

Q When did you begin soliciting contributions for Florida Friends of Reagan?

A I guess as quickly as I found out I was going to do it.

Q A couple of days after you originally thought of the idea?

A Yes.

Q Do you remember when the Florida Friends of Reagan received their first contribution?

A Not exactly.

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MR. SOLTOW: I think that is reflected in the report filed with the Commission on March 28.

MR. JOHANNSEN: We can determine that.

BY MR. JOHANNSEN:

Q The people you contacted either by word of mouth or on the phone, did you have any solicitation lists or was it just friends of yours?

A Yes. They were just close friends, most of them, because I didn't have time to go to any list. I am sure I could have gotten more money if I had gone to lower levels, but most of the people I called were people I knew could afford to give \$1,000 or \$500.

Q Did you use any list that had been used by the Citizens for Reagan Committee in the primary?

A I didn't use a list. I have known these people for years. I didn't need a list. They were active in the Republican Party and all.

Q I think you said earlier that you considered putting ads in newspapers in other states other than Wisconsin. Did you consider any other projects besides newspaper advertisements?

A Such as? I don't really know what you mean.

Q So primarily you only considered putting newspaper advertisements in other states?

A Yes.

Q You didn't consider involving yourself in other states' campaigns in any way?

A No.

Q I guess as chairman of Florida Friends of [redacted] you were the decision maker?

A Yes.

Q Why did you put the advertisements just in the Wisconsin papers?

A Just in the specific Wisconsin papers he put them in?

Q Generally why did you decide to put advertisements in newspapers in Wisconsin?

A Because that was the primary coming up. It wouldn't do any good to put them somewhere where there wasn't a primary.

Q Well, you stated earlier that you thought about placing advertisements in other states' newspapers. Why did you decide against doing that?

A Two reasons: Keene told me not to do it.

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specifically, absolutely not to do it because he thought it would be counterproductive, and there was not any great response from the people in Wisconsin for contributions. I thought the people in Wisconsin would contribute enough that you could go in and run ads in some -- in the Republican Party in Florida prior to this, not having anything to do with any specific candidate or anything like that, we would run ads, and people would send in contributions, and we would take that money and put ads in other papers to build your list of standing members.

Q So you were hoping to get contributions from people in Florida?

A Not Florida. Wisconsin.

Q Did you actually solicit contributions in the ads?

A Yes. There was a message. We didn't receive a lot of contributions from them. Those that gave a contribution of any size are listed.

I returned a lot of small contributions to Wisconsin and wrote a little note saying, "We are not going to run the ads, and so I am returning your money."

Q Why did you return the contributions?

A Because I wasn't going to run any more ads, and I

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didn't want to mislead them.

Q I think in your interrogatories you stated that you paid Long Advertising on April 5th, 1976, for their services, and the payment was for \$13,721.00?

A That is what it says.

Q Can you tell us how that payment was made?

A I guess I sent them a check.

Q Was it a committee check, or did you pay them personally?

A Maybe both. It may have been partly from the committee and partly personally, because I didn't know until -- in other words my contribution and my wife's were made to just balance out, just balance the bills, so we had nothing left over.

Q This was your contribution to --

A To the Florida Friends of Reagan.

Q So you don't remember exactly if you made part of the payment to Long Advertising? It could have been partly from you and partly from the committee?

A Yes. But at the final outset the Florida Friends of Reagan paid it all, and I may have got some money back personally because I had to pay them, and I can't tell you

whether I paid them with a personal check. I think in the final analysis he returned the money so it would balance out with the money that Florida Friends of Reagan had.

Q When you say, "he returned" --

A Long Advertisement. It is not a --

MR. BELTON: So it would balance out with the debt the Long Advertisement?

THE WITNESS: That is right.

BY MR. JOHNSON:

Q So any amount you paid to Long Advertisement for the Florida Friends of Reagan committee was reimbursed to you at a later date?

A In other words, we just swapped checks so that we were balanced with Florida Friends of Reagan.

Q Could you explain to me what you mean by swapping checks? Did Long Advertisement not cash your check?

A No. They did. I am sure they did, but I know I had to pay Long. Most -- well, I guess nearly all the money that was taken in practically -- there may have been some other expenses, I can't remember -- went to Long Advertisement. And I had to send them money up front to pay for the ads, and I think that when the Florida Friends

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of Reagan sent him the check for the balance, whatever it was, then whatever part was mine, as I recall, he refused it to me, and at that time I knew how much I had to get in.

Q Did he give you a check for any advertisement?

A I think so, but it was to balance it out, so he was paid and all the bills were paid, you know. It is in the trial transcript a complete detailed breakdown of every token.

Q You said earlier that you spoke with Mr. Reagan a few days before the ads were run in Wisconsin, and he said you shouldn't go forward. Is that correct?

A Words to that effect. Yes. He got hot about it. I told him it was none of his damn business.

Q Why did he not want you to go forward with the ads?

A He said, number one, there was a possibility -- I don't think he said it would be breaking the law; and two, he said they would be counterproductive.

Q Did you discuss whether or not it could be illegal?

A I told him it wasn't because I had already checked with my lawyer.

Q Did he indicate more than that you may get into

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trouble?

A No. I don't think he did. I can't recall. We exchanged some hot words about it.

Q Did you discuss the Wisconsin primary at all during that conversation?

A I don't think so. Somebody in Wisconsin called them and told them they didn't know we were going to run ads, and somebody called and told him they had seen the ads. Some newspaper had shown them the ads, something like that, and he said, you know, it was going to shoot them down, going to kill them. And I said, "You are not going to win anyway. What the hell difference does it make?"

Q Was this the only time that you talked to Mr. Keane after you finished up with the Citizens for Reagan Committee, do you recall?

A The only time between then and the Wisconsin thing?

Q Yes. You had a wrap-up period of time. After you had wrapped up the campaign in Florida, did you talk to Mr. Keane?

A I don't think so.

Q His secretary?

A I know I talked to his secretary about phone bills.

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things like that.

Q How about after you wrapped up the campaign in Florida?

MR. BOLTON: I think he just answered that. You are talking about his conversations about the Wisconsin ads?

BY MR. JOHANSEN:

Q I am sorry. No. After the Citizens for Reagan Committee terminated in Florida, then you had a period of about a month where you wrapped up whatever you had to wrap up. After that wrap-up period, did you talk to Mr. Keene from then until you talked to him immediately before the Wisconsin newspaper ads?

A I don't think so.

Q How about Governor Reagan?

A No.

Q Anyone else in the Citizens for Reagan Committee?

MR. BOLTON: Other than Ms. Peden?

THE WITNESS: Not that I can recall. We felt bad about losing the primary, and I am sure they felt bad about it, and there wasn't much to talk about.

BY MR. JOHANSEN:

Q When did Florida Friends of Reagan terminate its

activities?

A. When we filed our last report with you.

Q. And that decision was made by you?

A. Yes, sir.

Q. And it was made for the reasons you stated earlier?

A. Yes, sir.

(Discussion off the record.)

BY MR. JOHANSEN:

Q. Following the Wisconsin primary, did you resume any campaign responsibilities with Citizens for Reagan?

A. No.

Q. Even in an unofficial capacity did you assist or help them?

A. No. I mean -- what was the date of the Wisconsin primary? I still had to go close out the office. Was that before or after?

MR. JOHANSEN: April 6 was the Wisconsin primary.

THE WITNESS: Yes. I had to go close out the office in Orlando after that, but that was all.

BY MR. JOHANSEN:

Q. How did you submit receipts for expenditures which you incurred on behalf of Citizens for Reagan?

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A I submitted them to our office in Florida, and if they had the money they paid them. If they didn't, I guess they may have been paid in Washington. I submitted them to the secretary that we had. The people would sign the checks, the secretary and the CPA, and it was in his office. Mr. Tolson was in his office.

Q On the 14th of July, 1976, you received \$618.87 in travel reimbursement from Citizens for Reagan.

MR. BOLTON: I think the report, the Citizens for Reagan report, says travel reimbursement and office expenses.

MR. JOHANSEN: And motor vehicle, all three possibly.

MR. BOLTON: It is more than travel.

MR. JOHANSEN: Yes, I agree with you.

BY MR. JOHANSEN:

Q As you know, we have secured from the Citizens for Reagan Committee copies of receipts which you had submitted to them, and they were supplied to your attorney some time ago. Have you seen copies of them?

A Yes. There was one item on there, a lunch deal for \$7 and something, I don't think should have been charged to the Reagan Committee. I think it was in error. And most of them were incurred in March, but we kept up everything.

I handled everything on American Express. It is always a month before you get the bill, but I did, so I would have a record.

Q I think you are correct in that a number of the receipts were dated after March 9, the date of the Florida primary, and if possible, I would like to go through those receipts with you.

And the first invoice I am handing to you is from National Car Rental.

MR. BOWEN: No.

BY MR. JOHANSEN:

Q I am sorry. And it is dated March 28, 1976, and it was for \$43.06.

A Yes.

MR. JOHANSEN: I might ask that this be marked as Government Exhibit No. 1.

(The National Car Rental System, Inc. invoice dated March 28, 1976, for \$43.06 was marked Government Exhibit No. 1 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Could you examine that and tell us the purpose of

Q What expenditure?

A The \$15.90?

Q Yes.

A I can't remember exactly, but what it looks like to me -- the car was driven only 38 miles. It is about 13 miles, I guess, from the airport to the headquarters, and it was probably just as cheap, you know, to rent a car.

Because where our headquarters was there was no other way of getting around. You would have to call a taxi. But it looks like I had the car for two days and put 38 miles on it which would be just to headquarters and back.

Q So this is during the wrap-up activities when you were visiting headquarters in Orlando, the small headquarters?

A It would be the small headquarters.

Q The second invoice I am handing to you is also from the National Car Rental, dated May 19, 1976, and it is for \$15.90, and I ask that it be marked as Government Exhibit No. 2.

(The National Car Rental System, Inc. invoice dated May 19, 1976, for \$15.90 was marked Government Exhibit No. 2 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. ROSENBERG:

Q Could you explain that and explain the purpose of those expenditures?

A No. I can't. And I can't figure -- what could you get from them for \$15.90?

Q I don't know. Do you remember where the car was used?

A No. How would you get a bill for \$15.90?

Q Does it state on the invoice?

A No. It is the same number credit card and all, but you can't get anything for \$15.90.

Q Do you know if you were in Orlando on that date?

A I wouldn't think so. It is possible, but you can't rent a car for a day for \$15.90.

Q Would the office have been closed? Would you have had your small office closed on that date?

A I am not positive of the date we closed it. I would think off the top of my head, I would think the office was closed about the end of April; maybe May 1st. But it is possible it was open then, but I can't figure out what in the world you could get --

Q The third invoice I am going to hand you is a

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ticket stub from Southern Airways for a flight on May 18, 1976, from Panama City, Florida to Orlando, Florida and return on May 19. The amount is \$22.98. I think that the date correlates with the date of the car rental. I should have handed you the plane ticket first.

(The ticket stub from Southern Airways for a flight to Orlando, Florida from Panama City, Florida and return on May 18, 1976, was marked Government Exhibit no. 3 for identification, a copy of which is attached to the court copy of this deposition.)

THE WITNESS: But I still can't figure out how you could get a car for \$15.90.

BY MR. JOHANSEN:

Q When you were in Orlando, was that probably when you were closing up the small office?

A It is possible. Yes.

Q Do you recall whether you were in Orlando that day or what you did?

A No. The only thing I can remember doing was going down there and closing the office.

Q How about the American Express bill which is on the same sheet for \$7.49?

7 8 9 4 0 0 6 2 9 8 8

A That is the one I think is in error. I don't think it should be charged to Reagan.

Q It appears that the date is June 11, 1976, but it is very difficult to read.

A Right, but I think it is a mistake. It should have been charged to the Reagan committee.

Q But the official citations for Reagan were cited by the 11th of June?

A Yes.

(The American Express bill for \$20.01 dated April 28, 1976, was marked Government Exhibit No. 4 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fourth bill is one from American Express for \$20.01 on April 28, 1976. The place where the bill was charged to is blurred. Do you have any recollection of what that expenditure was for?

A No. Sure don't. I will say it was not a restaurant charge because if it was a restaurant charge there would be a tip on it.

MR. BOLTON: Excuse me. I have just noticed on some of

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these papers that there are handwritten notations in small numbers three, four, and five, that were not on copies that we got from Citizens for Bessie.

MR. JOHANSEN: I put them on to keep them straight.

MR. BURTON: Okay. Just so long as the record reflects

(The check stub record for \$11.58 payable to Shell Oil Company dated March 22, 1976, was marked Government Exhibit No. 5 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fifth document is a check stub record to Shell Oil Company on March 22, 1976, for \$11.58. That appears to be for gas. Do you know when that expenditure was made?

A When it was actually purchased?

Q Yes.

A Your credit card bill is always a month behind, so I would say the gas was bought sometime in February or maybe even January.

(The check stub record for \$59.27 payable to Farnco, Inc. dated April 15, 1976 was marked Government Exhibit No. 6 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The sixth is a check stub record of a check made out to Farnco, Inc. on April 15, 1976, listing an expenditure for the Reagan campaign of \$10. I think there were also billings on there that weren't attributed to the Reagan campaign. Is that correct?

A Yes.

Q Do you recall when the actual expenditure was made?

A No. But I can tell you that it would have to be sometime a month before that at least.

(The check stub record for \$21 payable to Shell Oil Company dated April 22, 1976 was marked Government Exhibit No. 7 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The next is a check stub recording of a check made out to Shell Oil Company on April 22, 1976; do you recall when the actual expenditure for that was made?

A No. Of course, it would be prior to that, at least a month.

Q Except for the charges for gasoline, the documents

marked to and marked as exhibits were expenditures made
in wrapping up the Reagan campaign in Florida.

A. I would agree, yes.

(The check stub record for \$67.20 payable to National Car Rental System, Inc, dated April 30, 1976, was marked Government Exhibit No. 8 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHNSON:

Q. Lastly, I am handing to you a check stub record of a check made out to National Car Rental dated April 30, 1976, for \$67.20, regarding these last four exhibits.

MR. BOLTON: Eight, seven, six and five.

BY MR. JOHNSON:

Q. Eight, seven, six, and five. They seem to indicate that funds were drawn from the Tommy Thomas Chevrolet, Inc. corporate account to pay for expenses incurred in the Reagan campaign.

A. Yes. And they were reimbursed. But you have there a duplication. This \$67.20 is the same bill as Exhibit 1, \$43.02 is part of \$67.20.

Q. Yes. I understand that. Could you explain the notation, "Reagan Committee," on those four exhibits?

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Q It is an accounts receivable, 220 is an accounts receivable, and it was charged to the Reagan Committee. They had an accounts receivable, and we had a running ledger set up in the name of the Reagan Committee, and every month we charged things to it, and they reimbursed Tommy Thomas Chevrolet, or reimbursed me, and I gave it to Tommy Thomas Chevrolet.

Q So Tommy Thomas Chevrolet set up an account number for the Reagan campaign?

A Yes. Because lots of time I wasn't there when the American Express bill came in, and what was charged to them, they gave me the tickets, and I got reimbursed and reimbursed them.

Q Okay, just so I understand. Account 220 was a special account that was created in the accounting procedures of Tommy Thomas Chevrolet to pay off campaign debts that were incurred on behalf of Governor Reagan?

A Well, 220 is accounts receivable in all General Motors' accounting. It doesn't make any difference whether it is Buick, Chevrolet or Oldsmobile; 220 means accounts receivable. Any auditor would know, so it was charged to accounts receivable in the name of the Reagan Committee.

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Q And then reimbursements were made to you from the Reagan Committee?

A Yes.

Q Were other bills presented to Tommy Thomas Chevrolet other than the four we have been discussing here?

A There were several, yes. And they were paid every month. Whenever bills were sent in they were paid and reimbursed, and it just washed out.

Q Do you know when the last reimbursement was made to Tommy Thomas Chevrolet?

A When I got the six hundred and some dollars check that balanced it out, the account worked out.

Q Could you explain again how the bill was paid to Long Advertising Company?

A I am not really sure. I would have to go back and check because I don't know exactly how it was handled.

Q But as you recall, you advanced money to Long Advertising?

A Some of it.

Q And then as money came in for the Florida Friends of Reagan Committee, it was sent to Long Advertising Company?

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A Yes.

Q And they reimbursed you for the amount of money you had initially paid for the advertisements?

MR. BOLTON: I think he also said some of the money was paid for directly out of Florida Friends of Reagan funds.

MR. JOHANSEN: Yes. I understand that also.

I have no further questions.

MR. BOLTON: Do I have the opportunity to ask questions?

MR. JOHANSEN: Yes.

EXAMINATION BY COUNSEL FOR LUTHER EDWIN THOMAS

BY MR. BOLTON:

Q There were some one or two places during the course of this deposition where, in response to questions from Mr. Jehansen you explained you may have spoken to people in other states connected with Citizens for Reagan, and you may have asked questions like, "How does it look in that state for Governor Reagan?" Were those conversations anything other than casual conversations?

A No.

MR. BOLTON: I have no further questions.

Excuse me. One other thing. I think we wanted to mark as exhibits the interrogatories, and I don't think we need to

mark the answers letters unless you want to.

(The interrogatories and the answers to interrogatories were marked Government Exhibits Nos. 8 and 10, respectively, for identification, copies of which are attached to the court copy of this deposition.)

THE COURT: This ends the deposition.

(By stipulation of counsel, in the presence of the witness, reading and signature waived.)

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CERTIFICATE OF NOTARY PUBLIC

I, Robb C. Lake, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to type writing by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Notary Public in and for
the District of Columbia

My commission expires
January 1, 1993

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Milton & Greenwood Reporting Associates, Inc.

(formerly Reynolds Reporting Associates, Inc.)

R. E. Milton
President
P. L. Greenwood
Vice President
Secretary-Treasurer

General Penotype Reporting

Suite 1110
1028 Connecticut Ave., N.W.
Washington, D.C. 20036

July 7, 1978

Phone:
202-833-3598
202-833-3599
Notary Public
D.C.-Va.-Md.

Gary Johansen, Esq.
Federal Election Commission
Fourth Floor
1325 K Street, N. W.
Washington, D. C. 20463

Re: BEFORE THE FEDERAL ELECTION COMMISSION: In the Matter of:
FLORIDA FRIENDS OF REAGAN, MUR 443 (77).

Dear Mr. Johansen:

Transmitted herewith for filing the deposition of LUTHER EDWARD
THOMAS, taken June 29, 1978. Mr. Thomas having waived the reading and
signing.

Sincerely yours,

MILTON & GREENWOOD
REPORTING ASSOCIATES, INC.

D. S. George
D. S. George
Administrative Assistant

cc:
file

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ORIGINAL

LAKE/BL

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

----- X
: In the Matter of: :
: FLORIDA FRIENDS OF REAGAN : MUR 443 (77)
: :
----- X

Washington, D. C.

Thursday, June 29, 1978

Deposition of

LUTHER EDWIN THOMAS

a witness in the above-entitled matter, called for examination
by counsel for the Federal Election Commission, taken at the
offices of the Federal Election Commission, 1325 K Street, N.W.,
Washington, D. C., beginning at 1:10 p.m., before Bobbie C.
Lake, a Notary Public in and for the District of Columbia,
when were present on behalf of the respective parties:

Milton & Greenwood Associates, Inc.

(NOTARY: D.C.-VA.-MD.)
OFFICIAL REPORTERS
1028 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036
Phones: (202) 833-3598
833-3599

78040062999

For the Federal Election Commission:

WILLIAM C. OLDAKER, ESQ.
and
GARY JOHANSEN, ESQ.
1325 K Street, N.W.
Washington, D. C. 20463

For Luther Edwin Thomas:

JOHN R. BOLTON, ESQ.
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Also Present:

PAUL LOVEJOY

C O N T E N T SEXAMINATION BY COUNSEL FOR:

FEDERAL ELECTION COMMISSION
(Mr. Johansen)

WITNESS:

LUTHER EDWIN THOMAS

3

LUTHER EDWIN THOMAS
(Mr. Bolton)

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E X H I B I T SMarked for identification and attached:Page

Government Exhibit No. 1 - National Car Rental Invoice	45
Government Exhibit No. 2 - National Car Rental Invoice	46
Government Exhibit No. 3 - Southern Airways ticket stub	48
Government Exhibit No. 4 - American Express bill	49

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EXHIBITS - cont'd

Marked for identification and attached:

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Government Exhibit No. 5 - check stub record for \$11.58	50
Government Exhibit No. 6 - check stub record for \$69.27	50
Government Exhibit No. 7 - check stub record for \$23	51
Government Exhibit No. 8 - check stub record for \$67.20	52
Government Exhibit No. 9 - interrogatories	56
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HEMLOCK
ERASABLE
COTTON CONTENT

HEMLOCK
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COTTON CONTENT

Thereupon

LUTHER EDWIN THOMAS

a witness, was called for examination by counsel for the Federal Election Commission and, after having been sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. JOHANSEN:

Q I might start as an introduction by saying that my name is Gary Johansen. I am here today representing the Federal Election Commission, and accompanying me is William Oldaker who is the General Counsel of the Federal Election Commission, and Paul Lovejoy who is a paralegal for the Office of General Counsel.

This is a deposition of L. E. Thomas, which is in furtherance of the Commission's investigation into possible violations of the Federal Election Campaign Act by the Florida Friends of Reagan, and the matter has been designated as MUR 443 (77).

The deposition is being conducted pursuant to the Commission's powers as stated in 2 U.S.C. Section 437d(a)(3). Mr. Thomas is represented by counsel, John R. Bolton, who is present here today.

Could you tell us your full name, please?

A Luther Edwin Thomas.

Q What is your home address?

A 2814 Canal Drive, Panama City, Florida.

Q How long have you been a resident of Florida?

A Thirteen years.

Q Are you married?

A Yes.

Q What is your wife's name?

A Virginia.

Q What is your occupation?

A Automobile dealer.

Q What is the occupation of your wife?

A Housewife.

Q Do you have a business address?

A 705 West 15th Street, Panama City, Florida.

Q You said your occupation is automobile dealer. Do you own an automobile dealership?

A Yes.

Q What is the name of your dealership?

A Tommy Thomas Chevrolet.

Q Is it incorporated?

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A Yes. It is incorporated.

Q Were you involved in Governor Reagan's campaign for president?

A Yes.

Q When did you first begin supporting Governor Reagan?

MR. BOLTON: Excuse me. Could I just ask a question? Do you intend to cover in this deposition matters that have been answered in response to questions enclosed with Mr. Oldaker's letter from earlier in this year?

MR. JOHANSEN: The interrogatories?

MR. BOLTON: That is correct.

MR. JOHANSEN: Yes. Those matters will be covered.

MR. BOLTON: You are going to ask --

MR. JOHANSEN: Not specifically verbatim, but those matters could be touched upon again.

BY MR. JOHANSEN:

Q I am sorry; what time did you say you first became involved in Governor Reagan's campaign for president?

A When he announced. I think it was initially November 20, 1975. I had been a Reagan supporter before that, but that is the official time.

Q When did you become involved in an official capacity?

A I became his Florida chairman when he announced.

Q So you were selected or appointed as chairman at the time he announced for the presidency?

A Yes.

Q How did the selection come about?

A I had been the former Republican state chairman, and everybody knew I was a Reagan supporter, philosophically, so I guess, as far as I know, they never talked to anybody else about doing it. They asked me to do it, and I was more than willing.

Q You say, "they;" did you talk to anybody else? Who did you speak to?

A Senator Laxalt and David Keene, and I think maybe John Sears.

Q What were their involvements in the campaign?

A Senator Laxalt was, I guess, the honorary chairman, and he was the chairman. John Sears, I guess, was called the campaign manager, and I assume he was paid. And David Keene was a field director.

Q What did you discuss at this meeting you had with those three individuals? Generally, what did you discuss?

A I don't think I met with them all at the same

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time. I talked with them at different times, and we discussed what you would normally discuss. We knew when the date of the primary would be, and we had to have a state-wide organization, and had a very limited budget and things like that.

Q During the period of time they initially contacted you, to become chairman, what did you discuss during that period?

MR. BOLTON: Are you referring to the period of time in November, 1975?

MR. JOHANSEN: When he was first contacted in regard to becoming chairman?

THE WITNESS: I can't specifically tell you what we discussed.

BY MR. JOHANSEN:

Q Just generally.

A Discussions about how many people I could afford to hire; how many volunteers we had to have; and how many people we could afford to hire; where we would put the state office; dates.

Q Did you discuss the national campaign at all?

A I can't say because I really -- I am sure we talked about it vaguely, what his chances were against Ford, et cetera, but I can't remember anything specific that we

talked about.

Q Do you remember when you first set up office as chairman of Citizens for Reagan in Florida?

A Yes.

Q What was that date?

A Well, I can't tell you exactly but it was immediately thereafter. I would say we opened our first office some time in December; maybe it was January. But, you know, as soon as possible -- practical -- after he announced.

Q This first discussion that you had was that a telephone conversation, or did you meet with one or all three individuals in person?

A At one time or another I met with them individually.

Q Did those meetings take place in Florida?

A They took place in Washington. I might have met with David Keene in Florida, and then I also met him in Washington. But I met John Sears and Senator Laxalt up here.

Q Who was your main contact with the Citizens for Reagan campaign people?

A David Keene.

Q What was his function with Citizens for Reagan?

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A I guess you would call him the field director. He was the main one we had any contact with, and I assume all the other states were the same way.

Q What kind of assistance did he give you? Did he give you any assistance?

A Well --

MR. BOLTON: Maybe you could be a little more specific.

BY MR. JOHANSEN:

Q Did you discuss strategy for the Florida campaign? Did you discuss how many offices would be set up? Did you discuss finances?

A Yes.

Q Did you discuss any national strategy?

A I don't think we discussed any national strategy.

Q Did you discuss the role of Florida and how that fit in with the other states in the national program?

A No. Not that I know of. I can't remember everything we talked about, but I can't see why we would.

Q How about with Mr. Sears or Senator Laxalt? Did you have any discussions with them?

A None.

Q Your conversations with Mr. Keene, were they usually telephone conversations?

A He came to Florida some, but usually it was on the phone.

Q Did you ever go to see him?

MR. BOLTON: In Washington?

BY MR. JOHANSEN

Q Where was Mr. Sears located?

A Mr. Sears was located in Washington, but during the primary he was down in Florida several times. I didn't always see him, and didn't always see Keene. They were doing their jobs, and I was doing mine. Sometimes our paths would cross.

Q During this period how often did you come to Washington to see Mr. Sears?

A I don't think I came to Washington specifically to see him. I met him in Washington one time.

Q That one time was when they first contacted you about becoming chairman?

A Yes.

Q Where did that meeting take place in Washington?

A Some hotel. It was a social activity. It wasn't

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a called meeting or anything like that. There was Sears and maybe David at the same time, and I don't remember whether Sears was there when Senator Laxalt was there, but it was not a business-type meeting in an office. It was -- I can't remember -- in some hotel, but I don't remember which one.

Q It was a reception or a casual occasion?

A No. We just -- I can't remember even whose room it was in.

Q Where there other people being solicited to become campaign chairmen in their states at that meeting?

A No. I don't think so.

Q During the time that you were chairman, did you have occasion to talk with Governor Reagan about the campaign?

A Sure.

Q Many times?

A During the primary yes, because I rode with him a lot of the time when he was making his speeches.

Q Did you talk about national strategy?

A Hell, no. I had enough problems in Florida. That was my only concern, and that was the major concern. Florida

was the first big primary with the exception of New Hampshire, and we didn't discuss New Hampshire except for how are things going; something like that.

Q Maybe you have told me this before, but how often did you talk with Mr. Sears, who was your contact.

A He wasn't my contact. David Keene was the field man.

Q I am sorry. With Mr. Keene?

A I talked to him fairly often. Every time I wanted to talk to him I could after I found him.

Q Once a day?

A Maybe twice a week and sometimes once a week. I don't know, but I would say on an average twice a week.

Q Could you describe your duties as Florida chairman of Citizens for Reagan?

A Mainly I recruited people; recruited people in the counties; county chairmen; field people.

Q How many people did you have underneath you; any idea?

A Volunteers I knew personally and contacted personally; I would say 150 that I dealt directly with, and there were thousands coming in and out I may have spoken to,

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but didn't know and wouldn't know if I saw them again.

Q How many field offices were there?

A Well the headquarters were in Orlando, and we had an office in Tampa. We had an office in Winter Haven, St. Petersburg, Miami, Fort Lauderdale; probably ten.

Q That's good for you to remember all those.

A Well, they are the biggest cities. There are not many Republicans in Florida. We are congregated in several counties.

Q Outside of Mr. Keene is there anyone else in the Citizens for Reagan Committee who you had much contact with while you were chairman?

A Well, Neal Peden; she was one of David's secretaries, and she was kind of a coordinator. I talked to her more than anybody.

Q Once a day?

A Probably on an average sometimes three or four times, and other days maybe none. I had a lot of contact with her.

Q What did you talk to her about?

A Where is David? They are going to change the schedule and blah, blah, blah; you know.

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Q In your discussions with Mr. Keene or his secretary did you ever talk about strategy in other states, what other states were doing in relation to what you were doing in Florida?

A Not really because we were the number two primary. In fact, I thought we were the most important primary and still think we were. I cried when we lost, because we should have won, and it was bad when we didn't win. I think the Florida primary was important.

Q Did you ever discuss possible future plans that the Citizens for Reagan Committee had?

A I wasn't interested in anything except Florida. I didn't want any job; nothing else.

Q Did you talk about finance as to how the Citizens for Reagan Committee was being financed?

A No. We did talk about finance, not specifically that, but when I took the job, they told me they had the money for the Florida campaign, and afterward I found out they didn't. I guess that's par for the course.

Q And you raised money in Florida for the campaign in Florida?

A We did; yes.

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Q Did you ever speak to other state chairmen of the Citizens for Reagan Committee?

A Yes.

Q Do you recall what other states possibly?

A Yes. The New Hampshire chairman. Just by a quirk the New Hampshire chairman opened a restaurant in Sarasota during the primary time. I didn't know him really, but when he opened the restaurant, I went by there and saw him.

I talked to the North Carolina chairman. I talked to other people that didn't have primaries like Mississippi that I can think of; and Alabama. I don't think either one of them had a primary.

Q What did you talk about; what did you discuss?

A I guess they called me about how the campaign was going in Florida.

Q Did you ask about their states?

A They didn't have a primary campaign. In Mississippi they have a caucus-type deal. In Alabama they don't have a primary. Anyway I don't know how they select their delegates. I think they have a state convention.

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Q How about New Hampshire?

A What do you mean?

Q You said you talked to the state chairman for New Hampshire.

A We didn't talk about anything specific -- how is it going to go? Are you going to win? And they assured me they were.

Q You talked generally about Governor Reagan and his campaign?

A Yes.

Q Did the national committee provide you with campaign material like posters or buttons?

MR. BOLTON: Excuse me. The national Reagan committee or the Republican National Committee?

MR. JOHANSEN: The national Reagan committee.

THE WITNESS: Sure. We didn't have any.

BY MR. JOHANSEN:

Q How about newspaper layouts?

A Yes.

Q Contributor lists for people you might want to contact in Florida?

A They forwarded me the letters of people who

wrote in. And here again -- remember this was the second primary, a week after the New Hampshire primary. At that time we didn't have a big contributor list.

Q But you used the letters from contributors that were supplied by the --

A Sure. I separated them and gave them to the county chairmen for contact. They returned all contributor money; they said they would like to work, et cetera.

Q When did the Florida Citizens for Reagan Committee terminate?

A Are you talking technically or actually? The day after the primary I closed the big office in Orlando, the state office, and we had a CPA who was the treasurer, and he had some space in his office which we rented. We moved everything we could to his small office. We still had bills, telephone deposits, things like that that had to be paid. But the morning after the primary, as soon as I woke up, we tore down all the partitions and things like that that we had put in this place. It took nearly all day to do that. I guess it did take all day.

The next morning I drove to Tampa. We already had a plan to get all these things done because I needed to get

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back to work. I went to Tampa. The Tampa office was already closed. I think when I got there, there was maybe one volunteer there, and they were waiting to get the phones.

I drove to St. Petersburg where we had a major office, because St. Petersburg has a major Republican party, a big one. They already had everything torn down and boxed up. I took the people there to lunch and drove on home, 400 or 500 miles, and that was the end of it.

I still had to contact these people by phone. We had telephone problems, things like that which I had to do; not of major significance, but they were important.

Q You said you contacted these people by phone. What people?

A The people who had been in charge of the counties all over the state, and they called me, or I called them, or they wrote me about, you know, we have a bill that hasn't been paid. And at the time there were quite a few Reagan bills that had not been paid. Some of them were clerical errors; bills didn't get in on time, little things like that.

If you have ever been in a campaign, you know advance men went around and contracted for the bills, and somebody had to pay them. So that is why we kept one girl in the

CPA's office in Orlando with the checkbook, and as soon as we had the money we paid them, and if we didn't have the money they were forwarded to Washington for payment.

Q Who were the advance men?

A They were professionals. Most of them were from California. I think they had worked for the Governor out there.

Q I believe the primary was on March 9; is that correct? So these activities would have been on the 10th of March?

A Yes. Was the 9th the right day?

MR. BOLTON: I think the 9th was right.

THE WITNESS: I don't know why, I thought it was the 6th.

BY MR. JOHANSEN:

Q So technically you would say that you terminated then on the day after the primary?

A Well, I tried to. I felt I had to go back down there the one time and turn the records over to the county Republican office because we had no place to put them, what was left. Of course, it all pertained to Florida, so we gave them what records we had left.

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Q In your January, 1978 response to the Commission's interrogatories you stated you were involved with the Citizens for Reagan Committee until termination on March 11, 1976. I think this would be two days after the primary. And then you said, "By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary." Is that what you meant by wrapping up obligations?

A Yes.

Q How long did it take you to wrap things up?

A When we closed the office in Orlando at the end of the month I think, as well as I can remember, that really put the finishing touches to it. All the little telephone deposits and things like that had been returned by that time.

Q You say when you closed the Orlando office when?

A The second office. We closed the big Orlando office the day after the primary. We moved the books to the CPA's office.

I was up here when they formed the Federal Election Commission. They had a briefing up here, and they gave us all the guidelines, everything you can do and can't do, and

I tried in the hardest way, particularly after Watergate, to make damn sure that every "I" was dotted and every "T" was crossed, and that is why we had a CPA for treasurer, and we thought we were doing everything just exactly.

Q You said you closed up the little Orlando office in November?

A No. We closed the big office and moved it to the little office the day after the primary. Then it was sometime in April I went back down there and took the girl to lunch and gave all the documents and all to the Republican county committee, gave the landlord back the keys to his office, and that was the end of it.

Q So in April sometime you officially terminated and wrapped things up?

A In the meantime I talked to her on the phone, but I wasn't down there, and I can't remember -- I think that was the only time I went down there. I might have gone one other time. I don't think I went but one other time. It is a long way from Panama City to Orlando, and air service isn't good, so --

Q So it was approximately a month?

A Yes.

Q During this wrap-up period of time, when you were

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wrapping up the offices in Florida, how often did you speak with people from the Citizens for Reagan Committee?

A You are talking about the people outside of the State of Florida?

Q Yes.

A Very, very seldom.

Q Did you have any meetings with them?

A No. Not that I remember. I didn't have any reason to have a meeting.

Q When you spoke with them, you spoke with Keene or his secretary?

A Yes.

Q Anyone else you can remember?

A Not that I can think. We were mainly concerned with telephone deposits being returned and things like that.

Q Did you discuss the national campaign at all during those conversations?

A I probably asked how it was going, but that is all, not anything in depth, not specifically. How does it look, et cetera?

Q Did you discuss any other states in particular that you can remember?

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A No. Not that I can remember.

Q Did you talk about campaign strategies in other states or what states might be crucial?

A There was one we probably discussed. We probably discussed Mississippi because the guy in Mississippi was a good friend of mine, and he turned out to be not a good friend of mine, and we could see it coming. Mrs. Peden, this lady, is from Mississippi, that worked for Dave Keene.

Q When you dismantled the Florida office did anyone from the Citizens for Reagan Committee help you in doing that?

A No.

Q They were mainly concerned about getting bills paid and those types of things?

A As quickly as the primary was over in Florida, there were two or three guys -- I can't remember who was there. The next morning they were gone. There was somebody down there that night, but they took off. We didn't see any of them.

Q While you were chairman, did you have any discussions with the national treasurer for the Citizens for Reagan campaign committee?

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A I don't know who the national chairman was. Who was it? If I could think who it was -- I don't want to say I didn't, but I don't know who it was. Do you know who it was? I ought to be able to remember that, but I can't tell you.

MR. BOLTON: That is okay.

BY MR. JORANSEN:

Q Can you describe the inception of the Florida Friends of Reagan Committee?

A Do you want it in detail?

Q Yes. In detail.

A I woke up one night mad as hell.

Q When was this?

A I think it was right after the North Carolina primary.

Q Do you remember the approximate date for that?

A Sometime in the latter part of March. And it would take me an hour to tell you what brought it about. Do you want to know it?

Q Sure. You don't have to take an hour.

MR. BOLTON: Take whatever time you feel you need.

THE WITNESS: I can understand why I am like I am -- and

I never met this man until an hour ago -- I am sure a lot of people can't understand why I am like I am, why I did it, and I would do it again. Maybe I shouldn't say that, but I will. And all you fellows are much younger than I am, and you probably have a hard time understanding this.

I was born in New York a rock-ribbed Republican. And you have heard of dropping out of school? I didn't drop out of high school; I jumped out. The day after I was 17 I joined the marines. By the time I was 19 I was a combat veteran. I married a girl from Alabama when I was in the marines, and when I was discharged, I went down there. I had been overseas, and I was still not 21. I went to the courthouse the day I was 21 to register to vote because these things are important to me. I found out that I couldn't register as a Republican and I raised all kinds of hell in the courthouse, because it is important to me to vote. It is very important to me. And I had an uphill struggle in Alabama for all those intervening years because I was a Republican.

The first automobile dealership I had -- I started out as a salesman, did very well, got a small dealership in a small town where Auburn University is. It's a small town,

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and I was the only Republican in town. So I took abuse for years, professional abuse, and the only damn thing that protected me were the wildlife laws, I guess, because I was an endangered species.

I was very active in the formation of the Republican Party in Alabama. After the '64 election I was lucky enough to get a Chevrolet dealership in Florida. I became active in the Republican Party in Florida. I became the state chairman and served four years.

And Jerry Ford is a very good friend of mine. I think he was a wonderful man, but I was opposed to the buddy system, and Governor Reagan spoke my language. And in all the time I rode with Governor Reagan during the Florida primary I kept trying to get him to break the 11th commandment, to quit being too much of a gentleman. He is still too much of a gentleman. If you are going to take someone's job away from them, you have to give them a reason to vote for you.

The reason we lost in Florida was because Reagan wouldn't break the 11th commandment. He couldn't criticize President Ford, and because the last week before the Florida primary, Ford came to Florida and unashamedly just spent

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millions of dollars. St. Petersburg, in the biggest Republican county, got a hospital which several other states were in contention for. Martin Marietta got a \$33 million defense contract in Orlando. The Secretary of Transportation came to Miami and gave \$15 million for a rapid transit system.

I was incensed. And Florida has five Republican congressmen, and those five Republican congressmen came back to Florida a week before the primary and told their constituents that they had all kinds of goodies for them; they had to support the President; otherwise I am convinced in my heart we would have won the Florida primary.

The people in North Carolina had told the Citizens for Reagan people here, David Keene, John Sears, to stay the hell out of North Carolina, they wanted to run the campaign their way and got a little tough and were critical of President Ford, and they won.

Okay, so after the North Carolina primary, I woke up in the middle of the night and thought, you know, damn it, Reagan will never win anything unless he does become more critical.

