

The original documents are located in Box 45, folder “President - Campaign Unauthorized Campaign Committees” of the Philip Buchen Files at the Gerald R. Ford Presidential Library.

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*Pres
Campaign*

THE WHITE HOUSE
WASHINGTON

June 18, 1975

MEMORANDUM FOR: ROBERT HARTMANN

FROM: PHILIP BUCHEN *P.W.B.*

SUBJECT: Unauthorized Campaign Committee

After you handed me a copy of a proposed press release concerning a committee to support the election of the President being instigated by Pierce McDonnell, I had the attached legal memorandum prepared for me by Barry Roth. I also called Pierce McDonnell and cautioned him that any efforts he might make involving the solicitation of contributions or the making of expenditures on behalf of the President as a candidate for election in 1976 would require authorization in writing from the candidate or the statute would require a disclaimer on all literature and advertisements of the unauthorized committee and a \$5,000 limit on its expenditures.

From what I have learned about McDonnell, he is completely unreliable, and I hope I have turned him away from implementing his plans. He says he has not released any copies of his proposed press release to any media representatives.

Attachment



THE WHITE HOUSE

WASHINGTON

June 10, 1975

MEMORANDUM FOR:

PHILIP W. BUCHEN

FROM:

BARRY ROTH *BR*

SUBJECT:

Unauthorized Campaign Committee

The following statutory provisions are relevant to the unauthorized formation of a committee in support of the President's running for office in 1976:

18 U. S. C. 608 (b)(1):

"...no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000."

18 U. S. C. 608 (b)(2):

"No political committee (other than a principal campaign Committee) shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$5,000."

18 U. S. C. 608 (b)(4)(A):

"contributions to a named candidate made to any political committee authorized by such candidate, in writing, to accept contributions on his behalf shall be considered to be contributions made to such candidate."

Comment:

The legislative history for this latter section makes it clear that the requirement that the committee be authorized in writing was not intended to create a loophole whereby the candidate could indirectly receive contributions in excess of the various statutory limits, e. g., \$1,000 per individual contributor. Particular care is necessary to



show that no implied authorization is given to this committee that could later be used to attribute its contributions and expenditures to limitations imposed on the President by other provisions of the election laws.

18 U.S.C. 608 (h):

"No candidate or political committee shall knowingly accept or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limit imposed on contributions and expenditures under this section."

18 U.S.C. 608 (c)(1):

"No person may make any expenditure... relative to a clearly identified candidate during a calendar year which, when added to all other expenditures made by such person during the year advocating the election or defeat of such candidate, exceeds \$1,000."

Comment:

The \$1,000 limitation on contributions is applicable regardless of whether such contributions are made to an authorized campaign committee.

Section 302(e) of the Federal Election Campaign Act of 1971 (2 U.S.C. 432(e)) remains unchanged, and provides that:

"Any political committee which solicits or receives contributions



or makes expenditures on behalf of any candidate that is not authorized in writing by such candidate to do so shall include a notice on the face or front page of all literature and advertisements published in connection with such candidate's campaign by such committee or on its behalf, stating that the committee is not authorized by such candidate and that such candidate is not responsible for the activities of such committee."

Recommendation: that you advise Mr. McDonnell by telephone that his committee has not been authorized by the President, and point out the above-cited statutory provisions, particularly those requiring publication on the face of literature that his committee is unauthorized by the President, and that the statute prohibits them from spending in excess of \$5,000 on behalf of President Ford's candidacy. This should be followed up with an appropriate letter of disclaimer, a copy of which should also be sent to the Federal Election Commission.



DRAFT

PRESS RELEASE:

ALL MEDIA

FROM: Pierce McDonnell
890 National Press Bldg.
Washington, D.C. 20045
(202) 638-0516

Hold for June 3⁵, 1975

CITIZENS' GROUP ENDORSE FORD

WASHINGTON -- "A nationwide citizens' group has endorsed President Gerald R. Ford as the Republican nominee for President," Pierce McDonnell, spokesman for the Ford Presidential Citizens' Organizing Committee, stated today.

"Our committee membership is drawn from a grassroots' citizen movement of moderate Democrats, loyal Republicans and Independents," Attorney McDonnell of Warrenton, Virginia, stated, who is a Washington lawyer. "We are represented in 50 states, in the Commonwealth of Puerto Rico and the District of Columbia. None of our Ford supporters are on public payrolls. We are independent-minded voters who believe that President Ford should be elected in his own right in 1976," Pierce McDonnell, Treasurer of the Committee concluded.

