The original documents are located in Box 16, folder "Management and Budget, Office of" of the Loen and Leppert Files at the Gerald R. Ford Presidential Library.

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET

Congressional Relations May 28, 1975

To: Vern Loen

From: Bob Bonitati

Per our conversation, I'm attaching the OMB comments on Del Clawson's draft bill.

Called Anita Charles
6-6-75

EXECUTIVE OFFICE OF THE PRESIDENT

OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

DATE: MAY 27 1975

REPLY TO ATTN OF: LRD (Frey)

SUBJECT: Informal OMB comments on Rep. Del Clawson's draft bill

• Bob Bonitati

As you requested May 19, here are some comments on the bill. We cannot find a single redeeming feature.

Whoever uses this material should do so orally and with discretion (i.e., do not leave the paper with the Congressman). We have discussed the pitfalls and problems of OMB providing views informally or formally to individual members on their bills rather than doing so through the usual process of responding to requests of the committees for views on introduced bills.

Frey

James M. Frey
Assistant Director for
Legislative Reference

Attachment

> To establish a method whereby the Congress may prevent the adoption by the executive branch of rules or regulations which are contrary to law or inconsistent with congressional intent or which go beyond the mandate of the legislation which they are designed to implement.

To carry out the purpose stated in its title, this draft of a bill would require that every rule or regulation or change thereof be submitted to Congress at least 60 days before it is to take effect and that either House of Congress could prevent such rule or regulation from taking effect by passing a simple resolution within the 60-day period. The basis of disapproval would be the standard set out in the title of the bill, as quoted above.

The major features of this proposed bill are highly objectionable for the following reasons:

-- From a legal point of view, the Justice Department has repeatedly declared the one-House veto procedure to be constitutionally objectionable -- see excerpt from most recent testimony presented by the Department during the week of May 12, 1975.

-- Also from a legal point of view, the stated grounds on which either House would exercise its veto--conformity with the intent of Congress, etc.--appears to be a judicial not a legislative function.

-- From a policy point of view, the bill is squarely contrary to the long accepted procedure that Congress legislates policy, criteria and standards and leaves to the executives and its technical expertise the job of flushing out the law through detailed rules and regulations--a procedure which seems increasingly necessary as problems and solutions become even more complex.

-- From both a legal and policy point of view, a variety of questions would appear to arise from the voluminous nature of many rules and regulations and what would happen to the remaining portions of them if only a limited portion were determined to be objectionable.

-- From a policy and practical point of view, the vast mass of material--running into many thousands of pages annually--which would have to flow to Congress under such a procedure would constitute an overwhelming burden on the Houses and their committees, would tend to give at least implied congressional approval to masses of rules and regulations allowed to take effect, and could result in an unacceptable slowdown in the operation of many important programs in a way that would adversely effect the public.

No evidence has been presented of widespread abuse of rules and regulations that would justify such a sweeping measure, quite apart from the fact that those aggrieved by rules and regulations which would be subject to disapproval now have accepted remedies in the courts--and the courts are increasingly willing to entertain such suits.

In addition, the vast majority if not all of the rules and regulations that would be covered by the bill are required to be published in the Federal Register. From the standpoint of the Congress, it appears that concerned committees could keep abreast of regulations of interest to them through this medium and could challenge those they find questionable through the exercise of their oversight functions which, in turn, could form a basis for remedial legislation.

Attachment

statute passed over the President's veto. A fortiori the concurrent resolution and Senate veto established by the present bills would be ineffective. With respect to executive agreements asserting only exclusive Presidential powers, then, the present bills would contravene the Constitution.

I turn next to agreements whose subject matter involves Presidential powers (conferred by the Constitution, statute or treaty) which are constitutionally subject to congressional control. In my view it is clear that such agreements are valid and binding unless Congress limits the Presidential powers in question by the one means available to it under the Constitution: legislation passed by both Houses and submitted to the President for his approval. Congress cannot repeal or amend or restrict Presidential powers by concurrent resolution as provided in S. 632 or by resolution of the Senate alone as provided in S. 1251, since this would distort the constitutional legislative process by avoiding the President's veto.

