

The original documents are located in Box 45, folder “President - Campaign President Ford Committee (2)” of the Philip Buchen Files at the Gerald R. Ford Presidential Library.

Copyright Notice

The copyright law of the United States (Title 17, United States Code) governs the making of photocopies or other reproductions of copyrighted material. Gerald R. Ford donated to the United States of America his copyrights in all of his unpublished writings in National Archives collections. Works prepared by U.S. Government employees as part of their official duties are in the public domain. The copyrights to materials written by other individuals or organizations are presumed to remain with them. If you think any of the information displayed in the PDF is subject to a valid copyright claim, please contact the Gerald R. Ford Presidential Library.

Bo Calloway

STATEMENT BY THE PRESS SECRETARY

"Bo Calloway has asked to step aside temporarily as Chairman of President Ford's Campaign Committee until all questions relative to his Crested Butte resort development are resolved. The President has agreed to this request and today has named Stuard Spencer as acting Campaign Chairman".

March 13, 1976



President Ford Committee

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

April 1, 1976

Arthur J. Block
21 Stuyvesant Oval
New York, New York 10009

Dear Mr. Block:

Reference is made to your letter, dated March 15, 1976, addressed to Mr. Spencer which has been referred to me for reply.

This is to advise you in the strongest possible term that the President Ford Committee does not intend to pay your statement for alleged services performed on its behalf. The reason for our position is quite simple in that neither Chairman Callaway nor any other member of the President Ford Committee have authorized you to provide any services whatsoever and, in fact, no such services have ever been received by this Committee.

Sincerely,



Robert P. Visser
General Counsel

RPV:dm



Monday 7/20/10

7:30 Barry said Visser will probably call. The ATLANTA CONSTITUTION ran a front-page story that either the President or the PFC somehow violated the law in in-kind corporate contributions as a result of the President's speech to the Chamber of Commerce.

Barry said he doesn't have the details yet.



~~CONFIDENTIAL~~
MEMORANDUM

file
PFC

April 30, 1976

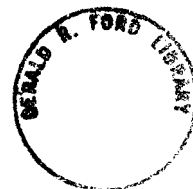
TO: Rogers Morton
Phil Buchen
Stu Spencer

FROM: Robert Visser *RPV*

RE: Oblon, Spivak, Maier & Visser

Upon the retention of my Firm and my agreement to serve as General Counsel to the President Ford Committee, Bo Callaway and I agreed that I would disclose the name of any significant client that I brought into my Firm during the campaign period.

Accordingly, this is to advise you that my Firm has been retained by Floor Broker Associates and a number of other independent floor broker-traders in New York City to conduct a study regarding such broker-traders and the Commodity Futures Trading Commission.



Determined to be an
Administrative Marking.

By TMH INKSA Date 1/22/16

[May 1976?]

PFC in Michigan

Michigan Headquarters

Kathleen Seglund
(Lansing)

(517) 374-7668

Chairman of the State

Peter Fletcher
(Ypsilanti)

(313) 482-0445



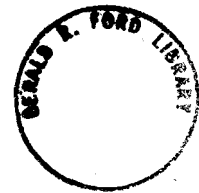
6:30 p.m.

Wednesday, June 2, 1976

Barry called and left the following message:

FEC's General Counsel has now taken the position that attorney and accountants' fees are excluded from the calculation of your expenditure ceiling and thus the PFC should have \$300-400,000, or more, to work with.

cc: Ed Schmults



THE WHITE HOUSE
WASHINGTON

Eva:
Send copy to Barry.
J.

Eva copy sent to Barry,
Here's Mr. B's copy
back



THE WHITE HOUSE

WASHINGTON

June 9, 1976

MEMORANDUM FOR: RON NESSEN

FROM: BOB MEAD 

SUBJECT: PFC COMMERCIALS, RE: NAVY PARTICIPATION

I have researched the subject requested on the Navy's participation in the latest political commercials made by Don Penny, the Directors Circle, and Mr. James Jordan, President of BBDO. (Mr. Jordan did not participate as President of the advertising agency in this venture, but as a free-lance independent, at the urging of his friend, Mr. Penny.)

First, let me reiterate the fact that under my control, the Navy Photographic center and its military employees have always been instructed not to be involved in any political activities concerning the White House. Their function is to record on film or videotape, the functions of the President for the Presidential archives and the future library of the President who holds the office. Because this film and filming is completed by using taxpayers money, any American citizen holds a right to purchase copies of this film from the Navy department. It is true that we do not make this fact generally known.