BY MR. JOHANSEN:

Q Did you talk to people in North Carolina about this?

A Yes.

Q This was before the North Carolina primary or afterward?

A Before, I think.

Q And you discussed strategy with them?

A Not in depth. But basically, they told me that they wouldn't let Keene and these other guys come in. They were running it their way.

So I called this advertising friend of mine, a local advertising agency who does commercial advertising who works for us, and we discussed it. And the Wisconsin primary was coming up in no time. We just had no time to get ready, and he got on the phone and found out how many papers there were that could run an ad on the Sunday before the Wisconsin primary, which was on Tuesday.

Q Let me interrupt. Did you discuss this with any other people aside from the advertising person?

A Yes. I took the brochure that was given to me as a Republican state chairman to my lawyer and said -- now in Florida -- he wasn't aware of this because in the northern part of the state our papers don't carry like in the southern part. But the Conservative Union had run an ad in the

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Florida papers for Reagan; so had Joseph Coors from Colorado. So I went to him and said here are the guidelines. Would you study them, and is there any reason why I can't set up a deal called, "Florida Friends of Reagan?"

He kept the booklet and called me the next day and said there was no reason why you can't as long as you file the forms, and I tried to do that.

Q Did you solicit other people's help or solicit other people to become members of Florida Friends of Reagan?

A Yes.

Q How many people?

A The ones I reported there.

Q Reported where?

A In the reports I filed with you all. The people who sent in money, I reported it all.

Q With the Federal Election Commission?

A Yes.

Q Did any of them help you organize the committee?

A No. Some might have called somebody else. Some that gave maybe a thousand dollars might have called somebody else, but I think everybody on there is a friend of mine that gave money. One guy may have called somebody

else for me because --

Q Did you discuss your idea with anyone from the Citizens for Reagan Committee?

A No. Not until -- in fact, when Dave Keene called me, I told him, and he asked me not to. That was about two or three days before, and he told me it was going to be counterproductive and not to do anymore. I intended to do it in other states, but after he said don't do it, I didn't.

Q Did you discuss the idea with anyone in other states about placing advertisements in other newspapers in other states?

A No.

Q Did you ever talk to Governor Reagan after the primary in Florida?

A Not until the convention.

Q You attended the convention?

A Yes.

Q Were you a delegate?

A Yes. I was a delegate.

Q Maybe you said this, but approximately how many people would you say were involved in Florida Friends of

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Reagan, say the first tier of people; not people who gave contributions?

A Me.

Q It was basically your committee?

A Yes. Me and my wife, and of course, I had to have an advertising agency.

Q How about some of the individuals that worked on the Citizens for Reagan Committee that had different offices throughout the state? Were any of those people involved at all?

A No. Except, I can't remember all the people that gave money now, but some of the people that were Reagan workers in the primary and Citizens for Reagan contributed to Friends of Reagan. Is that what you mean?

Q Yes. They gave contributions?

A Yes.

Q Could we go back to Long Advertising again? How did you make the decision to contact them?

A They do advertising work for me.

MR. BOLTON: For your company?

THE WITNESS: Yes.

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BY MR. JOHANSEN:

Q Did they do any advertising work for the Citizens for Reagan Committee?

A I wouldn't think so. I think all their advertising was totally out of Washington.

Q Did the Long Advertising Agency -- were they the ones who made the decision as to which newspapers to put ads in in Wisconsin?

A Yes.

Q Were those similar to ones in the Florida primary?

A No. They had nothing to do with them.

Q Who made them up?

MR. BOLTON: Which ones?

MR. JOHANSEN: Wisconsin.

THE WITNESS: Long Advertising took my ideas and made the ads. I didn't see the ads until afterward because they weren't typed to send to me for proofing. I had to trust them.

BY MR. JOHANSEN:

Q In your interrogatories I think you said you used a picture of Governor Reagan, and Mr. Bolton has a copy of the interrogatories. Maybe you would like to look at those. You said you got it from the Wall Street Journal.

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MR. BOLTON: The answers to the interrogatories identified the source of the copy, layout and design of the advertising paid for by Florida Friends of Reagan, and that was the response.

THE WITNESS: Long did it. They say the picture of the Governor was copied from the Wall Street Journal.

BY MR. JOHANSEN:

Q You don't know how they got it from the Wall Street Journal?

A No.

Q It wasn't from Citizens for Reagan, the picture?

A I don't think so. I have seen that. I guess it is one they mailed to newspapers and all, and they used it, but I don't know.

Q You also used a photograph of the White House, which you said was obtained from H. Armstrong Roberts Stock Photo Supplier. Do you know how Long Advertising obtained it from Mr. Stock?

MR. BOLTON: I think the person's name is H. Armstrong Roberts, and I think his business is Stock Photo Supplier.

BY MR. JOHANSEN:

Q Do you know how they obtained his name to get the

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picture of the White House?

A When I called Mike Thompson about it, he said they get them. It is like an office supply place, I assume.

Q Do you know if Long contacted anyone from the Citizens for Reagan campaign committee?

A I don't know. I couldn't say definitely. I don't know.

Q When were the ads actually placed in the Wisconsin newspapers?

A What day?

Q Yes. Do you remember in relation to the Wisconsin primary?

A Yes. They were on Sunday, and the primary was on Tuesday.

Q Do you know in how many papers the ads were placed?

A Ten or twelve I would guess; ten or twelve.

MR. BOLTON: It says in the interrogatories' answers 14.

THE WITNESS: Fourteen.

BY MR. JOHANSEN:

Q How did you raise money for the placement of these ads? You said you solicited contributions earlier. How did you do that?

A Called some of these friends of mine, people in Florida. Most of them that contributed I called. I didn't have time to write letters.

Q So they were either made by word of mouth or in a telephone conversation?

A Yes.

Q Who did the calling?

A I did.

Q Did your wife help you?

A No.

Q Did anyone else do any calling?

A No.

Q When did you begin soliciting contributions for Florida Friends of Reagan?

A I guess as quickly as I found out I was going to do it.

Q A couple of days after you originally thought of the idea?

A Yes.

Q Do you remember when the Florida Friends of Reagan received their first contribution?

A Not exactly.

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COMMUNICATIONS SECTION

MR. BOLTON: I think that is reflected in the report filed with the Commission on March 28.

MR. JOHANSEN: We can determine that.

BY MR. JOHANSEN:

Q The people you contacted either by word of mouth or on the phone, did you have any solicitation lists or was it just friends of yours?

A Yes. They were just close friends, most of them, because I didn't have time to go to any list. I am sure I could have gotten more money if I had gone to lower levels, but most of the people I called were people I knew could afford to give \$1,000 or \$500.

Q Did you use any list that had been used by the Citizens for Reagan Committee in the primary?

A I didn't use a list. I have known these people for years. I didn't need a list. They were active in the Republican Party and all.

Q I think you said earlier that you considered putting ads in newspapers in other states other than Wisconsin. Did you consider any other projects besides newspaper advertisements?

A Such as? I don't really know what you mean.

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COMMUNICATIONS SECTION

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Q So primarily you only considered putting newspaper advertisements in other states?

A Yes.

Q You didn't consider involving yourself in other states' campaigns in any way?

A No.

Q I guess as chairman of Florida Friends of Reagan you were the decision maker?

A Yes.

Q Why did you put the advertisements just in the Wisconsin papers?

A Just in the specific Wisconsin papers he put them in?

Q Generally why did you decide to put advertisements in newspapers in Wisconsin?

A Because that was the primary coming up. It wouldn't do any good to put them somewhere where there wasn't a primary.

Q Well, you stated earlier that you thought about placing advertisements in other states' newspapers. Why did you decide against doing that?

A Two reasons: Keene told me not to do it,

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specifically, absolutely not to do it because he thought it would be counterproductive, and there was not any great response from the people in Wisconsin for contributions. I thought the people in Wisconsin would contribute enough that you could go in and run ads in some -- in the Republican Party in Florida prior to this, not having anything to do with any specific candidate or anything like that, we would run ads, and people would send in contributions, and we would take that money and put ads in other papers to build your list of standing members.

Q So you were hoping to get contributions from people in Florida?

A Not Florida. Wisconsin.

Q Did you actually solicit contributions in the ads?

A Yes. There was a coupon. We didn't receive a lot of contributions from them. Those that gave a contribution of any size are listed.

I returned a lot of small contributions to Wisconsin and wrote a little note saying, "We are not going to run the ads, and so I am returning your money."

Q Why did you return the contributions?

A Because I wasn't going to run any more ads, and I

didn't want to mislead them.

Q I think in your interrogatories you stated that you paid Long Advertising on April 5th, 1976, for their services, and the payment was for \$14,771.40?

A That is what it says.

Q Can you tell me how that payment was made?

A I guess I sent them a check.

Q Was it a committee check, or did you pay them personally?

A Maybe both. It may have been partly from the committee and partly personally, because I didn't know until -- in other words my contribution and my wife's were made to just balance out, just balance the bills; so we had nothing left over.

Q This was your contribution to --

A To the Florida Friends of Reagan.

Q So you don't remember exactly if you made part of the payment to Long Advertisement? It could have been partly from you and partly from the committee?

A Yes. But at the final outset the Florida Friends of Reagan paid it all, and I may have got some money back personally because I had to pay them, and I can't tell you

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whether I paid them with a personal check. I think in the final analysis he returned the money so it would balance out with the money that Florida Friends of Reagan had.

Q When you say, "he returned" --

A Long Advertisement. It is not a --

MR. BOLTON: So it would balance out with the debt due Long Advertisement?

THE WITNESS: That is right.

BY MR. JOHANSEN:

Q So any amount you paid to Long Advertisement for the Florida Friends of Reagan committee was reimbursed to you at a later date?

A In other words, we just swapped checks to make sure we balanced with Florida Friends of Reagan.

Q Could you explain to me what you mean by swapping checks? Did Long Advertisement not cash your check?

A No. They did. I am sure they did, but I know I had to pay Long. Most -- well, I guess nearly all the money that was taken in practically -- there may have been some other expenses, I can't remember -- went to Long Advertisement. And I had to send them money up front to pay for the ads, and I think that when the Florida Friends

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of Reagan sent him the check for the balance, whatever it was, then whatever part was mine, as I recall, he refunded it to me, and at that time I knew how much I had to put in.

Q So he gave you a check for Long Advertisement?

A I think so, but it was to balance it out, so he was paid and all the bills were paid, you know. It is in the file. I sent you a complete detailed breakdown on every token.

Q You said earlier that you spoke with Mr. Keene a few days before the ads were run in Wisconsin, and he said you shouldn't go forward. Is that correct?

A Words to that effect. Yes. He got hot about it. I told him it was none of his damn business.

Q Why did he not want you to go forward with the ads?

A He said, number one, there was a possibility -- I don't think he said it would be breaking the law; and two, he said they would be counterproductive.

Q Did you discuss whether or not it could be illegal?

A I told him it wasn't because I had already checked with my lawyer.

Q Did he indicate more than that you may get into

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trouble?

A No. I don't think he did. I can't recall. We exchanged some hot words about it.

Q Did you discuss the Wisconsin primary at all during that conversation?

A I don't think so. Somebody in Wisconsin called them and told them they didn't know we were going to run ads, and somebody called and told him they had seen the ads. Some newspaper had shown them the ads, something like that, and he said, you know, it was going to shoot them down, going to kill them. And I said, "You are not going to win anyway. What the hell difference does it make?"

Q Was this the only time that you talked to Mr. Keene after you finished up with the Citizens for Reagan Committee; do you recall?

A The only time between then and the Wisconsin thing?

Q Yes. You had a wrap-up period of time. After you had wrapped up the campaign in Florida, did you talk to Mr. Keene?

A I don't think so.

Q His secretary?

A I know I talked to his secretary about phone bills,

things like that.

Q How about after you wrapped up the campaign in Florida?

MR. BOLTON: I think he just answered that. You are talking about his conversations about the Wisconsin ads?

BY MR. JOHANSEN:

Q I am sorry. No. After the Citizens for Reagan Committee terminated in Florida, then you had a period of about a month where you wrapped up whatever you had to wrap up. After that wrap-up period, did you talk to Mr. Keene from then until you talked to him immediately before the Wisconsin newspaper ads?

A I don't think so.

Q How about Governor Reagan?

A No.

Q Anyone else in the Citizens for Reagan Committee?

MR. BOLTON: Other than Ms. Peden?

THE WITNESS: Not that I can recall. We felt bad about losing the primary, and I am sure they felt bad about it, and there wasn't much to talk about.

BY MR. JOHANSEN:

Q When did Florida Friends of Reagan terminate its

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activities?

A When we filed our last report with you.

Q And that decision was made by you?

A Yes, sir.

Q And it was made for the reason you stated earlier?

A Yes, sir.

(Discussion off the record.)

BY MR. JOHANSEN:

Q Following the Wisconsin primary, did you resume any campaign responsibility with Citizens for Reagan?

A No.

Q Even in an unofficial capacity did you assist or help them?

A No. I mean -- what was the date of the Wisconsin primary? I still had to go close out the office. Was that before or after?

MR. BOLTON: April 6 was the Wisconsin primary.

THE WITNESS: Yes. I had to go close out the office in Orlando after that, but that was all.

BY MR. JOHANSEN:

Q How did you submit receipts for expenditures which you incurred on behalf of Citizens for Reagan?

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A I submitted them to our office in Florida, and if they had the money they paid them. If they didn't, I guess they may have been paid in Washington. I submitted them to the secretary that we had. Two people could sign the checks, the secretary and the CPA, and it was in his office. Her office was in his office.

Q On the 14th of July, 1976, you received \$610.57 in travel reimbursement from Citizens for Reagan.

MR. BOLTON: I think the report, the Citizens for Reagan report, says travel reimbursement and office expense.

MR. JOHANSEN: And motor vehicle; all three possibly.

MR. BOLTON: It is more than travel.

MR. JOHANSEN: Yes. I agree with you.

BY MR. JOHANSEN:

Q As you know, we have secured from the Citizens for Reagan Committee copies of receipts which you had submitted to them, and they were supplied to your attorney some time ago. Have you seen copies of them?

A Yes. There was one item on there, a lunch deal for \$7 and something, I don't think should have been charged to the Reagan Committee. I think it was in error. And most of them were incurred in March, but we kept up everything.

I handled everything on American Express. It is always a month before you get the bill, but I did, so I would have a record.

Q I think you are correct in that a number of the receipts were dated after March 9, the date of the Florida primary, and if possible, I would like to go through those quickly with you.

And the first invoice I am handing to you is from National Car Rental.

MR. BOLTON: No.

BY MR. JOHANSEN:

Q I am sorry. And it is dated March 28, 1976, and it was for \$43.08.

A Yes.

MR. JOHANSEN: I might ask that this be marked as Government Exhibit No. 1.

(The National Car Rental System, Inc. invoice dated March 28, 1976, for \$43.08 was marked Government Exhibit No. 1 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Could you examine that and tell us the purpose of

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this expenditure?

A The \$43.08?

Q Yes.

A I can't remember exactly, but what it looks like to me -- the car was driven only 38 miles. It is about 15 miles, I guess, from the airport to the headquarters, and it was probably just as cheap, you know, to rent a car. Because where our headquarters was there was no other way of getting around. You would have to call a taxi. But it looks like I had the car for two days and put 38 miles on it which would be just to headquarters and back.

Q So this is during the wrap-up activities when you were visiting headquarters in Orlando, the small headquarters?

A It would be the small headquarters.

Q The second invoice I am handing to you is also from the National Car Rental, dated May 19, 1976, and it is for \$15.90, and I ask that it be marked as Government Exhibit No. 2.

(The National Car Rental System, Inc. invoice dated May 19, 1976, for \$15.90 was marked Government Exhibit No. 2 for identification, a copy of which is attached to the court copy of this deposition.)

ticket stub from Southern Airways for a flight on May 18, from Panama City, Florida to Orlando, Florida and return on May 19. The amount is \$85.98. I think that the date correlates with the date of the car rental. I should have handed you the plane ticket first.

(The ticket stub from Southern Airways for a flight to Orlando, Florida from Panama City, Florida and return on May 18, 1976, was marked Government Exhibit No. 3 for identification, a copy of which is attached to the court copy of this deposition.)

THE WITNESS: But I still can't figure out how you could get a car for \$15.90.

BY MR. JOHANSEN:

Q When you were in Orlando, was that probably when you were closing up the small office?

A It is possible. Yes.

Q Do you recall whether you were in Orlando that day or what you did?

A No. The only thing I can remember doing was going down there and closing the office.

Q How about the American Express bill which is on the same sheet for \$7.49?

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A That is the one I think is in error. I don't think it should be charged to Reagan.

Q It appears that the date is June 11, 1976, but it is very difficult to read.

A Right, but I think it is a mistake. It shouldn't have been charged to the Reagan committee.

Q But the offices of Citizens for Reagan were closed by the 11th of June?

A Yes.

(The American Express bill for \$20.01 dated April 28, 1976, was marked Government Exhibit No. 4 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fourth bill is one from American Express for \$20.01 on April 28, 1976. The place where the bill was charged to is blurred. Do you have any recollection of what that expenditure was for?

A No. Sure don't. I will say it was not a restaurant charge because if it was a restaurant charge there would be a tip on it.

MR. BOLTON: Excuse me. I have just noticed on some of

these papers that there are handwritten notations in pencil, numbers three, four, and five, that were not on copies that we got from Citizens for Reagan.

MR. JOHANSEN: I put them on to keep them straight.

MR. BOLTON: Okay. Just so long as the record reflects that.

(The check stub record for \$11.58 payable to Shell Oil Company dated March 22, 1976, was marked Government Exhibit No. 5 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fifth document is a check stub record to Shell Oil Company on March 22, 1976, for \$11.58. That appears to be for gas. Do you know when that expenditure was made?

A When it was actually purchased?

Q Yes.

A Your credit card bill is always a month behind, so I would say the gas was bought sometime in February or maybe even January.

(The check stub record for \$69.27 payable to Texaco, Inc. dated April 15, 1976 was marked Government Exhibit No. 6 for identification, a copy of which is attached to the court copy of this deposition.)

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BY MR. JOHANSEN:

Q The sixth is a check stub record of a check made out to Texaco, Inc. on April 15, 1976, listing an expenditure for the Reagan campaign of \$18. I think there were also billings on there that weren't attributed to the Reagan campaign. Is that correct?

A Yes.

Q Do you recall when the actual expenditure was made?

A No. But I can tell you that it would have to be sometime a month before that at least.

(The check stub record for \$23 payable to Shell Oil Company dated April 22, 1976 was marked Government Exhibit No. 7 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The next is a check stub recording of a check made out to Shell Oil Company on April 22, 1976; do you recall when the actual expenditure for that was made?

A No. Of course, it would be prior to that, at least a month.

Q Except for the charges for gasoline, the documents

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I handed to you marked as exhibits were expenditures made in wrapping up the Citizens for Reagan campaign in Florida?

A I would assume so. Yes.

(The check stub record for \$67.20 payable to National Car Rental System, Inc. dated April 30, 1976, was marked Government Exhibit No. 8 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Lastly, I am handing to you a check stub record of a check made out to National Car Rental dated April 30, 1976, for \$67.20, regarding these last four exhibits.

MR. BOLTON: Eight, seven, six and five.

BY MR. JOHANSEN:

Q Eight, seven, six, and five. They seem to indicate that funds were drawn from the Tommy Thomas Chevrolet, Inc. corporate account to pay for expenses incurred in the Reagan campaign.

A Yes. And they were reimbursed. But you have there a duplication. This \$67.20 is the same bill as Exhibit 1; \$43.08 is part of \$67.20.

Q Yes. I understand that. Could you explain the notation, "Reagan Committee," on those four exhibits?

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Q And then reimbursements were made to you from the Reagan Committee?

A Yes.

Q Were other bills presented to Tommy Thomas Chevrolet, other than the four we have been discussing here?

A There were several; yes. And they were paid every month. Whenever bills were sent in they were paid and reimbursed, and it just washed out.

Q Do you know when the last reimbursement was made to Tommy Thomas Chevrolet?

A When I got the six hundred and some dollars back that balanced it out; the account zeroed out.

Q Could you explain again how the bill was paid to Long Advertising Company?

A I am not really sure. I would have to go back and check because I don't know exactly how it was handled.

Q But as you recall you advanced money to Long Advertising?

A Some of it.

Q And then as money came in for the Florida Friends of Reagan Committee, it was sent to Long Advertising Company?

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A Yes.

Q And they reimbursed you for the amount of money you had initially paid for the advertisements?

MR. BOLTON: I think he also said some of the money was paid for directly out of Florida Friends of Reagan funds.

MR. JOHANSEN: Yes. I understand that also.

I have no further questions.

MR. BOLTON: Do I have the opportunity to ask questions?

MR. JOHANSEN: Yes.

EXAMINATION BY COUNSEL FOR LUTHER EDWIN THOMAS

BY MR. BOLTON:

Q There were some one or two places during the course of this deposition where, in response to questions from Mr. Johansen you explained you may have spoken to people in other states connected with Citizens for Reagan, and you may have asked questions like, "How does it look in that state for Governor Reagan?" Were those conversations anything other than casual conversations?

A No.

MR. BOLTON: I have no further questions.

Excuse me. One other thing. I think we wanted to mark as exhibits the interrogatories, and I don't think we need to

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mark the covering letters unless you want to.

(The interrogatories and the answers to interrogatories were marked Government Exhibits Nos. 9 and 10, respectively, for identification, copies of which are attached to the court copy of this deposition.)

MR. JOHANSEN: This ends the deposition.

(By stipulation of counsel, in the presence of the witness, reading and signature waived.)

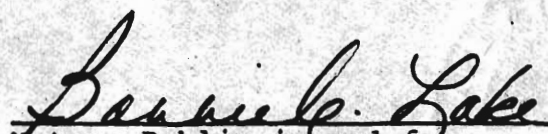
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HEMLOCK

CERTIFICATE OF NOTARY PUBLIC

I, Bobbie C. Lake, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to type-writing by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.


Notary Public in and for
the District of Columbia

My commission expires
January 1, 1983

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of
Florida Friends of Reagan

Subpoena
To Appear for Deposition
Upon Oral Examination
MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at 1325 K Street, N.W.
Washington, DC 20463
June 29, 1978, at 1:00 P.M.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day 6th of June, 1978.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

7 8 0 4 0 0 6 3 0 5 7

Documents Exhibit No. 1
BCI 6/29/78#
2,

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 04/06/76	YOUR LINE OF CREDIT IS 500.0 QUESTIONS***CALL 612-830-725	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO	AMOUNT
	LUTHER E THOMAS	ST PETERSBURG	03/03/76	H2456780	24.12
	LUTHER E THOMAS	ORLANDO	03/28/76	50197420	43.08

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

Ref - Changes to Rental

SUMMARY OF ACCOUNT	.00	67.20	.00 CR	.00	67.20
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.)
NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 35224, NORMANVILLE BRANCH MINNEAPOLIS, MINNESOTA 55435					

12000 REPORT 1305 855-4170
5400 1 5001 ROAD
ORLANDO, FLORIDA 32809

050 47 112 5010742 0

(1) CAR NO. 4090	(2) CAR WILL BE RETURNED TO: 50116	(3) MILES IN 8249	(4) MILES OUT 8217	(5) MILES DRIVEN 38
(6) DATE & TIME IN 2:11 PM	(7) DATE & TIME OUT 03 MAR 28	(8) CHECK IN CITY 05:00 9		
(9) STATE FL	(10) CITY ORLANDO	(11) STATE FL	(12) CITY ORLANDO	(13) STATE FL
(14) BILLING INFORMATION ONLY				

7001 056 1568 1

Tomlin, Thomas

(15) COMPANY NAME	(16) RENTER'S NAME	(17) ADDRESS	(18) CITY	(19) STATE	(20) ZIP
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(21) AMERICAN EXPRESS A.X.	(22) CARPIS E.A.	(23) DINER D.N.	(24) BANY AMERICA B.A.	(25) T.W.A. T.G.	(26) AVIS A.V.
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(27) MAKE CHARGE	(28) LOCAL REG. LO	(29) AIR TRAVEL A.T.	(30) HERTZ H.Z.	(31) ELM-FAR E.C.	(32) TILDEN T.L.	(33) OTHER
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(34) NAME	(35) ADDRESS	(36) CITY	(37) STATE	(38) ZIP
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(39) MAKE CHARGE	(40) LOCAL REG. LO	(41) AIR TRAVEL A.T.	(42) HERTZ H.Z.	(43) ELM-FAR E.C.	(44) TILDEN T.L.	(45) OTHER
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(46) TIME & MILEAGE	(47) TAX	(48) LESS GAS. ETC.	(49) LESS DEPOSIT	(50) TOTAL
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(51) TIME & MILEAGE	(52) TAX	(53) LESS GAS. ETC.	(54) LESS DEPOSIT	(55) TOTAL
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(56) TIME & MILEAGE	(57) TAX	(58) LESS GAS. ETC.	(59) LESS DEPOSIT	(60) TOTAL
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(61) TIME & MILEAGE	(62) TAX	(63) LESS GAS. ETC.	(64) LESS DEPOSIT	(65) TOTAL
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(66) TIME & MILEAGE	(67) TAX	(68) LESS GAS. ETC.	(69) LESS DEPOSIT	(70) TOTAL
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(71) MILES ALLOWED	(72) MILES CHARGED	(73) ALTERNATE CAR AND DATE
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(74) MILES IN	(75) MILES OUT	(76) MILES DRIVEN
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(77) MILES IN	(78) MILES OUT	(79) MILES DRIVEN
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(80) MILES IN	(81) MILES OUT	(82) MILES DRIVEN
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(83) MILES IN	(84) MILES OUT	(85) MILES DRIVEN
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(86) MILES IN	(87) MILES OUT	(88) MILES DRIVEN
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(89) MILES IN	(90) MILES OUT	(91) MILES DRIVEN
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(92) MILES IN	(93) MILES OUT	(94) MILES DRIVEN
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(95) MILES IN	(96) MILES OUT	(97) MILES DRIVEN
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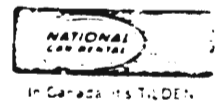
(98) MILES IN	(99) MILES OUT	(100) MILES DRIVEN
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(101) MILES IN	(102) MILES OUT	(103) MILES DRIVEN
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(104) MILES IN	(105) MILES OUT	(106) MILES DRIVEN
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(107) MILES IN	(108) MILES OUT	(109) MILES DRIVEN
----------------	-----------------	--------------------

(110) MILES IN	(111) MILES OUT	(112) MILES DRIVEN
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Make check payable to: NATIONAL CAR RENTAL
Mail to: 5501 GREEN VALLEY DRIVE, MINNEAPOLIS, MINN. 55437
PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT

INVOICE
WHITE - HOME OFFICE

73040063033

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Government Exempt No. 2

BCL 6/29/78

NATIONAL CAR RENTAL SYSTEM		ACCOUNT NUMBER		ACCOUNT TYPE	STATEMENT DATE	YOUR LINE OF CREDIT IS 500.00	
7001-056-1568-1		CENTRAL BILL		06/07/76	QUESTIONS***CALL 612-830-2252		
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO	AMOUNT		
	LUTHER E THOMAS	ORLANDO	05/19/76	50333463	15.90		

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

SUMMARY OF ACCOUNT	.00	15.90	.00 CR	.00	15.90
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.\$)

NATIONAL CAR RENTAL SYSTEM, INC.

P.O. BOX 35278 - NORMANDALE BRANCH
MINNEAPOLIS, MINNESOTA 55438

C. D. J. S. / 12/1/78

#3

ACKNOWLEDGE RECEIPT OF TICKETS AND/OR COUPONS FOR RELATED CHARGES DESCRIBED HEREON. PAYMENT FULL TO BE MADE WHEN BILLED OR IN FULL CASH. AMOUNTS SUBJECT TO STANDARD POLICY OF COMPANY ISSUING CARD AND ARE NOT TO BE APPLIED TO OTHERS.

UNIVERSAL
CREDIT CARD
CHARGE FORM

Southern Airways, Inc.

038 4420890476
SOUTHERN AIRWAYS
9 A10
PANAMA CITY FL

X MEMBER'S NAME AND ADDRESS (PRINT)

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER		CARRIER		FLIGHT	CLASS	DATE	TIME	STATUS	FARE BASIS/TKT. DESIGNATOR	REF. NO. & DATE	REF. NO. & DATE	CLASS
NOT GOOD FOR PASSAGE		SO		225	S	18 MAY	311P	OK	S			
PANAMA CITY		SO		230	S	19 MAY	930P	OK	S			
ORLANDO MCCOY												
PANAMA CITY												
VOID												
VOID												

IF EXT'D. PAY DBRD. 3 8 9 12
CIRCLE NO. OF MOS.

FARE CALCULATION

FARE	79.62
TAX	6.36
TOTAL	85.98

038 4420890476 2 0

015 003 180 5 100AX
VALID 10 75 THRU 09 76 58
LUTHER E THOMAS

015 003 180 5 100AX
VALID 10 75 THRU 09 76 58
LUTHER E THOMAS

Service Establishment: Date of Charge: Any delayed charges are entered below:

Merchandise Services: Type of Delayed Chg:

Taxes: Amt. of Delayed Chg:

Tips/Misc: Revised Total:

Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment Merchandise and/or service purchased on this card shall not be resold or returned for cash refund.

Cardmember Signature: Total: 14.00 Amexco Use Only: Equivalent Am:

Invoice Number: Amexco Copy

749
8598
9347*

523800 0318051100 0100000000749

78040063050

#5

*Don't want En kit
No. 4 BCL 6/29/78*

015 003 180 5 100

VALID 10/78

THRU 09/78
58



Approval Code

Check or Bill No

Service Establishment 1425 75 00164 100001 400017042	Rate of Charge 1425 75	Any delayed charges are entered below
Merchandise/Services 50.01	Type of Delayed Chg	
Taxes	Amt. of Delayed Chg	
Tips/Misc	Revised Total	
Establishment agrees to transmit to American Express Company (Amexco) or Authorized Representative for payment. Merchandise and/or service purchased on this card shall not be resold or returned for cash refund	Total 50.01	Amexco Use Only Equivalent Amt
Cardmember Signature X <i>[Signature]</i>		

Invoice Number

Amexco Copy

001676

010000002001

1 9 0 3 9 0 0 4 0 8 7

*Gov. REAGAN
CAMPAIGN*

0.00	T
20.28	+
35.65	+
24.00	+
20.25	+
27.19	+
187.19	T
187.19	+
187.19	T

Document Exhibit No. 5 BCL 6/29/78

#6

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

No. 47

DATE March 22, 1976

Tommy Thomas II 2569

PAY

\$11.50

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC

BY

NON-NEGOTIABLE

BY

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET
				PCT.	AMOUNT	
	Card # 89531,2569 Reagan Comm.	220 ✓				11.

Document Exhibit No. 6 BCL 6/6/9/78

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 5289

DATE April 15, 1976

69.27

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

\$ 69.27

TO THE
ORDER
OF

Texaco, Inc
P O Box 25487
Richmond, Va 23268

TOMMY THOMAS CHEVROLET, INC.

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct No 1188426660 Reagan	220	18.00			
		13A	18.37			
		513	32.90			69.27

18.00

© 1976 GM Corp. INC.

#7

7804000905

Government Exhibit No. 7 BC 16/29/78

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

83-810
838

No. 5431

DATE April 22, 1976

TOTAL DOLLARS 23 00

PAY

\$ 23.00

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct # 89531,2569 Reagan Co	220	✓			23.00

20423 - BOTE GRP., INC.

8#

7 8 0 4 0 0 0 6 3 0 6

Document's Exhibit No. 8 BC 6/29/72

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

No. 5562 A

DATE April 30, 1976

9

67 20

PAY

\$ 67.20

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

TO THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472

TOMMY THOMAS CHEVROLET, INC

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
4/30/76	Acct No. 7001-056-1568-1 Reagan Comm	220				67.20

BOYD BROS., INC.

Government Ex. Exhibit No. 9
BCL 6/29/78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 443
Florida Friends of)
Reagan) Interrogatories

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?
6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

Interrogatories
MUR 443
Page 2

7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).
8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.
9. State the date on which Florida Friends of Reagan was terminated.
10. State the date on which Florida Citizens for Reagan was terminated.
11. Describe the methods used by Florida Friends of Reagan to solicit contributions.
12. Describe any contractual agreements made between Florida Friends of Reagan and Long Advertising Agency, 20 S.E. 8th Street, Miami, Florida, or attach copies of such agreements to your answers to these interrogatories. State the dates and amounts

of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.
14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.
15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.
16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

Government Exhibit No. 10
BL L 6/29/78

ANSWERS OF L.E. THOMAS

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

The 1976 Florida primary was held on March 9 of that year, and we began closing our field offices throughout the State the next day. By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary.

4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a

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candidate, and I indicated I would be. Within a week or two of that date, I met in Washington, D.C., with Mr. Keene, Mr. John Sears, and Senator Paul Laxalt. We discussed the subject of the Florida primary, and we agreed that I would become the Florida Chairman should Governor Reagan decide to announce his candidacy for the Republican presidential nomination.

6. Your question asks that I list the names of "other" officials and employees of Citizens for Reagan with whom I spoke while I was Chairman of FFOR. If the question is meant to imply that I spoke with Mr. Sears and Senator Laxalt while I was Chairman of FFOR, the implication is inaccurate. If the question is meant to imply that I was an official or employee of Citizens for Reagan while I was chairman of FFOR, the implication is likewise inaccurate.

I did speak with Mr. Keene at least once. The substance of that conversation is detailed accurately in his letter to Mr. Oldaker, dated November 30, 1977.

I spoke a few times by telephone with Ms. Neal Peden, Mr. Keene's secretary, subsequent to the Florida primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

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3.

7. Not applicable.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

9. FFOR engaged in no activities after April 6, 1976, the date of the 1976 Wisconsin primary, and it was terminated in fact as of that date. FFOR filed its notice of termination with the Federal Election Commission on December 10, 1976.

10. Within forty-eight hours of the March 9 Florida primary, all of the field offices in Florida had been closed. One small office remained open in Orlando, staffed by one person, to handle matters relating to wrapping up the campaign. I do not know whether there was any official termination of the Florida Citizens for Reagan, because all such matters were handled by the main Citizens for Reagan Headquarters in Washington, D.C.

11. All contributions, other than my own and my wife's, were solicited by telephone calls.

12. The Long Advertising Agency (hereafter, "Long") does commercial work for my businesses in Florida. I asked them orally to help me in preparation of a newspaper advertisement. There was no written contract.

Long contacted various newspapers in Wisconsin to ascertain the rates at which those newspapers sold advertising

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space, they prepared one newspaper advertisement, and they placed the advertisement in fourteen Wisconsin newspapers.

FFOR made one payment to Long for its work in the amount of \$14,771.40. That payment was made on April 5, 1976.

13. Long was responsible for the advertisement's copy and layout. The photograph of the White House was obtained from H. Armstrong Roberts Stock Photo Supplier in Philadelphia, Pennsylvania. The typeface was obtained from the Wrightson Typesetting Company in Miami, Florida. The picture of Governor Reagan was copied from the Wall Street Journal. None of the components of the advertisement had any origin in any materials prepared by Citizens for Reagan.

14. I did.

15. Mr. Keene was the only person who indicated that there might be problems under the FECA with FFOR's project in Wisconsin.

At the time, of course, the Supreme Court had recently declared parts of the FECA unconstitutional, and there was great uncertainty about the effect of the Court's ruling. I was aware that during the Florida primary several individuals and groups who were not part of Citizens for Reagan had taken out advertisements on behalf of the Governor. I consulted with my local attorney in Florida,

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5.


and he indicated to me that he saw no legal problems in connection with FFOR's activities in Wisconsin.

16. I do not now have records which indicate what services were performed (or where they were performed) for which I received the travel reimbursement you identify. When the field offices of Florida Citizens for Reagan were closed, the great bulk of our records were transferred to the main Citizens for Reagan headquarters in Washington, D.C. A smaller amount of records was left with the local Republican Party headquarters in Orlando. I do not have access to those records.


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I hereby certify that the foregoing answers are true and correct to the best of my knowledge.


I. A. Thomas

Subscribed and sworn to before me
this 11th day of January, 1978.


Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COM. EXPIRES 12/31/80
BONDED BY FIDELITY INSURANCE CO.

7 8 0 4 0 0 6 3 0 7 5



PRIORITY MAIL

MAR 443 (77)

CERTIFIED

No. 213910

MAIL

Milton & Greenwood Reporting Associates, Inc.

General Handwritten Reporting

Suite 1110

1028 Connecticut Ave., N.W.

Washington, D.C. 20036

Phone: (202) 833-3598

Official
Transcript

Gary Johansen, Esq.
Federal Election Commission
Fourth Floor
1325 K St., N. W.
Washington, D. C. 20463

~~RECEIVED~~

604385

~~RECEIVED~~

RETURN RECEIPT
REQUESTED

PRIORITY MAIL

21:2 43 11 70P 82.

FEDERAL ELECTION
COMMISSION



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 443





FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 443



]

11 Hun 443 (77)

FEDERAL ELECTION COMMISSION

Memo from Johnson to Garr, 10-6-77

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

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

Signed

Cary W. Ch. L.

date

8-21-78



FEDERAL ELECTION COMMISSION

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

August 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443(77)

Dear Mr. Thomas:

On August 16, 1978, the Commission voted to terminate its investigation in MUR 443(77). A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosures:

Commission certification
General Counsel's Report

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth St., N.W.
Washington, D. C. 20006

17, 1978
CMB

REGISTERED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443(77)

Dear Mr. Thomas:

On August , 1978, the Commission voted to terminate its investigation in MUR 443(77). A copy of the Commission's determination and the General Counsel's Report is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosures:

Commission certification
General Counsel's Report

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth St., N.W.
Washington, D. C. 20006

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500080010086

PS Form 3811, Apr. 1977
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

443 760020

● 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:

L. E. Thomas

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
438195
(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE ☒ Addressee ☐ Authorized agent
4. DATE OF DELIVERY 1978
AUG 21 1978
5. ADDRESS (Complete only if requested)
MAIN OFFICE
PANAMA CITY, FLA. 32401
6. UNABLE TO DELIVER BECAUSE USPO CLERK'S INITIALS

AMERICAN CITY FL
AUG 21 1978

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan) MUR 443 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 16, 1978, the Commission determined by a vote of 5-0 to take the following actions in the above-captioned:

1. Take no further action on the issue of in-kind contributions to Citizens for Reagan by the Florida Friends of Reagan in excess of the limits of 2 U.S.C. §441a.
2. Take no further action on the issue of possible corporate contributions to Citizens for Reagan by Tommy Thomas Chevrolet, Inc.
3. Close the file.
4. Send the letter attached to the General Counsel's Report dated August 11, 1978.

Commissioner Aikens was not present at the time of the vote.

Attest:

8/17/78
Date

Margaret E. Chaney
Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 8-11-78, 3:32
Circulated on 48 hour vote basis: 8-14-78, 9:00

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *more by pc*

SUBJECT: Commissioner Tiernan's Comments
Regarding MUR 443, General
Counsel's Report dated August 8,
1978

DATE: AUGUST 16. 1978

Attached is a copy of Commissioner Tiernan's
vote sheet with comments regarding the above-named
document.

Attachment:
Vote Sheet





FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: 9:00 AUGUST 14, 1978

Commissioner Tice

RETURN TO OFFICE OF COMMISSION SECRETARY BY: 9:08 AUGUST 18, 1978

MUR No. 443 (78) - General Counsel's Report dated 8-11-78

(☒) I approve the recommendation

() I object to the recommendation

COMMENTS: Exercise of prosecutorial discretion
noting the time of actions.