George Grabner, Chairman of the Board, Lamson & Sessions and former Trustee of Case Western Reserve University, Cleveland, Ohio, is a member of the Ford Presidential Citizens' Organizing Committee.

Grabner was a fund raiser for the Nixon-Agnew Campaign in 1972 in Ohio.



THE WHITE HOUSE
WASHINGTON

June 18, 1975

MEMORANDUM FOR: ROBERT HARTMANN

FROM: PHILIP BUCHEN *T.W.B.*

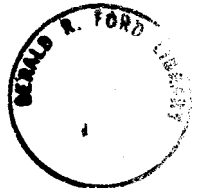
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Phil:
*Do we need
to put disclaimers
on paper?*
BRH



THE WHITE HOUSE
WASHINGTON

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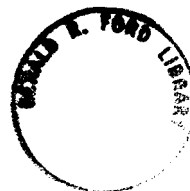
Phil: Do we need to put disclaimer on paper?

Roth

How told Bob

"no"

P.W.B.



THE WHITE HOUSE
WASHINGTON

*McDonnell,
Pierce*

Eva;

Enclosed are Gail's notes per your request.

Good luck with Mr. McDonnell.

*Jim
(Conzelman)*



*Mr. Donnell,
Pierce*

THE WHITE HOUSE
WASHINGTON

July 11 - 12:47 p.m.

Mr. Hartmann:

Pierce McDonnell (638-0516) called. He was not calling from his office at the Press Club.

He is State Chairman of the Virginia Citizens Committee (a non political activists citizens committee); also, National Chairman of the Citizens Presidential Committee.

He is sending over drafts of two press releases (one from each of the above committees) to the Mail Room at EOB and they will be delivered to our office.

He is sending 6 copies:

2 for Hartmann
2 for Marsh
2 for Buchen

1 copy is for them to keep and the other is to be returned with any comment they may have.

Should be returned to:

Miss I. M. Kesler
2nd Floor
Public Stenographer
Mayflower Hotel

Neta



THE WHITE HOUSE
WASHINGTON

July 9, 1975

Mr. Hartmann:

Mr. Pierce McDonald called yesterday and wanted an appt. with you. When I asked him what it concerned he said that Miss Leonard knew..... and then he broke into a song and became rather incoherent. "Yale Class of '41, there's a Ford in your future, Michigan--

He is certainly enthusiastic about Mr. Ford announcing his candidacy and McDonald said that he is "ready to roll" out in Virginia with his "There's a Ford in your Future" stationery.

Mildred says that he's nuts, but has so much enthusiasm-maybe too much.

What do you recommend-I do? Shall I refer him to the President Ford Committee?

638-0516

Gail



5:30

in 5 minutes

347 ~~437~~ - 3125 xt. 711



Called 4:15

Pierce McDonald

638-0516

wasn't in - will
return call



McDonnell
Pierce

Thursday 6/12/75

4:20 Pierce McDonald's secretary (?) -- we think it is an answering service -- called to say Mr. McDonald was sorry you and he had not been able to talk -- he's looking forward to hearing from you.

(He had called when you were in Rumsfeld's office earlier and Jackie thought you wouldn't want to take the call down there.)

She suggested that he will be in the lobby of the Mayflower between 6:00 and 6:30 and you could probably reach him -- if we paged him there.

They talked



THE WHITE HOUSE
WASHINGTON

Pierce McDonnell will call
Mr. Buchen.

638-0516

*6/11 called again ;
answering service
will give him
a message when
he calls in*



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WASHINGTON

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Grabner was a fund raiser for the Nixon-Agnew Campaign in 1972 in Ohio.

THE WHITE HOUSE
WASHINGTON

August 6, 1975

*President Ford
Campaign*

Dear Mr. Robinson:

Thank you for your letter of April 21 requesting permission to reproduce a photograph of the President.

Although you did not state the purpose for which the photograph would be used, I assume from the article enclosed in your letter that you intend to distribute campaign material about the President. The recently enacted Federal Election Campaign Act Amendments (P.L. 93-443) place several restrictions on political activities in connection with Federal election campaigns. In order to assure full compliance with the law, the President has asked that all campaign activities on his behalf be coordinated in advance with the President Ford Committee, which is headquartered in Suite 916, 1200 - 18th Street, N.W., Washington, D.C. 20036.

We are, therefore, unable to respond affirmatively to your request, but we do hope that you understand our position in this matter.

Your inquiry is appreciated.