BACKGROUND ON USUAL PROCEDURES

If a private citizen wishes to purchase film from the Navy Photo Center, which is of the President, that citizen would contact me in the office of Television Advisor. He is informed that, by appointment, he may view the film he is interested in at the NPC. The client then determines what he wants. Let us say he wishes to purchase 100 feet of film showing the President speaking to the Congress. The photo Center then makes a master copy print from the original film and the client is charged for the raw stock of film at the price of .44¢ per foot or \$44.00. The client is also charged a research fee of \$13 per hour to find the film and for the viewing time. There are many films which my office does not allow to be sold. The President's vacations in Vail would not be available, nor would the President's deposition in the Fromme case when we receive it from the counselor's office. This type of film is not listed in the catalog and no one knows it exists. It is a discretion on our part to allow some privacy to the President. If the future library or historians desire to make such films available in the future, that would be their decision.



RECENT OCCURRENCE DISCUSSED

With my permission Mr. Penny, went to the Navy Photo Center in Anacostia to view films which he felt may have been incorporated into a political television commercial. Mr. Penny viewed several thousand feet of film footage. He was charged the usual \$13 per hour research fee. The attached billing shows that two hours were charged to him or \$26 and a bill was sent to the New York address given by him.

Because of time limitations and the length of time it takes the Photo Center to make copies of films, Mr. Penny asked permission of Mr. Jack Horton, the liaison with whom I work, if he could take the film from the Center to New York where he could do his own dubbing or copying to save time. (it usually takes the Photo Center a few days to complete a job since it services the entire Navy fleet.)

Mr. Horton granted this permission and allowed 1000 feet of original President Ford archival film to leave the building. This is not an unusual practice. It is a bad practice and I have requested the Photo Center not to allow this to happen unless there are extreme emergencies, but particularly NOT with film which might find its way into political spots or some other commercial use. This film could have been badly scratched or damaged in the process of dubbing outside of our laboratory. The film was returned undamaged and some of the footage was used in the three commercials produced and broadcast in the campaign.

SUMMARY

Mr. Penny and/or his organization did not pay for footage used in the making of the television commercials because no raw film stock was used at the Navy Photo Center since it was not copied at that location. If a copying charge was made, it was done in a New York studio or laboratory. As far as I can determine, no law was broken in this transaction. It is true that the Navy Photo Center gave away archival footage to make a political commercial and did not charge for it, because they did not copy it. If they did, a charge of an extra \$440 would have been billed. (1000 feet @ 44-cents per foot) This decision was, in my mind, a bad decision because the commercial producers did, in essence get free film for commercial use. Also, there is the rest of the 1000 feet of film which could be used in the future for additional commercials. However, there is no cost for use of film. I have stopped the practice of loaning out film for such purposes in the future.

Perhaps to eliminate any future charge or insinuations of wrong doing, we



should send an additional bill for \$440 to the commercial producers, even though nothing has occurred which is illegal. However, there could arise charges of the military being used for political purposes; power of the office of the incumbent; or possibly in-house production of commercials for political gain by using military film.

To keep from embarrassing the President, it would be my suggestion that, as a White House employee, Mr. Penny might want to offer \$440 from the producer to stave off any future criticism. The production house commercials, which I find, personally quite high, and I feel the \$440 would be a pittance of their profits.

c. c. Phil Buchen for informational purposes
c. c. Bill Cuff, Military Aide's Office
attachmts



DATE

21 May 1976

TO:

Don Penny
Mel Matz
Directors Circle
870 7th Ave 10019
N.Y. Sheraton Hotel

FROM:

COMMANDING OFFICER
U.S. NAVAL PHOTOGRAPHIC CENTER
U.S. NAVAL STATION
WASHINGTON, D.C. 20390

CLASSIFICATION

Unclass

GROUP CLASSIFICATION DOD DIR 5200-10

ENCL.
BY
ITEM

REFERENCE

Jack Horton - White House Liaison

SUBJECT

White House ftge of Pres. Ford trip to Michigan; Loan of

1

One roll of 16mm color original, approx. 500' of White House number 360-375-76.

DO NOT CUT OR ALTER also 360-172-76 (Approx 500')

THIS IS LAON TO BE RETURNED ASAP

2

Prints for the above numbers also included.

THIS IS A LOAN**RETURN FILM TO:**

Commanding Officer
Naval Photographic Center
Motion Picture Film Depository
Naval District
Washington, D. C. 20374

METHOD
OF SHIPMENT

NPC ORIGINATOR

FDF - Pinto

CHARGE NO.