The difficulty is not solved by the fact that this legislation itself must pass over the President's veto. For this legislation does not purport to remove Presidential power to enter executive agreements (it is doubtful that it could constitutionally do so) or Presidential power to act in all of

those substantive areas which the category of executive agreements we are now discussing might deal with. The legislation would leave the power, but subject it to a congressional restriction which is simply not envisioned by the Constitution. One might reasonably ask, if the Congress can do the greater (take away the power entirely), why can it not do the lesser (subject the use of the power to congressional approval)? I can best explain by an analogy to the law of property: A person is entirely free under the common law to refuse to sell his real property, but if he chooses to sell it he cannot subject it to continuing restrictions, so-called "restraints on alienation," which are inconsistent with full title in the new owner. So also, the Congress has authority to deprive the President completely of substantive powers in a number of fields; but unless it is willing to take that drastic step, it cannot leave the powers intact and yet subject them to formal restrictions other than those that can subsequently be imposed by the normal legislative process. The need for this doctrine should be obvious: Without it, the carefully drawn legislative procedure of the Constitution could be entirely evaded by a congressional grant of enormously broad powers and authorities to the President, subject only to the condition

that Congress approve their exercise by concurrent resolution. In effect, our laws would thereafter be made by the Congress alone, without any effective Presidential participation.

The language and history of the Constitution indicate that the veto power of the President was intended to apply to all actions of Congress which have the force of law. It would be difficult to conceive of language and history which make the point more explicitly. Two provisions of Article I, section 7 are involved. The Constitution provides, first, that every bill which passes the House of Representatives and the Senate, shall, before it becomes a law, be presented to the President for his approval or disapproval. If disapproved it does not become law unless repassed by a two-thirds vote of each House. (Art. I, sec. 7, clause 2).

The problem that we face today was foreseen by the Framers. At the Constitutional Convention it was recognized that Congress might evade the above-described provision by passing "resolutions" (the precise language of these proposals) rather than bills. During the debate on this clause, James Madison observed that

> "if the negative of the President was confined to bills; it would be evaded by acts under the form and name of Resolutions, votes &c . . . ."

Madison believed that additional language was necessary to pin this point down and therefore

> "proposed that 'or resolve' should be added after 'bill' . . . with an exception as to votes of adjournment &c."

Madison's notes show that "after a short and rather confused conversation on the subject," his proposal was, at first, rejected. 2 M. Farrand, The Records of the Federal Convention of 1737, 301-02 (1937 Rev. ed.) ("Farrand"). However, at the commencement of the following day's session, Mr. Randolph, "having thrown into a new form" Madison's proposal, renewed it. It passed by a vote of 9-1. 2 Farrand 303-05. Thus, the Constitution today provides--not in clause 2 of section 7, dealing with the passage of legislation (which has its own Presidential veto provision), but as an entirely separate clause 3--the following:

> "Every Order, Resolution, or Vote to which the Concurrence of the Senate and House of Representatives may be necessary (except on a question of Adjournment) shall be presented to the President of the United States; and before the Same shall take Effect, shall be approved by him, or being disapproved by him shall be repassed by two-thirds of the Senate and House of Representatives, according to the Rules and Limitations prescribed in the Case of a Bill."

It should be apparent from the wording of this provision, and from its formulation as a separate clause apart from the clause dealing with legislation, that it was intended to

protect the President against all congressional evasions of his veto power, and not merely those that were formally connected with the legislative process. Of course, the fact that it refers only to concurrent resolutions, and not to one-House resolutions such as S. 1251 would provide, was not meant to sanction avoidance of the Presidential veto by the latter process; rather, the omission was meant to exclude from the veto requirement those instances in which, under the Constitution, the Senate has authority to take binding action on its own--to wit, in ratifying treaties and in confirming the appointment of Federal officers (Article II, section 2). It was probably not even envisioned that, apart from those constitutionally prescribed instances, a single House would purport to take any legally effective action on behalf of the entire Congress. In other words, the provision of S. 1251 for a one-House veto is not in literal violation of section 7, clause 3 of the Constitution only because it has in addition to the defect which that provision addresses the defect of being an unlawful delegation of congressional power to one of its Houses.