Sincerely,

Philip W. Buchen

Philip W. Buchen

Counsel to the President

Mr. J. Washington Robinson
157 Indiana Avenue
Blackwood, New Jersey 08012



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Philip W. Buchen
Counsel to the President

Mr. J. Washington Robinson
157 Indiana Avenue
Blackwood, New Jersey 08012

BNR: mo

Central Files



J. WASHINGTON ROBINSON

157 INDIANA AVENUE
BLACKWOOD, NEW JERSEY 08012

TEL. 609-227-7654

April 21, 1975

First Secretary to
President Gerald R. Ford
1600 Pennsylvania Ave.
Washington, D.C. 200

Dear Sir:

Please let me know the proper person to contact for permission to use twenty five million copes of a photograph of President Gerald R. Ford.

If you will give me one approved photograph, I would like to reproduce it in size 3 x 4" for my purpose, which I hope will also be of great benefit to the president.

At the present stage my plan is confidential, but if you need to know more before granting me permission to use the President's photograph I shall be glad to give you more details.

Very truly yours,


J. Washington Robinson

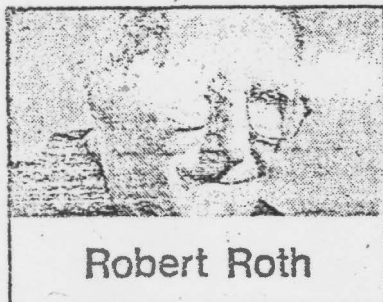
JWR:ew



J. WASHINGTON ROBINSON
 157 INDIANA AVENUE
 BLACKWOOD, NEW JERSEY 08012
 TEL. 609-227-7654



'Ford for President' group is forming



Robert Roth

Washington — It was said many times by Republican politicians as they watched Watergate make a shambles of their party that "this would never have happened if the Republican National Committee had been in charge."

"What can you expect," they asked, "when you turn a campaign over to a bunch of amateurs and public relations flacks who never ran for anything, who don't know the rules of the game, let alone play by them?"

Then and there they resolved — the "they" included President Ford — that never again would the National Committee, the backbone of the Republican establishment, be frozen out by an organization like CREEP (Committee to Reelect the President) which raised and spent the money for the 1972 campaign and left the Watergate scandals as their memorial.

But here we are, with the 1976 election still a year and half away, and already an independent committee is in process of formation to raise money for the reelection of Mr. Ford and to protect his interests in next year's primary elections. The committee is being formed, with Mr. Ford's blessing, not because he mistrusts the National Committee but because there is no other practical way to get the job done.

The National Committee is prohibited by law from working for the election of any contender, even a President, until he has been nominated at the party's national convention. Ordinarily that restriction does not bother a sitting President who can appoint whom he pleases as national chairman and who ordinarily can control the party machinery. But this time around the usual dominance of the President over his party is being disputed by the Republican right wing which cannot forgive Mr. Ford for making Nelson Rockefeller his vice president and for countenancing the biggest budget deficits in history.

The conservative branch, which has come to regard Mr. Ford as an unworthy renegade, is casting longing eyes in the direction of former Gov. Ronald Reagan whom it would much prefer as a candidate. Plans to enter Reagan in some key primaries already are well advanced and fund raising to support the effort already has begun. The need to counteract that movement before it advanced too far was obvious to Ford supporters who prevailed upon the President to start putting his own organization in the field.

There is a second reason why forma-

tion of a special Ford for President committee was if not inevitable at least pragmatically desirable. Under the new federal campaign financing law now in effect the Government will match dollar for dollar the funds raised by individual candidates, up to \$4.5 million per candidate, for presidential primary campaigns. But to be eligible for the matching funds the candidate must first raise on his own at least \$5,000 in small contributions in each of at least 20 states. To do that he must, of course, have a committee working for him.

The Ford blueprint calls for the special committee to disband and let the National Committee take over once Ford is safely nominated. No doubt that is the present intent but whether it will happen that way is another matter. It has been a long time since the National Committee really ran an election campaign for an incumbent President.

The actual control and direction of the campaign has been strongly held in the White House itself for more than a generation. There is no reason to expect it to be any different this time.

Rogers Morton, former Republican national chairman and a close friend of Mr. Ford, is to be transferred from his present post as secretary of the Interior to secretary of Commerce, a much less demanding position and one in which he could be expected to find time and opportunity to oversee the work of the President's special campaign committee.

It would not be surprising, in fact, to find Mr. Morton still running the show and the National Committee still standing by after the nominating convention. In politics, even more than in some other areas, the more things change, the more they are the same.