Date: 8/15/78 Signature: Robert O. Terman

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



7804008000
78040062730

August 11, 1978

MEMORANDUM TO: Marge Simmons
FROM: Elison L. GARY
SUBJECT: MUR 443

Please have the attached General Counsel's Report on MUR 443 distributed to the Commission on a 48 hour tally basis.

Thank you.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443(77)

General Counsel's Report

I. Allegations

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This matter involves the question of whether certain expenditures made by Florida Friends of Reagan ("FFOR") for the purpose of influencing the candidacy of Ronald Reagan were in-kind contributions to the Citizens for Reagan Committee ("CFR") rather than independent expenditures as reported by respondent. Also involved is the question of whether certain expenditures made by Mr. L. E. Thomas on behalf of CFR were initially paid from the corporate checking account of Tommy Thomas Chevrolet, Inc., and later reimbursed by CFR, constituting a violation of 2 U.S.C. 441b.

III. Background

On October 27, 1977, the Commission found reason to believe that FFOR may have violated 2 U.S.C. 441a in making independent expenditures in support of the candidacy of Ronald Reagan. On that date the Commission authorized a subpoena for oral deposition to Mr. Thomas and an Order for production of documents to CFR, pertaining to \$610.57 in reimbursed expenses incurred by Mr. Thomas on behalf of CFR.

On April 17, 1978, we received from CFR copies of receipts submitted by Mr. Thomas for reimbursement.

III. Investigation and Analysis

1. Independent expenditures made by FFOR

On June 29, 1978, we deposed Mr. L. E. Thomas, Chairman of FFOR and Florida Chairman of CFR. In his deposition and in interrogatories previously submitted to the Commission, Mr. Thomas stated that he became Florida Chairman of CFR on November 20, 1975, the date on which Governor Reagan announced his candidacy. He continued in this role until after the March 9, 1976, Florida primary election. Mr. Thomas stated that following the Florida primary election all Florida offices of CFR were closed with the exception of a small office maintained in Orlando, Florida which was within the office of the Committee's accountant and kept open for the purpose of retiring debts incurred by the committee during the primary campaign. After March 11, 1976, Mr. Thomas had only infrequent conversations with CFR personnel and only with regard to closing Florida offices and retiring debts. National campaign strategy was not discussed and Mr. Thomas was not thereafter involved with the principal campaign committee of Governor Reagan.

Following his involvement with CFR, Mr. Thomas determined that there was need for additional support for Governor Reagan in subsequent primary elections and formed

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the Florida Friends of Reagan Committee. To construct this additional support, Mr. Thomas solicited contributions by telephone from his friends and from supporters of Governor Reagan. He then contacted Long Advertising and instructed them to place advertisements in Wisconsin newspapers advocating the election of Governor Reagan. The only contact between Mr. Thomas and CFR regarding these Wisconsin expenditures appears to be a telephone conversation with David Keene, southern coordinator for CFR, in which Mr. Keene attempted to dissuade Mr. Thomas and FFOR from making such expenditures on the assumption that these newspaper advertisements would be counter-productive to the campaign strategy of CFR.

Mr. Thomas appears to be the sole active member of FFOR, aside from those individuals who contributed to the committee. All contributions to FFOR were solicited by Mr. Thomas in personal or telephone conversations with friends and associates who were supporters of Governor Reagan. All expenditures of the Committee were designed, authorized and implemented by Mr. Thomas. In short, Mr. Thomas was the entire committee.

The question of the independence of FFOR expenditures arises from Mr. Thomas' dual role as chairman of FFOR and Florida Chairman of CFR. While Commission regulation 11 CFR 109.1(b)(4)(i)(B) would now preclude Mr. Thomas from making independent expenditures in support of Ronald Reagan due to his prior activity in connection with CFR, this regulation was not in force at the time of the expenditure. Further, it appears that Mr. Thomas made a reasonable attempt

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to comply with the Act by contacting his local attorney to determine whether such expenditures were prohibited. Upon receiving legal counsel that such action was not prohibited by the Act, Mr. Thomas proceeded to form FFOR and make expenditures in support of Governor Reagan without the cooperation of Mr. Reagan's principal campaign committee, and with complete disregard to the advice given by Mr. Keene of that principal campaign committee.

It is our belief that the activities of Mr. Thomas and FFOR would be prohibited by the Commission's present standards for independent expenditures. However, these standards had not been formulated at the time of the activities of Mr. Thomas and FFOR. Further, Mr. Thomas appears to have attempted substantial compliance with the Act. In light of these circumstances, it is the recommendation of the Office of General Counsel that the Commission take no further action and close the file on the issue of independent expenditures made by FFOR.

2. Expenditures by Mr. Thomas reimbursed by CFR

On July 14, 1976, Mr. Thomas received \$610.57 in reimbursed travel and office expenses from CFR. In response to an Order, CFR sent to the Commission copies of checks and receipts submitted by Mr. Thomas for reimbursement. Information gained from examination of these documents and from the deposition of Mr. Thomas indicates that certain expenses incurred by Mr. Thomas in his role as Florida Chairman of CFR were initially paid from the corporate checking

account of Tommy Thomas Chevrolet, Inc., and later reimbursed to Tommy Thomas Chevrolet, Inc., through Mr. Thomas, by CFR. Documentation provided to the Commission by CFR shows a total of \$119.78 paid to three companies by Tommy Thomas Chevrolet, Inc. The checks submitted to CFR had the notation "Reagan Comm." printed on the stub.

Information gained from the deposition of Mr. Thomas indicates that Mr. Thomas chose to use his corporate account to pay certain CFR expenses because of his travel schedule. Bills for various expenses would from time to time be received while Mr. Thomas was out of town. When this would occur, they would be paid from the corporate checking account and later reimbursed by Mr. Thomas.

While these transactions appear to constitute a violation of 2 U.S.C. 441b(a) as corporate funds were used to advance payment to certain companies on behalf of CFR, it is the recommendation of the Office of General Counsel that the Commission take no further action with regard to this matter as all funds advanced through Tommy Thomas Chevrolet, Inc. have been reimbursed and the amount of money in question totals only slightly in excess of \$100.

IV. Recommendations


1. Take no further action on the issue of in-kind contributions to Citizens for Reagan

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by Florida Friends of Reagan in excess
of the limits of 2 U.S.C. 441a.

2. Take no further action on the issue of
possible corporate contributions to
Citizens for Reagan by Tommy Thomas
Chevrolet, Inc.
3. Close the file.
4. Send the attached letter.

8/11/78
Date



William C. Oldaker
General Counsel

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Q0* 4375

Lovejoy

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

FEDERAL ELECTION COMMISSION

805069

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER

(202) 452-6418

1980 AUG 4 PM 12:43
WX: 70-822-0005
TELE: 89-593

CABLE: COVLING

August 2, 1978

Paul Lovejoy, Esquire
Federal Election Commission
1325 K Street, N.W.--
Washington, D.C.

Dear Mr. Lovejoy:

Enclosed herewith are airline-ticket and taxicab receipts for Mr. L.E. Thomas, incurred for his travel from his home to Washington, D.C., for his deposition at the Commission. Mr. Thomas was able to obtain only one taxicab receipt (in the amount of \$4.50), but his return fare to National Airport was the same amount.

Accordingly, Mr. Thomas' total expenses were his air fares (\$165.00) and taxicab fares (\$9.00) for a total of \$174.00. You may mail the Commission's check directly to Mr. Thomas, or send it to me for forwarding.

Thank you for your cooperation in this matter.

Sincerely yours,

John R. Bolton /af
John R. Bolton

Enclosures

7804008001
78040062783

DRIVER

Yellow Cab

COMPANY OF D. C., INC.

1636 BLADENSBURG ROAD, N.E.
WASHINGTON, D.C. 20002

FOR RADIO DISPATCH 544-1212

CAB NO.

" TIME:

DATE:

FROM:

TO:

FARE:

CAB NO.:

6/29/75

Wash DC.

N. Quarter

\$4.50

WASHINGTON, D. C. 20006

Paul Lovejoy, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

80 : 71

10

[illegible]

GO# 4299

RECEIVED
FEDERAL ELECTION

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 200068 JUL 28 P 4: 31

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

July 28, 1978

004887

(202) 452-6418

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

Re: MUR 443 (77)

Dear Mr. Oldaker:

Pursuant to your invitation, made at the conclusion of the deposition of Mr. L.E. Thomas in this matter on June 29, 1978, we would like to make some additional comments regarding MUR 443 (77).

We believe that Mr. Thomas' deposition fully supports the answers to the Commission's interrogatories enclosed with my letter to you of January 16, 1978. The June 29 deposition transcript, page after page, demonstrates the independence of the activities of Florida Friends of Reagan (hereafter, "FFOR"). Mr. Thomas explicitly testified that he did not discuss with Governor Reagan, Senator Laxalt or Messrs. Sears or Keene or any State chairmen of Citizens for Reagan any aspects of the Citizens for Reagan national strategy. (Dep. tr. 8, 10, 14-15, 22, 55) In fact, his only discussions with these individuals on any matters apart from the Florida primary were on a casual basis. (Id.) Mr. Thomas testified further that he did not discuss the activities of FFOR with any Citizens for Reagan personnel. (Id. at 29, 42) He had no campaign responsibility for Citizens for Reagan after the Florida primary. (Id. at 18-21, 43)

Moreover, Mr. Thomas made it plain that FFOR was entirely his own idea and that FFOR was financed by contributions from friends and associates. (Id. at 35) No Citizens for Reagan mailing or fund-raising lists were used. (Id.) There was no connection between any advertisements utilized in Florida by Citizens for Reagan and the advertisements run in Wisconsin by FFOR. (Id. at 31) Wisconsin was chosen by FFOR as the primary State in which to run the advertisements because it was the first primary scheduled after Mr. Thomas

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William C. Oldaker
July 28, 1978
Page 2

conceived the idea of establishing FFOR. (Id. at 36) Mr. Thomas was contacted by only one staff member of Citizens for Reagan to discuss the Wisconsin advertisements, and Mr. Thomas told that person that the advertisements were "none of his damn business." (Id. at 40) Finally, Mr. Thomas once again confirmed that he consulted with an attorney in Florida prior to having the advertisements placed in Wisconsin newspapers. (Id. at 27-28)

As I stated in my letter to you of January 16, the circumstances surrounding the activities of FFOR provide compelling reason for the Commission to find that no violation of the Federal Election Campaign Act, as amended, (hereafter, "FECA") took place. Our views in this regard have been strengthened by the substantial factual differences between this case and the conciliation agreement entered into between the Commission and Mr. Peter F. Secchia (MUR 321(76)):

(1) Mr. Secchia's activities in 1976 on behalf of Friends of the First Family nearly all occurred after the effective date of the FECA Amendments of 1976. Mr. Thomas' activities on behalf of FFOR, by contrast, were undertaken during the period following the Supreme Court's decision in Buckley v. Valeo, 424 U.S. 1 (1976), when the state of the FECA was, to say the least, in turmoil and uncertainty.

(2) After March 22, when the Commission's executive powers were suspended because of the Court's refusal to extend any further its stay of the January 30 decision in Buckley, no advisory opinions could be sought from the Commission. Once again, Mr. Secchia's case is different; his activities took place when he could have requested an advisory opinion on behalf of Friends of the First Family.

(3) At the time of Mr. Thomas' activities, there were no Commission regulations publicly available, even in draft form. Proposed regulations were not available until May, 1976. While Mr. Secchia could have taken these proposed regulations into account, Mr. Thomas did not even have the benefit of draft proposals.

(4) In the General Counsel's report on the MUR involving Mr. Secchia, there is an extensive list of contacts, both written and oral, between Mr. Secchia and personnel of the President Ford Committee. No

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William C. Oldaker
July 28, 1978
Page 3

such list could be compiled for Mr. Thomas. His only contact with any CFR personnel after the Florida primary was for the limited purpose of handling matters relating to wrapping up the campaign.

All of these facts demonstrate the uniqueness of Mr. Thomas' situation. In this case, the Commission need not address questions of statutory construction or the interpretation of its regulations. As a matter of fact, Mr. Thomas's actions on behalf of FFOR were completely independent from Citizens for Reagan to the best ability of anyone in March, 1976, to understand and comply with the "independence" requirements.

Moreover, we do not believe that anyone who observed Mr. Thomas' demeanor during his deposition on June 29 could reach any conclusion other than that the activities of FFOR were totally independent of Citizens for Reagan. His credibility is unimpeachable.

There is no warrant on this record to continue this MUR further, and it should be dismissed forthwith. A dismissal on these facts would not establish a precedent that would pose problems for the Commission in future enforcement actions. To the contrary, any result other than a dismissal here would result in a very substantial injustice, and would serve no legitimate law-enforcement purpose. We would be more than happy to consult further with you or your staff if you have any questions.

Sincerely yours,


John R. Bolton

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288 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

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

3 JUL 23

HAND BELAYED
24:31



FEDERAL ELECTION COMMISSION

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

July 18, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

MWE

SUBJECT: MUR 443 - Interim Report dated 7-14-78
Received in Office of Commission
Secretary: 7-17-78, 12:30

The above-mentioned document was circulated on a 24 hour no-objection basis at 3:30 p.m., July 17, 1978.

As of 4:00 p.m. this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

Commissioners Aikens, Springer, Staebler, and Thomson returned their papers by the deadline.

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July 17, 1978

MEMORANDUM TO: Marge Hanson
FROM: Elissa T. Carr
SUBJECT: MUR #43

Please have the attached Interim Report distributed to the Commission on a 24 hour no-objection basis.

Thank you.


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Interim Report

On June 29, 1978, the General Counsel's Office deposed Mr. Thomas. Upon receipt of the transcript of this deposition we will submit to the Commission an analysis of this matter and recommendations as to its disposition.


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

June 13, 1978

MEMORANDUM TO: CHARLES STEELE

FROM:

MARJORIE W. EMMONS

MWE

SUBJECT:

MUR 443 (77) - Interim Status Report dated 6-12-78
Received in Office of Commission
Secretary: 6-12-78, 3:30

The above-mentioned document was circulated on a 24
hour no-objection basis at 9:00 a.m., June 13, 1978.

There were no objections to the Interim Status Report.

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June 12, 1978

MEMORANDUM TO: Margo Emerson
FROM: Elisea T. Gary
SUBJECT: MUN 443

Please have the attached Interim Status Report on
MUN 443 distributed to the Commission.

Thank you.

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~~78040062001~~

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Florida Friends of Reagan


MUR 443 (77)

Interim Status Report

This matter concerns the question of whether \$14,771.40 in expenditures made by Florida Friends of Reagan ("FFOR") for the purpose of supporting the candidacy of Ronald Reagan were in-kind contributions rather than independent expenditures as reported by respondent. An additional question involves the nature of \$610.57 in reimbursed expenses incurred by Mr. L.E. Thomas, Chairman of FFOR, on behalf of the Citizens for Reagan Committee while Mr. Thomas was serving as Florida Chairman of the Citizens for Reagan Committee.

The General Counsel's Office has scheduled the deposition of Mr. Thomas for June 29, 1978. Following that deposition, we shall present to the Commission an analysis of the information received and recommendations as to the disposition of this matter.

6/12/78
Date


William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

June 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443(77)

Dear Mr. Thomas:

After consultation with your attorney, John R. Bolton, we have established the date of your deposition. Enclosed is a subpoena requiring your attendance for oral deposition on June 29, 1978, at 1:00P.M. at the Federal Election Commission.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4175.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosure

cc: John R. Bolton, Esq.
Covington and Burling
888 Sixteenth Street, N.W.
Washington, DC 20006

780400628031

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
Florida Friends of Reagan)	To Appear for Deposition
)	Upon Oral Examination
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at 321 Magnolia Ave. on
Panama City, Florida 32401
February 24, 1978, at 10 AM.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 8th day of Feb, 1978.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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

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In the Matter of)	Subpoena
)	
Florida Friends of Reagan)	To Appear for Deposition
)	
)	Upon Oral Examination
)	
)	MUR 443 (77)

TO: Mr. L. E. Thomas
 705 West 15th Street
 Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at Federal Election Commission
 1325 K Street, N.W.
 Washington, DC 20463
 June 29, 1978, at 1:00 P.M.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day *6th* of June , 1978.

Joan D. Aikens

 Joan D. Aikens
 Chairman

ATTEST:

Marjorie W. Emmons

 Marjorie W. Emmons
 Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

June 6, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: SUBPOENA IN RELATION TO MUR 443

The attached subpoena, approved May 3, 1978, has been signed and sealed this date.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

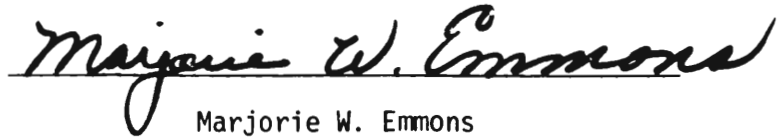
MUR 443 (77)

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 adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Proceed to depose Mr. L. E. Thomas.
2. Defer making a determination on the question of possible violations of 2 U.S.C. Section 441b.

Commissioner Aikens was not present at the time of the vote.



Marjorie W. Emmons
Secretary to the Commission

Date: May 4, 1978

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BEFORE THE FEDERAL ELECTION COMMISSION

April 25, 1978

In the Matter of)
)
Florida Friends of Reagan) MUR 443 (77)

GENERAL COUNSEL'S REPORT

Background and Evidence

This matter was internally initiated by the General Counsel's Office. In the course of examining documents submitted during the investigation of an unrelated MUR, it was noted by a member of the staff that one of the documents mentioned that L. E. Thomas and Florida Friends of Reagan had made independent expenditures on behalf of the candidacy of Ronald Reagan.

On October 27, 1977, the Commission found reason to believe that Florida Friends of Reagan may have violated 2 U.S.C. §441a in making independent expenditures in support of the candidacy of Ronald Reagan. On February 9, 1978, the Commission issued a subpoena for oral deposition to Mr. L. E. Thomas, Chairman of Florida Friends of Reagan, and Florida Chairman of Citizens for Reagan, and an Order requiring Citizens for Reagan to produce records pertaining to the activities of Mr. Thomas for which he received \$610.57 in travel reimbursements from Citizens for Reagan on July 14, 1976.

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. On April 17, 1978, the documents were received by the Commission (Attachment I).

Upon review of said documents, it appears that certain expenditures made by Mr. Thomas, and reimbursed by Citizens for Reagan, were drawn from the corporate account of Tommy Thomas Chevrolet, Inc., indicating a possible violation of 2 U.S.C. §441b.

Further, in his answers to the Commission's interrogatories, dated January 16, 1978, Mr. Thomas maintained that all operations of the Florida Citizens for Reagan Committee terminated on or about March 11, 1976.^{1/} However, examination of the subpoenaed documents received from Citizens for Reagan indicates that Mr. Thomas made expenditures, and was reimbursed by Citizens for Reagan, for rental of a car on March 28, 1976, and May 19, 1976, airline tickets on May 18, 1976, and for gasoline and automotive expenses on March 22, April 15, and April 22, of 1976. All of the above expenditures were made after the date of the Florida primary election, the date on which Florida Citizens for Reagan purportedly ceased activity, and on or after the date that Florida Friends of Reagan received its first contribution.

As a result of the information gained from the documents obtained from Citizens for Reagan, it is the recommendation of the General Counsel's Office that we proceed to depose Mr. Thomas regarding his activities as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan. Possible

^{1/} Florida Friends of Reagan received its first contribution on March 28, 1976, according to statements filed with the Commission.

communications between Mr. Thomas and members of Citizens for Reagan staff while Mr. Thomas was serving in his capacity as Chairman of Florida Friends of Reagan, and the nature of the account on which checks were drawn in payment for expenses incurred on behalf of Citizens for Reagan, and later reimbursed by Citizens for Reagan, should also be examined.

Counsel for Mr. Thomas has requested that he be able to see the documents submitted by Citizens for Reagan. This office does not object to the request and intends to make these documents available to respondent. We believe that the Commission should defer making a determination on the question of possible violations of 2 U.S.C. §441b in connection with checks drawn on the Tommy Thomas Chevrolet, Inc. account until after the deposition of Mr. Thomas.

Recommendation

1. Proceed to depose Mr. L. E. Thomas.
2. Defer making a determination on the question of possible violations of 2 U.S.C. §441b.

4/28/78
Date


William C. Oldaker
General Counsel

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891848

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

173 APR 17 AM

8:53

YCC
3269

HENRY M. BUCHANAN, C.P.A.
DAVID L. ZIMMER, C.P.A.
MICHAEL C. REMER, C.P.A.
J. CRAIG DEFIBAUGH, C.P.A.

TELEPHONE
(301) 652-0580

April 12, 1978

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

Re: Citizens for Reagan

Dear Mr. Lovejoy:

In correspondence dated April 4, 1978, Ed Meese, an attorney associated with the Citizens for the Republic, requested that I forward to you documents relating to a check for \$610.57 issued on July 14, 1976 by Citizens for Reagan, to L. E. Thomas.

After a review of papers and documents of Citizens for Reagan, I located the material which I have enclosed concerning the disbursement mentioned above. I am forwarding said material to you at the request of Ed Meese. If you have any questions on this matter, please communicate with me.

Sincerely,

Henry M. Buchanan

Henry M. Buchanan

HMB:pw
Enclosures
cc: Ed Meese

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NATIONAL CAR RENTAL SYSTEM, INC.

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 06/07/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-2252	
CARD HOLDER NUMBER	NAME OF RENTER LUTHER E THOMAS	CITY OF RENTAL ORLANDO	DATE OF TRANSACTION 05/19/76	RENTAL AGREEMENT NO 50333463	AMOUNT 15.90

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

Handwritten signature/initials

SUMMARY OF ACCOUNT	.00	15.90	.00 CR	.00	15.90
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.\$)

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 35226 - NORMANDEALE BRANCH
MINNEAPOLIS MINNESOTA 55436

C. D. J. S. / 100

78040062815
78040080041

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 04/06/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-225	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO	AMOUNT
	LUTHER E THOMAS	ST PETERSBURG	03/03/76	H2456780	24.12
	LUTHER E THOMAS	ORLANDO	03/28/76	50197420	43.08

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

Pay - Changes to Rental

SUMMARY OF ACCOUNT	.00	67.20	.00 CR	.00	67.20
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.)

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 15724, NORMANVILLE BRANCH, MINNEAPOLIS, MINNESOTA 55418

~~7804006087~~

22008001002

CAR BELL'S NATIONAL CAR RENTALS
2126 FIRST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712
TELS: 813/322-4101 TAMPA 813/576-3164

81004-00 **ONE** H 245678 0

(1) CAN NO. 2107		CAR WILL BE RETURNED BY 5379		MILEAGE DETERMINED BY READING FACTORY INSTALLED ODOMETER		DATE & TIME IN 8:10 AM 1976 MAR -3 PM 2:25	
MAKE Cat		OWNING CITY Tampa		MILES IN 4789		DATE & TIME OUT 1976 MAR -2 PM 1:55	
MODEL SE		LEASING CITY NO. 1004		MILES OUT 4703			
				MILES DRIVEN 84			

7001 056 1568 1
CENTRAL BILLING

LUTHER E THORAS

04
78

FOR SPECIAL RATES				
MINIMUM RENTAL	EXTRA DAYS	EXTRA HOURS	PREPAID ALLOWED (IF ANY)	EXTRA MILES

ALTERNATE CAR AND DATE	
MILES IN	MILES OUT
MILES DRIVEN	

SUB-TOTAL	
1995	

TOTAL TIME AND MILEAGE OR MINIMUM CHARGE	
10.95	

INTER-CITY FEE	

SUB-TOTAL	
19.95	

GAS TO FILL TAXABLE	

GAS TO FILL NON TAXABLE	
3.37	

TOTAL CHARGES	
24.12	

LESS GAS, ETC.	

NET CHARGE	
24.12	

LESS DEPOSIT	

AMOUNT DUE (U.S.)	
24.12	

PAID BY	
CASH OR CHECK	

(67) BILLING INFORMATION ONLY	

(66) RECAP NO.	

COMPANY NAME	
RENTER'S NAME	
ADDRESS	
CITY	

STATE	

C.B.	
A.X.	
B.L.	
D.N.	
B.A.	
T.G.	
A.V.	

MO.	
DAY	
YR.	
HEIGHT	
WEIGHT	
EYES	
HAIR	

Luther Edwin Thoras	
Box 490	

Panama City Fl.	
PHONE NO.	

INTER-CITY SETTLEMENT	

TIME & MILEAGE	

C.D.W.	

LESS GAS, ETC.	

TOTAL	

RECEIVING CITY	

GAS TO FILL	

REPAIRS	

STAMPS	

TOTAL EXPENSES	

AMOUNT COLLECTED OR REFUNDED	

NET AMOUNT \$	

Audit

COLLISION DAMAGE WAIVER

GASOLINE QUANTITY

CASH COUPON

UNUSUED DEPOSIT

GAS, ETC.

TOTAL REFUND

\$15.00 - 0000 CHARGES BETWEEN
8:1004-00 ST. PETERSBURG - CLEAR
CARRIED BY NATIONAL CAR RENTAL
P.O. BOX 1053
ST. PETERSBURG, FLORIDA 33712
MAKE CHECK PAYABLE TO NATIONAL CAR RENTAL
MILEAGE CHARGE

PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT.

H 245678 0

INVOICE
WHITE - HOME OFFICE 2

13500 REPORT (305, 555-4170)
54000 5501 ROAD
ORLANDO, FLORIDA 32309

050 47 NC 5010742 0

ORLANDO		MILEAGE DETERMINED BY READING FACTORY INSTALLED ODOMETER		DATE & TIME IN	
DATE IN	3-04-09	DATE OUT	3-11-09	TIME IN	8:24 AM
CAR MAKE	Ford	CAR MODEL	Mustang	TIME OUT	8:21 AM
STATE	FL	STATE	FL	DATE & TIME OUT	3-11-09
ODOMETER	75000	ODOMETER	75009	TIME OUT	8:21 AM

7001 056 1568 1

Tommy Thomas

COMPANY NAME	
RENTER'S NAME	
ADDRESS	
CITY	
STATE	
ZIP	

AMERICAN EXPRESS	CARTRIDGE	DINER	BANK	T.W.A.	AVIS
CA	BL	DN	BA	T.G.	AV

WEIGHT	150	EYES	BRN
HAIR	BRN	HAIR	BRN

NAME	Tommy Thomas
ADDRESS	PO Box 440
CITY	Orlando FL

PHONE	305-440-4400
TELETYPE	

INTER-CITY SETTLEMENT	
-----------------------	--

TIME & MILEAGE	
C.D.W.	

LESS GAS ETC	
TOTAL	

REPAIRS	
STAMPS	

TOTAL EXPENSES	
AMOUNT COLLECTED	

NET AMOUNT \$	
---------------	--

FOR SPECIAL RATES:	
MINIMUM RENTAL	
EXTRA DAYS	
EXTRA HOURS	
MILEAGE ALLOWED	
EXTRA MILES	

MILES IN	
MILES OUT	
MILES DRIVEN	

WEEKS	
HOURS	

VAC	
W.E.	

SUB-TOTAL	39.90
-----------	-------

TOTAL TIME AND MILEAGE OF MINIMUM CHARGE	39.90
--	-------

INTER-CITY FEE	
C.D. DAYS WEEKS	

GAS TO FILL TAXABLE	
SUB-TOTAL	39.90

TAX	
GAS TOTAL	1.60

TOTAL CHARGES	43.08
---------------	-------

LESS GAS, ETC	
NET CHARGE	43.08

AMOUNT DUE	43.08
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CUSTOMER INITIALS	
-------------------	--

LOCAL FLORIDA RATE ONLY 15.00 DROP CHARGE	
---	--

RENTAL AGREEMENT NO.	
----------------------	--



Make check payable to: NATIONAL CAR RENTAL
Mail to: 5501 GREEN VALLEY DRIVE, MINNEAPOLIS, MINN. 55437
PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT

5010742 0
THIS RENTAL AGREEMENT NO. MUST APPEAR ON ALL PAYMENTS AND CORRESPONDENCE
INVOICE
WHITE - HOME OFFICE

ACKNOWLEDGE RECEIPT OF TICKETS AND COUPONS FOR RELATED CHARGES DESCRIBED HEREON PAYMENT TO BE MADE WHEN BILLED OR IN EXTENDED PAYMENTS ACCORDING TO STANDARD POLICY OF COMPANY ISSUING CARD AND AS REFLECTED IN AVAILABLE TARIFF

UNIVERSAL CREDIT CARD CHARGE FORM

Southern Airways, Inc.

0384420890476
SOUTHERN AIRWAYS
9 A.O
PANAMA CITY FL

X READER OF FINGERPRINTS MUST BE PRESENT

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER				TOUR CODE				STATUS		FARE BASIS/TKT. DESIGNATOR		REF. NO. D. OTHER		REF. NO. D. OTHER		CLASS		
PANAMA CITY				CARRIER	FLIGHT	CLASS	DATE	TIME	STATUS	FARE BASIS/TKT. DESIGNATOR	REF. NO. D. OTHER	REF. NO. D. OTHER	CLASS					
ORLANDO MCCOY				SO	225	S	18 MAY	311P	OK	S								
PANAMA CITY				SO	230	S	19 MAY	930P	OK	S								
VOID																		
VOID																		
IF EXT'D. PAY DED. CIRCLE NO. OF MOS.				3 6 9 12				CREDIT CARD NAME/ADDR				APPROVAL OTHER						
FARE				79.62				FARE CALCULATION										
TAX				6.36														
TOTAL				85.98														

015 003 180 5 100AX

VALID 10 75 THRU 09 76
58

LUTHER E THOMAS

038 4420890476 2 0

DATE NO		CONNECTION OF PASSENGER WITH SUBSCRIBER	
015 003 180 5 100AX			
VALID 10 75 THRU 09 76			
LUTHER E THOMAS			
Service Establishment		Date of Charge	
4401550 24450 0 11 70		Any delayed charges are entered below	
2009918454 40900-		Merchandise Services	
7230370920 20677 10 7 3		Type of Delayed Chg	
		Taxes	
		Amt of Unlaved Chg	
		Tips/Misc	
		Revised Total	
Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment Merchandise and/or service purchased on this card and will be repaid or returned for cash refund		Total	
Cardmember Signature		Amexco Use Only	
Invoice Number		Equivalent Am	



Approval Code
Check or Bill No

749
8598
9347*

523800
0384420890476 2 0

01500000007491

73040080045
78040062817

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 788-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

65,010
832

No. 5289

DATE April 15, 1976

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

AMOUNT

TO
THE
ORDER
OF

Texaco, Inc
P O Box 25487
Richmond, Va 23268

TOMMY THOMAS CHEVROLET, INC.

BY

NON-NEGOTIABLE

BY

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PER CT.	AMOUNT	
	Acct. No. 1188426660 Reagan	220 13A 513	18.00 18.37 32.90			69.27
	18.00					

78040062818

78040080046

P. O. BOX 490



PH. 785-5222

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

PANAMA CITY, FLORIDA.

No. 5562 A

DATE April 30, 1976

\$ 67.20

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472 J

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
40008000 006281	Acct No. 7001-056-1568-1 Reagan Comm	220 ✓				67.20

HOODS - BOYD BROS., INC

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

83-910
632

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

No. 5431
DATE April 22, 1976

TOMMY THOMAS 23 00

PAY

\$ 23.00

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct # 89531,2569 Reagan Co	220	✓			23.00

7804006287
78040080048



FEDERAL ELECTION COMMISSION

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

April 12, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: MUR 443 (77) - Interim Report signed by the
General Counsel: 4-7-78
Received in Office of Commission
Secretary: 4-10-78, 11:47

The above-mentioned document was circulated to the
Commissioners on a 24 hour no-objection basis at 12:00,
April 11, 1978.

As of 2:00 p.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim
Report.

78040062821
78040080049

April 10, 1978

MEMORANDUM TO: Marge Emmons
FROM: Eliasa T. Carr
SUBJECT: MUR 443

Please have the attached Interim Report on MUR 443 distributed to the Commission on a 24 hour no-objection basis.

Thankyou.

78040080050
~~78040062822~~

73040080051
~~78040062825~~

In the Matter of)
)
Florida Friends of Reagan) MUR 443(77)

INTERIM REPORT

On February 8, 1978, the Commission issued a subpoena for deposition to Mr. L. E. Thomas, Chairman of Florida Friends of Reagan, and an Order requiring Citizens for Reagan to produce records pertaining to the activities of Mr. Thomas for which he received \$610.57 in travel reimbursements from Citizens for Reagan on July 14, 1976.

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. Mr. Ed Meese, general counsel of Citizens for the Republic (formerly Citizens for Reagan) telephoned on February 27, 1978 and said the organization had been unable to locate the particular records at its main records storage area and would have to search at several other locations. On April 4, 1978, Mr. Meese, telephoned and said that the information requested from Citizens for Reagan finally had been located and should be received by the Commission by April 7, 1978.

Upon receipt of these records, we will reschedule the deposition of Mr. Thomas.

4/1/18
Date

William C. Oldaker
William C. Oldaker

78040080052

78040062824

801848

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

78 APR 17 AM 8:53

YCC
3269

HENRY M. BUCHANAN, C.P.A.
DAVID L. ZIMMER, C.P.A.
MICHAEL C. REMER, C.P.A.
J. CRAIG DEFIBAUGH, C.P.A.

TELEPHONE
(301) 652-0560

April 12, 1978

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

Re: Citizens for Reagan

Dear Mr. Lovejoy:

In correspondence dated April 4, 1978, Ed Meese, an attorney associated with the Citizens for the Republic, requested that I forward to you documents relating to a check for \$610.57 issued on July 14, 1976 by Citizens for Reagan, to L. E. Thomas.

After a review of papers and documents of Citizens for Reagan, I located the material which I have enclosed concerning the disbursement mentioned above. I am forwarding said material to you at the request of Ed Meese. If you have any questions on this matter, please communicate with me.

Sincerely,

Henry M. Buchanan

Henry M. Buchanan

HMB:pw
Enclosures
cc: Ed Meese

78040080053
78040062825

Itemized Expenditures

Campaign Fundraising, Loans, and Transfers for Lines 20, 21, 22, and/or 23 of FEC Form 3

(see instructions on back)

Page 79 of for

LINE NUMBER 20

(Use separate schedules for each numbered line).

Name of Candidate or Committee in full

Citizens for Reagan

Full Name, mailing address and ZIP code

Southern Bell
85 Annex
Atlanta, GA 30385

Purpose of Expenditure

Telephone Expense

Date (month, day, year)

7/14/76

Amount of each expenditure this period

167.96

Full Name, mailing address and ZIP code

Winter Park Telephone Company
P. O. Box 4000
Winter Park, Florida 32789

Purpose of Expenditure

Telephone Expense

Date (month, day, year)

7/14/76

Amount of each expenditure this period

267.81

Full Name, mailing address and ZIP code

Club Rudo
322 Alexander Street
Mt. Dora, Florida 32757

Purpose of Expenditure

Luncheon Expense

Date (month, day, year)

7/14/76

Amount of each expenditure this period

240.03

Full Name, mailing address and ZIP code

The Graphics House
P. O. Box 1535
Winter Park, Florida 32789

Purpose of Expenditure

Photocopying Expense

Date (month, day, year)

7/14/76

Amount of each expenditure this period

110.24

Full Name, mailing address and ZIP code

Jim Blake Office Supply, Inc.
P. O. Box 127
Winter Park, Florida 32789

Purpose of Expenditure

Furniture Rental

Date (month, day, year)

7/14/76

Amount of each expenditure this period

41.60

Full Name, mailing address and ZIP code

Wintergate Square
1350 Orange Avenue
Winter Park, Florida 32789

Purpose of Expenditure

Office Rent

Date (month, day, year)

7/14/76

Amount of each expenditure this period

208.00

Full Name, mailing address and ZIP code

L. E. Thomas
P. O. Box 490
Panama City, Florida 32401

Purpose of Expenditure

Reimbursed Traveling
and Office Expenses

Date (month, day, year)

7/14/76

Amount of each expenditure this period

610.57

Full Name, mailing address and ZIP code

Margaret McClure
3892 N. 30th St.
Phoenix, Arizona 85016

Purpose of Expenditure

Xeroxing & Printing

Date (month, day, year)

7/17/76

7/28/76

Amount of each expenditure this period

21.74

13.10

Subtotal of expenditures this page (optional).

\$ 1,681.05

Total this period (last page this line number only)

\$

1229

No

7-14 '76

PAY TO

FOR

DEPOSIT

DEPOSIT

BALANCE

AMOUNT THIS CHECK

208 00

BALANCE

51

HARLAND - 7

1230

No

7-14 '76

PAY TO

FOR

DEPOSIT

DEPOSIT

BALANCE

AMOUNT THIS CHECK

208 84

37

682 85

610 57

BALANCE

72 28

HARLAND - 7

1231

No

PAY TO

FOR

DEPOSIT

DEPOSIT

BALANCE

AMOUNT THIS CHECK

BALANCE

HARLAND - 7

LIST SOURCE OF DEPOSITS AND INFORMATION ABOUT
EXPENDITURES ON BACK OF CHECKING STUBS

73040080055

28040062827

FLORIDA CITIZENS FOR REAGAN
CAMPAIGN FINANCE REQUEST

CHECK #

1230

CHECK DATE

7-14-76

AMOUNT

610.57

PAYEE

LE T. Jones

P O Box 490

Panama City, Fla 32401

PURPOSE

Reimburse for expenses

DATE REQUEST RECEIVED

BY

REQUEST BY

PHONE

78040080056

78040062823

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

83-910
838

No. 5431

DATE April 22, 1976

TOMMY THOMAS CHEVROLET, INC.
23 00

PAY

\$ 23.00

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

AMOUNT

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

NON-NEGOTIABLE

BY

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct # 89531,2569 Reagan Co	220				23.00

7 8 0 4 0 6 2 8 2 9
7 8 0 4 0 6 2 8 2 9

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 475

DATE March 22, 1976

TOMMY THOMAS CHEVROLET, INC.

PAY

\$11.50

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMT
				PCT.	AMOUNT	
	Card # 89531,2569 Reagan Comm.	220 ✓				11.50

70893 - BOYD BROS., INC.

78040080058

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

65,418
632

P. O. BOX 490



PH. 788-6222

PANAMA CITY, FLORIDA

No. 5289

DATE April 15, 1976

69 27

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

\$ 69.27

TO
THE
ORDER
OF

Texaco, Inc
P. O. Box 25487
Richmond, Va 23268

TOMMY THOMAS CHEVROLET, INC.

BY

NON-NEGOTIABLE

BY

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
	Acct No 1188426660 Reagan	220	18.00			
		13A	18.37			
		513	32.90			
						69.27

15.00

78040062831

7804008007082

Check Card Call

5

			Number	Amount
1	2 28	To Tampa, FL	813-877-7953	1.185
2		From Cambridge, MS	617-547-5257	
3				
4	2 28	To Panama City, FL	785-5221	1.85
5		From Cambridge, MS	617-547-5257	
6				
7	2 28	To Tampa, FL	813-877-7953	1.85
8		From Cambridge, MS	617-547-5257	
9				
10	3 28	To Panama City, FL	785-5221	3.72
11		From Cambridge, MS	617-547-5257	
12				
13	3 01	To Panama City, FL	785-7834	4.49
14		From Cambridge, MS	617-547-5257	
15				
16	3 01	To New York, NY	212-686-3477	1.185
17		From Cambridge, MS	617-547-5257	
18				
19	3 03	To Durham, AL	205-792-4422	2.75
20		From Panama City, FL		
21				
22	3 04	From Atlanta, GA	404-351-5923	1.675
23		From Cambridge, MS	617-547-5257	
24				
25	3 05	To Panama City, FL	769-4402	3.16
26		From Portage, FL	813-635-0000	
27				
28	3 06	To Birmingham, AL	205-822-4350	2.02
29		From Portage, FL	813-635-2167	
30				
31	3 06	To Panama City, FL	796-4402	1.95
32		From Birmingham, AL	205-822-4350	
33				
34	3 06	To Panama City, FL	785-5221	3.48
35		From Panama City, FL	305-571-6000	
36				
37	3 08	To San Antonio, TX	512-342-4584	2.15
38		From Portage, FL	305-644-6100	
39				
40				

OVER

Serial Cash Cases

			Number	Amount
1	3 08	To Tampa, FL	413-877779 53	1.35
2		From Winter Park, FL	305-164461 04	
3				
4	3 09	To Panama City, FL	764-4402	1.55
5		From Winter Park, FL	305-164461 00	
6				
7	3 10	To Panama City, FL	785-7834	1.22
8		From Cambridge, MS	617-5475257	
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
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22				
23				
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28				
29				
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40				

179.85

State Tax 4%

7.19

Local Tax 4% (per State)

7.19

194.23

STMT REC'D 3/2

\$195.24

0.00

1.92

2.30

2.48

8.36

3.80

3.95

2.14

11.78

3.42

2.21

5.39

1.95

3.42

6.45

2.93

1.32

7.46

2.80

5.12

17.84

0.71

10.04

1.45

1.60

2.80

1.25

1.70

1.85

1.85

1.85

3.72

4.49

11.65

2.75

6.75

3.16

2.02

1.95

3.48

2.15

1.39

1.99

12.21

179.85

179.85

4.