The purpose of the veto was not merely to prevent bad laws but to protect the powers of the President from inroads of the kind represented by S. 632 and S. 1251. Leading

participants in the Convention of 1737, such as James Madison, Gouverneur Morris and James Wilson, pointed out that the veto would protect the office of President against "encroachments of the popular branch" and guard against the legislature "swallowing up all the other powers." 2 Farrand 299-300, 586-87. In The Federalist (No. 73), Hamilton states that the primary purpose of conferring the veto power on the President is "to enable him to defend himself." Otherwise he "might be gradually stripped of his authorities by successive resolutions, or annihilated by a single vote." We are faced in this proposed legislation with precisely the situation these quotations describe. The actions of the President in carrying out one of his principal functions--as the sole instrument for the actual conduct of our foreign relations--will be subjected to impairment and reversal by congressional vote without protection of the Presidential veto.

Despite the explicit language of the Constitution and the clear evidence of the original understanding contained in the remarks of the Framers, statutes have existed for some years which provide for congressional action by concurrent resolution. Moreover, although Presidents have vetoed proposed laws because of the unconstitutionality of such provisions, and have even more frequently registered their constitutional

objections in signing statements, they have sometimes accepted such provisions in silence, and have on several occasions even proposed legislation containing them. This is to be explained, one presumes, by the Presidential determination of acute need for legislation which could not be obtained without the objectionable provision. Former Justice (and before that Attorney General) Jackson recounted that when President Roosevelt signed without objection the Lend Lease Act of 1941, 55 Stat. 32, he addressed an internal memorandum to the Attorney General stating, for the record, that in view of the importance of the legislation he felt constrained to sign the bill in spite of the fact that in his view section 3(c) purported to give legislative effect to congressional action not presented to the President and this violated Article I; section 7 of the Constitution. Jackson, A Presidential Legal Opinion, 66 Harv. L. Rev. 1353, 1357-58 (1953).

The argument suggests itself that repeated congressional use of such provisions, and occasional Presidential acceptance, comprise a constitutional practice which establishes their validity. This can not be so. Custom or practice may indeed give conclusive content to vague or ambiguous constitutional provisions, but it cannot overcome the explicit language of the text--especially when that text is supported by historical

evidence that shows it means precisely what it says. Moreover, if one is to rely upon practice, it must be both accepted and long standing. Repeated Presidential objections destroy the first of these characteristics, and the clear record of history eliminates the second. Use of the concurrent resolution is in fact a very recent phenomenon, and flatly contradicts what was the accepted understanding and usage until the second third of this century. A careful analysis of the historical practice was compiled by the Senate Judiciary Committee in 1897. It shows that from the First Congress through the nineteenth century concurrent resolutions were limited to matters "in which both Houses have a common interest, but with which the President has no concern." They never "embraced legislative provisions proper." S. Rep. No. 1335, 54th Cong., 1st Sess. 6 (1897). The report concluded that the Constitution requires that resolutions must be presented to the President when "they contain matter which is properly to be regarded as legislative in its character and effect." Id. at 8, quoted in part in 4 Hinds' Precedents of the House of Representatives § 3483. A concise formulation of the understanding may be found in Congressman Mann's statement that a concurrent resolution has "no force beyond the confines of the Capitol". 42 Cong. Rec. 2661 (1908).

It was not until the 1930's that enactments of the present sort first appeared, see R. Ginnane, The Control of Federal Administration by Congressional Resolutions and Committees, 66 Harv. L. Rev. 569, 575 (1953), and not until very recent years that they became fairly frequent. It has been recognized, even by their supporters, that they raise difficult constitutional issues. See, e.g., Memorandum of Senator Javits on the Foreign Assistance Act of 1961, 107 Cong. Rec. 15039 (1961); L. Henkin, Foreign Affairs and the Constitution 120-123 (1972). If, then, we are to give any credit to constitutional custom, we believe that it argues persuasively against the validity of congressional action by concurrent resolution. The practice begun with the adoption of the Constitution and continued uniformly until relatively recent years is entitled to far greater weight than a highly controverted contemporary phenomenon.

[Tentative Draft]

94th Congress
1st Session

Mr. Del Clawson

A B I L L

To establish a method whereby the Congress may prevent the adoption by the executive branch of rules or regulations which are contrary to law or inconsistent with congressional intent or which go beyond the mandate of the legislation which they are designed to implement.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That whenever any officer or agency in the executive branch of the Federal Government (including any independent establishment of the United States) proposes to prescribe or place in effect any rule or regulation to be used in the administration or implementation of any law of the United States or any program established by or under such a law, or proposes

to make or place in effect any change in such a rule or regulation, such officer or agency shall submit the proposed rule, regulation, or change to each House of Congress together with a report containing a full explanation thereof.