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THE WHITE HOUSE
WASHINGTON

Date 4/15

TO: Phil Bucher

FROM: BARRY ROTH *BR*

ACTION:

Approval/Signature

Comments/Recommendations

For Your Information

REMARKS:



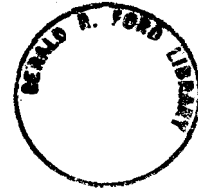
JFC
file

President Ford Committee

1828 L STREET, N. W., SUITE 250, WASHINGTON, D. C. 20036 (202) 457-6400

April 14, 1976

Loren Smith, Esquire
General Counsel
Citizens for Reagan
1835 K Street, N. W.
Washington, D. C. 20006



Dear Mr. Smith:

The purpose of this letter is to bring to your attention certain activities of the Texas Citizens for Reagan Committee and another affiliated organization in that State operating under the name of "Delegates for Reagan". These activities raise serious questions regarding the continued operation of "Delegates for Reagan" as a group of unauthorized delegates within the meaning of that term as determined by the Federal Election Commission.

Accordingly, we want to express our deep concern that the nature of these activities may constitute a violation of the Federal election campaign laws and may expose your committee and your delegates to complaints before the Federal Election Commission. Any such violation may, of course, result in substantial fines and possible imprisonment for such persons. Moreover, in view of the uncertainty regarding the immediate reconstitution of the FEC and the extent of its present powers, we believe that you bear the responsibility of immediately reviewing this situation and taking corrective action.

As you are aware, the Federal Election Commission issued a Policy Statement and Guidelines on Delegate Selection on February 10, 1976. The Guidelines state, inter alia, that an unauthorized delegate-candidate is one who has not been financially authorized by the Presidential candidate or his agents. In particular, the Commission pointed out the types of activities or actions which would change a previously unauthorized delegate-candidate into an authorized delegate-candidate. The Guidelines state:

"An "authorized delegate" is a delegate
(1) who is authorized or requested by a Presidential candidate (or the candidate's committee or agent) to receive contributions or make any expenditure on behalf of the Presidential candidate; (2) who is reimbursed by

Page Two
Loren Smith, Esquire
April 14, 1976

a Presidential candidate for any expenditures made on behalf of the Presidential candidate; or (3) whose own delegate fund-raising or spending is subject to direct or indirect control by the Presidential candidate.--

COMMENT: Financial authorization of a delegate by a Presidential candidate is separate and distinct from any other authorization or approval which may be required under party rules or State law. The fact that a delegate has to secure the approval of the Presidential candidate before he/she can appear as a "Jones delegate" on the primary ballot does not alone constitute financial authorization by the candidate.

Examples of actions which would constitute authorization of a delegate include:

(a) The Presidential campaign transfers funds to the delegate for use in the Presidential candidate's or the delegate's campaign;

(b) The Presidential campaign publicly or privately solicits contributions to a specific delegate or slate;

(c) The Presidential campaign guarantees loans to or for a delegate;

(d) The Presidential campaign directs or the Presidential candidate and delegate jointly plan fund-raising, advertising, or other campaign solicitation activities;

(e) A delegate is authorized to raise or spend funds on behalf of that candidate."

The Federal Election Commission Record, Vol. 2, No. 3 (1976)

It is our understanding that the 100 individuals running as delegate-candidates pledged to Mr. Reagan and the Texas Citizens for Reagan decided some months ago to conduct their primary campaign as "unauthorized delegates" acting together as "Delegates for Reagan". In particular, their



Page Three
Loren Smith, Esquire
April 14, 1976

campaign literature states that they have been officially endorsed by Ronald Reagan but are not authorized to expend or receive money on behalf of the Citizens for Reagan. This organization appears to be operating in a number of metropolitan areas, e.g., San Antonio, Fort Worth and Dallas.

Since the "Delegates for Reagan" is supposedly a group of unauthorized delegate-candidates, it may not under the aforementioned FEC Policy Statement and Guidelines coordinate fundraising, advertising or other financially-related activities with the Texas Citizens for Reagan. In this regard, the Executive Director for the Texas Citizens for Reagan, Ron Dear, noted on February 27, 1976 in a letter to "All Texas Reagan Campaign Officials", that ". . . the law requires that the official Texas Citizens for Reagan Campaign is not allowed to jointly plan or coordinate activities with the Reagan delegate-candidates . . ." (emphasis added). This statement recognizes that it is impossible for the Texas Citizens for Reagan to work together in such manner with unauthorized candidates without there being some financial effect and, therefore, de facto authorization. Moreover, it would appear, based on the facts set forth below, that the Delegates for Reagan and Texas Citizens for Reagan have been and are, for all practical purposes, operating as a single campaign organization in certain areas of Texas. Moreover, the delegate-candidates involved in such activity are now authorized delegates within the meaning of the Federal election campaign laws.