7.19

Credit Card Calls

			1	2	3	4	
			Number	Amount			
1	2 13	To Panama City, FL	785-5221	1445			1
2		From Jant PR, FL	—				
3							
4	2 13	To Dathan, AL	205-792-2233	293			
5		From Windsor Park, FL	305-647-7070				
6							
7	2 13	To Tampa, FL	813-477-7953	132			
8		From Orlando, FL	805-351-2421				
9							
10	2 14	To Panama City, FL	785-5221	746			
11		From Cambridge, MS	617-547-5257				
12							
13	2 17	To Tulsa, OK	918-938-0315	280			
14		From Panama City, FL	704-763-9627				
15							
16	2 17	To Panama City, FL	785-7854	512			
17		From Cambridge, MS	617-547-5257				
18							
19	2 18	To Ocean, AL	205-353-7221	1784			
20		From Fayette, AL	LOCAL TAX	71			
21							
22	2 18	To Birmingham, AL	205-251-6674	1004			
23		From Cambridge, MS	617-547-5257				
24							
25	2 19	Panama City, FL	785-5221	145			
26		From Fayette, AL	205-928-9201				
27							
28	2 20	To Panama City, FL	785-5221	160			
29		From Atlanta, GA	404-577-1234				
30							
31	2 20	To Tulsa, OK	918-938-3335	280			
32		From Panama City, FL	—				
33							
34	2 24	To Dathan, AL	205-792-4432	125			
35		From Panama City, FL	—				
36							
37	2 24	To Dathan, AL	205-792-4432	170			
38		From Panama City, FL	—				
39							
40							
41							

RONALD REAGAN CAMPAIGN

TELEPHONE 1/30-3/12/76

①

		Number	Amount
1	1 30 To: Panama City, FL	765-5221	192
2	From: St. Petersburg, FL	813-360-7051	
3			
4	2 02 To: Dothan, AL	205-792-4422	230
5	From: St. Petersburg, FL		
6			
7	2 02 To: Panama City, FL	785-5221	248
8	From: St. Petersburg, FL		
9			
10	2 05 To: Panama City, FL	785-5221	836
11	From: Las Vegas, NV	702-739-4111	
12			
13	2 05 To: Panama City, FL	785-5221	380
14	From: Las Vegas, NV	702-739-4111	
15			
16	2 05 To: Jacksonville, FL	791-3782	395
17	From: Las Vegas, NV	702-739-4111	
18			
19	2 05 To: Panama City, FL	783-9427	214
20	From: Las Vegas, NV	702-739-4111	
21			
22	2 06 To: Panama City, FL	785-5221	1178
23	From: Las Vegas, NV	702-739-4111	
24			
25	2 06 To: Panama City, FL	785-5221	342
26	From: Las Vegas, NV	702-739-4111	
27			
28	2 06 To: Cambridge, MA	617-547-5257	221
29	From: Las Vegas, NV	702-739-4111	
30			
31	2 07 To: Panama City, FL	785-5221	639
32	From: Las Vegas, NV	702-739-4111	
33			
34	2 07 To: Miami, FL	305-591-3957	195
35	From: Las Vegas, NV	702-739-4111	
36			
37	2 07 To: Panama City, FL	785-5221	342
38	From: Las Vegas, NV	702-739-4111	
39			
40			

(10/10)

TOMMY THOMAS CHEVROLET, INC.

P. O. BOX 490

CHEVROLET

PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 5562 A

DATE April 30, 1976

67 20

\$ 67.20

PAY

NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472

TOMMY THOMAS CHEVROLET, INC.

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
7 9 7 4 0 0 8 0 0 6 1	Acct No. 7001-056-1568-1 Reagan Comm	220 ✓				67.20

7800 - BOYD BROS., INC.

NATIONAL

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 06/07/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-2252	
CARD HOLDER NUMBER	NAME OF RENTER LUTHER E THOMAS	CITY OF RENTAL ORLANDO	DATE OF TRANSACTION 05/19/76	RENTAL AGREEMENT NO 50333463	AMOUNT 15.90

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

SUMMARY OF ACCOUNT	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE (U.S.\$)
	.00	15.90	.00 CR	.00	15.90

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 36226 - NORMANDALE BRANCH
MINNEAPOLIS, MINNESOTA 55436

7 8 0 4 0 0 6 2 8 3 7

7 8 0 4 0 0 8 0 0 6 5

CAMPBELL'S NATIONAL CAR RENTALS
2126 FIRST AVENUE SOUTH
ST. PETERSBURG, FLORIDA 33712
TELS: 813/822-4101 TAMPA 813/676-3164

81004-00

09 NE H 55678 0

(10) CAR NO. 2107
CAR WILL BE RETURNED BY 5376
CITY TAMPA
STATE FL
CITY NO. 1004
BILLING INFORMATION ONLY

MILEAGE DETERMINED BY READING FACTORY INSTALLED ODOMETER
(11) MILES IN 4789
(12) MILES OUT 4703
(13) MILES DRIVEN 86

(14) DATE & TIME IN 1976 MAR -3 PM 2:25
(15) DATE & TIME OUT 1976 MAR -2 PM 1:55

7001 056 1568 1
CENTRAL BILLING

LUTHER E THORAS

04
78

(16) RECAP NO.

(17) COMPANY NAME
(18) RENTER'S NAME
(19) ADDRESS
(20) CITY
(21) STATE

(22) ALTERNATE CAR AND DATE
(23) MILES IN
(24) MILES OUT
(25) MILES DRIVEN

FOR SPECIAL RATES
MINIMUM RENTAL \$
EXTRA DAYS \$
EXTRA HOURS \$
MILEAGE ALLOWED (IF ANY) \$
EXTRA MILES \$

MILES (41) \$
DATE 11/5/79
WEEKS 11.20
HOURS 5.00
VAC SP (26) (27)
WE MO

SUB-TOTAL 1995

TOTAL TIME AND MILEAGE OR MINIMUM CHARGE 1995

INTER-CITY FEE

C. DAYS WEEKS 150

GAS TO FILL TAXABLE

SUB-TOTAL 1945

GAS TO FILL NON TAXABLE 337

P. DAYS WEEKS 154

TOTAL CHARGES 2412

LESS GAS, ETC.

NET CHARGE 2412

LESS DEPOSIT

AMOUNT DUE 2412

PAID BY CASH OR CHECK

RECEIVED BY

STAMPS ON TEN ISSUED TO BE MAILED

RENTAL AGREEMENT NO.

AMERICAN EXPRESS A.X.
CARTE BLANCHE B.L.
DINER D.N.
RANK AMERICA R.A.
T.W.A. T.G.
AVIS A.V.
MASTER CHARGE M.C.
LOCAL R.C.
AIR TRAVEL A.T.
HERTZ H.Z.
EUROCAR E.C.
TILDEN T.L.
OTHER

MO. DAY YR. HEIGHT. WEIGHT. EYES. HAIR.

EXPIRATION DATE PHONE NO.

Lutther Edwin Thoras

Box 490

Panama City FL

PHONE NO.

ADDITIONAL DRIVER

INTER-CITY SETTLEMENT

OWNING CITY RENTING CITY

TIME & MILEAGE % TAX

LESS GAS, ETC. LESS DEPOSIT

TOTAL P.A.I.

RECEIVING CITY

GAS TO FILL + GAL.

REPAIRS

STAMPS

TOTAL EXPENSES \$

AMOUNT COLLECTED OR REFUNDED

NET AMOUNT \$

COLLISION DAMAGE WAIVER

IN CONSIDERATION OF THE COLLISION DAMAGE WAIVER...
CUSTOMER ACCEPTS OR DECLINES TO ACCEPT...
C.D.W. IS APPLIED AT RATE SPECIFIED...
ONLY IF ACCEPTED

GASOLINE QUANTITY

IN OUT

UNUSED DEPOSIT

GAS, ETC.

TOTAL REFUND

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED

STAMPED



\$15.00 - \$200.00 CHARGES BETWEEN
8:00 A.M. - 5:00 P.M. CLEAR
CAMPBELL'S NATIONAL CAR RENTAL
P.O. BOX 1003
ST. PETERSBURG, FLORIDA 33712
MAKE CHECK PAYABLE TO NATIONAL CAR RENTAL
MILEAGE CHARGE

NC H 245678 0

RENTAL AGREEMENT NO. 245678 0
INVOICE
WHITE - HOME OFFICE 2

PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT.

REPORT (305) 855-4170
54001 BOON ROAD
ORLANDO, FLORIDA 32809

000 47 112 5010742 0
Orlando
05009
DATE & TIME IN 211 00 MAR 28
DATE & TIME OUT

(10) CAR NO. 304090 (11) CAR WILL BE RETURNED BY 500 16 (12) MILES IN 8249
(13) CAR MAKE FIREBIRD (14) OWNERS CITY ORLANDO (15) MILES OUT 8217
(16) CAR MAKE 7E-488 (17) OWNERS CITY NO. 03 009 (18) MILES IN 38

7001 056 1568 1
PAL MILL

FOR SPECIAL RATES				
MINIMUM RENTAL	EXTRA DAYS	EXTRA HOURS	EXTRA MILES	EXTRA MILES
DAYS				

Tomlin, Thomas
RECAP NO.

MILES IN 0
MILES OUT 0
MILES DRIVEN 0
MILES ALLOWED 0
MILES CHARGED 0
MILES IN 0
MILES OUT 0
MILES DRIVEN 0

(19) COMPANY NAME
(20) RENTER'S NAME
(21) ADDRESS
(22) CITY
(23) STATE
(24) ZIP

SUB-TOTAL 3990

AMERICAN EXPRESS	CARTE	DINER	RAMP	T.W.A.	AVIS
CE	BL	DN	BA	TG	AV

ACCEPTS C.D.W. 1 C.D.W. 1 DECLINES C.D.W. 1
COLLISION DAMAGE WAIVED

TOTAL TIME AND MILEAGE OF MINIMUM CHARGE 3990

525 209312 FIA
1906 7E-488

IN CONSIDERATION OF THE COLLISION DAMAGE WAIVED BY C.D.W. AGREED UPON HEREIN, RENTOR AGREES TO WAIVER CUSTOMER OF LIABILITY FOR DAMAGES CAUSED BY COLLISION AS PROVIDED IN PARAGRAPH 5 ON BACK OF PAGE 1 OF THIS RENTAL AGREEMENT BUT CUSTOMER SHALL BE FULLY LIABLE FOR ALL DAMAGES OF ANY NATURE TO THE VEHICLE DESCRIBED HEREIN SHALL BE OPERATED IN VIOLATION OF ANY OF THE PROVISIONS OF THIS RENTAL AGREEMENT.

INTER-CITY FEE
C. DAYS WEEKS
D. 10
GAS TO FILL TAXABLE

100 100 100

COMMISSION 1 SALES TAX 1 INSURANCE 1

SUB-TOTAL 3990

100 100 100

GASOLINE QUANTITY
IN 1 OUT 1

TAX 160
GAS TO FILL 158

100 100 100

ACCEPTS PA 1 PERSONAL 1 ACCIDENT 1 INSURANCE 1

TOTAL CHARGES 4308

INTER-CITY SETTLEMENT	
TIME & MILEAGE	TIME & MILEAGE
C.D.W.	TAX
LESS GAS ETC	LESS DEPOSIT
TOTAL	P.A.

CASH 1 COUPON 1 REF 1

NET CHARGE 4308

LESS GAS ETC	LESS DEPOSIT
TOTAL	P.A.

UNLESS DEPOSIT 1 GAL ETC 1

AMOUNT DUE 4308

REPAIRS	COMMENTS
STAMPE	
TOTAL EXPENSES	

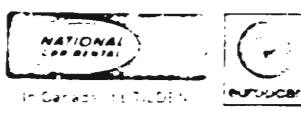
TOTAL 100 100 100

CUSTOMER INITIALS X

AMOUNT COLLECTED OR REFUNDED
NET AMOUNT \$

LOCAL FLORIDA RATE ONLY 15% DROP CHARGE
IF NOT RETURNED TO RENTING LOCATION
CITY NAME AND ADDRESS

RENTAL AGREEMENT NO. 5010742 0
THIS RENTAL AGREEMENT NO. MUST APPEAR ON ALL PAYMENTS AND CORRESPONDENCE



Make check payable to NATIONAL CAR RENTAL
Mail to: 54001 BOON ROAD, MINNEAPOLIS, MINN. 55437
PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT

INVOICE
WHITE - HOME OFFICE

7 8 0 4 0 0 8 0 0 6 8

~~7 8 0 4 0 0 6 2 8 4 0~~

ACCOUNT NUMBER 7001-056-1568-1		ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 04/06/76	YOUR LINE OF CREDIT IS 500.00 QUESTIONS***CALL 612-830-2252		
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO	AMOUNT	
	LUTHER E THOMAS	ST PETERSBURG	03/03/76	H2456780	24.12	
	LUTHER E THOMAS	ORLANDO	03/28/76	50197420	43.08	

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2347

Pay - Change to Rent

SUMMARY OF ACCOUNT	.00	67.20	.00 CR	.00	67.20
	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE TO US

NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 14374 - NORMANVILLE BRANCH
MINNEAPOLIS, MINNESOTA 55434

015 003 180 5 100

VALID 10/75

THRU 09/76

58



Approval Code

Check or Bill No.

Service Establishment

—Date of Charge—

Any delayed charges are entered below

142375
001676
100.00
40001754 122

Merchandise/Services

Type of Delayed Chg

Taxes

Am't of Delayed Chg

Tip/Misc

Revised Total

Establishment agrees to transmit to American Express Company (Amesco) or Authorized Representative for payment Merchandise and/or service purchased on this card shall not be resold or returned for cash refund

Cardmember Signature

X

Total

Amesco Use Only

Equivalent Am't

Invoice Number

Amesco Copy

001676

0.000000 200 1.1

ROC FORM 2028REV 1-73 PRINTED IN USA 16

Gov. REAGAN
CAMPAIGN

0.00	T
20.28	+
35.65	+
84.00	+
20.01	+
27.25	+
187.19	T
187.19	+
187.19	T

78040080069
78040062841

ACKNOWLEDGE RECEIPT OF TICKET(S) AND/OR COUPON(S) FOR RELATED CHARGES DESCRIBED HEREON. PAYMENT IN FULL TO BE MADE WHEN BILLED. IF IN FULL, PAYMENT IN ACCORDANCE WITH STANDARD POLICY OF COMPANY ISSUING CARD AND/OR REFLECTED IN APPLICABLE TERMS.

UNIVERSAL
CREDIT CARD
CHARGE FORM

Southern Airways Inc.

0384420890476
SOUTHERN AIRWAYS
9 A.O
PAGAZA CITY P.L.

X *[Signature]*

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER		CARRIER	FLIGHT	CLASS	DATE	TIME	STATUS	FARE BASIS/TKT. DESIGNATOR	IF VOID BEFORE	IF VOID AFTER	ALIAS
PANAMA CITY		SO	225	S	18 MAY	311P	OK	S			
ORLANDO MCCOY		SO	230	S	19 MAY	930P	OK	S			
PANAMA CITY											
VOID--											
VOID--											
FARE 79.62		IF EXT'D. PAY OVRD.		3 6 9 12		CREDIT CARD NAME (OVR)		APPROVAL CODE			
TAX 6.36		CIRCLE NO. OF MOD.									
TOTAL 85.98											

015 003 180 5 100AX

VALID 10 75 THRU 09 76
58

038 4420890476 20 LUTHER E THOMAS

OTATO NO		CONNECTION OF PASSENGER WITH SUBSCRIBER	
015 003 180 5 100AX			
VALID 10 75 THRU 09 76		58	
LUTHER E THOMAS		Approval Code	
Service Establishment		Date of Charge	
4500550 2440 0117		Merchandise/Services	
2009718434 40900		Type of Delivered Chg	
7000070900 20077		Taxes	
Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment Merchandise and/or service purchased on this card shall not be resold or returned for cash refund		Amount of Delivered Chg	
Cardmember Signature		Tips/Misc	
X		Revised Total	
Invoice Number		Total	
		Amexco Use Only	
		Equivalent Am	

523800 00318051100

01000000007491

78040087070
780400762842

*
749
8598
9347*

7 8 0 4 0 0 6 2 8 4 5

~~7 8 0 4 0 0 6 2 8 4 5~~



FEDERAL ELECTION COMMISSION

'78 APR 17 AM 8:58

HENRY M. BUCHANAN, C.P.A., P.A.
CERTIFIED PUBLIC ACCOUNTANTS
4706 HIGHLAND AVENUE
BETHESDA, MARYLAND 20014

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

SCC 3210
N/RN

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

FEDERAL ELECTION
COMMISSION

78 APR 10 PM 1:56

4 April 1978

Mr. Henry M. Buchanan
Certified Public Accountant
4706 Highland Avenue
Bethesda, Maryland 20014

Dear Hank:

As we discussed on the telephone yesterday, it is my understanding that you have located and have in your possession the invoice and supporting documents relating to the Citizens For Reagan check, dated 14 July 1976, in the amount of \$610.57, issued to L. E. Thomas.

Please send a photocopy of these documents as soon as possible to Mr. Paul Lovejoy, Federal Election Commission, 1325 K. Street, N.W., Washington, D.C. 20463, as they are needed by the Commission in regard to its inquiry number MUR 443 (77). Please also send a copy of the materials, and any accompanying communication sent to the FEC, to me at the above address.

I am informed that time is of the essence on this matter for the FEC, so your immediate action on this will be greatly appreciated.

Thank you for your assistance in this matter.

Sincerely,



cc: ✓ Paul Lovejoy
Federal Election Commission

CERTIFIED MAIL
Return Receipt Requested

78040062841
78040080072

ED MEESE

ATTORNEY AT LAW

9001 GROSSMONT BOULEVARD

LA MESA, CALIFORNIA 92041



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

8040080073
7804006284



FEDERAL ELECTION COMMISSION

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

March 15, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

more by pc

SUBJECT: MUR 443 (77) - Interim Report dated 3-7-78
Signed by General Counsel 3-10-78
Received in Commission Secretary's
Office - 3-10-78, 3:16

The above-mentioned document was circulated to the
Commissioners on a 24 hour no-objection basis at 12:30,
March 13, 1978.

No objections were received in this office to the Interim
Report on MUR 443 (77).



March 10, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
FROM: MUR 443

Please have the attached Interim Report on MUR 443 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040080075
~~78040062847~~

Before the Federal Election Commission

March 7, 1978

In the Matter of)
) MUR 443 (77)
Florida Friends of Reagan)

Interim Report

On February 8, 1978, the Commission issued a subpoena for oral deposition to Mr. L. E. Thomas, Chairman of Florida Friends of Reagan, and an Order requiring Citizens for Reagan to produce records pertaining to the activities of Mr. Thomas for which he received \$610.57 in travel reimbursements on July 14, 1976.

On February 14, 1978, the General Counsel's Office agreed to postpone the deposition of Mr. Thomas pending the receipt of the information from Citizens for Reagan. In a subsequent telephone conversation with Ed Meese, General Counsel to Citizens for the Republic (formerly Citizens for Reagan), Mr. Meese indicated that the Committee was attempting to locate the required information, but because the records were maintained in storage in several different locations, it would require searching through numerous boxes of materials to find the appropriate documents. Mr. Meese indicated that he anticipated that the subpoenaed documents would be forwarded to the Commission by March 8, 1978.

Upon receipt of this information, the General Counsel's Office will reschedule the deposition of Mr. Thomas.

3/10/78
Date


William C. Oldaker
General Counsel

200 2714

RECEIVED
FEDERAL ELECTION
COMMISSION

321 MAGNOLIA AVE.
PANAMA CITY, FLORIDA
32401
(904) 763-6948

PROFESSIONAL REPORTING SERVICE

*Official and General Shorthand Reporting
Secretarial Services*

'78 FEB 16 PM 12:40

MUR 473

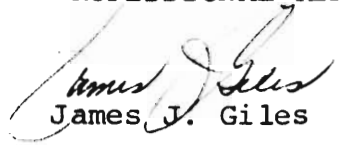
February 13, 1978

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

ATTN: Office of General Counsel

This will confirm that the Counsel for the Federal Election Commission has scheduled a deposition to be taken on the 24th of February, 1978, at 10:00 A.M., in the conference room of the Professional Reporting Service, 321 Magnolia Avenue, Panama City, Florida, 32401.

PROFESSIONAL REPORTING SERVICE.


James J. Giles

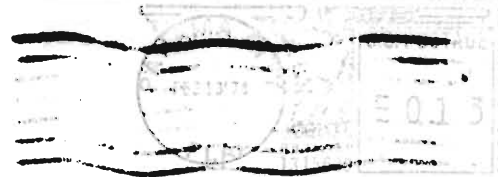
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7 8 0 4 0 0 6 2 8 1 9

PROFESSIONAL REPORTING SERVICE

OFFICIAL AND GENERAL SHORTHAND REPORTING

321 MAGNOLIA AVENUE

PANAMA CITY, FLORIDA 32401



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

ATTN: OFFICE OF GENERAL CONSEL
MR. ROTRUCK

7304008007

780400528

78 FEB 16 PM 12:21

ROU

1-1-34



FEDERAL ELECTION COMMISSION

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

February 16, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
888 Sixteenth Street N.W.
Washington, DC 20006

Re: MUR 443

Dear Mr. Bolton:

This letter is to confirm your telephone conversation with Paul Lovejoy of our staff on February 14, 1978, in which we agreed to a possible change in the date of Mr. Thomas' deposition pending receipt of documents from Citizens for the Republic, formerly Citizens for Reagan, pertaining to a \$610.57 travel reimbursement paid to Mr. Thomas by Citizens for Reagan on July 14, 1976.

In the event that these documents have not been received at the Commission by February 22, 1978, we will contact you and arrange another date for Mr. Thomas' deposition.

Sincerely,

William C. Oldaker
General Counsel



7-9040062852

MUR 443 *Laurel*

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:**
John R. Bolton, Esq.
888 16th St NW
Wash DC 20006

3. **ARTICLE DESCRIPTION:**
 REGISTERED NO. _____ CERTIFIED NO. 438165 INSURED NO. _____
 (Always obtain signature of addressee or agent)

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

4. **DATE OF DELIVERY** 2/21/78 **POSTMARK** _____

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

6. **UNABLE TO DELIVER BECAUSE:** _____ **CLERK'S INITIALS** _____

☆ GPO : 1977-O-234-337

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

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

February 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ronald Reagan, Chairman
Citizens for the Republic
1253 Seventh Street, Suite 200
Santa Monica, California 90401

Re: MUR 443

Dear Mr. Reagan:

The Federal Election Commission is conducting an investigation of the "independent expenditures" of Florida Friends of Reagan in connection with your presidential candidacy in 1976.

In furtherance of our investigation, the Commission has issued an Order requiring your committee to produce all documents, records and information pertaining to the dates, location and nature of Mr. L. E. Thomas' activities on behalf of Citizens for Reagan for which he received payment totaling \$610.57 on July 14, 1976.

The Commission is required to conduct its investigation expeditiously. Therefore, your response should be sent to the Federal Election Commission within ten days of your receipt of the enclosed Order.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



7304008003
78040062854

MUR 442 Lovejoy

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). <input type="checkbox"/> Show to whom and date delivered. <input checked="" type="checkbox"/> Show to whom, date, and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery. \$ (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: Ronald Reagan, Chrmn. Citizens for the Republic		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438038	
(Always obtain signature of addressee or agent)		
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent		
4. <i>Roger Mahon</i> DATE OF DELIVERY 2-16		
5. ADDRESS (Complete only if requested) 1253 7th #200		
6. UNABLE TO DELIVER BECAUSE:		

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443

TO: Citizens for the Republic
formerly, Citizens for Reagan
1253 7th Street, Suit 200
Santa Monica, California 90401

ORDER

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(1), requires that you produce for inspection by the Commission all documents, records and information relating to payment in the amount of \$610.57 made by Citizens for Reagan on or about July 14, 1976, to Mr. L.E. Thomas, including the nature, place and date of services provided by Mr. Thomas in connection with such payment. These materials shall be submitted to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel, within ten days of your receipt of this Order.

Thomas E. Harris

Thomas E. Harris
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

78040080083
78040062855

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2 8 0 4 0 0 6 2 8 5 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)

MUR 443

TO: Citizens for the Republic
formerly, Citizens for Reagan
1253 7th Street, Suit 200
Santa Monica, California 90401

ORDER

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(1), requires that you produce for inspection by the Commission all documents, records and information relating to payment in the amount of \$610.57 made by Citizens for Reagan on or about July 14, 1976, to Mr. L.E. Thomas, including the nature, place and date of services provided by Mr. Thomas in connection with such payment. These materials shall be submitted to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel, within ten days of your receipt of this Order.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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



FEDERAL ELECTION COMMISSION

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

February 13, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 32401

Re: MUR 443

Dear Mr. Thomas:

On January 16, 1978, we received your response to the Commission's interrogatories in the above matter. After careful review, the Commission has determined that it will be necessary to take your deposition.

Therefore, the Commission has issued the enclosed subpoena requiring your appearance for deposition.

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at 202/523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

cc: John R. Bolton, Esq.



78040062853

PS Form 3811, Apr. 1977

78040062853

MUR 443 HARRY JAY

● **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:**
Mr. L. E. THOMAS

3. **ARTICLE DESCRIPTION:**
REGISTERED NO. _____ CERTIFIED NO. **438033** INSURED NO. _____
(Always obtain signature of addressee or agent)

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

4. **DATE OF DELIVERY**

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

6. **UNABLE TO DELIVER BECAUSE:**

PANAMA CITY POSTMARK FEB 17 1978

CLERK'S INITIALS

★ GPO 1977-O-234-337

7 8 0 4 0 0 3 0 0 3 3
7 8 0 4 0 0 6 2 8 5 0

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
)	
Florida Friends of Reagan)	To Appear for Deposition
)	
)	Upon Oral Examination
)	
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at Professional Reporting Services
321 Magnolia Ave. on
Panama City, Florida 32401
February 24, 1978, at 10 AM.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 8th day of Feb, 1978.

Thomas E. Harris
Thomas E. Harris
Chairman

ATTEST:

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan)

MUR 443 (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. Issue a subpoena pursuant to 2 U.S.C. Section 437d(a)(3) requiring the attendance of Mr. L. E. Thomas for oral deposition.
2. Issue an order pursuant to 2 U.S.C. Section 437d(a)(1) requiring Citizens for Reagan to produce records and/or information pertaining to the activities of Mr. L. E. Thomas for which Mr. Thomas received \$610.57 in travel expense reimbursement on July 14, 1976.

Voting for these determinations 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

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78040062851



FEDERAL ELECTION COMMISSION

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

February 9, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *more by fe*

SUBJECT: Subpoena an Order in Relation to MUR 443 (77)

The attached Subpoena and Order, approved February 8, 1978, have been signed and sealed.

ATTACHMENTS:
Subpoena
Order



February 2, 1978

MEMORANDUM TO: Marge Emswiler
FROM: Elissa T. Garr
SUBJECT: MUR 443 Team #3 Lovejoy

Please have the attached General Counsel's Report on MUR 443 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of February 8, 1978.

Thank you.

78040080091

~~78040062865~~

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan) MUR 443 (77)

GENERAL COUNSEL'S REPORT

I. Allegation

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A review of independent expenditures made on behalf of presidential candidates showed that Florida Friends of Reagan ("Florida Friends") made \$14,771.40 in independent expenditures for Ronald Reagan during April 1976. Mr. L. E. Thomas served as Chairman of Florida Friends; and as Florida Chairman of Citizens for Reagan, Mr. Reagan's principal campaign committee. Also, Mr. Thomas received travel expense reimbursements from Citizens for Reagan. This information suggests that the \$14,771.40 spent by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan and as such would be considered a contribution to Citizens for Reagan in excess of the limitations set forth in 2 U.S.C. § 441a(a)(1).

II. Background

On October 27, 1977, the Commission found reason to believe that Florida Friends may have violated 2 U.S.C. 441a(a)(1). A letter notifying Florida Friends of such action was received by Mr. L. E. Thomas on November 8, 1977, requesting that Mr. Thomas provide the Commission with

information regarding his actions and responsibilities as Chairman of Florida Friends, and as Florida Chairman of Citizens for Reagan.

After receiving no response from Mr. Thomas, 1/ the Commission issued an order on December 21, 1977, requiring Mr. Thomas to answer interrogatories relating to his involvement with Florida Friends and Citizens for Reagan.

On January 16, 1978, the General Counsel's Office received a response to the interrogatories (see Attachment I). We believe that this response is incomplete. Despite our specific questions, the information provided by Mr. Thomas fails to establish the date on which he terminated his activities with Citizens for Reagan; the date on which Mr. Thomas began his involvement with Florida Friends; and the date on which Florida Friends terminated its activities.2/ Also, Mr. Thomas failed to provide the Commission with information regarding the dates, nature and location of his activities on behalf of Citizens of Reagan for which he received \$610.57 in travel reimbursements on July 14, 1976. Additionally, we believe that further clarification is

1/ Mr. David Keene, regional coordinator of Citizens for Reagan, wrote to the Commission at Mr. Thomas' request and set forth an explanation of the relationship between Florida Friends and Citizens for Reagan.

2/ In his response to the Commission's interrogatories Mr. Thomas states that Florida Friends terminated its operations on April 6, 1976. However, Commission records indicate that Florida Friends received contributions through July 7, 1976.

78040080093
78040062865

needed on possible communications between Mr. Thomas and Citizens for Reagan during the time Mr. Thomas was serving as Chairman of Florida Friends. Attachment II is a summary chronology of events based on our present information.

III. Recommendation

1. Issue a subpoena pursuant to 2 U.S.C. 437d(a)(3) requiring the attendance of Mr. L. E. Thomas for oral deposition.

2. Issue an order pursuant to 2 U.S.C. 437d(a)(1) requiring Citizens for Reagan to produce records and/or information pertaining to the activities of Mr. L. E. Thomas for which Mr. Thomas received \$610.57 in travel expense reimbursement on July 14, 1976.

2/1/78

DATE



WILLIAM C. OLDAKER
GENERAL COUNSEL

78040080094
78040062866

INTERROGATORIES AND ANSWERS BY MR. I.E. THOMAS
MUR 443

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

The 1976 Florida primary was held on March 9 of that year, and we began closing our field offices throughout the State the next day. By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary.

4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.

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7 8 0 4 0 0 6 2 8 6 7

4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a candidate, and I indicated I would be. Within a week or two of that date, I met in Washington, D.C., with Mr. Keene, Mr. John Sears, and Senator Paul Laxalt. We discussed the subject of the Florida primary, and we agreed that I would become the Florida Chairman should Governor Reagan decide to announce his candidacy for the Republican presidential nomination.

6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

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primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).

7. Not applicable.

8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

9. State the date on which Florida Friends of Reagan was terminated.

9. FFOR engaged in no activities after April 6, 1976, the date of the 1976 Wisconsin primary, and it was terminated in fact as of that date. FFOR filed its notice of termination with the Federal Election Commission on December 10, 1976.

10. State the date on which Florida Citizens for Reagan was terminated.

10. Within forty-eight hours of the March 9 Florida primary, all of the field offices in Florida had been closed. One small office remained open in Orlando, staffed by one person, to handle matters relating to wrapping up the campaign. I do not know whether there was any official termination of the Florida Citizens for Reagan, because all such matters were handled by the main Citizens for Reagan Headquarters in Washington, D.C.

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11. Describe the methods used by Florida Friends of Reagan to solicit contributions.

11. All contributions, other than my own and my wife's, were solicited by telephone calls.

12. Describe any contractual agreements made between Florida Friends of Reagan and Long Advertising Agency, 20 S.E. 8th Street, Miami, Florida, or attach copies of such agreements to your answers to these interrogatories. State the dates and amounts of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

12. The Long Advertising Agency (hereafter, "Long") does commercial work for my businesses in Florida. I asked them orally to help me in preparation of a newspaper advertisement. There was no written contract.

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FFOR made one payment to Long for its work in the amount of \$14,771.40. That payment was made on April 5, 1976.

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14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.

14. I did.

15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.

15. Mr. Keene was the only person who indicated that there might be problems under the FECA with FFOR's project in Wisconsin.

At the time, of course, the Supreme Court had recently declared parts of the FECA unconstitutional, and there was great uncertainty about the effect of the Court's ruling. I was aware that during the Florida primary several individuals and groups who were not part of Citizens for Reagan had taken out advertisements on behalf of the Governor. I consulted with my local attorney in Florida, and he indicated to me that he saw no legal problems in connection with FFOR's activities in Wisconsin.

16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

16. I do not now have records which indicate what services were performed (or where they were performed) for which I received the travel reimbursement you identify. When the field offices of Florida Citizens for Reagan were closed, the great bulk of our records were transferred to the main Citizens for Reagan headquarters in Washington, D.C. A smaller amount of records was left with the local Republican Party headquarters in Orlando. I do not have access to those records.

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L.E. THOMAS MUR 443

Activities as

Date	Chairman, Florida CFR	Chairman, FFOR
August 20 1975	-Date Thomas met with Keene, Sears and Laxalt and agreed to become Florida Chairman.	
November 20 1975	-Date Reagan announced candidacy; date Thomas became Florida Chairman.	
March 9 1976	-Date of Florida Primary	
March 11 1976	-Date Thomas says by which all but one CFR office in Florida closed; date Thomas says he completed his official duties as Florida Chairman, except in wrapping up obligations remaining from Primary	
March 28 1976		-Date of receipt of first contribution
April 5 1976		-Date FFOR paid Long Advertising; \$14,771.40
April 6 1976		-Date Thomas says FFOR terminated; date of Wisconsin Primary
May 7 1976		-Date Thomas says FFOR received last contribution
July 7 1976		-Date of receipt of last contribution
July 14 1976	-Date Thomas received \$610.57 in travel reimbursements from CFR	
December 16 1976		-FFOR filed notice of termination with Commission

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INTERROGATORIES AND ANSWERS BY MR. L.E. THOMAS

MUR 443

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

The 1976 Florida primary was held on March 9 of that year, and we began closing our field offices throughout the State the next day. By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary.

4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.

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4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a candidate, and I indicated I would be. Within a week or two of that date, I met in Washington, D.C., with Mr. Keene, Mr. John Sears, and Senator Paul Laxalt. We discussed the subject of the Florida primary, and we agreed that I would become the Florida Chairman should Governor Reagan decide to announce his candidacy for the Republican presidential nomination.

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I spoke a few times by telephone with Ms. Neal Peden, Mr. Keene's secretary, subsequent to the Florida

primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

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8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

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13. Long was responsible for the advertisement's copy and layout. The photograph of the White House was obtained from H. Armstrong Roberts Stock Photo Supplier in Philadelphia, Pennsylvania. The typeface was obtained from the Wrightson Typesetting Company in Miami, Florida. The picture of Governor Reagan was copied from the Wall Street Journal. None of the components of the advertisement had any origin in any materials prepared by Citizens for Reagan.

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16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

16. I do not now have records which indicate what services were performed (or where they were performed) for which I received the travel reimbursement you identify. When the field offices of Florida Citizens for Reagan were closed, the great bulk of our records were transferred to the main Citizens for Reagan headquarters in Washington, D.C. A smaller amount of records was left with the local Republican Party headquarters in Orlando. I do not have access to those records.

L.E. THOMAS MUR 443

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COVINGTON & BURLINGAME
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

RECEIVED
FEDERAL ELECTION
COMMISSION

HAND DELIVERED

McC. 2460

TELEPHONE
(202) 452-6000

WRITERS DIRECT DIAL NUMBER

78 JAN 16 P2: 01

710-822-0005
TELEX: 89-693
CABLE: COVLING

HAND DELIVERED

January 16, 1978

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

880100

Re: MUR 443(77)

Dear Mr. Oldaker:

Enclosed herewith are the answers, under oath, of Mr. L.E. Thomas to Interrogatories propounded to him and enclosed in your letter of December 22, 1977.

Mr. Thomas firmly believes that both he and Florida Friends of Reagan (hereafter, "FFOR") have at all times acted in strict compliance with all applicable Federal statutes. Mr. Thomas will, therefore, endeavor to assist in resolving this matter as expeditiously as possible. Certain preliminary points should, however, be made clear at the outset.

First, neither of your letters has stated with any specificity what it is about Mr. Thomas's activities that leads you to assert that there is "reason to believe" that there has been any violation of the Federal Election Campaign Act, as amended (hereafter, "FECA"). In the absence of a specific articulation of the supposed violation, and even though we believe the answers to the Interrogatories to be a complete response, we are necessarily left unsure. In such circumstances, and despite the statement in your November 2 letter to the contrary, Mr. Thomas cannot be deemed to have been afforded a "reasonable opportunity to demonstrate that no action should be taken" against him. 2 U.S.C. § 437g(a)(4).

Second, the enclosed materials do not in any way constitute a waiver, express or implied, of any procedural or substantive rights or arguments that Mr. Thomas may

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William C. Oldaker, Esq.
January 16, 1978
Page Two

ultimately desire to assert. We trust that if you disagree with this or the foregoing point, you will so notify us forthwith.

Third, we would like to know whether the Commission has received any complaints from anyone not on the Commission staff regarding this matter. This request is not limited to complaints which comply with standards set forth in 2 U.S.C. § 437g(a)(1), but applies as well to complaints which are not in compliance with that section. We ask that we be supplied, at your earliest convenience, with copies of any such complaints and with any correspondence between the Commission and the complainant.

Fourth, you state in your letter of December 22 that the Commission received no information from Mr. Thomas in response to your November 2 letter. Your December 22 letter does not acknowledge receipt of a letter, dated November 30, 1977, from Mr. David A. Keene to Mr. David Stein. Mr. Keene, a former field director for Citizens for Reagan, demonstrated convincingly in his letter that Mr. Thomas' activities in connection with FFOR were totally independent of both former Governor Reagan and his principal campaign committee.

It is significant that Mr. Thomas consulted with an attorney before he undertook any activities in connection with FFOR. Especially considering the period during which FFOR undertook its one and only project (i.e., when the Commission was unable to provide Advisory Opinions), Mr. Thomas took every possible step he could to remain in strict compliance with the FECA.

The enclosed responses by Mr. Thomas corroborate the fact that there has been no violation of the FECA. Accordingly, there is no present need to consider issues of Commission regulations, statutory interpretation or constitutional law. Since there is no indication of any violation of the law, this Matter Under Review should be promptly closed.

Sincerely yours,


John R. Bolton

cc: Mr. Lovejoy

Enclosures

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ANSWERS OF L.E. THOMAS

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I hereby certify that the foregoing answers are true and correct to the best of my knowledge.