360

SPECIFICALLY

☐ GUARD MAIL

SPECIFICALLY

☐ U.S. MAIL

SPECIFICALLY

☐ EXPRESS☒ COURIER

Mr. Penny will hand carry

ADDRESSEE
NOTIFICATION:

TIME

DATE

BY

SHIPPING SECTION FILE COPY



Memorandum

DATE: 24 May 1976

FROM: Head, Film Depository Division

TO : Comptroller

SUBJ : Cash Sale Transaction; billing of

. It is requested that a bill be send on project 2530-76079:

2 hrs. search time @13.00 per hr.

\$26.00

. Send bill to:

Mr. Don Penny
Directors Circle
New York Sheraton Hotel
870 7th Avenue
New York, New York 10019

CARL A. CARLSON
Head, Film Depository Division



President Ford Committee

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

June 10, 1976

MEMORANDUM

TO: Bob Moot

FROM: Robert Visser
T. Timothy Ryan

RE: Attorneys and Accountants Fees



The purpose of this memorandum is to advise you as to the impact of the 1976 Amendments to the Federal Election Campaign Act ("Act") with regard to the question of whether expenses incurred by a candidate or committee for legal and accounting services paid to ensure compliance with the Act must be charged against the expenditure limitations. In particular, the following sets forth our specific recommendations and guidelines for the determination of those functions of the Treasurer's Office, General Counsel's Office, and outside consultants such as Arthur Anderson and Company, which are excludable from the expenditure limitations.

I. Advisory Opinion 1975-27

In Advisory Opinion 1975-27, published in the Federal Register on November 4, 1975, the Federal Election Commission ("FEC") decided, by a four to two vote, that expenditures for attorney's and accounting fees paid for the purpose of general compliance with the Act must be charged against the expenditure limitations of the Act. However,



fees paid to prepare and respond to formal compliance action would be exempt from the expenditure ceiling. The majority based its conclusion on the fact that the definition of the term "expenditure" as used in the 1974 Act (i.e., 18 U.S.C. §591(f) enumerated several specific exclusions from the definition but that none of the exclusions extended to amounts paid for accounting or legal services rendered to assist a Federal candidate in complying with the Act. The majority did exempt out compensation for such services rendered in connection with formal compliance proceedings on the theory that they are not expenditures made for the purpose of influencing the election of a Federal candidate. Commissioners Aiken and Tiernan in their dissent noted that such expenditures made to "assure adherence to the mandates of this complex new law at every stage of a campaign for Federal office have an equal claim for an exemption from the expenditure limits of the Act". Moreover, they stated "good faith attempts to anticipate and meet the requirements of the Act well in advance of a formal complaint action should also be recognized and given strong encouragement and endorsement [and that] . . . this assistance should be available to every candidate, no matter whether it is used prospectively to guide a campaign within the boundaries of the Act, or subsequently to defend against formal complaints". Finally, they noted that such accounting and legal efforts "can easily be distinguished from political strategy and tactical advice."

II. The 1976 Amendments

The Federal Election Campaign Act Amendments of 1976, signed into law on May 11, 1976, added identical new provisions to the



statutory exclusions for the definitions of both of the terms "expenditure" and "contribution" under the Act.

Sections 431(e)(4) defines "contribution", inter alia, as

"the payment, by any person other than a candidate or a political committee, of compensation for the personal services of another person which are rendered to such candidate or political committee without charge for any such purpose EXCEPT THAT THIS PARAGRAPH SHALL NOT APPLY IN THE CASE OF LEGAL OR ACCOUNTING SERVICES RENDERED TO OR ON BEHALF OF THE NATIONAL COMMITTEE OF A POLITICAL PARTY (UNLESS THE PERSON PAYING FOR SUCH SERVICES IS A PERSON OTHER THAN THE REGULAR EMPLOYER OF THE INDIVIDUAL RENDERING SUCH SERVICES), OTHER THAN SERVICES ATTRIBUTABLE TO ACTIVITIES WHICH DIRECTLY FURTHER THE ELECTION OF A DESIGNATED CANDIDATE OR CANDIDATES TO FEDERAL OFFICE, NOR SHALL THIS PARAGRAPH APPLY IN THE CASE OF LEGAL OR ACCOUNTING SERVICES RENDERED TO OR ON BEHALF OF A CANDIDATE OR POLITICAL COMMITTEE SOLELY FOR THE PURPOSE OF ENSURING COMPLIANCE WITH THE PROVISIONS OF THE ACT OR CHAPTER 95 OR CHAPTER 96 OF THE INTERNAL REVENUE CODE OF 1954 (UNLESS THE PERSON PAYING FOR SUCH SERVICES IS A PERSON OTHER THAN THE REGULAR EMPLOYER OF THE INDIVIDUAL RENDERING SUCH SERVICES), BUT AMOUNTS PAID OR INCURRED FOR SUCH LEGAL OR ACCOUNTING SERVICES SHALL BE REPORTED IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 434(b)." (Emphasis added)