Over twenty of the allegedly "unauthorized" delegate-candidates pledged to Mr. Reagan are members of the official Texas Citizens for Reagan campaign organization. In this regard, some of the delegate-candidates serve as Co-Chairmen of the Texas Citizens for Reagan Committee, Regional Chairmen and Congressional District Chairmen of that Committee, and Members of the Texas Citizens for Reagan Executive Committee. In particular, it is our understanding that the following activities have taken place or will, in the near future, take place which raise serious questions regarding the continued operation of the Delegates for Reagan as an "unauthorized" group of delegate-candidates with no expenditure limitations during the Primary election: . . .



Page Four
Loren Smith, Esquire
April 14, 1976

I. ADVERTISING -- It appears that in some areas of Texas, e.g., San Antonio and Dallas, the Delegates for Reagan are producing flyers and related campaign material which request voters to go to the polls for Reagan delegates in the Primary. These materials also note the "Reasons for Reagan" which is set forth in the same type and appears to be exactly the same copy as the Citizens for Reagan campaign materials distributed in Texas (Attachment A). By utilizing this copy, the Delegates for Reagan accomplish the same advertising goal as the Citizens for Reagan. However, the Citizens for Reagan apparently do not pay for these materials nor do they report such expenses as campaign expenditures.

II. FUNDRAISING -- According to a report in the Sunday edition of the Fort Worth Star-Telegram (Attachment B), a reception for Mr. Reagan will be held at the Hilton Inn at 1:15 P.M. on Thursday, April 15, 1976. Tickets to the reception cost \$50.00 each. Ticket requests were directed to the Citizens for Reagan headquarters at 1020 W. 7th Street in Fort Worth rather than the Delegates for Reagan headquarters at 1012 W. 7th Street. It was also noted in the article that tickets could be obtained at the door and checks ". . . should be made payable to the Delegates for Reagan." The hosts for this reception are "unauthorized" delegate-candidates for Reagan and members of the Texas Citizens for Reagan Fort Worth operation.

In Dallas, the "Delegates for Reagan" committee has recently mailed a package to Republican voters which includes the aforementioned flyers and pamphlets and specifically requests that contributions and volunteer responses be sent to 8428 Kate Street, Suite 215, which is also the address of the Texas Citizens for Reagan in Dallas.

III. INSTRUCTIONS TO REAGAN DELEGATE-CANDIDATES -- Prior to the selection of delegates by the statutorily required delegate selection committee for the 21st Congressional District, Willard King, Chairman of the Citizens for Reagan in that District sent a letter to the "Republican Leadership" in his area which apparently included individuals who are now delegate-candidates pledged to Mr. Reagan. In that letter he stated:

"Prior to suggesting a candidate his permission will be required. In all fairness I think he should be reminded that all expense of attending the convention is a personal expense and it is estimated that



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Loren Smith, Esquire
April 14, 1976

it will run approximately \$500.00. It is also hoped that each delegate selected will spend a considerable amount of money for his own election. A thousand dollars has been suggested. Of course a delegate candidate must live in the 21st Congressional District and must pledge his support for Ronald Reagan." (emphasis added).

IV. JOINT USE OF HEADQUARTERS AND RELATED OFFICE EQUIPMENT -- It has come to our attention that in both Fort Worth and Dallas, Delegates for Reagan meetings were held on March 30, 1976 and April 8 or 9, 1976, respectively. The meetings were allegedly called to discuss fundraising and the political campaign in Texas. In both locations, Regional Chairmen of the Texas Citizens for Reagan conducted the meetings. The facts relative to the Dallas meeting can be verified by viewing the evening news program of WFAA-TV in Dallas for April 9, 1976.

Further, in San Antonio, it is our understanding that the Texas Citizens for Reagan and the Delegates for Reagan headquarters are located next to each other at 6838 and 6840 San Pedro. The offices for each of the headquarters inter-connect and apparently share the same duplicating and printing equipment and are staffed by the same personnel.