L. E. Thomas

Subscribed and sworn to before me
this 11th day of January, 1978.


Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES MAY 6, 1981
BONDED BY RESERVE INSURANCE CO.

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COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

HAND DELIVERY

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

HAND DELIVERED

COVINGTON & BURLING

888 SIXTEENTH ST. N.W.

WASHINGTON, D.C.

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78 JAN 16 12:00

COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.
WASHINGTON, D. C. 20006

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

HAND DELIVERY

COVINGTON & BURLING
888 SIXTEENTH ST., N. W.
WASHINGTON, D. C. 20006

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FEDERAL ELECTION COMMISSION

COVINGTON & BURLING

888 SIXTEENTH STREET, N. W.

WASHINGTON, D. C. 20006

MUR 443

ALL 40

TELEPHONE
(202) 452-6000

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

January 6, 1978

HAND DELIVERED

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

Dear Mr. Lovejoy:

This letter is to inform you that I am serving
as counsel to Mr. Tommy Thomas in the MUR relating to
him currently pending at the Federal Election Commission.

I appreciate your assistance in this matter.

Sincerely yours,


John R. Bolton

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John K. Eolton
COVINGTON & BURLING

WASHINGTON, D. C. 20006

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FEDERAL ELECTION COMMISSION

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

MUR 443
1/6/78

Given to John Bolton Esq.:

- A. Copy of Order to answer interrogatories
- B. Copy of Interrogatories
- C. Copy of 12/21/77 letter from Commission to L.E.

Thomas

Received: *Robert H. [Signature]*

1/6/78



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 443
Florida Friends of) Interrogatories
Reagan)

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity. -
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
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7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).
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FEDERAL ELECTION COMMISSION

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

December 22, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

Re: MUR 443(77)

Dear Mr. Thomas:

On November 8, 1977, you received notification that the Federal Election Commission found reason to believe that Florida Friends of Reagan may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. In that notification the Commission requested that you set forth any legal or factual material relevant to this matter, specifically including information pertaining to your responsibilities and activities as Chairman of Florida Friends of Reagan and as Chairman of Florida Citizens for Reagan.

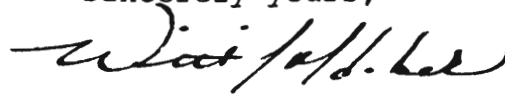
We received no information from you. The Commission, pursuant to 2 U.S.C. §437d(a)(1), has issued the attached Order requiring you to answer the enclosed interrogatories within ten days of your receipt of this letter.

In a telephone conversation on November 21, 1977, with attorney David Stein of this office, you stated your intention to retain Mr. David Keene as counsel. Please be advised that in a telephone conversation on December 8, 1977, Mr. Keene told staff member Paul Lovejoy that he had not been retained as counsel for you or Florida Friends of Reagan. If you intend to retain Mr. Keene or another attorney as counsel, please have such counsel so notify the Commission in writing.



If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at (202) 523-4001.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure
Interrogatories
Order

78040062883

CERTIFIED MAIL
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Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

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Paul Lovejoy
12/22/77

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- 2 -
If you have any questions, please contact
Paul Levaty, the staff member assigned to this
matter, at (202) 523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure
Interrogatories
Order

78040080127
~~78040080200~~

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida Friends of Reagan) MUR 443(77)

TO: Mr. L.E. Thomas
Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 34201

ORDER

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The Federal Election Commission pursuant to its power set forth in 2 U.S.C. §437d(a)(1), and in furtherance of its investigation in the above entitled matter, requires that you, on behalf of the Florida Friends of Reagan, submit in writing and under oath, answers to the attached interrogatories within ten (10) days of your receipt of this Order to:

The Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

ATTEST:

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

Thomas E. Harris
THOMAS E. HARRIS
CHAIRMAN
FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

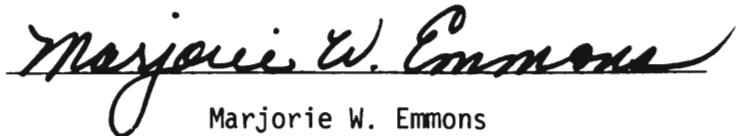
In the Matter of)
Florida Friends of Reagan)

MUR 443 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 21, 1977, the Commission determined by a vote of 4-0 to issue an order pursuant to U.S.C. Section 437d(a)(1) requiring Mr. L. E. Thomas to answer interrogatories about his involvement with Florida Friends of Reagan and Citizens for Reagan.

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



Marjorie W. Emmons
Secretary to the Commission

73740080129

December 16, 1977

MEMORANDUM TO: Marge Emmons
FROM: Eliana T. Garr
SUBJECT: MUR 443 Team #3 Lovejoy

Please have the attached Interim Report on MUR 443 distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of December 21, 1977.

Thank you.

78040080130
~~7804006282~~

BEFORE THE FEDERAL ELECTION COMMISSION
December 14, 1977

In the Matter of)
) MUR 443(77)
Florida Friends of Reagan)

INTERIM REPORT

I. ALLEGATION:

A review of independent expenditures made on behalf of presidential candidates showed that Florida Friends of Reagan (hereinafter "Florida Friends") made \$14,771.40 in independent expenditures for Ronald Reagan during April 1976. Mr. L.E. Thomas served as Chairman of Florida Friends; and as Florida Chairman of Citizens for Reagan, Mr. Reagan's principal campaign committee. Also, Mr. Thomas received reimbursement for travel expenses from Citizens for Reagan. This information suggests that the \$14,771.40 spent by Florida Friends may have been made in cooperation, consultation, or concert with Citizens for Reagans and as such would be considered a contribution to that Citizens for Reagan in excess of the limitations set out in 2 U.S.C. §441a(a)(1).

II. PRIOR COMMISSION ACTION:

On October 27, 1977, the Commission found reason to believe that Florida Friends may have violated 2 U.S.C. §441a(a)(1). A letter notifying Florida Friends of this matter was received by Mr. Thomas on November 8, 1977.

On November 21, 1977, Mr. Thomas telephoned the General Counsel's Office and said that he had just returned from a trip abroad, intended to retain counsel in this matter, and his attorney would contact us shortly.

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The General Counsel's Office received a letter from Mr. David Keene, former southern coordinator of Citizens for Reagan, on December 6, 1977 (Attachment I). Mr. Keene states that following the Florida primary election, Citizens for Reagan removed its authorization from Florida Citizens for Reagan. Mr. Keene further states that he learned of Mr. Thomas' intention to place advertisements in Wisconsin newspapers only a day or so before the primary election in Wisconsin. Mr. Keene says that at the time he was concerned that the actions of Mr. Thomas and Florida Friends would possibly be in violation of the Act and counter-productive to the Citizens for Reagan Wisconsin campaign.

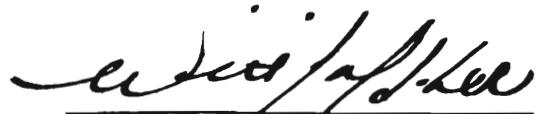
According to Mr. Keene, Mr. Thomas replied by saying he had a right to do as he pleased.

On December 8, 1977, the General Counsel's Office contacted Mr. Keene to inquire whether Mr. Keene was representing Mr. Thomas or Florida Friends. Mr. Keene replied that he had not been retained as counsel for Florida Friends and that his letter of November 30, 1977, had been written to explain the situation from his perspective as southern coordinator of Citizens for Reagan.

III. RECOMMENDATION:

Issue an order pursuant to 2 U.S.C. §437d(a)(1) requiring Mr. L.E. Thomas to answer interrogatorities about his involvement with Florida Friends of Reagan and Citizens for Reagan and send attached letter.

12/14/77
DATE


WILLIAM C. OLDAKER
GENERAL COUNSEL

78040080133
-78040062895

David A. Keene

Suite 600

One Thousand Connecticut Avenue, N. W.

Washington, D. C. 20036

(202) 452-1377

RECEIVED

FEDERAL ELECTION
COMMISSION

ATTACHMENT I

DEC 6 AM 11:54

Stein

November 30, 1977

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

7005

Dear Mr. Stein:

Re: MUR 443 (77)

I had tried to reach you earlier in the week without success, so I thought it best to write you concerning the possibility that Mr. L. E. Thomas may have been acting in "cooperation, consultation or concert with the Citizens For Reagan" when he purchased advertisements in a number of Wisconsin newspapers following the 1976 Florida primary.

The possibility that Mr. Thomas was acting in concert with the CFR is obvious given the fact situation. He was our Florida chairman, and we were running an active campaign in Wisconsin. However, in this instance, I can assure you that there was no coordination.

I was at the time a field director working for the CFR, and it was I who selected Mr. Thomas to head our Florida campaign. After that primary, we closed up our Florida operation and instructed Mr. Thomas and others not to spend any of the funds remaining in our Florida account or incur any new debts on our behalf. We, in effect, removed our authorization as we did in other primary states after their primaries were held.

Mr. Thomas followed these instructions, but proceeded on his own--and without our knowledge--to put together a newspaper ad and buy space to run it in Wisconsin. We only learned of this effort a day or so before the ads ran, when our people began to pick up rumors from people at the newspapers themselves. By that time, there was little we could do, though I did call Mr. Thomas to tell him that he shouldn't do anything.

He informed me that he had a right to do what he wanted to do and said he wasn't using our money to do it. He told me he was upset by the tone of the President's effort in Florida and wanted others to know just what went on. I informed him that he could conceivably get into trouble because of his position with us and told him that we didn't want him to do anything. After a rather heated conversation, he told me he had already spent his own money and intended to run the ads.

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Mr. David Stein
November 30, 1977
Page Two

Our concern at the time went beyond the question of whether Mr. Thomas' action would be viewed as a coordinated act. We were also worried about the substance of his ads in a state far different from his own. We frankly learned that his effort would be counter-productive at a time when we were deemphasizing our campaign there in preparation for a bigger effort in the later primaries.

I give you these facts in the hope that they will help clarify your picture of what actually happened. I will add only one other thing. Mr. Thomas is a very good friend of mine, and I respect him; but as any reporter who knows him or any politician who has worked with him can tell you, he is not a man who can be controlled by anyone.

If I can be of any further assistance, please don't hesitate to contact me.

With best regards, I remain

Sincerely yours,



David A. Keene

DAK:md

78040080135
78040062897



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
Florida Friends of Reagan
705 West 15th Street
Panama City, Florida 43201

Re: MUR 443(77)

Dear Mr. Thomas:

On November 8, 1977, you received notification that the Federal Election Commission found reason to believe that Florida Friends of Reagan may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. In that notification the Commission requested that you set forth any legal or factual material relevant to this matter, specifically involving information pertaining to your responsibilities and activities as Chairman of Florida Friends of Reagan and as Chairman of Florida Citizens for Reagan.

We received no information from you. The Commission, pursuant to 2 U.S.C. §437d(a)(1), has issued the attached Order requiring you to answer the enclosed interrogatories within ten days of your receipt of this letter.

In a telephone conversation on November 21, 1977, with attorney David Stein of this office, you stated your intention to retain Mr. David Keene as counsel. Please be advised that in a telephone conversation on December 8, 1977, Mr. Keene told staff member Paul Lovejoy that he had not been retained as counsel for you or Florida Friends of Reagan. If you intend to retain Mr. Keene or another attorney as counsel, please have such counsel so notify the Commission in writing.



- 2 -

If you have any questions, please contact Paul Lovejoy, the staff member assigned to this matter, at (202) 523-4001.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure
Interrogatories
Order

78040062899
78040062899

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of) MUR 443
Reagan) Interrogatories

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?
6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

78040062900

Interrogatories
MUR 443
Page 2

7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).
8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.
9. State the date on which Florida Friends of Reagan was terminated.
10. State the date on which Florida Citizens for Reagan was terminated.
11. Describe the methods used by Florida Friends of Reagan to solicit contributions.
12. Describe any contractual agreements made between Florida Friends of Reagan and Long Advertising Agency, 20 S.E. 8th Street, Miami, Florida, or attach copies of such agreements to your answers to these interrogatories. State the dates and amounts

of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.
14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.
15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.
16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

78040062901

ACC # 2337
RECEIVED
FEDERAL ELECTION
COMMISSION

77 DEC 23 AM 11:01

P. O. Box No. 490
Panama City, Fla. 32401
December 20, 1977

Re: MUR 443 (77)

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

Dear Mr. Stein:

I have received a copy of Mr. David Keene's letter of
November 30, 1977, addressed to you, and tried to call
Mr. Keene to see exactly where I stood in this matter.
(I am not an attorney.)

Mr. Keene is out of his office until this Thursday, and
I do not want to be in violation of any time limit, etc.

Will you please advise me of any further action necessary
on my part.

Sincerely,



L. E. "Tommy" Thomas

LET:lp

cc: Mr David A Keene, Suite 600
1000 Connecticut Ave., N.W.
Washington, D. C. 20036

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78040062902

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E. Thomas
P.O. Box 490
Panama City, Fla

RECEIVED
FEDERAL ELECTION COMMISSION

77 DEC 23 AM 10:59

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



LCC 2193

David A. Keene
Suite 600
One Thousand Connecticut Avenue, N. W.
Washington, D. C. 20036
(202) 452-1511

RECEIVED
FEDERAL ELECTION
COMMISSION

DEC 6 AM 11:54

November 30, 1977

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

700

Dear Mr. Stein:

Re: MJR 443 (77)

I had tried to reach you earlier in the week without success, so I thought it best to write you concerning the possibility that Mr. L. E. Thomas may have been acting in "cooperation, consultation or concert with the Citizens For Reagan" when he purchased advertisements in a number of Wisconsin newspapers following the 1976 Florida primary.

The possibility that Mr. Thomas was acting in concert with the CFR is obvious given the fact situation. He was our Florida chairman, and we were running an active campaign in Wisconsin. However, in this instance, I can assure you that there was no coordination.

I was at the time a field director working for the CFR, and it was I who selected Mr. Thomas to head our Florida campaign. After that primary, we closed up our Florida operation and instructed Mr. Thomas and others not to spend any of the funds remaining in our Florida account or incur any new debts on our behalf. We, in effect, removed our authorization as we did in other primary states after their primaries were held.

Mr. Thomas followed these instructions, but proceeded on his own--and without our knowledge--to put together a newspaper ad and buy space to run it in Wisconsin. We only learned of this effort a day or so before the ads ran, when our people began to pick up rumors from people at the newspapers themselves. By that time, there was little we could do, though I did call Mr. Thomas to tell him that he shouldn't do anything.

He informed me that he had a right to do what he wanted to do and said he wasn't using our money to do it. He told me he was upset by the tone of the President's effort in Florida and wanted others to know just what went on. I informed him that he could conceivably get into trouble because of his position with us and told him that we didn't want him to do anything. After a rather heated conversation, he told me he had already spent his own money and intended to run the ads.

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Mr. David Stein
November 30, 1977
Page Two

Our concern at the time went beyond the question of whether Mr. Thomas' action would be viewed as a coordinated act. We were also worried about the substance of his ads in a state far different from his own. We frankly learned that his effort would be counter-productive at a time when we were deemphasizing our campaign there in preparation for a bigger effort in the later primaries.

I give you these facts in the hope that they will help clarify your picture of what actually happened. I will add only one other thing. Mr. Thomas is a very good friend of mine, and I respect him; but as any reporter who knows him or any politician who has worked with him can tell you, he is not a man who can be controlled by anyone.

If I can be of any further assistance, please don't hesitate to contact me.

With best regards, I remain

Sincerely yours,



David A. Keene

DAK:md

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RECEIVED
FEDERAL ELECTION
COMMISSION
7 8 0 4 0 0 8 0 1 4
David A. Keene

Suite 600

One Thousand Connecticut Avenue, N. W.

Washington, D. C. 20036

'77 DEC 6 AM 11:54

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





FEDERAL ELECTION COMMISSION

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

November 2, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

Please be advised that the Federal Election Commission (the "Commission") has found reason to believe that the Florida Friends of Reagan ("Florida Friends") may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. We have numbered this matter MUR 443 (77).

Specifically, the Commission has found reason to believe that \$14,771.40 in "independent expenditures" by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan, the candidate's principal campaign committee, as a result of your apparent dual role as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan during the 1976 primary campaign. Additionally, you are reported as having received reimbursement for travel expenses from Citizens for Reagan.

If Florida Friends' expenditures were not independent expenditures within 2 U.S.C. §431(p), they would be considered a contribution to Citizens for Reagan under 2 U.S.C. §441a(a)(7)(B)(i). Such a contribution would be in excess of the contribution limitation applicable to Florida Friends at the time of the contribution. 2 U.S.C. §441a(a)(1).



Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within 10 days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan, and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,



William C. Oldaker
General Counsel

78040080147
78040062908

MAIL 443 Stein

● SENDER: Complete items 1, 2, and 3. "RETURN TO" space on reverse. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). Show to whom and date delivered 25¢ Show to whom, date, & address of delivery 45¢ <input checked="" type="checkbox"/> Show to whom, date, & address of delivery 85¢ <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom and date delivered \$1.05 <input type="checkbox"/> RESTRICTED DELIVERY. Show to whom, date, and address of delivery \$1.05 <input type="checkbox"/> Show to whom, date, and address of delivery and other (Fees shown are in addition to postage charges and other fees).	
2. ARTICLE ADDRESSED TO: MR. L. E. THOMAS, Chmn FLORIDA FRIENDS OR REAGAN 705 W. 15th St. FLORIDA FRIENDS OR REAGAN, P.O. Box 34201 MIAMI, FL 33101	
3. ARTICLE DESCRIPTION: REGISTERED NO. 4138654 CERTIFIED NO. 4138654 INSURED NO.	4. DATE OF DELIVERY 1977
5. ADDRESS (Complete only if requested) DATE OF DELIVERY 1977	
6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS	

PS Form 3811, Nov. 1976
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL
☆ GPO: 1976-O-203-456



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

Please be advised that the Federal Election Commission (the "Commission") has found reason to believe that the Florida Friends of Reagan ("Florida Friends") may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. We have numbered this matter MUR 443 (77).

Specifically, the Commission has found reason to believe that \$14,771.40 in "independent expenditures" by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan, the candidate's principal campaign committee, as a result of your apparent dual role as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan during the 1976 primary campaign. Additionally, you are reported as having received reimbursement for travel expenses from Citizens for Reagan.

If Florida Friends' expenditures were not independent expenditures within 2 U.S.C. §431(p), they would be considered a contribution to Citizens for Reagan under 2 U.S.C. §441a(a)(7)(B)(i). Such a contribution would be in excess of the contribution limitation applicable to Florida Friends at the time of the contribution. 2 U.S.C. §441a(a)(1).



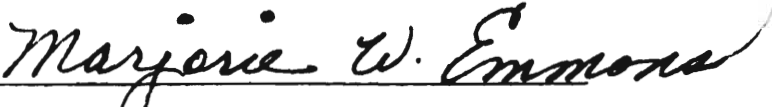
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of Reagan)
L. E. Thomas, Chairman)
Citizens for Reagan)

MUR 443 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election
Commission, do hereby certify that on October 27, 1977, the Commission
determined by a vote of 6-0 that there was Reason to Believe that
Florida Friends of Reagan had violated 2 U.S.C. Section 441a(a).


Marjorie W. Emmons
Secretary to the Commission

78040080149
78040062



FEDERAL ELECTION COMMISSION

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

October 18, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MAJORIE W. EMMONS *mwe*
SUBJECT: MUR 443 (77) - First General Counsel's Report

The above-mentioned document was transmitted to the
Commissioners on October 17, 1977.

Commissioner Thomson has submitted an objection to the report.

MUR 443 (77) will be placed on the Compliance Agenda for
the week of October 24. You will be notified as soon as the
date is set.





FEDERAL ELECTION COMMISSION

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

October 24, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 (77)

Please have the attached 7 Day Report on MUR 443 (77) distributed to the Commission on a 24 hour no-objection basis.

Thank you.



73010080151
78040062912

October 7, 1957

MEMORANDUM TO: Marye Hanson
FROM: Elissa T. Carr
SUBJECT: MUR 443 (77)

Please withdraw from 24 no-objection circulation
the 7 Day Report on MUR 443 (77).

Thank you.

78040080152

78040062913

October 6, 1977

MEMORANDUM TO: Marge Malone
FROM: Elissa F. Carr
SUBJECT: MUR 443 (77)

Please have the attached 7 Day Report on MUR 443 (77) distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040080153
~~70040062914~~

Oldaker



FEDERAL ELECTION COMMISSION

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

October 7, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 443 (77)

Please withdraw from 24 no-objection circulation
the 7 Day Report on MUR 443 (77).

Thank you.

730100400800154
62915



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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR NO. 443(77)
DATE COMPLAINT RECEIVED
BY OGC _____

ATTORNEY D. Stein

COMPLAINANT'S NAME: Information ascertained in the normal
course of carrying out the Commission's
supervisory responsibilities

RESPONDENT'S NAME: Florida Friends of Reagan
L. E. Thomas, Chairman
Citizens for Reagan

RELEVANT STATUTE: 2 U.S.C. §441a(a)

INTERNAL REPORTS CHECKED: Respondent Committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Florida Friends of Reagan made \$14,771.40 in "independent expenditures" for Ronald Reagan during April 1976. Mr. L. E. Thomas was Chairman of Florida Friends of Reagan and also appears to have been Florida Chairman of Citizens for Reagan.¹ In addition, Mr. Thomas received \$610.57 from Citizens for Reagan, Mr. Reagan's principal campaign committee, as reimbursement for travel expenses. The \$14,771.40 was not an independent expenditure within §431(p) if made in concert with or at the request or suggestion of any authorized agent of a candidate's principal campaign committee.

¹ According to Sharon Synder, Branch Chief, Presidential Branch, Disclosure Division, "Florida Citizens for Reagan" was assigned a Committee Identification number, but no reports were received from the Committee; the organization never materialized as an affiliate or independent committee of Citizens for Reagan; and individuals working in Florida on behalf of Mr. Reagan were, for reporting purposes, not part of the CFR (Citizens for Reagan) organization.

PRELIMINARY LEGAL ANALYSIS

The allegations stated above are from the records of the respondent committees and suggest that the \$14,771.40 spent by Florida Friends was spent in cooperation, consultation or concert with the candidate's authorized political committee and should be considered to be a contribution to that candidate. 2 U.S.C. §441a(a)(B)(i). Such a contribution would exceed the contribution limitation of Section 441a(a)(1) applicable to Florida Friends.

RECOMMENDATION

Find Reason to Believe that Florida Friends of Reagan violated 2 U.S.C. §441a(a). Send attached letter.

78040080156
78040062917



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. E. Thomas, Chairman
FLORIDA FRIENDS OF REAGAN
705 West 15th Street
Panama City, FL 34201

Re: MUR 443 (77)

Dear Mr. Thomas:

Please be advised that the Federal Election Commission (the "Commission") has found reason to believe that the Florida Friends of Reagan ("Florida Friends") may have violated the Federal Election Campaign Act of 1971, as amended, in connection with its support of Ronald Reagan's 1976 Presidential campaign. We have numbered this matter MUR 443 (77).

Specifically, the Commission has found reason to believe that \$14,771.40 in "independent expenditures" by Florida Friends may have been made in cooperation, consultation or concert with Citizens for Reagan, the candidate's principal campaign committee, as a result of your apparent dual role as Chairman of Florida Friends of Reagan and Florida Chairman of Citizens for Reagan during the 1976 primary campaign. Additionally, you are reported as having received reimbursement for travel expenses from Citizens for Reagan.

If Florida Friends' expenditures were not independent expenditures within 2 U.S.C. §431(p), they would be considered a contribution to Citizens for Reagan under 2 U.S.C. §441a(a)(7)(B)(1). Such a contribution would be in excess of the contribution limitation applicable to Florida Friends at the time of the contribution. 2 U.S.C. §441a(a)(1).



Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within fifteen (15) days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,

William C. Oldaker
General Counsel

73040080158
78040062919

Pursuant to 2 U.S.C. §437g(a)(4), the Commission advises you that Florida Friends has a reasonable opportunity to demonstrate that no action should be taken by the Commission in connection with this matter. Accordingly, the Commission requests that you submit any legal or factual material relevant to this case within 10 days of your receipt of this letter. Specifically, we request that you set forth information explaining your responsibilities and activities as Chairman of Florida Friends of Reagan, and as Florida Chairman of Citizens for Reagan.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless Florida Friends notifies the Commission, in writing, that it wishes the investigation to be made public.

If you have any questions, please contact David Stein, the attorney assigned to this matter, at (202) 523-4178.

Sincerely yours,

William C. Oldaker
General Counsel

PS
11/17/77

78040080157
78040062920

Florida Friends of Reagan
P. O. Box 490
Panama City, Florida

Dear Treasurer,

This letter is prompted by the Commission's interest in assisting candidates and committees to comply with the Federal Election Campaign Act, as amended. This law has, as you may know, many and sometimes complex provisions. 2 U.S.C. 431 (d) defines a "political committee" to mean "any committee, club, association, or other group of persons which receives contributions or makes expenditures in excess of \$1000 during a calendar year." The definition of contributions and expenditures further clarifies that such receipts and expenditures are those received or expended for the purpose of influencing the nomination for election, or election of any person to Federal office or for the purpose of influencing the results of a primary held for the selection of delegates to a national nominating convention of a political party.

A review of the Report of Independent Expenditures of Contributions by Persons (FEC Form 5) intended for the use of persons other than political committees or candidates) filed by your committee reveals that contributions in excess of \$1000 have been received. Therefore, it would appear that your organization would qualify as a "political committee."

Enclosed are relevant informational materials with regard to the Federal Election Campaign Act, including the appropriate forms for registration and reporting by political committees. Please examine these materials and if you agree that your organization is a political committee please submit a Statement of Organization on FEC Form 1 within ten days of receipt of this letter. In addition, your committee will be required to file disclosure reports in accordance with the provisions of 2 U. S. C. 434 on FEC Form 3. If your committee no longer supports candidates for Federal office and has no outstanding debts or obligations, then a single report when accompanied by a statement of disposition of residual funds, may be designated a notice of termination from reporting requirements.

If you believe that your organization does not qualify as a "political committee" please provide within ten days to the Commission a statement detailing the reason for this position.

If you have any questions concerning this matter, please do not hesitate to contact Ron Ewalt (202-382-3484) our Reports Analyst assigned to you.

Sincerely,

Gordon Andrew McKay
Assistant Director for
Disclosure and Compliance

7 9 0 4 0 0 8 0 1 6 0
-7 8 0 4 0 0 6 2 9 2 1

11-10-68

ctions on reverse side)

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

Both

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

EXPENDITURES OR CONTRIBUTIONS

BY PERSONS

78 JUL 12 P 1:25

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

Person (in Full)

FLORIDA FRIENDS OF REAGAN

2 This is a Report of

☐ Independent Expenditures☐ Independent Contributions☒ Both

Address (Number & Street)

P. O. Box 190. 705 W. 15th Street

City, State & Zip Code

Panama City, Florida 32401

Date of Report (check appropriate box)

☐ April 10 ☐ October 10 ☐ Amendment to _____ Report☐ July 10 ☐ January 31☐ Tenth day report preceding _____ election on _____ in the state of _____

(primary, general or convention) (date)

☐ Thirtieth day report following _____ election on _____ in the state of _____

(primary, general or convention) (date)

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

Name, Mailing Address & Zip Code of Each Payee

Purpose of Expenditure/Contribution

Date (month, day, year)

Amount

Name of Federal Candidate advocated by the Expenditure/Contribution

Expenditure to ☒ Contribution to

e complete list attached

Newspaper Ads in Wisconsin

4/5/76

\$14,771.40

Ronald Reagan

Expenditure to ☒ Contribution to

ng Advertising Co.

S. E. 8th Street

Miami, Florida 33131

Payment for newspaper ads in Wisconsin

4-5-76

\$14,771.40

Ronald Reagan

Expenditure to ☐ Contribution toExpenditure to ☐ Contribution to

Subtotal of Itemized Expenditures and/or Contributions.....\$ 14,771.40

Subtotal of Unitemized Expenditures and/or Contributions.....\$

Total Expenditures and/or Contributions.....\$ 14,771.40

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

(Signature)


July 9, 1976

(Date)

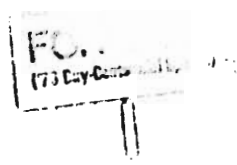
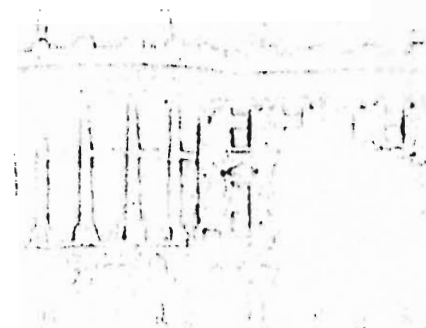
	<u>Amount</u>	<u>Mailing Address</u>
Herbert Stockham	\$ 300.00	2940 Argyle Road
W. D. Malone, Jr.	300.00	P. O. Box No. 2554
Jeanne D. Rodriguez	100.00	409 Melanie Way
Robert H. Shedd, MD	200.00	460 W. Marion Ave.
Robert Q. Borland, DMD	100.00	211 W. Main Street
Robert A. Rosasco	100.00	11830 S. W. 92nd Ave.
J. D. Danielson	100.00	1320 So. Dixie Hwy
Thomas L. Wolfe	100.00	6330 Cellini
Shirley P. Greene	100.00	3574 So. Moorings Way
Russell Wittenberg	100.00	8070 S.W. 140 Terrace
B. J. Guider	100.00	795 N. E. 94th St.
E. N. Claughton	100.00	34 S.E. 2nd Ave.
C. Salman-Ferro	50.00	2977 Coral Way
Charles V. Bradley	100.00	12855 Hickory Road
Pamela G. Cadman	50.00	9768 S.W. 106 Terrace
Hugh O. Rosser	50.00	7360 S.W. 130 St.
Ellen K. Ogle	1,000.00	518 Lido Drive
Gwyneth L. Cordiner	1,000.00	155 Bayview Dr, Bellair
Frederick W. Guardabassi	3,000.00	915 Middle River Dr.
Richard D. Pope, Sr.	100.00	5325 So. Orange Blossom
W. M. Funk	100.00	1625 W. Grant
Mack Pulmer	100.00	Raley Groves
William L. Raley	100.00	Box 37
Ben R. Adams	100.00	2921 Island View Cir.
Herman Russell	100.00	527 No. Palo Alto Ave.
Mrs. Donald H. Anderson	100.00	23 Isla Bahia Dr
Sally M. Lambert	150.00	346 Turtle Grass, Bay Point
F. E. Busby	300.00	Box 24203
George R. Gish	5.00	13365 Marquette Ave.
Terry Garrick	7.00	914 Magellan Drive
Lucille M. Stickle	25.00	177 Ocean Lane Drive
Vernice K. Baxter	50.00	1401 3rd Ave., West
Donnie Russell	500.00	118 Spring Valley Loop
Audrey Holloway	100.00	Langford Resort Hotel
Robert N. Langford	200.00	2814 Canal Drive
L. E. Thomas	5,784.40	

Birmingham, Ala. 35211
 Birmingham, Ala. 35211
 Maitland, Fla. 32751
 Punta Gorda, Fla. 33771
 Dothan, Ala. 36301
 Miami, Fla. 33176
 Coral Gables, Fla. 33134
 Coral Gables, Fla. 33134
 Coconut Grove, Fla. 33134
 Miami, Fla. 33158
 Miami Shores, Fla. 33131
 Miami, Fla. 33131
 Miami, Fla. 33142
 No. Miami, Fla. 33181
 Miami, Fla. 33176
 Miami, Fla. 33156
 Ft Lauderdale, Fla. 33311
 Clearwater, Fla. 33751
 Ft Lauderdale, Fla. 33311
 Cypress Gardens, Fla. 33511
 Orlando, Fla. 32809
 Orlando, Fla. 32805
 Winter Haven, Fla. 33891
 Auburndale, Fla. 33823
 Panama City, Fla. 32401
 Panama City, Fla. 32401
 Ft Lauderdale, Fla. 33311
 Panama City, Fla. 32401
 Tampa, Fla. 33623
 Elm Grove, Wis. 53122
 Sarasota, Fla. 33580
 Key Biscayne, Fla. 33149
 Birmingham, Ala. 35201
 Altamonte Sprgs, Fla. 32701
 Winter Park, Fla. 32789
 Panama City, Fla. 32401

Total..... \$11,771.40


 7-9-76

SHOULD WE SELL THE WHITE HOUSE?



GERALD FORD IS OUT TO BUY IT... WITH YOUR HARD-EARNED MONEY!

No American President in history has so blatantly used taxpayers' money (your money) to buy an election. This is not a mere allegation—it's a fact.

FACT: Six days before the Florida Republican Primary, Mr. Ford revealed that he would pour \$33 million of new federal contracts into the Orlando plant of Martin-Marietta Corp.

FACT: Five days before the election, Mr. Ford dispatched his Secretary of Transportation to Miami to announce that up to \$60 million would be available for a local rapid-transit program.

FACT: A week before the election, more than \$2 million was granted to subsidize Cuban exile lobster fishermen (there are 27,000 Cuban Republicans in Miami).

FACT: In vote-rich and elderly St. Petersburg, Mr. Ford promised a new VA hospital.

FACT: Despite the sharply curtailed spending for the space program, Mr. Ford said he'd create 150 new civilian jobs at Patrick Air Force Base, in heavily Republican Brevard County.

FACT: Jerry Thomas, the 1974 GOP nominee for Governor of Florida, made a surprise announcement of support for Mr. Ford, four weeks later, Ford added Thomas to the federal payroll as an undersecretary of the Treasury.

And after Mr. Ford was asked by a Florida voter when Interstate 75 would be finished in that state (from Tampa to Naples), he replied with laughter, "When do you want it finished?"

Is it really funny? Is it a joke that the money we taxpayers turn over to the Washington machine should be used primarily not for the good of the people, but for the good of politicians?

Is it a joke that with this year's federal deficit—at least \$100 billion—Mr. Ford should put us deeper into debt in order to bribe the voters?

The irony of all this is that while Gerald Ford gave the "Santa Claus" before the Florida election, after the election he ordered massive cutbacks at two Florida military bases... went from Santa to Scrooge, once the votes were counted.

We Florida Republicans witnessed the tragic spectacle of Mr. Ford's vote buying just a few weeks ago. And the same thing has happened, or is happening, in other states where there are elections. We are sorry for our nation that the presidency has been so degraded. And as Republicans, trying to survive in a hostile national climate, we are equally grieved for our Party.

We pray that our fellow Republicans in Wisconsin will rebuke this raw abuse of power.

If a Republican President wishes to buy votes and thus initiate pork barrel politicians... then it is time for Republican voters to say, "NO!"... time for Republican voters to insist on a higher standard for the highest office in the land.

We sincerely believe that Ronald Reagan, as evidenced by his record of reelection as Governor, represents that higher standard which America needs in The White House.

IMPORTANT!

Democrats, Independents and Republicans... ALL can vote for Ronald Reagan in the Wisconsin Primary. And YOUR vote counts (for example, in Florida, if fewer than six extra voters per precinct had decided to vote for Ronald Reagan, he would have carried the entire state... instead of the impressive 48% that he did carry. So, VOTE TUESDAY!!)



And should we give away the Panama Canal?

WISCONSIN'S REVERED SENATOR SPOONER, WHOSE LEGISLATION CREATED THE CANAL, WOULD TURN OVER IN HIS GRAVE IF HE KNEW OF THE FORD-KISSINGER SCANDAL.

The Panama Canal is ours... is sovereign American property fully paid for and legally recognized as U.S. territory. Yet, Gerald Ford and Henry Kissinger are fully committed to give it away to the Panamanian dictator, Gen. Omar Torrijos, who is an avowed Marxist and ally of Cuba's Fidel Castro.

Republican U.S. Senator John C. Spooner of Wisconsin introduced in 1902 the legislation which eventually created the Panama Canal. The mural in the Capitol at Madison pays homage to Senator Spooner's vision for linking the Atlantic and the Pacific to foster world commerce.

What would Senator Spooner, if he were living say to Gerald Ford today in response to this fantastic scheme to give away America's canal?

We believe that Senator Spooner, and most Americans, would reject the frightening and illegal Ford-Kissinger plan. What do you think?

YES! I WANT REPUBLICANS IN OTHER PRIMARY STATES TO KNOW THE FACTS ABOVE. HERE'S MY CONTRIBUTION TO HELP PUBLISH YOUR MESSAGE ELSEWHERE.

NAME: _____ ADDRESS: _____
CITY: _____ STATE: _____ ZIP: _____

AMOUNT OF CONTRIBUTION: \$ _____
(Personal check or money order payable to Florida Friends of Reagan)

OCCUPATION: _____

BUSINESS ADDRESS: _____

(All above information is required by federal law. NO corporate contributions may be accepted.)

MAIL TODAY TO: FLORIDA FRIENDS OF REAGAN, 1706-1707 15th STREET, PANAMA CITY, FLORIDA 32401

Florida Friends of Reagan is a 501(c)(3) non-profit organization. Florida Friends of Reagan is not a political party. Florida Friends of Reagan will report all contributions to the Federal Election Commission.

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78040062925

SHOULD WE SELL THE WHITE HOUSE?

FO...
(78 Buy-Contest...)

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NAME: _____ ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

AMOUNT OF CONTRIBUTION: \$ _____
(Personal check or money order payable to: Florida Friends of Reagan)

OCCUPATION: _____

BUSINESS ADDRESS: _____
(All above information is required by federal law. NO corporate contributions may be accepted.)

MAIL TODAY TO: FLORIDA FRIENDS OF REAGAN / 708 WEST 10th STREET / PANAMA CITY, FLORIDA 32401

78040080166

79040062927

Federal Election Commission

1335 F Street, N. W.,

Washington, D.C. 20563

Flood Receipts

Enclosed please find the following receipts:

From [illegible] for a Political Committee.

From [illegible] for a Committee.

From [illegible] for a Committee.

From [illegible] for a Committee.

Date 12-13-76

From Florida [illegible]

P. O. Box 400

Panama City, Fla. 32401

13 DEC 1976

Section Commission
treat, N.W.
on, D.C. 20463

Statement of Organization For a Political Committee

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

(See Reverse Side For Instructions.)

ED
ECTION
SION

170 DEC 16 AM 10:01

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

1(a) Name of Committee (in full) ☐ Check if name or address is changed

Florida Friends of Reagan

2 Identification Number

(b) Address (number and street)

705 West 15th Street

3 Date

12-10-76

(c) City, State and ZIP code

Panama City, Fla. 32401

4 Is this an amended statement? ☐ Yes ☒ No
If "YES" FILL IN ONLY THOSE LINES ON
WHICH THERE HAS BEEN A CHANGE

5 Check one:

☐ (a) This committee has been designated as the principal campaign committee for

a candidate for _____

(Federal office sought)

in the _____

Name of Candidate

Faction

to be held in the State of _____

(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION IN ALL CASES A TRUE STATEMENT OF ORGANIZATIONAL FILINGS
EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate, and is authorized by

to receive contributions and make expenditures with respect to the

held in _____

(Year of election in State)

committee _____

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION TO ACCEPT CONTRIBUTIONS)

☒ (c) This committee supports only one candidate _____

Name of Candidate

☐ (d) This committee supports more than one Federal candidate and is not a party committee

☐ (e) This committee is a _____

committee of the _____

6 Names of affiliated and/or connected
organizations _____

If the key words "Republican" or "Democratic" are used, the committee must be a party committee.
☐ Corporate or labor organization
☐ Cooperative
☐ Other (Specify) _____

Submit additional information on separate sheet, if necessary, and attach to this statement. Attach to the appropriate
section above where information is furnished on primary papers.