Identical language is contained in Section 431(f)(4)(J) excluding such compensation for legal or accounting services from the definition of "expenditure". The FEC's proposed regulations published in the Federal Register on May 26, 1976, also reflects such change in the law. (§100.4(a)(12) and §100.7(a)(15))

As I advised you during our recent meeting, following enactment of the 1976 Amendments, I requested a meeting with the General Counsel of the FEC, Jack Murphy, to discuss the Commission's interpretation of this new section. In that meeting, Jack Murphy stated that, although the new statutory language is somewhat ambiguous, it is clear to him that the Congress fully intended to overrule the Commission's earlier Advisory Opinion regarding this matter. In



particular, he stated that all expenditures relating to legal and accounting services rendered on behalf of a candidate or campaign committee in order to ensure compliance with the Federal election campaign laws are exempt from the expenditure ceiling. Although the statute restricts such exclusion only for those expenditures solely relating to the purpose of ensuring compliance with the provisions of the Act and portions of the Internal Revenue Code, Mr. Murphy stated that he interprets the term "compliance" as an extremely broad concept encompassing all such reasonable direct and indirect expenses incurred for the purpose of guiding and assisting a campaign committee in understanding, adhering to and complying with all aspects of the Federal election campaign laws.

This is also to confirm that I have been advised by both Loren Smith, General Counsel to the Citizens for Reagan Committee, and Jan Baran, General Counsel to the Republican Congressional Campaign Committee that Jack Murphy has separately and independently advised them of the same opinion with regard to this matter. As a result, Loren Smith advised me that he is excluding from the ceiling anything related, directly or indirectly, to compensation for attorneys and accountants services in connection with their advisory functions on the Federal election campaign laws, including but not limited to direct consulting advice and opinion, analyses and disclosure and reporting, as well as formal compliance procedures. Moreover, following these meetings I confirmed this interpretation at a meeting with Commissioner Aikens and several FEC staff members.

Accordingly, Tim and I have reviewed with you, Jim Cochran and Tom Moran the basic Treasurer's office functions and activities.

Following this review and an examination of the summary sheet you provided to us, we have reached the following conclusions regarding application of this new statutory provision to our national ceiling.

First, with reference to your sheet entitled "Functions of the Treasurer's Office", a copy of which is attached hereto for your information, we believe that the following items are clearly a function of this Committee's good faith effort to ensure full and adequate compliance with the Federal election campaign laws and are totally excludable from the PFC ceiling.



2. Processing Checks for Bank Deposit:
Riggs Lock Box Service
Staff making up Deposits for Checks received direct
3. Contribution, Coding to identify Contributors Occupation, Title, Solicitation I.D. number, etc.
4. Contribution Computer Processing including integrated data bank for multiple purpose of recording and accounting for contributions, providing print-outs for acknowledgement, for state fund raisers, for re-solicitation, for matching fund requests and for FEC Reporting.
5. Contribution Processing Supervision
6. Follow-up on Contributions to secure information required by law re Full Name, Address, Occupation, etc.
8. Coding of Invoices to provide information required by law, i.e., vendor identification, state limitation charged, fund raising vs campaign cost, etc.
11. Preparation of FEC Receipt & Expenditure Monthly Reports
13. Preparation and Justification of Matching Fund Requests
19. Other Outside Services
 - Arthur Andersen & Co. Matching Fund Aid
 - Arthur Andersen & Co. Callaway Mgs. System
 - AMS Callaway Mgs. System
 - Arthur Andersen & Co. Systems Assistance

20. AMS Computer Expense System with data Bank to provide General Ledger data re expenditure categories and FEC Expenditure Reporting.

In addition, we believe that the following items reflect activities of the Treasurer's office which should be viewed as support functions directly related to the preparation for, adherence to and compliance with all reporting, disclosure and other legal aspects of the Federal Election Campaign Act:

1. Opening of Treasurer's Office Mail, Sorting, Distributing
7. Receipt of Invoices verifying delivery, writing checks for payment.
9. Maintaining General Ledgers, reconciling bank accounts, internal financial reporting.
10. Supervision of Expense Coding
12. Overall Accounting Supervision
14. Preparation and Maintenance of entire Headquarters & Campaign Payroll
Riggs Payroll Service
Staff Service
15. Financing of Field Campaign Operations, State by State - Campaign & Fund Raising
16. Secretarial Service
17. Receptionist/Typist Service
18. Other related costs -
Insurance
Taxes
Bank Charges
21. Overall Treasurer Supervision
22. Allocation of Overhead - Rent, Supplies, Telephone, Etc.