It would appear from the facts set forth above that the members of the entire Delegates for Reagan organization have become authorized delegate-candidates because of the joint financial activities with the Texas Citizens for Reagan Committee. As such, expenditures by such individuals or groups with which they are associated must be, of course, reported to the Federal Election Commission by the Citizens for Reagan Committee. In addition, contributions to such authorized delegates would be treated as contributions to the Citizens for Reagan Committee. In other words, individuals who had previously given \$1,000 to the Citizens for Reagan would be in apparent violation of the law if they were to make additional contributions to such authorized delegates or group.

Another matter which has come to our attention appears to indicate that this type of activity is not limited to Texas or the Delegates for Reagan. The Sunday, April 4, 1976 edition of the Milwaukee Journal carried a political advertisement entitled "Should We Sell the White House?" The advertisement and related

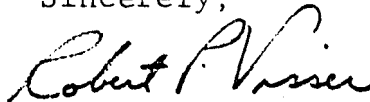


Page Six
Loren Smith, Esquire
April 14, 1976

solicitation for contributions was paid for by the "Florida Friends of Reagan". The disclosure statement at the bottom of the advertisement noted that the Chairman of this Committee is Mr. L. E. Thomas of Panama City, Florida. If this Mr. Thomas is the same individual who is serving as Chairman of the Florida Citizens for Reagan, then any expenditure relative to the advertisement must be reported to the Federal Election Commission by the Citizens for Reagan Committee. Moreover, contributions to this committee would be considered contributions to the Citizens for Reagan campaign committee. Even if Mr. Thomas is no longer the Chairman of the Florida Citizens for Reagan Committee, such expenditures must be reported by your Committee since the Florida Friends of Reagan's chairman is de facto an authorized delegate-candidate pledged to Mr. Reagan.

In conclusion, we trust that you understand that this letter is being sent as a result of our sincere desire for Republican Party unity in Texas, as well as the rest of the country, and with the hope that you will take immediate action to rectify these matters in accordance with the Federal election campaign laws. Your prompt response with regard to these matters would be appreciated so that we are not forced to take other action which we might deem appropriate.

Sincerely,



Robert P. Visser
General Counsel



T. Timothy Ryan
Assistant General Counsel

Attachments

CC: John Sears, Esquire
William Cramer, Esquire
Ray Hutchison, Esquire
Hon. Ernest Angelo, Jr.
Mrs. William Staff
Hon. Ray A. Barnhart
Mr. James E. Lyon
Mr. Ronald B. Dear
Mr. L. E. Thomas



If You Want To Elect Gov. Ronald Reagan President — YOU MUST

1. Vote in the Republican Primary on Saturday, May 1st — and
2. Vote for Each of the Four Delegates pledged to Gov. Reagan:

IF YOU ARE IN DOUBT, LOOK AT YOUR VOTER REGISTRATION CERTIFICATE, DETERMINE YOUR PRECINCT NUMBER, AND — CALL 459-1253.

Paid for by Delegates for Reagan Comittee, Ray Dennis, Chairman, office endorsed by CITIZENS FOR REAGAN, but not authorized to spend or receive money on behalf of CITIZENS FOR REAGAN pursuant to Advisory opinion 1975-12 of the Federal Election Commission



Remember to vote for Reagan in the primary on Saturday, May 1st. Call 459-1253 for more information.

Reasons for Reagan:

- **Inflation.** "The one basic cause of inflation is government spending more than it takes in. When Washington runs in the red, year after year, it cheapens every dollar you earn; it makes a profit on your cost-of-living wage increases by pushing you into higher tax brackets; it borrows in the capital market to cover its deficits, cutting off business and industry from that capital which is needed to fuel our economy and create jobs; it robs your savings of value; and it denies retired people the stability they need and expect for their fixed incomes."

The cure: a balanced budget. The federal government must set a timetable, a systematic plan, to balance the budget — and it must stick to it.

IN CONGRESSIONAL DISTRICT 10

Mark your ballot four times as shown below:

- R. Miller Hicks, delegate for RONALD REAGAN
- Rhoda Benson, delegate for RONALD REAGAN
- Judge St. John Garwood, delegate for RONALD REAGAN
- Sue Briscoe, delegate for RONALD REAGAN

- **Energy.** "The one thing we shouldn't forget is this: If we relax government controls on natural gas, nuclear plants and domestic sources of oil, we won't have to worry any longer about being dependent on the Middle East and other oil exporters."

● **Welfare.** "For years there has been a group of people calling for a Federal takeover of welfare. Actually we should do the opposite — and decentralize welfare."