78040080167

(Page 3)

12 of Committee

List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Arthur B. Thomas	P O Box 490, Panama City, Fla. 32401	Chairman
Laurens P. Russell	P O Box 490, Panama City, Fla. 32401	Treasurer

Does the committee plan to stay in existence beyond the current calendar year? ☒ Yes ☐ No
If "Yes" for how long? 2 years
In the event of dissolution, what disposition will be made of residual funds? to the school

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

Name of bank, repository, etc.	Address with city and ZIP code
E. National Bank of Panama City	West 15th Street P O Box 2500 Panama City, Fla. 32401

1. List all election reports required to be filed by this committee with State and local jurisdictions, together with the names, addresses, and phone numbers of the preparers of the reports (other than reports filed with Clerks of State courts or with AGO-ABO).

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NOTE: Submission of false, erroneous, or incomplete information may result in a program suspending the borrower from the program until 2 years after the date of the submission.

• *Handwritten*
• *unintentional*
• *error*

Form 3
 375
 U.S. Election Commission
 1100 K Street, N.W.
 Washington, D.C. 20463

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

RECEIVED
 FEDERAL ELECTION
 COMMISSION

76 DEC 16 AM 10:01

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

1(a) Name of Candidate or Committee (in full) <input type="checkbox"/> Check if name or address is changed Florida Friends of Reagan		2 Identification Number
1(b) Address (number and street) P O Box 490, 705 West 15th Street		3(a) Is this a report of receipts and expenditures for only one election? <input type="checkbox"/> Yes <input type="checkbox"/> No
1(c) City, State and ZIP code Panama City, Florida 32401		3(b) If "Yes," for which election? Primary on 11-6-76 (general, primary, runoff) (date)
4 Type of Report (Check appropriate box and complete, if applicable)		
(a) <input type="checkbox"/> Amendment For (Which report)		(e) <input type="checkbox"/> January 31 Year End Report
(b) <input type="checkbox"/> April 10 Quarterly Report		(f) <input type="checkbox"/> Monthly Report (Month)
(c) <input type="checkbox"/> July 10 Quarterly Report		(g) <input checked="" type="checkbox"/> Termination Report
(d) <input type="checkbox"/> October 10 Quarterly Report		
(h) <input type="checkbox"/> Tenth day report preceding election on in the State of		
(i) <input type="checkbox"/> Thirtieth day report following election on in the State of		

Candidate or Committee Summary of Receipts and Expenditures

5 Covering Period: From Through		Column A This Period	Column B Calendar Year To Date
Section A - Cash Balance Summary			
6 Cash on hand January 1, 19		\$	\$
7 Cash on hand at beginning of reporting period		\$	
8 Total receipts (from line 13)		\$ 14,771.40	\$ 14,771.40
(c) Subtotal (Add lines 7 and 8)		\$ 14,771.40	\$ 14,771.40
9 Total expenditures (from line 25)		\$ 14,771.40	\$ 14,771.40
10 Cash on hand at close of reporting period (Subtract line 9 from line 8)		\$	\$
11 Contributed items on hand to be liquidated (attach itemized list)	\$		
Section B - Presidential Campaign Expenditures Subject to Limitation Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)			
12 Operating expenditures (from line 20)		\$	\$
13 Refunds and Rebates (from line 12)		\$	\$
14 (a) Expenditures subject to limitation (Subtract line 13 from line 12)		\$	\$
(b) Expenditures from prior years subject to limitation			\$
(c) Total expenditures subject to limitation (Add lines 14a and 14b)			\$
I certify that the foregoing is a true and correct statement of my knowledge and belief, as of the date of filing of this report.			
Signature of Candidate or Committee Chairman		Date 12-16-76	
Typed Name of Candidate or Committee Chairman		Typed Name of Treasurer or Secretary	

Note: Submission of false information is a criminal offense. Any person who knowingly furnishes false information may be subject to the laws regarding perjury and obstruction of justice, 18 U.S.C. § 1503 and 18 U.S.C. § 1505. See instructions for Form 3.

For further
 information
 Contact:



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

Any information received hereon may not be relied on or used by any person for purposes of soliciting contributions or for any commercial purpose.

78040080169
 78040080169

Commission
I.W.
20463

Detailed Summary Schedule of Receipts and Expenditures (Page 2)

Candidate or Committee	REPORT COVERING THE PERIOD	
	FROM	TO
	Column A This Period	Column B Calendar year-to-date
I - RECEIPTS		
Contributions and other income:		
Itemized (use Schedule A)	\$ 14,534.10	
Unitemized	\$ 237.00	
Sales and Collections Included Above		
List by event on memo Schedule D (\$)		
Subtotal of contributions and other income	\$ 14,771.10	\$ 14,771.10
Loans and Loan Repayments Received:		
Itemized (use Schedule A)	\$	
Unitemized	\$	
Subtotal of loans and loan repayments received	\$	\$
Refunds, Rebates, Returns Received:		
Itemized (use Schedule A)	\$	
Unitemized	\$	
Subtotal of refunds, rebates, returns	\$	\$
Transfers In:		
(a) From Affiliated Committee (Itemize on Schedule A Regardless of Amount)	\$	
(b) From other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c) Subtotal of transfers in	\$	\$
Total Receipts	\$ 14,771.10	\$ 14,771.10

PART II - EXPENDITURES

Operating Expenditures (Committees Not Receiving Federal Funds Include Fundraising, Legal, and Accounting Expenditures)		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of operating expenditures	\$	\$
Independent Expenditures (use Schedule E)	\$ 14,771.10	\$ 14,771.10
Loans, Loan Repayments, and Contribution Refunds Made:		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of loans and loan repayments made and contribution refunds	\$	\$
For Use Only By Presidential Campaigns Receiving Federal Funds, Exempt Fundraising, Legal, and Accounting Expenditures		
(a) Itemized (use Schedule B)	\$	
(b) Unitemized	\$	
(c) Subtotal of fundraising expenditures	\$	\$
Transfers Out:		
(a) To Affiliated Committee (Itemize on Schedule B Regardless of Amount)	\$	
(b) To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	
(c) Subtotal of transfers out	\$	\$
Total Expenditures	\$ 14,771.10	\$ 14,771.10

PART III - DEBTS AND OBLIGATIONS

26 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	
27 Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$	

PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES

28 Total Receipts (from line 24)	\$ 14,771.10	
29 Transfers to (from line 26)	\$	
30 Net Receipts (subtract line 29 from line 28)	\$ 14,771.10	
31 Total Expenditures (from line 25)	\$ 14,771.10	
32 Transfers out (from line 26)	\$	
33 Net Expenditures (subtract line 32 from line 31)	\$ 14,771.10	

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

Page 1 of 5 for
LINE NUMBER 15 A
(Use separate schedule(s) for each
numbered line)

A
Commission
#W.
L 20463

1 Candidate or Committee in full
FLORIDA FRIENDS OF REAGAN

78040080171
3
3
2
6
4
0
0
8
0
4
0
0
8
0
1
7
1

Name, mailing address and ZIP code Herbert Stockham 2910 Argyle Road Birmingham, Ala. 35213		Date (month, day, year) 4-25-76	Amount of each receipt this period 300.00
Principal place of business 4000 10th Ave., No. Birmingham, Alabama		Occupation Industrialist	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 300.00	
Name, mailing address and ZIP code W. D. Malone, Jr. P. O. Box 255h Birmingham, Ala. 35290		Date (month, day, year) 4-3-76	Amount of each receipt this period 300.00
Principal place of business 112 20th St., No. Birmingham, Alabama		Occupation Banker	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 300.00	
Name, mailing address and ZIP code Jeanne D. Rodrigues 109 Melanie Way Maitland, Florida 32751		Date (month, day, year) 4-2-76	Amount of each receipt this period 100.00
Principal place of business		Occupation Restaurant Owner	
		<input checked="" type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 100.00	
Name, mailing address and ZIP code Robert H. Shedd, MD 140 W. Marion Avenue Punta Gorda, Florida 33950		Date (month, day, year) 4-15-76	Amount of each receipt this period 200.00
Principal place of business		Occupation Medical Doctor	
		<input checked="" type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 200.00	
Name, mailing address and ZIP code Robert C. Borland, MD 211 West Main Street Madison, Alabama 37131		Date (month, day, year) 4-15-76	Amount of each receipt this period 200.00
Principal place of business		Occupation Physician	
		<input checked="" type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 200.00	
Name, mailing address and ZIP code Robert A. Robinson 1133 S. W. 11th Avenue Miami, Florida 33176		Date (month, day, year) 4-15-76	Amount of each receipt this period 200.00
Principal place of business		Occupation Attorney	
		<input checked="" type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date \$ 200.00	
Subtotal of receipts this page (line 15A)			\$ 900.00
Total this period (last page this line number only)			\$ 900.00

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

Page 2 of 5 for

LINE NUMBER 15 a

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

Name of Candidate or Committee in full

FLORIDA FRIENDS OF REAGAN

Full Name, mailing address and ZIP code

J. D. Danielson
1320 So. Dixie Highway
Coral Gables, Florida 33146

Date (month,
day, year)

Amount of each
receipt for this period

\$100.00

Principal place of business

Occupation

Director, Art Museum

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Full Name, mailing address and ZIP code

Thomas L. Wolfe
6330 Cellini
Coral Gables, Fla. 33146

Date (month,
day, year)

Amount of each
receipt for this period

100.00

Principal place of business

Occupation

Attorney

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Full Name, mailing address and ZIP code

Shirley P. Greene
3574 So. Moorings Way
Tocomat Grove, Florida 33133

Date (month,
day, year)

Amount of each
receipt for this period

100.00

Principal place of business

Occupation

Homemaker

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Full Name, mailing address and ZIP code

Russell Wittenburg
8073 S.W. 110 Terrace
Miami, Florida 33156

Date (month,
day, year)

Amount of each
receipt for this period

100.00

Principal place of business

Occupation

Pilot, Pan Am

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Full Name, mailing address and ZIP code

R. J. Gilder
206 E. S. 11th Street
Miami Beach, Florida 33139

Date (month,
day, year)

Amount of each
receipt for this period

100.00

Principal place of business

Occupation

Retired

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Full Name, mailing address and ZIP code

E. H. Clouston
24 E. P. 1st Avenue
Miami, Fla. 33131

Date (month,
day, year)

Amount of each
receipt for this period

100.00

Principal place of business

Occupation

Attorney

3-29-76

Check if Contributor is self-employed

Aggregate Year-to-date \$ 100.00

Subtotal of receipts for this page (line 15 only)

\$ 5

Total this period (last page this line number only)

\$ 5

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File A

action Commission
real, N.W.
n, D.C. 20463

Itemized Rec.'pts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 11 of 5 for

LINE NUMBER 15 A

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

Name of Candidate or Committee in full

FLORIDA FRIENDS OF REAGAN

Full Name, mailing address and ZIP code	Mack Fulmer 1625 W. Grant Orlando, Fla. 32805	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Produce Dealer	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Full Name, mailing address and ZIP code	William L. Raley Raley Groves Winter Haven, Fla. 33990	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Farmer	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Full Name, mailing address and ZIP code	Ben B. Adams Box 37 Auburndale, Fla. 33823	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Farmer	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Full Name, mailing address and ZIP code	John Herman Russell 2021 Island View Circle Panama City, Fla. 32401	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Automotive Sales Manager	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Full Name, mailing address and ZIP code	Mr. Donald M. Anderson 207 So. P. In Alto Avenue Panama City, Florida 32401	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Mr. Anderson	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Full Name, mailing address and ZIP code	Wally W. Jensen 23101 Bahia Center St. Petersburg, Fla. 33704	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation Mr. Jensen	1-4-78	100.00
<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-to-date \$ 100.00			
Subtotal of receipts (see instructions)			\$ 500.00
Total this period (this page - use line number only)			\$ 500.00

78040080173

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et, N.W.
D.C. 20453

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

Page 1 of 1 Pages

(See reverse side for instructions)

ne of Candidate or Committee in full

id. No.

Florida Friends of Reagan

II Name, mailing address and ZIP code

L. E. Thomas, Chairman

P. O. Box 490

Panama City, Fla. 324.01

Is This a Separate Report by a Committee Filing
on FEC Form 34? _____

imize expenditures which exceed, in the aggregate, \$100 within a calendar year.

[illegible]

Under penalty of perjury, I declare that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the forming of, or contribution to, a separate fund, in which or in part of any campaign materials provided by the candidate, his campaign personnel, or their agent.

2. *Chrysomelids* (17 spp.)

1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

J. Polym. Sci. Part A: Polym. Chem. **28**, 1079-1086 (1990)

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1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

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PRIORITY MAIL

Mar 443 (771)

CERTIFIED
No. 213910
MAIL

Milton & Greenwood Reporting Associates, Inc.
General Purpose Reporting
Suite 1110
1028 Connecticut Ave., N.W.
Washington, D.C. 20036
Phone: (202) 833-3598

Official
Transcript

Gary Johansen, Esq.
Federal Election Commission
Fourth Floor
1325 K St., N. W.
Washington, D. C. 20463

804385

Return Receipt
Requested

PRIORITY MAIL

21:2 WA 11 JUL 82

Milton & Greenwood Reporting Associates, Inc.

(formerly Reynolds Reporting Associates, Inc.)

R. E. Milton
President
P. L. Greenwood
Vice President
Secretary-Treasurer

General Stenotype Reporting

Suite 1110
1028 Connecticut Ave., N.W.
Washington, D.C. 20036

July 7, 1978

Phone:
202-833-3586
202-833-3599
Notary Public
D.C.-Va.-Md.

Gary Johansen, Esq.
Federal Election Commission
Fourth Floor
1325 K Street, N. W.
Washington, D. C. 20463

Re: BEFORE THE FEDERAL ELECTION COMMISSION: In the Matter of:
FLORIDA FRIENDS OF REAGAN, MUR 443 (77).

Dear Mr. Johansen:

Transmitted herewith for filing the deposition of LUTHER EDWARD
THOMAS, taken June 29, 1978. Mr. Thomas having waived the reading and
signing.

Sincerely yours,

MILTON & GREENWOOD
REPORTING ASSOCIATES, INC.

D. S. George
D. S. George

Administrative Assistant

cc:
file

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78040080176

LAKE/BL

- - - - - X
:
In the Matter of: :
:
FLORIDA FRIENDS OF REAGAN : MUR 443 (77)
:
- - - - - X

Thursday, June 29, 1978

LUTHER EDWIN THOMAS

a witness in the above-entitled matter, called for examination by counsel for the Federal Election Commission, taken at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D. C., beginning at 1:10 p.m., before Bobbie C. Lake, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

(NOTARY: D.C.-VA.-MD.)
OFFICIAL REPORTERS
1028 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036
Phones: (202) 833-3598
833-3599

For the Federal Election Commission:

WILLIAM C. OLDAKER, ESQ.
and
GARY JOHANSEN, ESQ.
1325 K Street, N.W.
Washington, D. C. 20463

For Luther Edwin Thomas:

JOHN R. BOLTON, ESQ.
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Also Present:

PAUL LOVEJOY

C O N T E N T S

EXAMINATION BY COUNSEL FOR:

FEDERAL ELECTION COMMISSION
(Mr. Johansen)

WITNESS:

LUTHER EDWIN THOMAS

3

LUTHER EDWIN THOMAS
(Mr. Bolton)

55

E X H I B I T S

Marked for identification and attached:

Page

Government Exhibit No. 1 - National Car Rental Invoice	45
Government Exhibit No. 2 - National Car Rental Invoice	46
Government Exhibit No. 3 - Southern Airways ticket stub	48
Government Exhibit No. 4 - American Express bill	49

MEMORANDUM
2-A
SECTION 1

EXHIBITS - cont'd

Marked for identification and attached:

Page

Government Exhibit No. 5 - check stub record for \$11.58	50
Government Exhibit No. 6 - check stub record for \$69.27	50
Government Exhibit No. 7 - check stub record for \$23	51
Government Exhibit No. 8 - check stub record for \$67.20	52
Government Exhibit No. 9 - interrogatories	56
Government Exhibit No. 10 - answers to interrogatories	56

MEMORANDUM
2-A
SECTION 1

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Thereupon

LUTHER EDWIN THOMAS

a witness, was called for examination by counsel for the Federal Election Commission and, after having been sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. JOHANSEN:

Q I might start as an introduction by saying that my name is Gary Johansen. I am here today representing the Federal Election Commission, and accompanying me is William Oldaker who is the General Counsel of the Federal Election Commission, and Paul Lovejoy who is a paralegal for the Office of General Counsel.

This is a deposition of L. E. Thomas, which is in furtherance of the Commission's investigation into possible violations of the Federal Election Campaign Act by the Florida Friends of Reagan, and the matter has been designated as MUR 443 (77).

The deposition is being conducted pursuant to the Commission's powers as stated in 2 U.S.C. Section 437d(a)(3). Mr. Thomas is represented by counsel, John R. Bolton, who is present here today.

Could you tell us your full name, please?

A Luther Edwin Thomas.

Q What is your home address?

A 2814 Canal Drive, Panama City, Florida.

Q How long have you been a resident of Florida?

A Thirteen years.

Q Are you married?

A Yes.

Q What is your wife's name?

A Virginia.

Q What is your occupation?

A Automobile dealer.

Q What is the occupation of your wife?

A Housewife.

Q Do you have a business address?

A 705 West 15th Street, Panama City, Florida.

Q You said your occupation is automobile dealer. Do you own an automobile dealership?

A Yes.

Q What is the name of your dealership?

A Tommy Thomas Chevrolet.

Q Is it incorporated?

A Yes. It is incorporated.

Q Were you involved in Governor Reagan's campaign for president?

A Yes.

Q When did you first begin supporting Governor Reagan?

MR. BOLTON: Excuse me. Could I just ask a question? Do you intend to cover in this deposition matters that have been answered in response to questions enclosed with Mr. Oldaker's letter from earlier in this year?

MR. JOHANSEN: The interrogatories?

MR. BOLTON: That is correct.

MR. JOHANSEN: Yes. Those matters will be covered.

MR. BOLTON: You are going to ask --

MR. JOHANSEN: Not specifically verbatim, but those matters could be touched upon again.

BY MR. JOHANSEN:

Q I am sorry; what time did you say you first became involved in Governor Reagan's campaign for president?

A When he announced. I think it was initially November 20, 1975. I had been a Reagan supporter before that, but that is the official time.

Q When did you become involved in an official capacity?

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A I became his Florida chairman when he announced.

Q So you were selected or appointed as chairman at the time he announced for the presidency?

A Yes.

Q How did the selection come about?

A I had been the former Republican state chairman, and everybody knew I was a Reagan supporter, philosophically, so I guess, as far as I know, they never talked to anybody else about doing it. They asked me to do it, and I was more than willing.

Q You say, "they;" did you talk to anybody else? Who did you speak to?

A Senator Laxalt and David Keene, and I think maybe John Sears.

Q What were their involvements in the campaign?

A Senator Laxalt was, I guess, the honorary chairman, and he was the chairman. John Sears, I guess, was called the campaign manager, and I assume he was paid. And David Keene was a field director.

Q What did you discuss at this meeting you had with those three individuals? Generally, what did you discuss?

A I don't think I met with them all at the same

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time. I talked with them at different times, and we discussed what you would normally discuss. We knew when the date of the primary would be, and we had to have a state-wide organization, and had a very limited budget and things like that.

Q During the period of time they initially contacted you, to become chairman, what did you discuss during that period?

MR. BOLTON: Are you referring to the period of time in November, 1975?

MR. JOHANSEN: When he was first contacted in regard to becoming chairman?

THE WITNESS: I can't specifically tell you what we discussed.

BY MR. JOHANSEN:

Q Just generally.

A Discussions about how many people I could afford to hire; how many volunteers we had to have; and how many people we could afford to hire; where we would put the state office; dates.

Q Did you discuss the national campaign at all?

A I can't say because I really -- I am sure we talked about it vaguely, what his chances were against Ford, et cetera, but I can't remember anything specific that we

talked about.

Q Do you remember when you first set up office as chairman of Citizens for Reagan in Florida?

A Yes.

Q What was that date?

A Well, I can't tell you exactly but it was immediately thereafter. I would say we opened our first office some time in December; maybe it was January. But, you know, as soon as possible -- practical -- after he announced.

Q This first discussion that you had was that a telephone conversation, or did you meet with one or all three individuals in person?

A At one time or another I met with them individually.

Q Did those meetings take place in Florida?

A They took place in Washington. I might have met with David Keene in Florida, and then I also met him in Washington. But I met John Sears and Senator Laxalt up here.

Q Who was your main contact with the Citizens for Reagan campaign people?

A David Keene.

Q What was his function with Citizens for Reagan?

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A I guess you would call him the field director. He was the main one we had any contact with, and I assume all the other states were the same way.

Q What kind of assistance did he give you? Did he give you any assistance?

A Well --

MR. BOLTON: Maybe you could be a little more specific.

BY MR. JOHANSEN:

Q Did you discuss strategy for the Florida campaign? Did you discuss how many offices would be set up? Did you discuss finances?

A Yes.

Q Did you discuss any national strategy?

A I don't think we discussed any national strategy.

Q Did you discuss the role of Florida and how that fit in with the other states in the national program?

A No. Not that I know of. I can't remember everything we talked about, but I can't see why we would.

Q How about with Mr. Sears or Senator Laxalt? Did you have any discussions with them?

A None.

Q Your conversations with Mr. Keene, were they usually telephone conversations?

A He came to Florida some, but usually it was on the phone.

Q Did you ever go to see him?

MR. BOLTON: In Washington?

BY MR. JOHANSEN

Q Where was Mr. Sears located?

A Mr. Sears was located in Washington, but during the primary he was down in Florida several times. I didn't always see him, and didn't always see Keene. They were doing their jobs, and I was doing mine. Sometimes our paths would cross.

Q During this period how often did you come to Washington to see Mr. Sears?

A I don't think I came to Washington specifically to see him. I met him in Washington one time.

Q That one time was when they first contacted you about becoming chairman?

A Yes.

Q Where did that meeting take place in Washington?

A Some hotel. It was a social activity. It wasn't

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a called meeting or anything like that. There was Sears and maybe David at the same time, and I don't remember whether Sears was there when Senator Laxalt was there, but it was not a business-type meeting in an office. It was -- I can't remember -- in some hotel, but I don't remember which one.

Q It was a reception or a casual occasion?

A No. We just -- I can't remember even whose room it was in.

Q Where there other people being solicited to become campaign chairmen in their states at that meeting?

A No. I don't think so.

Q During the time that you were chairman, did you have occasion to talk with Governor Reagan about the campaign?

A Sure.

Q Many times?

A During the primary yes, because I rode with him a lot of the time when he was making his speeches.

Q Did you talk about national strategy?

A Hell, no. I had enough problems in Florida. That was my only concern, and that was the major concern. Florida

was the first big primary with the exception of New Hampshire, and we didn't discuss New Hampshire except for how are things going; something like that.

Q Maybe you have told me this before, but how often did you talk with Mr. Sears, who was your contact.

A He wasn't my contact. David Keene was the field man.

Q I am sorry. With Mr. Keene?

A I talked to him fairly often. Every time I wanted to talk to him I could after I found him.

Q Once a day?

A Maybe twice a week and sometimes once a week. I don't know, but I would say on an average twice a week.

Q Could you describe your duties as Florida chairman of Citizens for Reagan?

A Mainly I recruited people; recruited people in the counties; county chairmen; field people.

Q How many people did you have underneath you; any idea?

A Volunteers I knew personally and contacted personally; I would say 150 that I dealt directly with, and there were thousands coming in and out I may have spoken to,

but didn't know and wouldn't know if I saw them again.

Q How many field offices were there?

A Well the headquarters were in Orlando, and we had an office in Tampa. We had an office in Winter Haven, St. Petersburg, Miami, Fort Lauderdale; probably ten.

Q That's good for you to remember all those.

A Well, they are the biggest cities. There are not many Republicans in Florida. We are congregated in several counties.

Q Outside of Mr. Keene is there anyone else in the Citizens for Reagan Committee who you had much contact with while you were chairman?

A Well, Neal Peden; she was one of David's secretaries, and she was kind of a coordinator. I talked to her more than anybody.

Q Once a day?

A Probably on an average sometimes three or four times, and other days maybe none. I had a lot of contact with her.

Q What did you talk to her about?

A Where is David? They are going to change the schedule and blah, blah, blah; you know.

Q In your discussions with Mr. Keene or his secretary did you ever talk about strategy in other states, what other states were doing in relation to what you were doing in Florida?

A Not really because we were the number two primary. In fact, I thought we were the most important primary and still think we were. I cried when we lost, because we should have won, and it was bad when we didn't win. I think the Florida primary was important.

Q Did you ever discuss possible future plans that the Citizens for Reagan Committee had?

A I wasn't interested in anything except Florida. I didn't want any job; nothing else.

Q Did you talk about finance as to how the Citizens for Reagan Committee was being financed?

A No. We did talk about finance, not specifically that, but when I took the job, they told me they had the money for the Florida campaign, and afterward I found out they didn't. I guess that's par for the course.

Q And you raised money in Florida for the campaign in Florida?

A We did; yes.

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Q Did you ever speak to other state chairmen of the Citizens for Reagan Committee?

A Yes.

Q Do you recall what other states possibly?

A Yes. The New Hampshire chairman. Just by a quirk the New Hampshire chairman opened a restaurant in Sarasota during the primary time. I didn't know him really, but when he opened the restaurant, I went by there and saw him.

I talked to the North Carolina chairman. I talked to other people that didn't have primaries like Mississippi that I can think of; and Alabama. I don't think either one of them had a primary.

Q What did you talk about; what did you discuss?

A I guess they called me about how the campaign was going in Florida.

Q Did you ask about their states?

A They didn't have a primary campaign. In Mississippi they have a caucus-type deal. In Alabama they don't have a primary. Anyway I don't know how they select their delegates. I think they have a state convention.

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Q How about New Hampshire?

A What do you mean?

Q You said you talked to the state chairman for New Hampshire.

A We didn't talk about anything specific -- how is it going to go? Are you going to win? And they assured me they were.

Q You talked generally about Governor Reagan and his campaign?

A Yes.

Q Did the national committee provide you with campaign material like posters or buttons?

MR. BOLTON: Excuse me. The national Reagan committee or the Republican National Committee?

MR. JOHANSEN: The national Reagan committee.

THE WITNESS: Sure. We didn't have any.

BY MR. JOHANSEN:

Q How about newspaper layouts?

A Yes.

Q Contributor lists for people you might want to contact in Florida?

A They forwarded me the letters of people who

wrote in. And here again -- remember this was the second primary, a week after the New Hampshire primary. At that time we didn't have a big contributor list.

Q But you used the letters from contributors that were supplied by the --

A Sure. I separated them and gave them to the county chairmen for contact. They returned all contributor money; they said they would like to work, et cetera.

Q When did the Florida Citizens for Reagan Committee terminate?

A Are you talking technically or actually? The day after the primary I closed the big office in Orlando, the state office, and we had a CPA who was the treasurer, and he had some space in his office which we rented. We moved everything we could to his small office. We still had bills, telephone deposits, things like that that had to be paid. But the morning after the primary, as soon as I woke up, we tore down all the partitions and things like that that we had put in this place. It took nearly all day to do that. I guess it did take all day.

The next morning I drove to Tampa. We already had a plan to get all these things done because I needed to get

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back to work. I went to Tampa. The Tampa office was already closed. I think when I got there, there was maybe one volunteer there, and they were waiting to get the phones.

I drove to St. Petersburg where we had a major office, because St. Petersburg has a major Republican party, a big one. They already had everything torn down and boxed up. I took the people there to lunch and drove on home, 400 or 500 miles, and that was the end of it.

I still had to contact these people by phone. We had telephone problems, things like that which I had to do; not of major significance, but they were important.

Q You said you contacted these people by phone. What people?

A The people who had been in charge of the counties all over the state, and they called me, or I called them, or they wrote me about, you know, we have a bill that hasn't been paid. And at the time there were quite a few Reagan bills that had not been paid. Some of them were clerical errors; bills didn't get in on time, little things like that.

If you have ever been in a campaign, you know advance men went around and contracted for the bills, and somebody had to pay them. So that is why we kept one girl in the

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CPA's office in Orlando with the checkbook, and as soon as we had the money we paid them, and if we didn't have the money they were forwarded to Washington for payment.

Q Who were the advance men?

A They were professionals. Most of them were from California. I think they had worked for the Governor out there.

Q I believe the primary was on March 9; is that correct? So these activities would have been on the 10th of March?

A Yes. Was the 9th the right day?

MR. BOLTON: I think the 9th was right.

THE WITNESS: I don't know why, I thought it was the 6th.

BY MR. JOHANSEN:

Q So technically you would say that you terminated then on the day after the primary?

A Well, I tried to. I felt I had to go back down there the one time and turn the records over to the county Republican office because we had no place to put them, what was left. Of course, it all pertained to Florida, so we gave them what records we had left.

Q In your January, 1978 response to the Commission's interrogatories you stated you were involved with the Citizens for Reagan Committee until termination on March 11, 1976. I think this would be two days after the primary. And then you said, "By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary."

Is that what you meant by wrapping up obligations?

A Yes.

Q How long did it take you to wrap things up?

A When we closed the office in Orlando at the end of the month I think, as well as I can remember, that really put the finishing touches to it. All the little telephone deposits and things like that had been returned by that time.

Q You say when you closed the Orlando office when?

A The second office. We closed the big Orlando office the day after the primary. We moved the books to the CPA's office.

I was up here when they formed the Federal Election Commission. They had a briefing up here, and they gave us all the guidelines, everything you can do and can't do, and

I tried in the hardest way, particularly after Watergate, to make damn sure that every "I" was dotted and every "T" was crossed, and that is why we had a CPA for treasurer, and we thought we were doing everything just exactly.

Q You said you closed up the little Orlando office in November?

A No. We closed the big office and moved it to the little office the day after the primary. Then it was sometime in April I went back down there and took the girl to lunch and gave all the documents and all to the Republican county committee, gave the landlord back the keys to his office, and that was the end of it.

Q So in April sometime you officially terminated and wrapped things up?

A In the meantime I talked to her on the phone, but I wasn't down there, and I can't remember -- I think that was the only time I went down there. I might have gone one other time. I don't think I went but one other time. It is a long way from Panama City to Orlando, and air service isn't good, so --

Q So it was approximately a month?

A Yes.

Q During this wrap-up period of time, when you were

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wrapping up the offices in Florida, how often did you speak with people from the Citizens for Reagan Committee?

A You are talking about the people outside of the State of Florida?

Q Yes.

A Very, very seldom.

Q Did you have any meetings with them?

A No. Not that I remember. I didn't have any reason to have a meeting.

Q When you spoke with them, you spoke with Keene or his secretary?

A Yes.

Q Anyone else you can remember?

A Not that I can think. We were mainly concerned with telephone deposits being returned and things like that.

Q Did you discuss the national campaign at all during those conversations?

A I probably asked how it was going, but that is all, not anything in depth, not specifically. How does it look, et cetera?

Q Did you discuss any other states in particular that you can remember?

A No. Not that I can remember.

Q Did you talk about campaign strategies in other states or what states might be crucial?

A There was one we probably discussed. We probably discussed Mississippi because the guy in Mississippi was a good friend of mine, and he turned out to be not a good friend of mine, and we could see it coming. Mrs. Peden, this lady, is from Mississippi, that worked for Dave Keene.

Q When you dismantled the Florida office did anyone from the Citizens for Reagan Committee help you in doing that?

A No.

Q They were mainly concerned about getting bills paid and those types of things?

A As quickly as the primary was over in Florida, there were two or three guys -- I can't remember who was there. The next morning they were gone. There was somebody down there that night, but they took off. We didn't see any of them.

Q While you were chairman, did you have any discussions with the national treasurer for the Citizens for Reagan campaign committee?

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A I don't know who the national chairman was. Who was it? If I could think who it was -- I don't want to say I didn't, but I don't know who it was. Do you know who it was? I ought to be able to remember that, but I can't tell you.

MR. BOLTON: That is okay.

BY MR. JOHANSEN:

Q Can you describe the inception of the Florida Friends of Reagan Committee?

A Do you want it in detail?

Q Yes. In detail.

A I woke up one night mad as hell.

Q When was this?

A I think it was right after the North Carolina primary.

Q Do you remember the approximate date for that?

A Sometime in the latter part of March. And it would take me an hour to tell you what brought it about. Do you want to know it?

Q Sure. You don't have to take an hour.

MR. BOLTON: Take whatever time you feel you need.

THE WITNESS: I can understand why I am like I am -- and

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I never met this man until an hour ago -- I am sure a lot of people can't understand why I am like I am, why I did it, or why I would do it again. Maybe I shouldn't say that, but I will. And all you fellows are much younger than I am, and you probably have a hard time understanding this.

I was born in New York a rock-ribbed Republican. And you have heard of dropping out of school? I didn't drop out of high school; I jumped out. The day after I was 17 I joined the marines. By the time I was 19 I was a combat veteran. I married a girl from Alabama when I was in the marines, and when I was discharged, I went down there. I had been overseas, and I was still not 21. I went to the courthouse the day I was 21 to register to vote because these things are important to me. I found out that I couldn't register as a Republican and I raised all kinds of hell in the courthouse, because it is important to me to vote. It is very important to me. And I had an uphill struggle in Alabama for all those intervening years because I was a Republican.

The first automobile dealership I had -- I started out as a salesman, did very well, got a small dealership in a small town where Auburn University is. It's a small town,

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and I was the only Republican in town. So I took abuse for years, professional abuse, and the only damn thing that protected me were the wildlife laws, I guess, because I was an endangered species.

I was very active in the formation of the Republican Party in Alabama. After the '64 election I was lucky enough to get a Chevrolet dealership in Florida. I became active in the Republican Party in Florida. I became the state chairman and served four years.

And Jerry Ford is a very good friend of mine. I think he was a wonderful man, but I was opposed to the buddy system, and Governor Reagan spoke my language. And in all the time I rode with Governor Reagan during the Florida primary I kept trying to get him to break the 11th commandment, to quit being too much of a gentleman. He is still too much of a gentleman. If you are going to take someone's job away from them, you have to give them a reason to vote for you.

The reason we lost in Florida was because Reagan wouldn't break the 11th commandment. He couldn't criticize President Ford, and because the last week before the Florida primary, Ford came to Florida and unashamedly just spent

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millions of dollars. St. Petersburg, in the biggest Republican county, got a hospital which several other states were in contention for. Martin Marietta got a \$33 million defense contract in Orlando. The Secretary of Transportation came to Miami and gave \$15 million for a rapid transit system.

I was incensed. And Florida has five Republican congressmen, and those five Republican congressmen came back to Florida a week before the primary and told their constituents that they had all kinds of goodies for them; they had to support the President; otherwise I am convinced in my heart we would have won the Florida primary.

The people in North Carolina had told the Citizens for Reagan people here, David Keene, John Sears, to stay the hell out of North Carolina, they wanted to run the campaign their way and got a little tough and were critical of President Ford, and they won.

Okay, so after the North Carolina primary, I woke up in the middle of the night and thought, you know, damn it, Reagan will never win anything unless he does become more critical.

BY MR. JOHANSEN:

Q Did you talk to people in North Carolina about this?

A Yes.

Q This was before the North Carolina primary or afterward?

A Before, I think.

Q And you discussed strategy with them?

A Not in depth. But basically, they told me that they wouldn't let Keene and these other guys come in. They were running it their way.

So I called this advertising friend of mine, a local advertising agency who does commercial advertising who works for us, and we discussed it. And the Wisconsin primary was coming up in no time. We just had no time to get ready, and he got on the phone and found out how many papers there were that could run an ad on the Sunday before the Wisconsin primary, which was on Tuesday.

Q Let me interrupt. Did you discuss this with any other people aside from the advertising person?

A Yes. I took the brochure that was given to me as a Republican state chairman to my lawyer and said -- now in Florida -- he wasn't aware of this because in the northern part of the state our papers don't carry like in the southern part. But the Conservative Union had run an ad in the

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Florida papers for Reagan; so had Joseph Coors from Colorado. So I went to him and said here are the guidelines. Would you study them, and is there any reason why I can't set up a deal called, "Florida Friends of Reagan?"

He kept the booklet and called me the next day and said there was no reason why you can't as long as you file the forms, and I tried to do that.

Q Did you solicit other people's help or solicit other people to become members of Florida Friends of Reagan?

A Yes.

Q How many people?

A The ones I reported there.

Q Reported where?

A In the reports I filed with you all. The people who sent in money, I reported it all.

Q With the Federal Election Commission?

A Yes.

Q Did any of them help you organize the committee?

A No. Some might have called somebody else. Some that gave maybe a thousand dollars might have called somebody else, but I think everybody on there is a friend of mine that gave money. One guy may have called somebody

else for me because --

Q Did you discuss your idea with anyone from the Citizens for Reagan Committee?

A No. Not until -- in fact, when Dave Keene called me, I told him, and he asked me not to. That was about two or three days before, and he told me it was going to be counterproductive and not to do anymore. I intended to do it in other states, but after he said don't do it, I didn't.

Q Did you discuss the idea with anyone in other states about placing advertisements in other newspapers in other states?

A No.

Q Did you ever talk to Governor Reagan after the primary in Florida?

A Not until the convention.

Q You attended the convention?

A Yes.

Q Were you a delegate?

A Yes. I was a delegate.

Q Maybe you said this, but approximately how many people would you say were involved in Florida Friends of

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Reagan, say the first tier of people; not people who gave contributions?

A Me.

Q It was basically your committee?

A Yes. Me and my wife, and of course, I had to have an advertising agency.

Q How about some of the individuals that worked on the Citizens for Reagan Committee that had different offices throughout the state? Were any of those people involved at all?

A No. Except, I can't remember all the people that gave money now, but some of the people that were Reagan workers in the primary and Citizens for Reagan contributed to Friends of Reagan. Is that what you mean?

Q Yes. They gave contributions?

A Yes.

Q Could we go back to Long Advertising again? How did you make the decision to contact them?

A They do advertising work for me.

MR. BOLTON: For your company?

THE WITNESS: Yes.

BY MR. JOHANSEN:

Q Did they do any advertising work for the Citizens for Reagan Committee?

A I wouldn't think so. I think all their advertising was totally out of Washington.

Q Did the Long Advertising Agency -- were they the ones who made the decision as to which newspapers to put ads in in Wisconsin?

A Yes.

Q Were those similar to ones in the Florida primary?

A No. They had nothing to do with them.

Q Who made them up?

MR. BOLTON: Which ones?

MR. JOHANSEN: Wisconsin.

THE WITNESS: Long Advertising took my ideas and made the ads. I didn't see the ads until afterward because they weren't typed to send to me for proofing. I had to trust them.

BY MR. JOHANSEN:

Q In your interrogatories I think you said you used a picture of Governor Reagan, and Mr. Bolton has a copy of the interrogatories. Maybe you would like to look at those. You said you got it from the Wall Street Journal.

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MR. BOLTON: The answers to the interrogatories identified the source of the copy, layout and design of the advertising paid for by Florida Friends of Reagan, and that was the response.

THE WITNESS: Long did it. They say the picture of the Governor was copied from the Wall Street Journal.

BY MR. JOHANSEN:

Q You don't know how they got it from the Wall Street Journal?

A No.

Q It wasn't from Citizens for Reagan, the picture?

A I don't think so. I have seen that. I guess it is one they mailed to newspapers and all, and they used it, but I don't know.

Q You also used a photograph of the White House, which you said was obtained from H. Armstrong Roberts Stock Photo Supplier. Do you know how Long Advertising obtained it from Mr. Stock?

MR. BOLTON: I think the person's name is H. Armstrong Roberts, and I think his business is Stock Photo Supplier.

BY MR. JOHANSEN:

Q Do you know how they obtained his name to get the

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picture of the White House?