Based upon our discussions, we believe that it would be appropriate to aggregate all of the expenses relating to the above support categories and allocate percent (80%) of the cost of all such expenditures to the excluded category for ceiling purposes.

In addition, it is my understanding that the Treasurer's office has incurred certain direct transportation expenditures in connection with Field Audits and other services requiring outside travel in connection with monitoring and supervision of state finance and campaign committee offices for the purpose of complying with the Federal election laws. All such travel expenditures would, of course, not count against the expenditure ceiling.

III. Miscellaneous

Finally, this is to confirm that during my discussions with Jack Murphy, I raised the issue of post-nomination incurred convention expenses which are not directly related to the General Election. Jack advised me that several questions have been asked with regard to such expenditures and that it was his personal belief that there may be certain categories of expense which have been incurred following the nomination and which are not directly related or attributable to General Election functions or activities (for example, thank you letters may be viewed as a General Election expense under the theory that it is a mechanism by which you encourage participation in the General Election). We will submit a written question to the Commission on this regarding categories of expense (including clean up and travel expenditures incurred after the nomination) for the Commission's determination. I am uncertain as to whether or not the Commission will view such expenditures as separate and distinct from the general primary expenditures made for the purpose of securing the nomination. As a result, I would suggest that we maintain a factor for such expenditures in our current ceiling projections.

IV. General Counsel's Office

This is to advise you that Tim Ryan and I have again reviewed



the functions of the General Counsel's office with regard to activities undertaken other than those directly or indirectly related to legal matters relating to the Federal Election Campaign Act. Following this review, we believe that a fair allocation of all of our direct and indirect expenditures, including travel, would be ninety-five percent (95%).

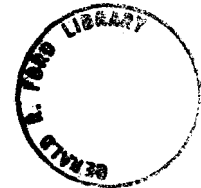
cc: Rogers C. B. Morton
Roy Hughes
Stu Spencer



THE PRESIDENT FORD COMMITTEE

Functions of the Treasurer's Office

#	FUNCTION	Solely to Ensure Act Compliance	Normal Mgement Functions	Mixed Mgement & Compliance
1.	Opening of Treasurer's Office Mail, Sorting, Distributing			
2.	Processing Checks for Bank Deposit: Riggs Lock Box Service Staff making up Deposits for checks received direct			
3.	Contribution Coding to identify Contributors Occupation, Title, Solicitation I.D. number, etc.			
4.	Contribution Computer Processing including integrated data bank for multiple purpose of recording and accounting for contributions, providing print-outs for acknowledgement, for state fund raisers, for re-solicitation, for matching fund requests and for FEC Reporting.			
5.	Contribution Processing Supervision			
6.	Follow-up Contributions to secure information required by law re Full Name, Address, Occupation, etc.			
7.	Receipt of Invoices verifying delivery, writing checks for payment			
8.	Coding of Invoices to provide information required by law, i.e., vendor identification, state limitation charged, fund raising vs campaign cost, etc.			
9.	Maintaining General Ledgers, reconciling bank accounts, internal financial reporting.			
10.	Supervision of expense coding			



cont'd

11. Preparation of FEC Receipt & Expenditure Monthly Reports
12. Overall Accounting Supervision
13. Preparation and Justification of Matching Fund Requests
14. Preparation and Maintenance of entire Hdqts & Campaign Payroll
 - Riggs Payroll Service
 - Staff Service
15. Financing of Field Campaign Operations
 - State by State - Campaign & Fund Raising
16. Secretarial Service
17. Receptionist/Typist Service
18. Other related costs -
 - Insurance
 - Taxes
 - Bank Charges
19. Other Outside Services
 - Arthur Andersen & Co. Matching Fund Air
 - Arthur Andersen & Co. Callaway Mgs. System
 - AMS Callaway Mgs. System
 - Arthur Andersen & Co. Systems Assistance
20. AMS Computer Expense System with data Bank to provide General Ledger data re expenditure categories and FEC Expenditure Reporting
21. Overall Treasurer Supervision
22. Allocation of Overhead - Rent, Supplies, Telephone, Etc.