"If Joe Dooks is using his welfare money to go down to the pool hall and drink beer and gamble, and the people on his block are paying the bill directly, Joe is apt to undergo a change in his lifestyle — or get off welfare."

● **Social Security.** "Social Security must be strengthened and improved. The program needs to be reformed. But any reform must have as its first priority the guarantee that all those counting on Social Security will continue to receive their monthly check and that their benefits won't decline in purchasing power, but will keep pace with inflation."

"There are inequities that must be corrected affecting women, people 65-and-over who want to continue to work, and younger workers. But reforms must be made with care so that they don't jeopardize those already retired, those now working, or those who will enter the work force in the future."

● **Crime.** "We must remember that the principal reasons for locking up criminals are punishment and isolation — to keep them from hurting law-abiding citizens and to serve as a deterrent to others. It does no good to take guns from the law-abiding. The most effective gun control is mandatory sentences for those who commit crimes with guns in their possession. When a would-be lawbreaker knows he can kill without facing the ultimate penalty, when he knows that parole or probation may come easy for him, we cannot say we have effective deterrents to increased crime."

● **Detente.** "Through detente we have sought peace with our adversaries. We should continue to do so, but must make it plain that we expect a stronger indication that they also seek a lasting peace with us. Too often we act as if a concession on our side — with none by them — is automatically helpful to the process as a whole. Detente will work only if it is a two-way street — something for something."

● **Defense.** "A decade ago we had military superiority. Today, we are in danger of being surpassed by a nation that has never made any effort to hide its hostility to everything we stand for. As a nation, we must commit ourselves to spend whatever is necessary to remain strong. To be second is to be last."



REMEMBER: There is no voter registration by party in Texas. You may vote in the Republican primary regardless of political affiliation.



"Together we can make those decisions which will restore confidence in our way of life and release that energy that is the American spirit.

"Together we can renew the greatness of America!"

Ronald Reagan

Delegates for Reagan

R. MILLER HICKS

RHODA BENSON

JUDGE ST. JOHN GARWOOD

SUE BRISCOE

REAGAN FOR PRESIDENT HDQTRS.

3009 North Lamar

Austin, Texas 78705

Texas Citizens For Reagan

4721 Richmond Ave. Houston, Texas 77027

Paid for by Citizens for Reagan. Senator Paul Laxalt, Chairman; Henry M. Buchanan, Treasurer.

"A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C."



Reasons for Reagan



Attachment "B"

Reagan plans visit to FW area

Presidential candidate Ronald Reagan will land at Meacham Field at 11:15 a.m. Thursday on one leg of his campaign tour of Texas to gather support for the May 1 Republican primary.

At the airport, he will be met by his Tarrant County coordinator, Mrs. Pat Jacobson; county GOP chairwoman Mrs. Anna Mowery; State Sen. Betty Andujar, and other area GOP leaders. He will receive the key to the city from Mayor Clit Overcash.

Other meetings the former California governor is scheduled to attend include a noon rally at Burnet Park downtown and a fund-raising reception at 1:15 p.m. in the Times Square Ballroom at the Hilton Inn.

Mrs. Gordon Fitzgerald, a Reagan volunteer campaign worker, said tickets to the reception will be \$50 each.

She said they may be obtained by contacting Miss Jane Sims at Reagan Headquarters, 1020 W. 7th St., or by calling 731-1508, 731-1528 or 335-6243.

Tickets also may be purchased at the door in the Hilton, she said, and checks should be made payable to "Delegates for Reagan."

Reagan is scheduled to leave from Meacham at 2:45 p.m.

Hosts of the reception will be Mrs. Andujar and her husband, Dr. John J. Andujar; Mrs. Jacobson and her husband, Dr. Bruce Jacobson; Mr. and Mrs. Eddie Chiles; Mr. and Mrs. James Cribbs; Mr. and Mrs. James Garvey; Mr. and Mrs. John Howell; Dr. and Mrs. Paul Laird; Mr. and Mrs. Bob Leonard Sr.; Mr. and Mrs. Bob Leonard Jr.; Dr. and Mrs. William McKinney and Mr. and Mrs. W. A. Moncrief Sr.





CITIZENS FOR REAGAN

1835 K Street N.W. • Washington, D.C. 20006 • 202/452-7576

April 20, 1976

Robert P. Visser, Esquire
General Counsel
T. Timothy Ryan, Esquire
Assistant General Counsel
PRESIDENT FORD COMMITTEE
Suite 250
1828 L Street, N.W.
Washington, D.C. 20036

Dear Sirs:

After reading of your letter to me in the Washington Post, I actually received the same. I have reviewed it with some care and find the charges of no merit. While I respect your integrity as lawyers, I cannot help but believe that the charges embodied in your letter represented a political ploy to offset your candidate's questionable uses of the powers of the incumbency for purely political purposes.