A When I called Mike Thompson about it, he said they get them. It is like an office supply place, I assume.

Q Do you know if Long contacted anyone from the Citizens for Reagan campaign committee?

A I don't know. I couldn't say definitely. I don't know.

Q When were the ads actually placed in the Wisconsin newspapers?

A What day?

Q Yes. Do you remember in relation to the Wisconsin primary?

A Yes. They were on Sunday, and the primary was on Tuesday.

Q Do you know in how many papers the ads were placed?

A Ten or twelve I would guess; ten or twelve.

MR. BOLTON: It says in the interrogatories' answers 14.

THE WITNESS: Fourteen.

BY MR. JOHANSEN:

Q How did you raise money for the placement of these ads? You said you solicited contributions earlier. How did you do that?

A Called some of these friends of mine, people in Florida. Most of them that contributed I called. I didn't have time to write letters.

Q So they were either made by word of mouth or in a telephone conversation?

A Yes.

Q Who did the calling?

A I did.

Q Did your wife help you?

A No.

Q Did anyone else do any calling?

A No.

Q When did you begin soliciting contributions for Florida Friends of Reagan?

A I guess as quickly as I found out I was going to do it.

Q A couple of days after you originally thought of the idea?

A Yes.

Q Do you remember when the Florida Friends of Reagan received their first contribution?

A Not exactly.

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MR. BOLTON: I think that is reflected in the report filed with the Commission on March 28.

MR. JOHANSEN: We can determine that.

BY MR. JOHANSEN:

Q The people you contacted either by word of mouth or on the phone, did you have any solicitation lists or was it just friends of yours?

A Yes. They were just close friends, most of them, because I didn't have time to go to any list. I am sure I could have gotten more money if I had gone to lower levels, but most of the people I called were people I knew could afford to give \$1,000 or \$500.

Q Did you use any list that had been used by the Citizens for Reagan Committee in the primary?

A I didn't use a list. I have known these people for years. I didn't need a list. They were active in the Republican Party and all.

Q I think you said earlier that you considered putting ads in newspapers in other states other than Wisconsin. Did you consider any other projects besides newspaper advertisements?

A Such as? I don't really know what you mean.

Q So primarily you only considered putting newspaper advertisements in other states?

A Yes.

Q You didn't consider involving yourself in other states' campaigns in any way?

A No.

Q I guess as chairman of Florida Friends of Reagan you were the decision maker?

A Yes.

Q Why did you put the advertisements just in the Wisconsin papers?

A Just in the specific Wisconsin papers he put them in?

Q Generally why did you decide to put advertisements in newspapers in Wisconsin?

A Because that was the primary coming up. It wouldn't do any good to put them somewhere where there wasn't a primary.

Q Well, you stated earlier that you thought about placing advertisements in other states' newspapers. Why did you decide against doing that?

A Two reasons: Keene told me not to do it,

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specifically, absolutely not to do it because he thought it would be counterproductive, and there was not any great response from the people in Wisconsin for contributions. I thought the people in Wisconsin would contribute enough that you could go in and run ads in some -- in the Republican Party in Florida prior to this, not having anything to do with any specific candidate or anything like that, we would run ads, and people would send in contributions, and we would take that money and put ads in other papers to build your list of standing members.

Q So you were hoping to get contributions from people in Florida?

A Not Florida. Wisconsin.

Q Did you actually solicit contributions in the ads?

A Yes. There was a coupon. We didn't receive a lot of contributions from them. Those that gave a contribution of any size are listed.

I returned a lot of small contributions to Wisconsin and wrote a little note saying, "We are not going to run the ads, and so I am returning your money."

Q Why did you return the contributions?

A Because I wasn't going to run any more ads, and I

didn't want to mislead them.

Q I think in your interrogatories you stated that you paid Long Advertising on April 5th, 1976, for their services, and the payment was for \$14,771.40?

A That is what it says.

Q Can you tell me how that payment was made?

A I guess I sent them a check.

Q Was it a committee check, or did you pay them personally?

A Maybe both. It may have been partly from the committee and partly personally, because I didn't know until -- in other words my contribution and my wife's were made to just balance out, just balance the bills; so we had nothing left over.

Q This was your contribution to --

A To the Florida Friends of Reagan.

Q So you don't remember exactly if you made part of the payment to Long Advertisement? It could have been partly from you and partly from the committee?

A Yes. But at the final outset the Florida Friends of Reagan paid it all, and I may have got some money back personally because I had to pay them, and I can't tell you

whether I paid them with a personal check. I think in the final analysis he returned the money so it would balance out with the money that Florida Friends of Reagan had.

Q When you say, "he returned" --

A Long Advertisement. It is not a --

MR. BOLTON: So it would balance out with the debt due Long Advertisement?

THE WITNESS: That is right.

BY MR. JOHANSEN:

Q So any amount you paid to Long Advertisement for the Florida Friends of Reagan committee was reimbursed to you at a later date?

A In other words, we just swapped checks to make sure we balanced with Florida Friends of Reagan.

Q Could you explain to me what you mean by swapping checks? Did Long Advertisement not cash your check?

A No. They did. I am sure they did, but I know I had to pay Long. Most -- well, I guess nearly all the money that was taken in practically -- there may have been some other expenses, I can't remember -- went to Long Advertisement. And I had to send them money up front to pay for the ads, and I think that when the Florida Friends

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of Reagan sent him the check for the balance, whatever it was, then whatever part was mine, as I recall, he refunded it to me, and at that time I knew how much I had to put in.

Q So he gave you a check for Long Advertisement?

A I think so, but it was to balance it out, so he was paid and all the bills were paid, you know. It is in the file. I sent you a complete detailed breakdown on every token.

Q You said earlier that you spoke with Mr. Keene a few days before the ads were run in Wisconsin, and he said you shouldn't go forward. Is that correct?

A Words to that effect. Yes. He got hot about it. I told him it was none of his damn business.

Q Why did he not want you to go forward with the ads?

A He said, number one, there was a possibility -- I don't think he said it would be breaking the law; and two, he said they would be counterproductive.

Q Did you discuss whether or not it could be illegal?

A I told him it wasn't because I had already checked with my lawyer.

Q Did he indicate more than that you may get into

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trouble?

A No. I don't think he did. I can't recall. We exchanged some hot words about it.

Q Did you discuss the Wisconsin primary at all during that conversation?

A I don't think so. Somebody in Wisconsin called them and told them they didn't know we were going to run ads, and somebody called and told him they had seen the ads. Some newspaper had shown them the ads, something like that, and he said, you know, it was going to shoot them down, going to kill them. And I said, "You are not going to win anyway. What the hell difference does it make?"

Q Was this the only time that you talked to Mr. Keene after you finished up with the Citizens for Reagan Committee; do you recall?

A The only time between then and the Wisconsin thing?

Q Yes. You had a wrap-up period of time. After you had wrapped up the campaign in Florida, did you talk to Mr. Keene?

A I don't think so.

Q His secretary?

A I know I talked to his secretary about phone bills,

things like that.

Q How about after you wrapped up the campaign in Florida?

MR. BOLTON: I think he just answered that. You are talking about his conversations about the Wisconsin ads?

BY MR. JOHANSEN:

Q I am sorry. No. After the Citizens for Reagan Committee terminated in Florida, then you had a period of about a month where you wrapped up whatever you had to wrap up. After that wrap-up period, did you talk to Mr. Keene from then until you talked to him immediately before the Wisconsin newspaper ads?

A I don't think so.

Q How about Governor Reagan?

A No.

Q Anyone else in the Citizens for Reagan Committee?

MR. BOLTON: Other than Ms. Peden?

THE WITNESS: Not that I can recall. We felt bad about losing the primary, and I am sure they felt bad about it, and there wasn't much to talk about.

BY MR. JOHANSEN:

Q When did Florida Friends of Reagan terminate its

activities?

A When we filed our last report with you.

Q And that decision was made by you?

A Yes, sir.

Q And it was made for the reason you stated earlier?

A Yes, sir.

(Discussion off the record.)

BY MR. JOHANSEN:

Q Following the Wisconsin primary, did you resume any campaign responsibility with Citizens for Reagan?

A No.

Q Even in an unofficial capacity did you assist or help them?

A No. I mean -- what was the date of the Wisconsin primary? I still had to go close out the office. Was that before or after?

MR. BOLTON: April 6 was the Wisconsin primary.

THE WITNESS: Yes. I had to go close out the office in Orlando after that, but that was all.

BY MR. JOHANSEN:

Q How did you submit receipts for expenditures which you incurred on behalf of Citizens for Reagan?

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EX-103
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A I submitted them to our office in Florida, and if they had the money they paid them. If they didn't, I guess they may have been paid in Washington. I submitted them to the secretary that we had. Two people could sign the checks, the secretary and the CPA, and it was in his office. Her office was in his office.

Q On the 14th of July, 1976, you received \$610.57 in travel reimbursement from Citizens for Reagan.

MR. BOLTON: I think the report, the Citizens for Reagan report, says travel reimbursement and office expense.

MR. JOHANSEN: And motor vehicle; all three possibly.

MR. BOLTON: It is more than travel.

MR. JOHANSEN: Yes. I agree with you.

BY MR. JOHANSEN:

Q As you know, we have secured from the Citizens for Reagan Committee copies of receipts which you had submitted to them, and they were supplied to your attorney some time ago. Have you seen copies of them?

A Yes. There was one item on there, a lunch deal for \$7 and something, I don't think should have been charged to the Reagan Committee. I think it was in error. And most of them were incurred in March, but we kept up everything.

I handled everything on American Express. It is always a month before you get the bill, but I did, so I would have a record.

Q I think you are correct in that a number of the receipts were dated after March 9, the date of the Florida primary, and if possible, I would like to go through those quickly with you.

And the first invoice I am handing to you is from National Car Rental.

MR. BOLTON: No.

BY MR. JOHANSEN:

Q I am sorry. And it is dated March 28, 1976, and it was for \$43.08.

A Yes.

MR. JOHANSEN: I might ask that this be marked as Government Exhibit No. 1.

(The National Car Rental System, Inc. invoice dated March 28, 1976, for \$43.08 was marked Government Exhibit No. 1 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Could you examine that and tell us the purpose of

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this expenditure?

A The \$43.08?

Q Yes.

A I can't remember exactly, but what it looks like to me -- the car was driven only 38 miles. It is about 15 miles, I guess, from the airport to the headquarters, and it was probably just as cheap, you know, to rent a car. Because where our headquarters was there was no other way of getting around. You would have to call a taxi. But it looks like I had the car for two days and put 38 miles on it which would be just to headquarters and back.

Q So this is during the wrap-up activities when you were visiting headquarters in Orlando, the small headquarters?

A It would be the small headquarters.

Q The second invoice I am handing to you is also from the National Car Rental, dated May 19, 1976, and it is for \$15.90, and I ask that it be marked as Government Exhibit No. 2.

(The National Car Rental System, Inc. invoice dated May 19, 1976, for \$15.90 was marked Government Exhibit No. 2 for identification, a copy of which is attached to the court copy of this deposition.)

47

BY MR. JOHANSEN:

Q Could you examine that and explain the purpose of those expenditures.

A No. I can't. And I can't figure -- what could you get from them for \$15.90?

Q I don't know. Do you remember where the car was used?

A No. How would you get a bill for \$15.90?

Q Does it state on the invoice?

A No. It is the same number credit card and all, but you can't get anything for \$15.90.

Q Do you know if you were in Orlando on that date?

A I wouldn't think so. It is possible, but you can't rent a car for a day for \$15.90.

Q Would the office have been closed? Would you have had your small office closed on that date?

A I am not positive of the date we closed it. I would think off the top of my head, I would think the office was closed about the end of April; maybe May 1st. But it is possible it was open then, but I can't figure out what in the world you could get --

Q The third invoice I am going to hand you is a

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ticket stub from Southern Airways for a flight on May 18, from Panama City, Florida to Orlando, Florida and return on May 19. The amount is \$85.98. I think that the date correlates with the date of the car rental. I should have handed you the plane ticket first.

(The ticket stub from Southern Airways for a flight to Orlando, Florida from Panama City, Florida and return on May 18, 1976, was marked Government Exhibit No. 3 for identification, a copy of which is attached to the court copy of this deposition.)

THE WITNESS: But I still can't figure out how you could get a car for \$15.90.

BY MR. JOHANSEN:

Q When you were in Orlando, was that probably when you were closing up the small office?

A It is possible. Yes.

Q Do you recall whether you were in Orlando that day or what you did?

A No. The only thing I can remember doing was going down there and closing the office.

Q How about the American Express bill which is on the same sheet for \$7.49?

A That is the one I think is in error. I don't think it should be charged to Reagan.

Q It appears that the date is June 11, 1976, but it is very difficult to read.

A Right, but I think it is a mistake. It shouldn't have been charged to the Reagan committee.

Q But the offices of Citizens for Reagan were closed by the 11th of June?

A Yes.

(The American Express bill for \$20.01 dated April 28, 1976, was marked Government Exhibit No. 4 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fourth bill is one from American Express for \$20.01 on April 28, 1976. The place where the bill was charged to is blurred. Do you have any recollection of what that expenditure was for?

A No. Sure don't. I will say it was not a restaurant charge because if it was a restaurant charge there would be a tip on it.

MR. BOLTON: Excuse me. I have just noticed on some of

these papers that there are handwritten notations in pencil, numbers three, four, and five, that were not on copies that we got from Citizens for Reagan.

MR. JOHANSEN: I put them on to keep them straight.

MR. BOLTON: Okay. Just so long as the record reflects that.

(The check stub record for \$11.58 payable to Shell Oil Company dated March 22, 1976, was marked Government Exhibit No. 5 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fifth document is a check stub record to Shell Oil Company on March 22, 1976, for \$11.58. That appears to be for gas. Do you know when that expenditure was made?

A When it was actually purchased?

Q Yes.

A Your credit card bill is always a month behind, so I would say the gas was bought sometime in February or maybe even January.

(The check stub record for \$69.27 payable to Texaco, Inc. dated April 15, 1976 was marked Government Exhibit No. 6 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The sixth is a check stub record of a check made out to Texaco, Inc. on April 15, 1976, listing an expenditure for the Reagan campaign of \$18. I think there were also billings on there that weren't attributed to the Reagan campaign. Is that correct?

A Yes.

Q Do you recall when the actual expenditure was made?

A No. But I can tell you that it would have to be sometime a month before that at least.

(The check stub record for \$23 payable to Shell Oil Company dated April 22, 1976 was marked Government Exhibit No. 7 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The next is a check stub recording of a check made out to Shell Oil Company on April 22, 1976; do you recall when the actual expenditure for that was made?

A No. Of course, it would be prior to that, at least a month.

Q Except for the charges for gasoline, the documents

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I handed to you marked as exhibits were expenditures made in wrapping up the Citizens for Reagan campaign in Florida?

A I would assume so. Yes.

(The check stub record for \$67.20 payable to National Car Rental System, Inc. dated April 30, 1976, was marked Government Exhibit No. 8 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Lastly, I am handing to you a check stub record of a check made out to National Car Rental dated April 30, 1976, for \$67.20, regarding these last four exhibits.

MR. BOLTON: Eight, seven, six and five.

BY MR. JOHANSEN:

Q Eight, seven, six, and five. They seem to indicate that funds were drawn from the Tommy Thomas Chevrolet, Inc. corporate account to pay for expenses incurred in the Reagan campaign.

A Yes. And they were reimbursed. But you have there a duplication. This \$67.20 is the same bill as Exhibit 1; \$43.08 is part of \$67.20.

Q Yes. I understand that. Could you explain the notation, "Reagan Committee," on those four exhibits?

A It is an accounts receivable; 220 is an accounts receivable, and it was charged to the Reagan Committee. They had an accounts receivable, and we had a running ledger set up in the name of the Reagan Committee, and every month we charged things to it, and they reimbursed Tommy Thomas Chevrolet, or reimbursed me, and I gave it to Tommy Thomas Chevrolet.

Q So Tommy Thomas Chevrolet set up an account number for the Reagan campaign?

A Yes. Because lots of time I wasn't there when the American Express bill came in, and what was charged to them, they gave me the tickets, and I got reimbursed and reimbursed them.

Q Okay, just so I understand. Account 220 was a special account that was created in the accounting procedures of Tommy Thomas Chevrolet to pay off campaign debts that were incurred on behalf of Governor Reagan?

A Well, 220 is accounts receivable in all General Motors' accounting. It doesn't make any difference whether it is Buick, Chevrolet or Oldsmobile; 220 means accounts receivable. Any auditor would know, so it was charged to accounts receivable in the name of the Reagan Committee.

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Q And then reimbursements were made to you from the Reagan Committee?

A Yes.

Q Were other bills presented to Tommy Thomas Chevrolet, other than the four we have been discussing here?

A There were several; yes. And they were paid every month. Whenever bills were sent in they were paid and reimbursed, and it just washed out.

Q Do you know when the last reimbursement was made to Tommy Thomas Chevrolet?

A When I got the six hundred and some dollars back that balanced it out; the account zeroed out.

Q Could you explain again how the bill was paid to Long Advertising Company?

A I am not really sure. I would have to go back and check because I don't know exactly how it was handled.

Q But as you recall you advanced money to Long Advertising?

A Some of it.

Q And then as money came in for the Florida Friends of Reagan Committee, it was sent to Long Advertising Company?

A Yes.

Q And they reimbursed you for the amount of money you had initially paid for the advertisements?

MR. BOLTON: I think he also said some of the money was paid for directly out of Florida Friends of Reagan funds.

MR. JOHANSEN: Yes. I understand that also.

I have no further questions.

MR. BOLTON: Do I have the opportunity to ask questions?

MR. JOHANSEN: Yes.

EXAMINATION BY COUNSEL FOR LUTHER EDWIN THOMAS

BY MR. BOLTON:

Q There were some one or two places during the course of this deposition where, in response to questions from Mr. Johansen you explained you may have spoken to people in other states connected with Citizens for Reagan, and you may have asked questions like, "How does it look in that state for Governor Reagan?" Were those conversations anything other than casual conversations?

A No.

MR. BOLTON: I have no further questions.

Excuse me. One other thing. I think we wanted to mark as exhibits the interrogatories, and I don't think we need to

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(The interrogatories and the answers to interrogatories were marked Government Exhibits Nos. 9 and 10, respectively, for identification, copies of which are attached to the court copy of this deposition.)

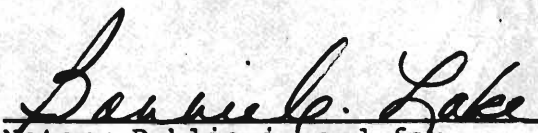
(By stipulation of counsel,
in the presence of the witness,
reading and signature waived.)

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CERTIFICATE OF NOTARY PUBLIC

I, Bobbie C. Lake, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to type-writing by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.


Notary Public in and for
the District of Columbia

My commission expires
January 1, 1983

3010080236
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ACCOUNT NUMBER	ACCOUNT TYPE	STATEMENT DATE	YOUR LINE OF CREDIT IS 500.00	
7001-056-156A-1	CENTRAL BILL	04/06/76	QUESTIONS**CALL 612-830-7325	
CARD HOLDER NUMBER	NAME OF RENTER	CITY OF RENTAL	DATE OF TRANSACTION	RENTAL AGREEMENT NO
LUTHER E THOMAS	LUTHER E THOMAS	ST PETERSBURG	03/03/76	2456780
LUTHER E THOMAS	LUTHER E THOMAS	ORLANDO	03/28/76	50197420
				24.12
				43.08

IN CASE OF ERRORS OR INQUIRIES ABOUT
YOUR BILL, SEND YOUR LETTER TO
KAYE BRUNDAGE
5501 GREEN VALLEY DRIVE
MINNEAPOLIS, MINNESOTA 55437
TEL 612-830-2342

Pat - Charles To General

SUMMARY OF ACCOUNT	PREVIOUS BALANCE	CURRENT CHARGES	TOTAL PAYMENTS	TOTAL ADJUSTMENTS	NEW BALANCE DUE TO US \$
NATIONAL CAR RENTAL SYSTEM, INC.	-00	67.20	.00CR	.00	67.20

P.O. BOX 15122 MINNEAPOLIS, MINN. 55416
 MINNEAPOLIS, MINN. 55416

050 47 MC 5019742 0

[illegible]

IN CONGRESS, 1947-1948.



Make check payable to: NATIONAL CAR RENTAL
Mail to: 5501 GREEN VALLEY DRIVE, MINNEAPOLIS, MINN. 55437
PLEASE DETACH AND RETURN THIS STUB WITH PAYMENT

102 591 2742 0

THIS RENTAL AGREEMENT NO. MUST APPEAR
ON ALL PAYMENTS AND CORRESPONDENCE.

Page 1

INVOICE
WHITE - HOME OFFICE

73040080238
 78040063059
 BEL 6/29/78

NATIONAL CAR RENTAL SYSTEM, INC.

ACCOUNT NUMBER 7001-056-1568-1	ACCOUNT TYPE CENTRAL BILL	STATEMENT DATE 06/07/76	YOUR LINE OF CREDIT IS 500.00	
NAME OF RENTER LUTHER E THOMAS	CITY OF RENTAL ORLANDO	DATE OF TRANSACTION 05/19/76	RENTAL AGREEMENT NO. 050333463	AMOUNT 15.90

IN CASE OF ERRORS OR INQUIRIES ABOUT
 YOUR BILL, SEND YOUR LETTER TO
 KAYE BRUNDAGE
 5501 GREEN VALLEY DRIVE
 MINNEAPOLIS, MINNESOTA 55437
 TEL 612-830-2347

SUMMARY OF ACCOUNT	PREVIOUS BALANCE	0.00	CURRENT CHARGES	15.90	TOTAL PAYMENTS	0.00 CR	TOTAL ADJUSTMENTS	0.00	NEW BALANCE DUE (U.S.\$)	15.90
	NATIONAL CAR RENTAL SYSTEM, INC. P.O. BOX 35228, NORMANDIE BRANCH MINNEAPOLIS, MINNESOTA 55438 <small>THE BILL IS VALID FOR 90 DAYS FROM DATE OF RENTAL</small>									

#

4

ACKNOWLEDGE RECEIPT OF TICKETS AND/OR COUPONS FOR RELATED CHARGES DESCRIBED HEREON. PAYMENT IS FULL TO BE MADE WHEN BILLED OR IN EXTENDED PAYMENT PLAN. COMPANY ISSUING CARD AND ITS RECEIPT IN APPLICABLE TARIFFS.

UNIVERSAL CREDIT CARD CHARGE FORM

Southern Airways, Inc.

0384420890476
SOUTHERN AIRWAYS
9 A.O
PANAMA CITY FL

THOMAS/TOMMY

18 APR 70

NAME OF PASSENGER		TOUR CODE		DATE		TIME		STATUS		FARE BASIS/TKT. DESIGNATOR		NOT VALID BEFORE		NOT VALID AFTER		ALIAS	
1/O	NOT GOOD FOR PASSAGE	CARRIER	FLIGHT	CLASS	DATE	TIME	STATUS	FARE BASIS/TKT. DESIGNATOR	NOT VALID BEFORE	NOT VALID AFTER	ALIAS						
	PANAMA CITY	SO	225	S	18MAY	311P	OK	S									
	ORLANDO MCCOY	SO	230	S	19MAY	930P	OK	S									
	PANAMA CITY																
	--VOID--																
	--VOID--																
FARE		79.62		IF EXT'D. PAY DEND.		CIRCLE NO. OF MOS.		3		6		9		12		CREDIT CARD NAME CODE	
TAX		6.36		FARE CALCULATION													
TOTAL		85.98															

015 003 180 5 100AX

VALID 10 75 THRU 09 76

58

LUTHER E THOMAS

038 4420890476 2 0

OTATO NO

CONNECTION OF PASSENGER WITH SUBSCRIBER

015 003 180 5 100AX

VALID 10 75

THRU 09 76

58

LUTHER E THOMAS

Approval Code

Check of Bill No

Service Establishment

Date of Charge

Any delayed charge are entered below

430050 2445 0 11 70
2009918484 40900-
7230570900 20677 1-7 3

Merchandise/Services

Type of Delayed Chg

Taxes

Am't of Delayed Chg

Tips/Misc

Revised Total

Establishment agrees to transmit to American Express Company (Amexco) for Authorized Representative for payment Merchandise and/or service purchased on this card and will be resubmitted for cash refund

Cardmember Signature

Total

Amexco Use Only

Invoice Number

Equivalent Am't

Amexco Copy

523800 031805 100

00000000749

730100800239

780400063060

749
8598

9347*

Document Exhibit 710.5 BCL 6/29/72

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P. O. BOX 490



PH. 785-5222

PANAMA CITY, FLORIDA

No. 475

DATE March 22, 1976

TOMMY THOMAS I I 58

PAY

\$11.58

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

Shell Oil Company
Box 160
Tulsa Ok 74184

TOMMY THOMAS CHEVROLET, INC

BY

BY

NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET
				PCT.	AMOUNT	
	Card # 89531,2569 Reagan Comm.	220 ✓				11.

20883 - BOYD BROS., INC.

78040080241
78040080241

Document # 6 BCL 6/69/78

#7

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P.O. BOX 490

CHEVROLET

PH. 765-5222

PANAMA CITY, FLORIDA

No. 5289

DATE April 15, 1976

PAY

(NOT VALID AFTER 90 DAYS FROM DATE OF ISSUE)

TO
THE
ORDER
OF
Tenneco Inc
P.O. Box 25487
Richmond, VA 23268

TOMMY THOMAS CHEVROLET, INC.

BY _____
NON-NEGOTIABLE
Two signatures required

TOMMY THOMAS CHEVROLET, INC. Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT PCT. AMOUNT	NET AMOUNT
	Acct No 1188426660 Reagan	220	18.00		
		15A	18.37		
		515	52.90		
					69.27

69039004087
6420001087

Government Exhibit No. 7 BC L6/29/70

TOMMY THOMAS CHEVROLET, INC.

P.O. BOX 480 CHEVROLET PH. 785-5222

PANAMA CITY, FLORIDA

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

No. 5431

DATE April 22, 1976

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO THE ORDER OF
Shell Oil Company
Box 160
Tulsa OK 74184

TOMMY THOMAS CHEVROLET, INC.

BY _____
NON-NEGOTIABLE

TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT PCT. AMOUNT	NET AMOUNT
Acct #	89531,2569	Reagan Co	220		23.00

204045 - 20475 20408 - INC.

#8

1 9 0 3 9 0 0 4 0 8 7
3 4 2 0 0 0 0 4 0 8 7

Document's Exhibit No. 8 BCL 6/27/72

TOMMY THOMAS CHEVROLET, INC.

SOUTHEAST NATIONAL BANK
PANAMA CITY, FLORIDA

P. O. BOX 490  PH. 785-5222

PANAMA CITY, FLORIDA

No. 5562 A

DATE April 30, 1976

TOTAL DUE 67.20

PAY

NOT VALID AFTER 30 DAYS FROM DATE OF ISSUE

TO
THE
ORDER
OF

National Car Rental System, Inc
P O Box 35226
Normandale Branch
Minneapolis, Minnesota 55472

TOMMY THOMAS CHEVROLET, INC.

BY _____
BY _____ NON-NEGOTIABLE
TWO SIGNATURES REQUIRED

TOMMY THOMAS CHEVROLET, INC., Panama City, Florida. (Please Detach This Stub Before Cashing)

DATE	DESCRIPTION	ACCOUNT NO.	AMOUNT	DISCOUNT		NET AMOUNT
				PCT.	AMOUNT	
410080241	Acct No. 7001-056-1568-1 Reagan Comm	220				67.20

797
BOYD BROS., INC.

Government Exhibit No. 9
BCL 6/27/78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida Friends of) MUR 443
Reagan) Interrogatories

✓

1. State the date on which you became Chairman of Florida Friends of Reagan and the period of time you served in that capacity.
2. Describe your duties and responsibilities as Chairman of Florida Friends of Reagan.
3. State the date on which you became Chairman of Florida Citizens for Reagan and the time period you served in that capacity.
4. Describe your duties and responsibilities as Chairman of Florida Citizens for Reagan.
5. How were you appointed or selected as Chairman of Florida Citizens for Reagan and who made that appointment or selection?
6. List the names and titles of those other officials and employees of Citizens for Reagan with whom you communicated while you were Chairman of Florida Friends of Reagan; and describe the substance and dates of all such communications.

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Interrogatories
MUR 443
Page 2

7. If you have held any other positions with either Florida Friends of Reagan or Florida Citizens for Reagan, state the title of such position(s) and the dates you served in such position(s); and describe your duties and responsibilities in such position(s).
8. State the date on which Florida Friends of Reagan began receiving contributions and the date on which its last contribution was received.
9. State the date on which Florida Friends of Reagan was terminated.
10. State the date on which Florida Citizens for Reagan was terminated.
11. Describe the methods used by Florida Friends of Reagan to solicit contributions.
12. Describe any contractual agreements made between Florida Friends of Reagan and Long Advertising Agency, 20 S.E. 8th Street, Miami, Florida, or attach copies of such agreements to your answers to these interrogatories. State the dates and amounts

of all payments to Long Advertising Agency and describe the services actually provided by the agency to Florida Friends of Reagan.

13. Identify the source of each component (e.g., pictures, copy, typeface, layout design) of the advertising paid for by Florida Friends of Reagan.
14. Identify each person who reviewed or approved the advertising paid for by Florida Friends of Reagan.
15. Identify each person who informed you that your activities in connection with Florida Friends of Reagan may involve problems or violations of the Federal Election Campaign Act of 1972, as amended.
16. Describe the services you performed on behalf of Citizens for Reagan for which you received travel reimbursements of \$610.57 on July 14, 1976, including the locations in which such services were performed.

ANSWERS OF L.E. THOMAS

1. I was Chairman of Florida Friends of Reagan (hereafter, "FFOR") from its inception until it ceased its activities on or about April 6, 1976.

2. I performed as Chairman of FFOR the duties required of a Chairman of a political committee by the Federal Election Campaign Act, as amended (hereafter, "FECA"). FFOR undertook only one limited project, the placing of advertisements in fourteen Wisconsin newspapers, and I implemented that project on behalf of FFOR.

3. Governor Reagan declared his candidacy for the Republican presidential nomination on November 20, 1975, and that date would be the most accurate date to fix as the time I officially became Chairman of Florida Citizens for Reagan.

The 1976 Florida primary was held on March 9 of that year, and we began closing our field offices throughout the State the next day. By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary.

4. I performed the customary political duties of a State chairman in preparation for a candidate's campaign in a presidential primary.

5. I was first contacted on or about August 20, 1975, by Mr. David A. Keene of Citizens for Reagan. Mr. Keene asked if I would be interested in being Governor Reagan's Florida Chairman should the Governor decide to become a

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candidate, and I indicated I would be. Within a week or two of that date, I met in Washington, D.C., with Mr. Keene, Mr. John Sears, and Senator Paul Laxalt. We discussed the subject of the Florida primary, and we agreed that I would become the Florida Chairman should Governor Reagan decide to announce his candidacy for the Republican presidential nomination.

6. Your question asks that I list the names of "other" officials and employees of Citizens for Reagan with whom I spoke while I was Chairman of FFOR. If the question is meant to imply that I spoke with Mr. Sears and Senator Laxalt while I was Chairman of FFOR, the implication is inaccurate. If the question is meant to imply that I was an official or employee of Citizens for Reagan while I was chairman of FFOR, the implication is likewise inaccurate.

I did speak with Mr. Keene at least once. The substance of that conversation is detailed accurately in his letter to Mr. Oldaker, dated November 30, 1977.

I spoke a few times by telephone with Ms. Neal Peden, Mr. Keene's secretary, subsequent to the Florida primary. Those conversations concerned exclusively the subject of the closing of the Florida field offices of Citizens for Reagan, and wrapping up remaining debts and similar matters from the primary.

3.

7. Not applicable.

8. FFOR received its first contribution on or about March 28, 1976. It received its last contribution on or about May 7, 1976.

9. FFOR engaged in no activities after April 6, 1976, the date of the 1976 Wisconsin primary, and it was terminated in fact as of that date. FFOR filed its notice of termination with the Federal Election Commission on December 10, 1976.

10. Within forty-eight hours of the March 9 Florida primary, all of the field offices in Florida had been closed. One small office remained open in Orlando, staffed by one person, to handle matters relating to wrapping up the campaign. I do not know whether there was any official termination of the Florida Citizens for Reagan, because all such matters were handled by the main Citizens for Reagan Headquarters in Washington, D.C.

11. All contributions, other than my own and my wife's, were solicited by telephone calls.

12. The Long Advertising Agency (hereafter, "Long") does commercial work for my businesses in Florida. I asked them orally to help me in preparation of a newspaper advertisement. There was no written contract.

Long contacted various newspapers in Wisconsin to ascertain the rates at which those newspapers sold advertising

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4.

space, they prepared one newspaper advertisement, and they placed the advertisement in fourteen Wisconsin newspapers.

FFOR made one payment to Long for its work in the amount of \$14,771.40. That payment was made on April 5, 1976.

13. Long was responsible for the advertisement's copy and layout. The photograph of the White House was obtained from H. Armstrong Roberts Stock Photo Supplier in Philadelphia, Pennsylvania. The typeface was obtained from the Wrightson Typesetting Company in Miami, Florida. The picture of Governor Reagan was copied from the Wall Street Journal. None of the components of the advertisement had any origin in any materials prepared by Citizens for Reagan.

14. I did.

15. Mr. Keene was the only person who indicated that there might be problems under the FECA with FFOR's project in Wisconsin.

At the time, of course, the Supreme Court had recently declared parts of the FECA unconstitutional, and there was great uncertainty about the effect of the Court's ruling. I was aware that during the Florida primary several individuals and groups who were not part of Citizens for Reagan had taken out advertisements on behalf of the Governor. I consulted with my local attorney in Florida,

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and he indicated to me that he saw no legal problems in connection with FFOR's activities in Wisconsin.

16. I do not now have records which indicate what services were performed (or where they were performed) for which I received the travel reimbursement you identify. When the field offices of Florida Citizens for Reagan were closed, the great bulk of our records were transferred to the main Citizens for Reagan headquarters in Washington, D.C. A smaller amount of records was left with the local Republican Party headquarters in Orlando. I do not have access to those records.

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I hereby certify that the foregoing answers are true and correct to the best of my knowledge.


I. E. Thomas

Subscribed and sworn to before me
this 11th day of January, 1978.

Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
EXPIRATION DATE 12/31/80
BORN 05/15/1912 RESIDENCE NO.

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)	Subpoena
)	
Florida Friends of Reagan)	To Appear for Deposition
)	
)	Upon Oral Examination
)	
)	MUR 443 (77)

TO: Mr. L. E. Thomas
705 West 15th Street
Panama City, Florida 34201

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to appear for deposition with regard to the Commission's investigation of your responsibilities and activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan.

The scope of the deposition will include, but not necessarily be limited to, your activities as Chairman of Florida Friends of Reagan and as Florida Chairman of Citizens for Reagan, your work for Citizens for Reagan for which you received travel reimbursement, and communications between yourself and persons connected with Citizens for Reagan while you were serving as Chairman of Florida Friends of Reagan.

Your deposition shall take place at 1325 K Street, N.W.
Washington, DC 20463
June 29, 1978, at 1:00 P.M.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day *6th* of June, 1978.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION

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MILTON & GRUNDY ASSOC.
1028 CONN. AVE. NW
WASH., DC 20036

Subject of Correspondence

mur 443

Date Received

07/18/78

Suspense Date

08/08/78

Referred to

Action (Optional)

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Answer Date

NRN

File Designation

4300

Special Instructions:

FEC Form 17 (Revised March 1977)

FEDERAL ELECTION COMMISSION
1326 K STREET, NW
WASHINGTON, DC 20463
OFFICIAL BUSINESS

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COMMISSION

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Hand deliver to:

Mr. Lovejoy

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In the Matter of: :
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FLORIDA FRIENDS OF REAGAN : MUR 443 (77)
:
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Thursday, June 29, 1978

LUTHER EDWIN THOMAS

a witness in the above-entitled matter, called for examination by counsel for the Federal Election Commission, taken at the offices of the Federal Election Commission, 1325 K Street, N.W., Washington, D. C., beginning at 1:10 p.m., before Bobbie C. Lake, a Notary Public in and for the District of Columbia, when were present on behalf of the respective parties:

(NOTARY: D.C.-VA.-MD.)
OFFICIAL REPORTERS
1028 Connecticut Ave., N.W., Suite 1100
Washington, D.C. 20036
Phones: (202) 833-3598
833-3599

For the Federal Election Commission:

WILLIAM C. OLDAKER, ESQ.
and
GARY JOHANSEN, ESQ.
1325 K Street, N.W.
Washington, D. C. 20463

For Luther Edwin Thomas:

JOHN R. BOLTON, ESQ.
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Also Present:

PAUL LOVEJOY

C O N T E N T S

EXAMINATION BY COUNSEL FOR:

FEDERAL ELECTION COMMISSION
(Mr. Johansen)

WITNESS:

LUTHER EDWIN THOMAS

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LUTHER EDWIN THOMAS
(Mr. Bolton)

55

E X H I B I T S

Marked for identification and attached:

Page

Government Exhibit No. 1 - National Car Rental Invoice	45
Government Exhibit No. 2 - National Car Rental Invoice	46
Government Exhibit No. 3 - Southern Airways ticket stub	48
Government Exhibit No. 4 - American Express bill	49

EXHIBIT - cont'd

Marked for identification and attached:

Page

Government Exhibit No. 3 - check stub record for \$11.58 30
 Government Exhibit No. 4 - check stub record for \$69.27 34
 Government Exhibit No. 5 - check stub record for \$23 32
 Government Exhibit No. 6 - check stub record for \$67.20 33
 Government Exhibit No. 7 - interrogatories 56
 Government Exhibit No. 8 - answers to interrogatories 56

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Thereupon

LUTHER EDWIN THOMAS

a witness, was called for examination by counsel for the Federal Election Commission and, after having been sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE FEDERAL ELECTION COMMISSION

BY MR. JOHNSON:

Q I might start as an introduction by saying that my name is Gary Johnson. I am here today representing the Federal Election Commission, and accompanying me is William Oldaker who is the General Counsel of the Federal Election Commission, and Paul Lovejoy who is a paralegal for the Office of General Counsel.

This is a deposition of L. E. Thomas, which is in furtherance of the Commission's investigation into possible violations of the Federal Election Campaign Act by the Florida Friends of Reagan, and the matter has been designated as MUR 443 (77).

The deposition is being conducted pursuant to the Commission's powers as stated in 2 U.S.C. Section 437d(a)(3). Mr. Thomas is represented by counsel, John R. Bolton, who is present here today.

A Yes. It is incorporated.

Q Were you involved in Governor Reagan's campaign for president?

A Yes.

Q When did you first begin supporting Governor Reagan?

MR. BOLTON: Excuse me. Could I just ask a question?

Do you intend to cover in this deposition matters that have been answered in response to questions enclosed with Mr. Olsaker's letter from earlier in this year?

MR. JOHANSEN: The interrogatories?

MR. BOLTON: That is correct.

MR. JOHANSEN: Yes. Those matters will be covered.

MR. BOLTON: You are going to ask --

MR. JOHANSEN: Not specifically verbatim, but those matters could be touched upon again.

BY MR. JOHANSEN:

Q I am sorry; what time did you say you first became involved in Governor Reagan's campaign for president?

A When he announced. I think it was initially November 20, 1975. I had been a Reagan supporter before that, but that is the official time.

Q When did you become involved in an official capacity?

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A I became his Florida chairman when he announced.

Q So you were selected or appointed as chairman at the time he announced for the presidency?

A Yes.

Q How did the selection come about?

A I had been the former Republican state chairman, and everybody knew I was a League supporter, philosophically, so I guess, as far as I know, they never talked to anybody else about doing it. They asked me to do it, and I was more than willing.