President Ford Committee

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

Sucher
copy to
copy to

July 2, 1976

MEMORANDUM

TO: Rog Morton
Stu Spencer

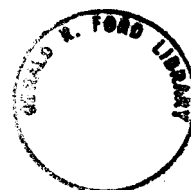
FROM: Bob Visser *RV*
Tim Ryan

RE: Citizens for Reagan - Rooms and Convention Tickets

Attached is a self-explanatory letter from Loren A. Smith, General Counsel to the Citizens for Reagan campaign committee, alleging that the President Ford Committee has received preferential treatment regarding the assignment of rooms and convention tickets at the Republican National Convention in violation of Section 9008(c), Title 26, United States Code. In particular, the Citizens for Reagan Committee has alleged that the allocation of Convention rooms and passes to the White House is grossly improper in that 388 hotel rooms are allocated to the Ford Campaign and White House, whereas only 100 rooms are allocated to the Reagan Campaign. In addition, the Ford "group" has been given 650 Gallery passes whereas the Reagan Campaign has been allotted only 300. Realistically, the facts in this matter are as follows.

The PFC has been afforded 200 Gallery passes and the Reagan Committee has been afforded 300 Gallery passes. In addition, the White House has been allocated 450 such passes to accommodate the official White House Staff, Cabinet and the like. With regard to rooms, both the PFC and the Citizens for Reagan Committee have received assignment of 100 rooms apiece and the White House has received an allotment of 288 rooms to provide for the President, Cabinet, Vice President and his staff, WHACA, and the Secret Service. It should also be noted that the PFC and Reagan Committee have each received 15 floor passes to the Convention. As you can see, the factual basis of the Reagan argument is specious and, in fact, the PFC has received a third less Gallery tickets than the Reagan Committee.

The argument that the above allocation of rooms and floor passes represents a "serious misuse of government funds and the incumbency by the Ford campaign" is ill founded. First, there is



Citizens for Reagan - Rooms
and Convention Tickets Memo
July 2, 1976
Page Two

no expenditure of funds involved with respect to the allocation of such rooms and passes. Moreover, of course, the extension of such courtesies to the Executive Branch of the Government by the Republican National Committee at the National Convention is a matter of long-standing tradition.

Second, Section 9008(c), Title 26, United States Code, is inapplicable. This Section of the Presidential Election Campaign Fund Act, entitled "Payments for Presidential Nominating Conventions" provides as follows:

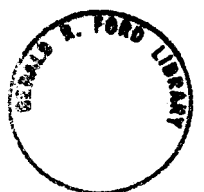
Use of funds. No part of any payment made under subsection (b) shall be used to defray the expenses of any candidate or delegate who is participating in any presidential nominating convention. Such payments shall be used only --

(1) to defray expenses incurred with respect to a presidential nominating convention (including the payment of deposits) by or on behalf of the national committee receiving such payments; or

(2) to repay loans the proceeds of which were used to defray such expenses, or otherwise to restore funds (other than contributions to defray such expenses received by such committee) used to defray such expenses.

As noted above, no part of such funds would be used to defray the expenses of any candidate who is participating in the Republican National Nominating Convention.

Finally, following the basic tenants of Cousins v. Wagoda, 419 U. S. 477 (1975), the Federal election campaign laws do not apply to the determinations of the Convention or the Republican National Committee except as specifically provided in the Act as above. Accordingly, I do not believe that the Federal Election Commission has or will assume jurisdiction over this claim. It is more likely that this is another step in the Reagan public relations campaign to attempt to paint the Ford campaign as railroading the Republican National Convention and subsequent nomination. We should be alert to this tactic and be prepared to respond with our own public relations activities.





CITIZENS FOR REAGAN

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

June 30, 1976

Honorable Mary Louise Smith
Chairman, Republican National Committee
310 First Street, S.E.
Washington, D. C. 20003

HAND DELIVERED

Dear Mrs. Smith:

In recent days, as you know, we have sought to obtain equitable treatment from the Republican National Committee regarding rooms and convention tickets at the Republican National Convention for Citizens for Reagan, the official presidential campaign organization of Ronald Reagan. Because we have been unable to obtain equal treatment through amicable negotiations, Citizens for Reagan is insisting that the Republican National Committee fully comply with its legal obligation, under 26 U.S.C. Section 9008(c), to stage a national convention that does not benefit any Republican candidate for the nomination in any way over any other candidate.

As you, of course, know, this year for the first time the national convention of our party is fully funded by the taxpayers. Through a system of equal payments to both major parties, a public decision has been made to take the funding of this part of the nominating process out of private hands. In so doing, however, the legal mandate is clear: the convention shall not be a vehicle to advance the candidacy of any one person over another.