In this post-Watergate era, it was my hope that all campaigns would recognize that basic changes had occurred in our system. Each campaign is under severe financial limitations. These limitations, however, become a mere mockery when an incumbent may use cabinet officers, making supposedly "non-political" speeches, at taxpayer expense, to attack his opponent. We feel the whole practice of using the White House as an auxilliary campaign headquarters raises serious ethical and legal questions. We have so indicated to the Federal Election Commission as you may have noted.

Even though the primary purpose of your "charges" is political (I know how tight the contest is viewed over there), I feel I should respond to your letter.

Pursuant to Advisory Opinion 1975-12 and the Federal Election Commission's policy statement on delegate selection, which I am enclosing for your information, our committee decided that it would not financially authorize delegate candidates. Pursuant to this decision, our committee has scrupulously abided by both the letter and the spirit of those



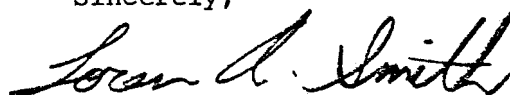
documents, even though their current legal status is uncertain due to the decision in Buckley v. Valeo, January 30, 1976, Slip Opinion.

You may remember that under the Federal Election Commission's guidelines, an unauthorized delegate is one who is not financially authorized and whose campaign is not financially coordinated with the Presidential candidate's campaign. The Federal Election Commission inherently recognized a degree of political coordination when they removed the provision from their delegate statement requiring campaign officials running as delegates to run as authorized delegates. If a state chairman is running as a delegate, no doubt his campaign will know what the presidential campaign is thinking.

Your quarrel is not with our committee, but with Mr. Ford who signed a confusing and poorly drafted bill. I should further add that it is our policy to make campaign materials available to all individuals who wish to support Governor Reagan; we might even give you a couple of buttons and brochures to sway your votes. Our offices are consistently open to the public (which does include delegates I am told). While we have consistently presented our support, materials, positions, and views to all who would listen (I think to about 40 million individuals to date) we have not sought in any way to divert campaign funds from the delegates' campaigns into the Reagan campaign. In this regard I believe we have been scrupulous beyond what the Federal Election Commission's rules require.

I hope this letter is an appropriate response to your letter of the 14th of April.

Sincerely,



Loren A. Smith
General Counsel

CC: John Sears, Esquire
William Cramer, Esquire
Ray Hutchison, Esquire
Hon. Ernest Angelo, Jr.
Mrs. William Staff
Hon. Ray A. Barnhart
Mr. James E. Lyon
Mr. Ronald B. Dear
Mr. L. E. Thomas



THE WHITE HOUSE

WASHINGTON

May 28, 1976

MEMORANDUM FOR: DAVE GERGEN

FROM: BARRY ROTH *BR*

Referencing our conversations concerning contributions to political committees making independent expenditures in support of Ronald Reagan, the FEC is issuing today a general statement of policy in this regard. The FEC policy permits an individual to give \$1,000 to Reagan or his authorized committee (Citizens for Reagan) and up to \$5,000 to any unauthorized committee, as long as the individual does not give to that committee with knowledge that the money will in turn be contributed to the candidate. Such contributions to candidates and political committees remain subject to the \$25,000 annual limit on political contributions.

For your information, Bob Visser had argued the position with the FEC staff that an individual who had contributed \$1,000 to a candidate or his authorized committees could not contribute at all to a committee making independent expenditures, or else could only contribute up to \$1,000 to each such unauthorized committee. However, the FEC's position is the better interpretation of the law.

This policy does not appear to affect independent expenditures made by an individual or group of individuals, e.g., fifteen persons join together and pay for a political advertisement in a newspaper. In such cases, the individual has a direct control over the expenditure, which he surrenders when he contributes to a political committee. To the extent an individual's expenditures exceed \$100 per calendar year on behalf of a clearly identifiable candidate, the individual must file expenditure reports with the FEC.



With respect to the independent Reagan California Fund that we discussed, they are being contacted by the FEC to insure that they do not cash any checks in excess of \$5,000 which were received after May 11, and instead that they return the checks to the contributors. Bob Visser will follow up with the FEC compliance personnel to make sure this is being done.

cc: Philip W. Buchen
Edward Schmults