Sec. 2. (a) Except as provided in subsections (b) and (c), any proposed rule, regulation, or change described in the first section of this Act shall become effective 60 legislative days after the date of its submission to the Congress as provided in such section, or at such later time as may be provided in the rule, regulation, or change itself or in the report submitted therewith.

(b) No proposed rule, regulation, or change described in the first section of this Act shall be placed in effect if, within the 60-day period described in subsection (a) of this section, either House of Congress adopts a resolution in substance disapproving such rule, regulation, or change because it contains provisions which are contrary to law or inconsistent with the intent of the Congress, or because it goes beyond the mandate of the legislation which it is designed to implement or in the administration of which it is designed to be used.

(c) Nothing in this Act shall prevent the Congress, at any time during the 60-day period described in subsection (a) of this section, from adopting a concurrent resolution specifically approving the rule, regulation, or change involved; and upon the adoption of any such concurrent resolution the rule, regulation, or change may become immediately effective.

(d) As used in this Act, the term "legislative days" does not include any calendar day on which both Houses of Congress are not in session.

Sec. 3. (a) This section is enacted by the Congress--

(1) as an exercise of the rulemaking power of the Senate and the House of Representatives, respectively, and as such it shall be considered as part of the rules of each House, respectively, and such rules shall supersede other rules only to the extent that they are inconsistent therewith; and

(2) with full recognition of the constitutional right of either House to change such rules (as far as relating to the procedures of that House) at any time, in the same manner and to the same extent as in the case of any other rule of that House.

(b)(1) Any resolution introduced under section 2(b) shall be referred to a committee by the Speaker of the House or by the President of the Senate, as the case may be.

(2) If the committee to which any such resolution is referred has not reported any resolution relating to the rule, regulation, or change involved before the expiration of 30 calendar days after the submission of such rule, regulation, or change, it shall then be in order to move to discharge the committee from further consideration of such resolution.

(3) Such motion may be made only by a person favoring the resolution, and such motion shall be privileged. An amendment to such motion is not in order, and it is not in order to move to reconsider the vote by which such motion is agreed to or disagreed to.

(4) If the motion to discharge is agreed to or disagreed to, such motion may not be renewed.

(5) When the committee has reported, or has been discharged from further consideration of, a resolution introduced under section 2(b), it shall at any time thereafter be in order (even though a previous motion to the same effect has been disagreed to) to move to proceed to the consideration of such resolution. Such motion shall be privileged. An amendment to such motion is not in order, and it is not in order to move to reconsider the vote by which such motion is agreed to or disagreed to.

(c) Except to the extent specifically otherwise provided in the preceding provisions of this section, consideration of any resolution with respect to a proposed rule, regulation, or change in either House of Congress shall be governed by the Rules of that House which are applicable to other resolutions in similar circumstances.

Sec. 4. This Act shall apply with respect to all proposed rules, regulations, and changes therein which (but for the provisions of this Act) would take effect on or after the first day of the first month which begins after the date of the enactment of this Act.

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET

Date: 6/6/75

TO: Vern Loen

FROM: Deputy Director

Per your request, informal memo. - Not a good idea.

Vera Hannegan
called Chuck Sheeren
225-6911
6/10 - 10:45

SUBJECT: FECA coverage for Federal jurors who are not Federal employees

The attached draft bill submitted to Congress by the Administrative Office of the U.S. Courts would extend FECA coverage to persons serving as Federal petit and grand jurors who are not Federal employees. Coverage under FECA for Federal employee jurors was enacted in recent amendments last fall.

Informal views of Labor and Justice

Labor opposes on principle coverage under FECA for non-Federal employees, and offered no specific comments on the bill.

Justice has no objection to the proposal.

General consideration

OMB staff agree with Labor that, in principle, FECA should cover only Federal employees. Despite Labor's opposition, however, the Act now covers various non-Federal employee groups, such as

-- Peace Corps and VISTA volunteers

-- Teacher Corps members

-- Job Corps enrollees

-- State and local law enforcement officers killed or injured when a Federal crime is involved

-- civil air patrol volunteers

Accordingly, coverage of non-Federal employees on Federal jury duty would hardly be the first breach of the system. At the same time, each non-Federal addition seems to lead to more attempts to bring "outsiders" into a Federal personnel benefit program.