In Federal Election Commission Advisory Opinion - 1975 - 72, which you requested, the Federal Election Commission dealt with the problem of a political party benefiting only one candidate for its nomination. In that Advisory Opinion, the Commission found that it would be presumed an impermissible campaign contribution to pay Mr. Ford's travel to party events after January 1, 1976. Before that date the Commission noted:

"IT n the period prior to January 1, 1976, IT during which the Republican National Committee paid over



three hundred thousand dollars in Ford travel expenses⁷, the RNC will accord equitable treatment to all of its presidential candidates." 40 Fed. Reg. 56589 (1975).

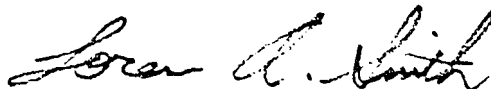
If the Republican National Committee is going to do something for one candidate, it must do it for every candidate for that same office.

Our committee is concerned about preferential treatment given by the convention managers and the Republican National Committee to the White House and, therefore, to the Ford Committee. The allocation of a quota of rooms and passes to the White House is grossly improper. Currently, 388 hotel rooms are allocated to the Ford campaign and White House, while only 100 rooms are allocated to the Reagan campaign. The Ford groups have received 650 gallery passes, while the Reagan campaign has received only 300. We must demand absolute numerical equality in all of these areas.

The White House and the incumbency have no proper role in this convention. Any special functional role granted to the White House officially recognizes a serious misuse of government funds and the incumbency by the Ford campaign.

I recognize that these are strong words, but they express deep concerns for a fair and honest convention. I am having this letter hand-delivered so we may resolve this matter this week. I will call you at 11:00 A.M. Friday hoping that this matter can be resolved. If we do not reach a mutually acceptable solution at that time, then I'm afraid we will have no recourse but to initiate litigation or complaint proceedings before the Federal Election Commission.

Sincerely,

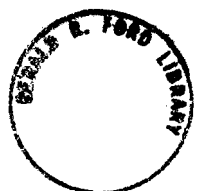


Loren A. Smith
General Counsel

cc: Honorable Ody J. Fish, Vice Chairman
Arrangements Committee, Republican National Committee

William C. Cramer, Esq., General Counsel
Republican National Committee

Robert P. Visser, Esq., General Counsel
President Ford Committee



Buckner

July 2, 1976

MEMORANDUM

TO: Peter Kaye

FROM: Bob Visser *[Signature]*
Tim Ryan

RE: Reagan Request for Temporary Injunction

At 1:30 a.m. on July 2, 1976, a Mr. Huffman, Ohio counsel for the Citizens for Reagan, filed a request for a Temporary Injunction with the Court of Common Pleas in Franklin County (Columbus) Ohio. This request, filed on behalf of three delegate candidates who ran on Reagan's behalf in the 12th Congressional District charged gross negligence and fraud on the part of the Franklin County Board of Elections.

This request for a temporary injunction emanates from the final recount results issued on July 1, 1976, which found that President Ford defeated Ronald Reagan by 20 votes. At 4:30 a.m., July 2, 1976, a Temporary Injunction Order was issued by a Judge in Columbus restraining the Franklin County Board of Elections from certifying the results of the election in the 12th Congressional District. A hearing on the injunction has been set for 9:00 a.m. July 2, 1976.

We think it is very important at this juncture that the PFC aggressively set forth the facts regarding the Reagan tactics. In other words, we should point out that the Reagan campaign was so disorganized in Ohio that it failed to file delegate slates in 8 Congressional Districts and the only reason Mr. Reagan was on the at-large ballot was because of an appeal to the Secretary of State. In addition, the Reagan Ohio campaign was so ineptly conducted that they defeated the President in only two Congressional Districts out of 23. Now, because of the desperate situation in which the Reagan campaign finds itself, behind the President in the delegate count, the Reagan committee has taken to the Courts with a frivolous and spurious legal action. A strong charge of "gross negligence and fraud" on the part of a county Board of Elections is nothing other than a smoke screen and really an attempt by the Reagan Committee to set up a challenge to the Ohio delegation to the National Convention. The end result of such a challenge is obvious--since the Reagan forces cannot win the nomination fairly they will attempt to steal the nomination.



President Ford Committee

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

July 16, 1976

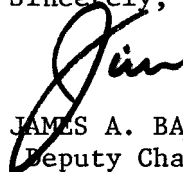
The Honorable
Philip Buchen
Counsel to the President
The White House
Washington, D.C. 20500

Dear Phil:

Thanks for the copy of the letter from Maurice Gersten. His suggestions are good ones and, with minor variations, we have been following these procedures since I arrived here in May.