Q You say, "they;" did you talk to anybody else? Who did you speak to?

A Senator Laxalt and David Keene, and I think maybe John Sears.

Q What were their involvements in the campaign?

A Senator Laxalt was, I guess, the honorary chairman, and he was the chairman. John Sears, I guess, was called the campaign manager, and I assume he was paid. And David Keene was a field director.

Q What did you discuss at this meeting you had with those three individuals? Generally, what did you discuss?

A I don't think I met with them all at the same

time. I talked with them at different times, and we discussed what we would normally discuss. We knew when the date of the primary would be, and we had to have a state-wide organization, and had a very limited budget and things like that.

Q During the period of time they initially contacted you, to become chairman, what did you discuss during that period?

MR. BOLTON: Are you referring to the period of time in November, 1975?

MR. JOHANSEN: When he was first contacted in regard to becoming chairman?

THE WITNESS: I can't specifically tell you what we discussed.

BY MR. JOHANSEN:

Q Just generally.

A Discussions about how many people I could afford to hire; how many volunteers we had to have; and how many people we could afford to hire; where we would put the state office; dates.

Q Did you discuss the national campaign at all?

A I can't say because I really -- I am sure we talked about it vaguely, what his chances were against Ford, et cetera, but I can't remember anything specific that we

A I guess you would call him the field director. He was the main one we had any contact with, and I assume all the other states were the same way.

Q What kind of assistance did he give you? Did he give you any assistance?

A Well --

MR. BOLTON: Maybe you could be a little more specific.

BY MR. JOHANSEN:

Q Did you discuss strategy for the Florida campaign? Did you discuss how many offices would be set up? Did you discuss finances?

A Yes.

Q Did you discuss any national strategy?

A I don't think we discussed any national strategy.

Q Did you discuss the state of Florida and how that fit in with the other states in the national program?

A No. Not that I know of. I don't remember anything we talked about, but I can't see why we would.

Q How about with Mr. Sparr or Senator Bessie? Did you have any discussions with them?

A None.

Q Your conversations with Mr. Keene, were they
usually telephone conversations?
A He came to Florida and usually it was on
the phone.

Q Did you ever see him?
A In Washington
Johannson

Q Where, local Washington, during
the primary down, Florida several times. I didn't
always see him, did always Keene. They were
going Air Force I would sometimes see
him in the crowd.

Q During the time you
Washington see him, did you come to
see him?
A Not really.

Q To see him, can you Na
to see him, net, on specifically
Q He was in
about him, they
A He contacted you

Q Did he come to Washington?
A It wasn't

Q Your conversations with Mr. Keene, were they usually telephone conversations?

A He came to Florida some, but usually it was on the phone.

Q Did you ever go to see him?

MR. BOLTON: In Washington?

BY MR. JOHANSEN

Q Where was Mr. Sears located?

A Mr. Sears was located in Washington, but during the primary he was down in Florida several times. I didn't always see him, and didn't always see Keene. They were doing their jobs, and I was doing mine. Sometimes our paths would cross.

Q During this period how often did you come to Washington to see Mr. Sears?

A I don't think I came to Washington specifically to see him. I met him in Washington one time.

Q That one time was when they first contacted you about becoming chairman?

A Yes.

Q Where did that meeting take place in Washington?

A Some hotel. It was a social activity. It wasn't

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a called meeting or anything like that. There was Seare and maybe David at the same time, and I don't remember whether Seare was there when Senator Laxalt was there, but it was not a business-type meeting in an office. It was -- I can't remember -- in some hotel, but I don't remember which one.

Q It was a meeting or a casual occasion?

A No. We just -- I can't remember even whose room it was in.

Q Where there other people being solicited to become campaign chairmen in their states at that meeting?

A No. I don't think so.

Q During the time that you were chairman, did you have occasion to talk with Governor Reagan about the campaign?

A Sure.

Q Many times?

A During the primary yes, because I rode with him a lot of the time when he was making his speeches.

Q Did you talk about national strategy?

A Well, no. I had enough problems in Florida. That was my only concern, and that was the major concern. Florida

was the first big primary with the exception of New Hampshire, and we didn't discuss New Hampshire except for how are things going; something like that.

Q Maybe you have told me this before, but how often did you talk with Mr. Sears, who was your contact.

A He wasn't my contact. David Keene was the field man.

Q I am sorry. With Mr. Keene?

A I talked to him fairly often. Every time I wanted to talk to him I could after I found him.

Q Once a day?

A Maybe twice a week and sometimes once a week. I don't know, but I would say on an average twice a week.

Q Could you describe your duties as Florida chairman of Citizens for Reagan?

A Mainly I recruited people; recruited people in the counties; county chairmen; field people.

Q How many people did you have underneath you; any idea?

A Volunteers I knew personally and contacted personally; I would say 150 that I dealt directly with, and there were thousands coming in and out I may have spoken to,

but didn't know and wouldn't know if I saw them again.

Q How many field offices were there?

A Well the headquarters were in Orlando, and we had an office in Tampa. We had an office in Winter Haven, St. Petersburg, Miami, Fort Lauderdale; probably ten.

Q What's good for you to remember all these.

A Well, they are the biggest cities. There are not many Republicans in Florida. We are congregated in several counties.

Q Outside of Mr. Keane is there anyone else in the Citizens for Reagan Committee who you had much contact with while you were chairman?

A Well, Neal Peden; she was one of David's secretaries, and she was kind of a coordinator. I talked to her more than anybody.

Q Once a day?

A Probably on an average sometimes three or four times, and other days maybe none. I had a lot of contact with her.

Q What did you talk to her about?

A Where is David? They are going to change the schedule and blah, blah, blah; you know.

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Q In your discussions with Mr. Keene or his secretary did you ever talk about strategy in other states, what other states were doing in relation to what you were doing in Florida?

A Not really because we were the number two primary. In fact, I thought we were the most important primary and still think we were. I cried when we lost, because we should have won, and it was bad when we didn't win. I think the Florida primary was important.

Q Did you ever discuss possible future plans that the Citizens for Reagan Committee had?

A I wasn't interested in anything except Florida. I didn't want any job; nothing else.

Q Did you talk about finance as to how the Citizens for Reagan Committee was being financed?

A No. We did talk about finance, not specifically that, but when I took the job, they told me they had the money for the Florida campaign, and afterward I found out they didn't. I guess that's par for the course.

Q And you raised money in Florida for the campaign in Florida?

A We did; yes.

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Q Did you ever speak to other state chairmen of the Citizens for Reagan Committee?

A Yes.

Q Do you recall what other states possibly?

A Yes. The New Hampshire chairman. Just by a quirk the New Hampshire chairman opened a restaurant in Sarasota during the primary time. I didn't know him really, but when he opened the restaurant, I went by there and saw him.

I talked to the North Carolina chairman. I talked to other people that didn't have primaries like Mississippi that I can think of; and Alabama. I don't think either one of them had a primary.

Q What did you talk about; what did you discuss?

A I guess they called me about how the campaign was going in Florida.

Q Did you ask about their states?

A They didn't have a primary campaign. In Mississippi they have a caucus-type deal. In Alabama they don't have a primary. Anyway I don't know how they select their delegates. I think they have a state convention.

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Q How about New Hampshire?

A What do you mean?

Q You said you talked to the state chairman for New Hampshire.

A We didn't talk about anything specific -- how is it going to go? Are you going to win? And they assured me they were.

Q You talked generally about Governor Reagan and his campaign?

A Yes.

Q Did the national committee provide you with campaign material like posters or buttons?

MR. BOLTON: Excuse me. The national Reagan committee or the Republican National Committee?

MR. JOHANSEN: The national Reagan committee.

THE WITNESS: Sure. We didn't have any.

BY MR. JOHANSEN:

Q How about newspaper layouts?

A Yes.

Q Contributor lists for people you might want to contact in Florida?

A They forwarded me the letters of people who

wrote in. And here again -- remember this was the second primary, a week after the New Hampshire primary. At that time we didn't have a big contributor list.

Q But you used the letters from contributors that were supplied by the --

A Sure. I separated them and gave them to the county chairman for contact. They returned all contributor money; they said they would like to work, et cetera.

Q When did the Florida Citizens for Reagan Committee terminate?

A Are you talking technically or actually? The day after the primary I closed the big office in Orlando, the state office, and we had a CPA who was the treasurer, and he had some space in his office which we rented. We moved everything we could to his small office. We still had bills, telephone deposits, things like that that had to be paid. But the morning after the primary, as soon as I woke up, we tore down all the partitions and things like that that we had put in this place. It took nearly all day to do that. I guess it did take all day.

The next morning I drove to Tampa. We already had a plan to get all these things done because I needed to get

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back to work. I went to Tampa. The Tampa office was already closed. I think when I got there, there was maybe one volunteer there, and they were waiting to get the phones.

I drove to St. Petersburg where we had a major office, because St. Petersburg has a major Republican party, a big one. They already had everything torn down and boxed up. I took the people there to lunch and drove on home, 400 or 500 miles, and that was the end of it.

I still had to contact these people by phone. We had telephone problems, things like that which I had to do, not of major significance, but they were important.

Q You said you contacted these people by phone. What people?

A The people who had been in charge of the counties all over the state, and they called me, or I called them, or they wrote me about, you know, we have a bill that hasn't been paid. And at the time there were quite a few Reagan bills that had not been paid. Some of them were clerical errors; bills didn't get in on time, little things like that.

If you have ever been in a campaign, you know advance men went around and contracted for the bills, and somebody had to pay them. So that is why we kept one girl in the

CPA's office in Orlando with the checkbook, and as soon as we had the money we paid them, and if we didn't have the money they were forwarded to Washington for payment.

Q Who were the advance men?

A They were professionals. Most of them were from California. I think they had worked for the Governor out there.

Q I believe the primary was on March 9; is that correct? So these activities would have been on the 10th of March?

A Yes. Was the 9th the right day?

MR. BOLTON: I think the 9th was right.

THE WITNESS: I don't know why, I thought it was the 6th.

BY MR. JOHANSEN:

Q So technically you would say that you terminated them on the day after the primary?

A Well, I tried to. I felt I had to go back down there the one time and turn the records over to the county Republican office because we had no place to put them, what was left. Of course, it all pertained to Florida, so we gave them what records we had left.

Q In your January, 1976 response to the Commission's interrogatories you stated you were involved with the Citizens for Reagan Committee until termination on March 11, 1976. I think this would be two days after the primary. And then you said, "By approximately March 11 I had completed my official duties as Florida Chairman, except in connection with wrapping up obligations remaining from the primary." Is that what you meant by wrapping up obligations?

A Yes.

Q How long did it take you to wrap things up?

A When we closed the office in Orlando at the end of the month I think, as well as I can remember, that really put the finishing touches to it. All the little telephone deposits and things like that had been returned by that time.

Q You say when you closed the Orlando office when?

A The second office. We closed the big Orlando office the day after the primary. We moved the books to the CPA's office.

I was up here when they formed the Federal Election Commission. They had a briefing up here, and they gave us all the guidelines, everything you can do and can't do, and

I tried in the hardest way, particularly after Watergate, to make damn sure that every "I" was dotted and every "T" was crossed, and that is why we had a CPA for treasurer, and we thought we were doing everything just exactly.

Q You said you closed up the little Orlando office in November?

A No. We closed the big office and moved it to the little office the day after the primary. Then it was sometime in April I went back down there and took the girl to lunch and gave all the documents and all to the Republican county committee, gave the landlord back the keys to his office, and that was the end of it.

Q So in April sometime you officially terminated and wrapped things up?

A In the meantime I talked to her on the phone, but I wasn't down there, and I can't remember -- I think that was the only time I went down there. I might have gone one other time. I don't think I went but one other time. It is a long way from Panama City to Orlando, and air service isn't good, so --

Q So it was approximately a month?

A Yes.

Q During this wrap-up period of time, when you were

wrapping up the offices in Florida, how often did you speak with people from the Citizens for Reagan Committee?

A You are talking about the people outside of the State of Florida?

Q Yes.

A Very, very seldom.

Q Did you have any meetings with them?

A No. Not that I remember. I didn't have any reason to have a meeting.

Q When you spoke with them, you spoke with Reene or his secretary?

A Yes.

Q Anyone else you can remember?

A Not that I can think. We were mainly concerned with telephone deposits being returned and things like that.

Q Did you discuss the national campaign at all during those conversations?

A I probably asked how it was going, but that is all, not anything in depth, not specifically. How does it look, et cetera?

Q Did you discuss any other states in particular that you can remember?

A No. Not that I can remember.

Q Did you talk about campaign strategies in other states or what states might be crucial?

A There was one we probably discussed. We probably discussed Mississippi because the guy in Mississippi was a good friend of mine, and he turned out to be not a good friend of mine, and we could see it coming. Mrs. Peden, this lady, is from Mississippi, that worked for Dave Keene.

Q When you dismantled the Florida office did anyone from the Citizens for Reagan Committee help you in doing that?

A No.

Q They were mainly concerned about getting bills paid and those types of things?

A As quickly as the primary was over in Florida, there were two or three guys -- I can't remember who was there. The next morning they were gone. There was somebody down there that night, but they took off. We didn't see any of them.

Q While you were chairman, did you have any discussions with the national treasurer for the Citizens for Reagan campaign committee?

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A I don't know who the national chairman was. Who was it? If I could think who it was -- I don't want to say I didn't, but I don't know who it was. Do you know who it was? I ought to be able to remember that, but I can't tell you.

MR. BOLTON: That is okay.

BY MR. JOHNSON:

Q Can you describe the inception of the Florida Friends of Reagan Committee?

A Do you want it in detail?

Q Yes. In detail.

A I woke up one night mad as hell.

Q When was this?

A I think it was right after the North Carolina primary.

Q Do you remember the approximate date for this?

A Sometime in the latter part of March. And it would take me an hour to tell you what brought it about. Do you want to know it?

Q Sure. You don't have to take an hour.

MR. BOLTON: Take whatever time you feel you need.

THE WITNESS: I can understand why I am like I am -- and

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I never met this man until an hour ago -- I am sure a lot of people can't understand why I am like I am, why I did it, and I would do it again. Maybe I shouldn't say that, but I will. And all you fellows are much younger than I am, and you probably have a hard time understanding this.

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I was born in New York a rock-ribbed Republican. And you have heard of dropping out of school? I didn't drop out of high school; I jumped out. The day after I was 17 I joined the marines. By the time I was 19 I was a combat veteran. I married a girl from Alabama when I was in the marines, and when I was discharged, I went down there. I had been overseas, and I was still not 21. I went to the courthouse the day I was 21 to register to vote because these things are important to me. I found out that I couldn't register as a Republican and I raised all kinds of hell in the courthouse, because it is important to me to vote. It is very important to me. And I had an uphill struggle in Alabama for all those intervening years because I was a Republican.

The first automobile dealership I had -- I started out as a salesman, did very well, got a small dealership in a small town where Auburn University is. It's a small town,

and I was the only Republican in town. So I took abuse for years, professional abuse, and the only damn thing that protected me were the wildlife laws, I guess, because I was an endangered species.

I was very active in the formation of the Republican Party in Alabama. After the '64 election I was lucky enough to get a Chevrolet dealership in Florida. I became active in the Republican Party in Florida. I became the state chairman and served four years.

And Jerry Ford is a very good friend of mine. I think he was a wonderful man, but I was opposed to the party system, and Governor Reagan spoke my language. And in all the time I rode with Governor Reagan during the Florida primary I kept trying to get him to break the 11th commandment, to quit being too much of a gentleman. He is still too much of a gentleman. If you are going to take someone's job away from them, you have to give them a reason to vote for you.

The reason we lost in Florida was because Reagan wouldn't break the 11th commandment. He couldn't criticize President Ford, and because the last week before the Florida primary, Ford came to Florida and unashamedly just spent

millions of dollars. St. Petersburg, in the biggest Republican county, got a hospital which several other states were in contention for. Martin Marietta got a \$33 million defense contract in Orlando. The Secretary of Transportation came to Miami and gave \$15 million for a rapid transit system.

I was incensed. And Florida has five Republican congressmen, and those five Republican congressmen came back to Florida a week before the primary and told their constituents that they had all kinds of goodies for them; they had to support the President; otherwise I am convinced in my heart we would have won the Florida primary.

The people in North Carolina had told the Citizens for Reagan people here, David Keene, John Sears, to stay the hell out of North Carolina, they wanted to run the campaign their way and get a little tough and were critical of President Ford, and they won.

Okay, so after the North Carolina primary, I woke up in the middle of the night and thought, you know, damn it, Reagan will never win anything unless he does become more critical.

BY MR. JOHANSEN:

Q Did you talk to people in North Carolina about this?

A Yes.

Q This was before the North Carolina primary or afterward?

A Before, I think.

Q And you discussed strategy with them?

A Not in depth. But basically, they told me that they wouldn't let me and these other guys come in. They were running it their way.

So I called this advertising friend of mine, a local advertising agency who does commercial advertising who works for us, and we discussed it. And the Wisconsin primary was coming up in no time. We just had no time to get ready, and he got on the phone and found out how many papers there were that could run an ad on the Sunday before the Wisconsin primary, which was on Tuesday.

Q Let me interrupt. Did you discuss this with any other people aside from the advertising person?

A Yes. I took the brochure that was given to me as a Republican state chairman to my lawyer and said -- now in Florida -- he wasn't aware of this because in the northern part of the state our papers don't carry like in the southern part. But the Conservative Union had run an ad in the

Florida papers for Reagan, so had Joseph Coors from Colorado. So I went to him and said here are the guidelines. Would you study them, and is there any reason why I can't set up a deal called, "Florida Friends of Reagan?"

He kept the booklet and called me the next day and said there was no reason why you can't as long as you file the forms, and I tried to do that.

Q Did you solicit other people's help or solicit other people to become members of Florida Friends of Reagan?

A Yes.

Q How many people?

A The ones I reported there.

Q Reported where?

A In the reports I filed with you all. The people who sent in money, I reported it all.

Q With the Federal Election Commission?

A Yes.

Q Did any of them help you organize the committee?

A No. Some might have called somebody else. Some that gave maybe a thousand dollars might have called somebody else, but I think everybody on there is a friend of mine that gave money. One guy may have called somebody

also for me because --

Q Did you discuss your idea with anyone from the Citizens for Reagan Committee?

A No. Not until -- in fact, when Dave Keene called me, I told him, and he asked me not to. That was about two or three days before, and he told me it was going to be counterproductive and not to do anymore. I intended to do it in other states, but after he said don't do it, I didn't.

Q Did you discuss the idea with anyone in other states about placing advertisements in other newspapers in other states?

A No.

Q Did you ever talk to Governor Reagan after the primary in Florida?

A Not until the convention.

Q You attended the convention?

A Yes.

Q Were you a delegate?

A Yes. I was a delegate.

Q Maybe you said this, but approximately how many people would you say were involved in Florida Friends of

Reagan, say the first tier of people; not people who gave contributions?

A No.

Q It was basically your committee?

A Yes. Me and my wife, and of course, I had to have an advertising agency.

Q How about some of the individuals that worked on the Citizens for Reagan Committee that had different offices throughout the state? Were any of those people involved at all?

A No. Except, I can't remember all the people that gave money now, but some of the people that were Reagan workers in the primary and Citizens for Reagan contributed to Friends of Reagan. Is that what you mean?

Q Yes. They gave contributions?

A Yes.

Q Could we go back to Long Advertising again? How did you make the decision to contact them?

A They do advertising work for me.

MR. BOLTON: For your company?

THE WITNESS: Yes.

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BY MR. JOHANSEN:

Q Did they do any advertising work for the Citizens for Reagan Committee?

A I wouldn't think so. I think all their advertising was totally out of Washington.

Q Did the Long Advertising Agency -- were they the ones who made the decision as to which newspapers to put ads in in Wisconsin?

A Yes.

Q Were those similar to ones in the Florida primary?

A No. They had nothing to do with them.

Q Who made them up?

MR. BOLTON: Which ones?

MR. JOHANSEN: Wisconsin.

THE WITNESS: Long Advertising took my ideas and made ads. I didn't see the ads until afterward because they weren't typed to send to me for proofing. I had to trust them.

BY MR. JOHANSEN:

Q In your interrogatories I think you said you used a picture of Governor Reagan, and Mr. Bolton has a copy of the interrogatories. Maybe you would like to look at those. You said you got it from the Wall Street Journal.

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MR. BOLTON: The answers to the interrogatories identified the source of the copy, layout and design of the advertising paid for by Florida Friends of Reagan, and that was the response.

THE WITNESS: Long did it. They say the picture of the Governor was copied from the Wall Street Journal.

BY MR. JOHANSEN:

Q You don't know how they got it from the Wall Street Journal?

A No.

Q It wasn't from Citizens for Reagan, the picture?

A I don't think so. I have seen that. I guess it is one they mailed to newspapers and all, and they used it, but I don't know.

Q You also used a photograph of the White House, which you said was obtained from H. Armstrong Roberts Stock Photo Supplier. Do you know how Long Advertising obtained it from Mr. Stock?

MR. BOLTON: I think the person's name is H. Armstrong Roberts, and I think his business is Stock Photo Supplier.

BY MR. JOHANSEN:

Q Do you know how they obtained his name to get the

picture of the White House?

A When I called Mike Thompson about it, he said they got them. It is like an office supply place, I assume.

Q Do you know if Long contacted anyone from the Citizens for Reagan Campaign committee?

A I don't know. I couldn't say definitely. I don't know.

Q When were the ads actually placed in the Wisconsin newspapers?

A What day?

Q Yes. Do you remember in relation to the Wisconsin primary?

A Yes. They were on Sunday, and the primary was on Tuesday.

Q Do you know in how many papers the ads were placed?

A Ten or twelve I would guess; ten or twelve.

MR. BOLTON: It says in the interrogatories' answers 14.

THE WITNESS: Fourteen.

BY MR. JOHANSEN:

Q How did you raise money for the placement of these ads? You said you solicited contributions earlier. How did you do that?

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A Called some of these friends of mine, people in Florida. Most of them that contributed I called. I didn't have time to write letters.

Q So they were either made by word of mouth or in a telephone conversation?

A Yes.

Q Who did the calling?

A I did.

Q Did your wife help you?

A No.

Q Did anyone else do any calling?

A No.

Q When did you begin soliciting contributions for Florida Friends of Reagan?

A I guess as quickly as I found out I was going to do it.

Q A couple of days after you originally thought of the idea?

A Yes.

Q Do you remember when the Florida Friends of Reagan received their first contribution?

A Not exactly.

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MR. SOLTEN: I think that is reflected in the report filed with the Commission on March 28.

MR. JOHANSEN: We can determine that.

BY MR. JOHANSEN:

Q The people you contacted either by word of mouth or on the phone, did you have any solicitation lists or was it just friends of yours?

A Yes. They were just close friends, most of them, because I didn't have time to go to any list. I am sure I could have gotten more money if I had gone to lower levels, but most of the people I called were people I knew could afford to give \$1,000 or \$500.

Q Did you use any list that had been used by the Citizens for Reagan Committee in the primary?

A I didn't use a list. I have known these people for years. I didn't need a list. They were active in the Republican Party and all.

Q I think you said earlier that you considered putting ads in newspapers in other states other than Wisconsin. Did you consider any other projects besides newspaper advertisements?

A Such as? I don't really know what you mean.

Q So primarily you only considered putting newspaper advertisements in other states?

A Yes.

Q You didn't consider involving yourself in other states' campaigns in any way?

A No.

Q I guess as chairman of Florida Friends of Reagan you were the decision maker?

A Yes.

Q Why did you put the advertisements just in the Wisconsin papers?

A Just in the specific Wisconsin papers he put them in?

Q Generally why did you decide to put advertisements in newspapers in Wisconsin?

A Because that was the primary coming up. It wouldn't do any good to put them somewhere where there wasn't a primary.

Q Well, you stated earlier that you thought about placing advertisements in other states' newspapers. Why did you decide against doing that?

A Two reasons: Keene told me not to do it.

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specifically, absolutely not to do it because he thought it would be counterproductive, and there was not any great response from the people in Wisconsin for contributions. I thought the people in Wisconsin would contribute enough that you could go in and run ads in some -- in the Republican Party in Florida prior to this, not having anything to do with any specific candidate or anything like that, we would run ads, and people would send in contributions, and we would take that money and put ads in other papers to build your list of standing members.

Q So you were hoping to get contributions from people in Florida?

A Not Florida. Wisconsin.

Q Did you actually solicit contributions in the ads?

A Yes. There was a coupon. We didn't receive a lot of contributions from them. Those that gave a contribution of any size are listed.

I returned a lot of small contributions to Wisconsin and wrote a little note saying, "We are not going to run the ads, and so I am returning your money."

Q Why did you return the contributions?

A Because I wasn't going to run any more ads, and I

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didn't want to mislead them.

Q I think in your interrogatories you stated that you paid Long Advertising on April 5th, 1976, for their services, and the payment was for \$12,771.49?

A That is what it says.

Q Can you tell me how that payment was made?

A I guess I sent them a check.

Q Was it a committee check, or did you pay them personally?

A Maybe both. It may have been partly from the committee and partly personally, because I didn't know until -- in other words my contribution and my wife's were made to just balance out, just balance the bills; so we had nothing left over.

Q This was your contribution to --

A To the Florida Friends of Reagan.

Q So you don't remember exactly if you made part of the payment to Long Advertisement? It could have been partly from you and partly from the committee?

A Yes. But at the final outset the Florida Friends of Reagan paid it all, and I may have got some money back personally because I had to pay them, and I can't tell you

whether I paid them with a personal check. I think in the final analysis he returned the money so it would balance out with the money that Florida Friends of Reagan had.

Q When you say, "he returned" --

A Long Advertisement. It is not a --

MR. BOLTON: So it would balance out with the debt due Long Advertisement?

THE WITNESS: That is right.

BY MR. JOHANSEN:

Q So any amount you paid to Long Advertisement for the Florida Friends of Reagan committee was reimbursed to you at a later date?

A In other words, we just swapped checks to make sure we balanced with Florida Friends of Reagan.

Q Could you explain to me what you mean by swapping checks? Did Long Advertisement not cash your check?

A No. They did. I am sure they did, but I know I had to pay Long. Most -- well, I guess nearly all the money that was taken in practically -- there may have been some other expenses, I can't remember -- went to Long Advertisement. And I had to send them money up front to pay for the ads, and I think that when the Florida Friends

of Reagan sent him the check for the balance, whatever it was, then whatever part was mine, as I recall, he refunded it to me, and at that time I knew how much I had to put in.

Q So he gave you a check for long Advertisement?

A I think so, but it was to balance it out, so he was paid and all the bills were paid, you know. It is in the file. I gave you a complete detailed breakdown on every token.

Q You said earlier that you spoke with Mr. Keene a few days before the ads were run in Wisconsin, and he said you shouldn't go forward. Is that correct?

A Words to that effect. Yes. He got hot about it. I told him it was none of his damn business.

Q Why did he not want you to go forward with the ads?

A He said, number one, there was a possibility -- I don't think he said it would be breaking the law; and two, he said they would be counterproductive.

Q Did you discuss whether or not it could be illegal?

A I told him it wasn't because I had already checked with my lawyer.

Q Did he indicate more than that you may get into

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trouble?

A No. I don't think he did. I can't recall. We exchanged some hot words about it.

Q Did you discuss the Wisconsin primary at all during that conversation?

A I don't think so. Somebody in Wisconsin called them and told them they didn't know we were going to run ads, and somebody called and told them they had seen the ads. Some newspaper had shown them the ads, something like that, and he said, you know, it was going to shoot them down, going to kill them. And I said, "You are not going to win anyway. What the hell difference does it make?"

Q Was this the only time that you talked to Mr. Keene after you finished up with the Citizens for Reagan Committee, do you recall?

A The only time between then and the Wisconsin thing?

Q Yeah. You had a wrap-up period of time. After you had wrapped up the campaign in Florida, did you talk to Mr. Keene?

A I don't think so.

Q His secretary?

A I know I talked to his secretary about phone bills,

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things like that.

Q How about after you wrapped up the campaign in Florida?

MR. BOLTON: I think he just answered that. You are talking about his conversations about the Wisconsin ads?

BY MR. JOHANSEN:

Q I am sorry. No. After the Citizens for Reagan Committee terminated in Florida, then you had a period of about a month where you wrapped up whatever you had to wrap up. After that wrap-up period, did you talk to Mr. Keene from then until you talked to him immediately before the Wisconsin newspaper ads?

A I don't think so.

Q How about Governor Reagan?

A No.

Q Anyone else in the Citizens for Reagan Committee?

MR. BOLTON: Other than Ms. Peden?

THE WITNESS: Not that I can recall. We felt bad about losing the primary, and I am sure they felt bad about it, and there wasn't much to talk about.

BY MR. JOHANSEN:

Q When did Florida Friends of Reagan terminate its

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activities?

A When we filed our last report with you.

Q And that decision was made by you?

A Yes, sir.

Q And it was made for the reason you stated earlier?

A Yes, sir.

(Discussion off the record.)

BY MR. JOHANSEN:

Q Following the Wisconsin primary, did you resume any campaign responsibility with Citizens for Reagan?

A No.

Q Even in an unofficial capacity did you assist or help them?

A No. I mean -- what was the date of the Wisconsin primary? I still had to go close out the office. Was that before or after?

MR. JOHANSEN: April 6 was the Wisconsin primary.

THE WITNESS: Yes. I had to go close out the office in Orlando after that, but that was all.

BY MR. JOHANSEN:

Q How did you submit receipts for expenditures which you incurred on behalf of Citizens for Reagan?

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A I submitted them to our office in Florida, and if they had the money they paid them. If they didn't, I guess they may have been paid in Washington. I submitted them to the secretary that we had. The people could sign the checks, the secretary and the CPA, and it was in his office. Her office was in his office.

Q On the 14th of July, 1976, you received \$610.57 in travel reimbursement from Citizens for Reagan.

MR. BOLTON: I think the report, the Citizens for Reagan report, says travel reimbursement and office expenses.

MR. JOHANSEN: And motor vehicle; all three possibly.

MR. BOLTON: It is more than travel.

MR. JOHANSEN: Yes, I agree with you.

BY MR. JOHANSEN:

Q As you know, we have secured from the Citizens for Reagan Committee copies of receipts which you had submitted to them, and they were supplied to your attorney some time ago. Have you seen copies of them?

A Yes. There was one item on there, a lunch deal for \$7 and something, I don't think should have been charged to the Reagan Committee. I think it was in error. And most of them were incurred in March, but we kept up everything.

I handled everything on American Express. It is always a month before you get the bill, but I did, so I would have a record.

Q I think you are correct in that a number of the receipts were dated after March 9, the date of the Florida primary, and if possible, I would like to go through those quickly with you.

And the first invoice I am handing to you is from National Car Rental.

MR. ROYER: No.

BY MR. JOHANSEN:

Q I am sorry. And it is dated March 28, 1976, and it was for \$43.08.

A Yes.

MR. JOHANSEN: I might ask that this be marked as Government Exhibit No. 1.

(The National Car Rental System, Inc. invoice dated March 28, 1976, for \$43.08 was marked Government Exhibit No. 1 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Could you examine that and tell us the purpose of

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this expenditure?

A The \$43.00?

Q Yes.

A I can't remember exactly, but what it looks like to me -- the car was driven only 38 miles. It is about 15 miles, I guess, from the airport to the headquarters, and it was probably just as cheap, you know, to rent a car. Because where our headquarters was there was no other way of getting around. You would have to call a taxi. But it looks like I had the car for two days and put 38 miles on it which would be just to headquarters and back.

Q So this is during the wrap-up activities when you were visiting headquarters in Orlando, the small headquarters?

A It would be the small headquarters.

Q The second invoice I am handing to you is from the National Car Rental, dated May 19, 1976, and it is for \$15.90, and I ask that it be marked as Government Exhibit No. 2.

(The National Car Rental System, Inc. invoice dated May 19, 1976, for \$15.90 was marked Government Exhibit No. 2 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANNSEN:

Q Could you examine that and explain the purpose of those expenditures.

A No. I can't. And I can't figure -- what could you get from them for \$15.90?

Q I don't know. Do you remember where the car was used?

A No. How would you get a bill for \$15.90?

Q Does it state on the invoice?

A No. It is the same number credit card and all, but you can't get anything for \$15.90.

Q Do you know if you were in Orlando on that date?

A I wouldn't think so. It is possible, but you can't rent a car for a day for \$15.90.

Q Would the office have been closed? Would you have had your small office closed on that date?

A I am not positive of the date we closed it. I would think off the top of my head, I would think the office was closed about the end of April; maybe May 1st. But it is possible it was open then, but I can't figure out what in the world you could get --

Q The third invoice I am going to hand you is a

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ticket stub from Southern Airways for a flight on May 18, from Panama City, Florida to Orlando, Florida and return on May 19. The amount is \$85.98. I think that the date correlates with the date of the car rental. I should have handed you the plane ticket first.

(The ticket stub from Southern Airways for a flight to Orlando, Florida from Panama City, Florida and return on May 18, 1976, was marked Government Exhibit No. 3 for identification, a copy of which is attached to the court copy of this deposition.)

THE WITNESS: But I still can't figure out how you could get a car for \$15.90.

BY MR. JOHANSEN:

Q When you were in Orlando, was that probably when you were closing up the small office?

A It is possible. Yes.

Q Do you recall whether you were in Orlando that day or what you did?

A No. The only thing I can remember doing was going down there and closing the office.

Q How about the American Express bill which is on the same sheet for \$7.49?

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A That is the one I think is in error. I don't think it should be charged to Reagan.

Q It appears that the date is June 11, 1976, but it is very difficult to read.

A Right, but I think it is a mistake. It shouldn't have been charged to the Reagan committee.

Q But the offices of Citizens for Reagan were closed by the 11th of June?

A Yes.

(The American Express bill for \$20.01 dated April 28, 1976, was marked Government Exhibit No. 4 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fourth bill is one from American Express for \$20.01 on April 28, 1976. The place where the bill was charged to is blurred. Do you have any recollection of what that expenditure was for?

A No. Sure don't. I will say it was not a restaurant charge because if it was a restaurant charge there would be a tip on it.

MR. BOLTON: Excuse me. I have just noticed on some of

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these papers that there are handwritten notations in pencil, numbers three, four, and five, that were not on copies that we got from Citizens for Reagan.

MR. JOHANSEN: I put them on to keep them straight.

MR. BOLTON: Okay. Just so long as the record reflects that.

(The check stub record for \$11.58 payable to Shell Oil Company dated March 22, 1976, was marked Government Exhibit No. 5 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The fifth document is a check stub record to Shell Oil Company on March 22, 1976, for \$11.58. That appears to be for gas. Do you know when that expenditure was made?

A When it was actually purchased?

Q Yes.

A Your credit card bill is always a month behind, so I would say the gas was bought sometime in February or maybe even January.

(The check stub record for \$59.27 payable to Texaco, Inc. dated April 15, 1976 was marked Government Exhibit No. 6 for identification, a copy of which is attached to the court copy of this deposition.)

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BY MR. JOHANSEN:

Q The sixth is a check stub record of a check made out to Texaco, Inc. on April 15, 1976, listing an expenditure for the Reagan campaign of \$10. I think there were also billings on there that weren't attributed to the Reagan campaign. Is that correct?

A Yes.

Q Do you recall when the actual expenditure was made?

A No. But I can tell you that it would have to be sometime a month before that at least.

(The check stub record for \$23 payable to Shell Oil Company dated April 22, 1976 was marked Government Exhibit No. 7 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q The next is a check stub recording of a check made out to Shell Oil Company on April 22, 1976; do you recall when the actual expenditure for that was made?

A No. Of course, it would be prior to that, at least a month.

Q Except for the charges for gasoline, the documents

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I handed to you marked as exhibits were expenditures made in wrapping up the Citizens for Reagan campaign in Florida?

A I would assume so. Yes.

(The check stub record for \$67.20 payable to National Car Rental System, Inc. dated April 30, 1976, was marked Government Exhibit No. 4 for identification, a copy of which is attached to the court copy of this deposition.)

BY MR. JOHANSEN:

Q Lastly, I am handing to you a check stub record of a check made out to National Car Rental dated April 30, 1976, for \$67.20, regarding these last four exhibits.

MR. BOLTON: Eight, seven, six and five.

BY MR. JOHANSEN:

Q Eight, seven, six, and five. They seem to indicate that funds were drawn from the Tommy Thomas Chevrolet, Inc. corporate account to pay for expenses incurred in the Reagan campaign.

A Yes. And they were reimbursed. But you have some a duplication. This \$67.20 is the same bill as Exhibit 1; \$43.08 is part of \$67.20.

Q Yes. I understand that. Could you explain the notation, "Reagan Committee," on those four exhibits?

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A It is an accounts receivable; 220 is an accounts receivable, and it was charged to the Reagan Committee. They had an accounts receivable, and we had a running ledger set up in the name of the Reagan Committee, and every month we charged things to it, and they reimbursed Tommy Thomas Chevrolet, or reimbursed me, and I gave it to Tommy Thomas Chevrolet.

Q So Tommy Thomas Chevrolet set up an account number for the Reagan campaign?

A Yes. Because lots of time I wasn't there when the American Express bill came in, and what was charged to them, they gave me the tickets, and I got reimbursed and reimbursed them.

Q Okay, just so I understand. Account 220 was a special account that was created in the accounting procedures of Tommy Thomas Chevrolet to pay off campaign debts that were incurred on behalf of Governor Reagan?

A Well, 220 is accounts receivable in all General Motors' accounting. It doesn't make any difference whether it is Buick, Chevrolet or Oldsmobile; 220 means accounts receivable. Any auditor would know, so it was charged to accounts receivable in the name of the Reagan Committee.

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Q And then reimbursements were made to you from the Reagan Committee?

A Yes.

Q Were other bills presented to Tommy Thomas Chevrolet, other than the four we have been discussing here?

A There were several; yes. And they were paid every month. Whenever bills were sent in they were paid and reimbursed, and it just washed out.

Q Do you know when the last reimbursement was made to Tommy Thomas Chevrolet?

A When I got the six hundred and some dollars back that balanced it out, the account zeroed out.

Q Could you explain again how the bill was paid to Long Advertising Company?

A I am not really sure. I would have to go back and check because I don't know exactly how it was handled.

Q But as you recall you advanced money to Long Advertising?

A Some of it.

Q And then as money came in for the Florida Friends of Reagan Committee, it was sent to Long Advertising Company?

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A Yes.

Q And they reimbursed you for the amount of money you had initially paid for the advertisements?

MR. BOLTON: I think he also said some of the money was paid for directly out of Florida Friends of Reagan funds.

MR. JOHANSEN: Yes. I understand that also.

I have no further questions.

MR. BOLTON: Do I have the opportunity to ask questions?

MR. JOHANSEN: Yes.

EXAMINATION BY COUNSEL FOR LUTHER EDWIN THOMAS

BY MR. BOLTON:

Q There were some one or two places during the course of this deposition where, in response to questions from Mr. Johansen you explained you may have spoken to people in other states connected with Citizens for Reagan, and you may have asked questions like, "How does it look in that state for Governor Reagan?" Were those conversations anything other than casual conversations?

A No.

MR. BOLTON: I have no further questions.

Excuse me. One other thing. I think we wanted to mark as exhibits the interrogatories, and I don't think we need to

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Mark the covering letters unless you want to.

(The interrogatories and the answers to interrogatories were marked Government Exhibits Nos. 8 and 10, respectively, for identification, copies of which are attached to the court copy of this deposition.)

THE JOURNALIST: This ends the deposition.

(By stipulation of counsel, in the presence of the witness reading and signature waived.)

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CERTIFICATE OF NOTARY PUBLIC

I, Bobbie C. Lake, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to type-writing by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Notary Public in and for
the District of Columbia

My commission expires
January 1, 1993

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 443