Specific problems

1. If the bill is seriously considered, it would be preferable if the rate of pay the juror is deemed to be receiving for purposes of compensation were not set at GS-2, which would establish

N-60

yet another link with Federal employment and would rise every time the GS-2 pay rate is increased. It would be better if the bill were changed to tie to the rate at which Federal jurors are paid. (This is currently $20 per day, or approximately $400 per month, compared to approximately $500 per month for a GS-2.)

2. No provision is made in the draft bill as to which appropriation account would be charged. Under current law, in the case of Federal employees serving as jurors, Labor says it is unclear whether FECA should charge the employing agency or GSA (which has certain responsibilities for Federal jurors, such as under the Tort Claims Act.)

3. The draft bill provides coverage only while the person is actually performing jury duty. Accordingly, problems could arise with respect to injury or death which occurs after jury duty has been completed, but stems from such service as in a reprisal injury or death. However, these problems apply to Federal employee jurors as well.

None of these problems seems earthshaking if we are willing to accept coverage of non-Federal employees in the first place.

Paul O'Neill
(Chuck Sheenn)
informal views
225-6911

804

ADMINISTRATIVE OFFICE OF THE
UNITED STATES COURTS
SUPREME COURT BUILDING
WASHINGTON, D. C. 20544

MAR 24 1975

Honorable Carl Albert, Speaker
U. S. House of Representatives
Washington, D. C. 20515

Dear Mr. Speaker:

In accordance with the resolution of the Judicial Conference of the United States adopted at its March 6, 7, 1975 meeting, I am transmitting to the Congress for its consideration and action a draft bill which would provide Federal Employee Compensation Act coverage not only for Federal employees serving as Federal jurors but also for other persons performing jury duty in Federal court as a fulfillment of one of their obligations of citizenship.

Although coverage for Federal employees who are serving as Federal jurors was recently provided for in Public Law 93-416 (88 Stat. 1143), the extension of benefits to private citizens who are injured while serving as Federal jurors was not provided for in that legislation although Senate Report 93-1081 (to accompany H.R. 13871) evidenced agreement with a similar resolution of the Judicial Conference of March 1974. (See pamphlet 10 U.S. Code Cong. and Admin. News, 4293, 4299 (paragraph 3) (October 15, 1974, 93rd Cong., 2nd Sess.)).

Serious problems can arise when non-Federally employed Federal jurors are injured or disabled while in the performance of their jury duties. On several occasions prior to the enactment of P.L. 93-416, the United States Department of Labor rejected Federal jurors' claims for injury on the basis that jurors were not defined as "employees" of the Federal government within the meaning of the then 5 U.S.C. §8101(1). After enactment of P.L. 93-416 nothing would indicate a change in position relating to persons, not Federally employed, who are serving as jurors in Federal court. The purpose of this bill is to provide remedial legislation to specify that compensation benefits apply to all persons serving as Federal jurors.

Strong policy reasons exist for bringing all jurors within the coverage of the compensation acts. Jurors actually serving provide valuable government services. While in actual service as a petit or grand juror, the citizen-juror should rationally be accorded the benefit of protection in case of a "job-related" mishap. What begins as a high duty of citizenship through public service to the government could be turned into an economic mishap for the juror in the event of an accident or injury while serving. Now a person injured while serving as a juror cannot recover unless he can bring his case under the Federal Tort Claims Act by proving negligence in a government agent, a difficult burden. Moreover, this inequity is compounded by the fact that a Federal employee is covered by these compensation acts. It would also contribute to the juror's peace of mind, especially in a protracted case or in a situation where he must be transported to make a site inspection, to know that this benefit is available. This aspect of the proposal might be especially reassuring to the head of a family or to the timorous juror sitting in a sensational criminal case. While jurors are very seldom injured, we do have a record of several such cases.

The enclosed draft bill adds a new section, §8142a, to Chapter 81 of Title 5. Proposed §§8142a(a) and (b) define the protected juror to be one who is in actual attendance upon court and specify when payments can commence. Proposed §8142a(c)(1) defines the rate of pay that a Federal juror is deemed to be receiving for purposes of the compensation of the scheme provided for in Chapter 81. This subsection also takes into account and specifies the compensation of the actual Federal employee, who is receiving his normal rate of pay while on court leave pursuant to 5 U.S.C. §5537 and §6322, to be his actual rate of pay. Section 8142a(c)(2) limits and defines when the juror is deemed to be in the performance of duty so that claims for compensation are not granted except for duty-related mishaps. By adding this section covering jurors to Chapter 81 of Title 5, United States Code, Federal jurors would not be made actual employees of the Federal government. Nor could this amendment be construed to characterize jurors as employees for any other purpose. Also, §8116(c) makes recovery under the Federal Employees' Compensation Act the exclusive remedy of the juror against the United States.

We will be pleased to provide any further information that is desired in the consideration of this proposal.

Sincerely,

Rowland F. Kirks
Director

Enclosure

A B I L L

To amend the Federal Employees' Compensation Acts, as amended, Title 5, United States Code, by adding a new section providing for work injury coverage of federal petit and grand jurors in the performance of their duties.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That Chapter 81, Title 5, United States Code, is amended by the addition of the following new section:

"8142a. Federal Petit or Grand Jurors

"(a) For the purpose of this section, federal petit or grand juror means -- a person, selected pursuant to Title 28, United States Code, Chapter 121 and summoned to serve as a petit or grand juror, who is in actual attendance in court such that he would be entitled to the fees provided for his attendance by 28 U.S.C. §1871;

"(b) Subject to the provisions of this section, this subchapter applies to a federal grand or petit juror, except that entitlement to disability compensation payments does not commence until the day after the date of termination of his service as a juror;

"(c) In administering this subchapter for a juror covered by this subsection --

(1) A juror is deemed to receive pay at a rate equivalent to the monthly minimum pay of a GS-2 unless his actual pay as a government employee while serving on court leave is higher, in which case his monthly pay is determined in accordance with §8114.

(2) Performance of duty includes an act of a juror while he is in attendance at court, pursuant to a summons, in deliberation or when sequestered by order of a judge; *provided however*, performance of duty shall not include his travel to and from the courthouse except under sequestration order or as necessitated by order of court such as for the taking of a view."

Section 2. The chapter analysis of Chapter 81 of Title 5, United States Code, is amended by addition of the following new item:

"8142a. Federal Petit and Grand Jurors."

THE WHITE HOUSE

WASHINGTON

Max:

Pls note delay

& file.

Chas.

week of House recess prior to this. Delay is always in sign off of all parties memo goes thru

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

July 11, 1975

MEMORANDUM FOR: CHARLIE LEPPERT

FROM: ALAN M. KRANOWITZ AMK

SUBJECT: Orm Fink and the GAO Audit of the Federal Reserve

On June 25 Orm Fink called Jim Lynn's office and, in his absence, the call was referred to my office.

Ken Hagerty spoke to Fink. Orm asked for the OMB position on legislation calling for a GAO audit of the Federal Reserve. Fink was told that OMB deferred to the Department of the Treasury which opposed the bill and that we concurred in their opposition. Fink asked for no more information and we considered the matter closed. His only parting shot was a statement that when Charlie Schultze (not George, but Charles) was the Director, he never had to talk to Congressional Relations types.

The Director and I know Orm from our HUD days. Orm has already left for the weekend, but I will call him on Monday and, after that, if he still must talk to Jim Lynn, I am sure the Director will call him.

Suggestion for the next time a situation of this type develops: call me on the telephone or mention it at our morning staff meeting. Your memo was dated July 8 and didn't arrive here until noon on July 11, prompting an initial three days of delay in calling Orm and now three more days of delay since Orm has left for the weekend.

cc:
Max Friedersdorf
Vern Loen

8
7/11

THE WHITE HOUSE

WASHINGTON

July 8, 1975

MEMORANDUM FOR: JIM LYNN

THRU: MAX FRIEDERSDORF M.F.
VERN LOEN VL

FROM: CHARLES LEPPERT, JR. CLJr.

SUBJECT: GAO Audit of Federal Reserve

Orm Fink, Minority Professional Staff Director of the House Committee on Banking, Currency and Housing states that he has been unable to reach you by telephone regarding the above stated subject. Fink indicates a discussion or talk with you on the subject is important. Can you call him? His telephone number is 225 - 2258.