With best regards,

Sincerely,



JAMES A. BAKER III
Deputy Chairman





1200 SIXTEENTH STREET, N.W.

WASHINGTON, D. C. 20036 DISTRICT 7-4704

July 13, 1976

Dear Jim:

Enclosed is a thoughtful letter from an attorney in Hartford, Connecticut who writes to me because of his relationship to a man on my staff.

I am sure you are flooded with various suggestions and may not find these practical, but I think they are worth considering.

Sincerely,

Philip W. Buchen
Counsel to the President

The Honorable James Baker
Deputy Chairman
President Ford Committee
1828 L Street, N. W.
Suite 250
Washington, D. C. 20036

Enclosure



THE WHITE HOUSE
WASHINGTON

July 13, 1976

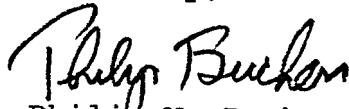
Dear Mr. Gersten:

Many thanks for your thoughtful letter.

I am immediately conveying your ideas to those in a position to consider their feasibility.

We are delighted to have H.P. working on our staff, and he seems to be enjoying the experience very much.

Sincerely,



Philip W. Buchen
Counsel to the President

Mr. Maurice R. Gersten
234 Pearl Street
Hartford, Connecticut 06103



Law Offices
Gersten, Butler & Gersten

Maurice R. Gersten
Charles D. Gersten
Staron L. Gersten
Harold Gersten
William J. Butler
Michael E. Grossmann
Edward S. Klemenski
John H. Allicks

234 Pearl Street
Hartford, Conn. 06103
203-522-0173

July 8, 1976

Philip W. Buchen, Esq.
Counsel to the President
The White House
1600 Pennsylvania Avenue
Washington, D. C. 20500

Dear Mr. Buchen:

My nephew, Harold Peter Goldfield, who is a student employee with your office has asked me from time to time why I cannot make some sort of significant contribution to the President's efforts, perhaps because I had served as a state legislator and at one time I was president of the Hartford County Republican Associates, and have attended Republican conventions.

For several weeks I have been thinking of how some bold stroke could be taken by the President which would indicate a masterful leadership quality and not only win the nomination handily, but even have the delegates and alternates, guests at the convention and even those who are forced to cast a vote against him go back to their homes exhilarated with a drive to work laboriously for their President in the general election.

It was an article in the Boston Globe of July 4, 1976, concerning Mr. John Sears, a copy of which article is enclosed, which created the impetus for this letter. I had once worked with Mr. Sears and I believe that the simple proposals in this letter, when efficiently carried out, would make him wonder just what happened!

I propose that the President make one or one-half minute telephone calls personally to each delegate and/or each alternate. First, however, this should be done very carefully and systematically by setting up a short profile on each person so that if the President has met or spoken to the lady or gentleman, the telephone call could be more cordial. It could be likely that the President might have shared an event at one time or another



Law Offices
Gersten, Butler & Gersten

Philip W. Buchen, Esq.
Counsel to the President
July 8, 1976
Page 2

if he had not met the delegate or alternate, or that the characteristics of the city or town might be recalled to create an emotional everlasting warmth.

Expenses: Expenses should be carefully segregated so that there could be no expenses whatsoever charged to the Government.

Notification: The State Chairman should be notified, but only just prior to the telephone calls so that the idea cannot be used by anyone else. The National Committeeman should also be notified in a similar way.

Letters: Letters also should be prepared and signed by the President and sent to every delegate and alternate with the most precise attention given to the proper spelling of the names and addresses. Where possible if the first name can be used properly, based upon previous experiences, this could be an extremely effective rapport.

The convention for many people is somewhat cold, but the warmth generated by the telephone calls and the letters of the President would harness the most genuine feeling of sincerity. I venture to state that these letters would be framed and treasured and shown. They would be the subject of family and community discussions with the most gratifying feeling that the President found the time from his onerous schedule of world affairs, "to think of me personally."

When the President speaks at the convention, after following these suggestions, there will be unprecedented admiration. An incredible affinity will have been created and the contagion will spread throughout the land. A "one-to-one" basis with the President will be established. If the President has his picture taken with all the delegates individually, as is customary, I think that there will be such unanimous feeling again which will last far beyond the election. Just imagine the ovation he will receive from the audience which feels that it already knows him personally. This will create a very effective television audience rating and the press will pick it up from there.

Will we not be off to a glorious start in bringing about the President's re-election with the recognition and attention outlined.

With all good wishes for success.

Very truly yours,

Maurice R. Gersten
Maurice R. Gersten



MRG:ahj

PROFILE . . .

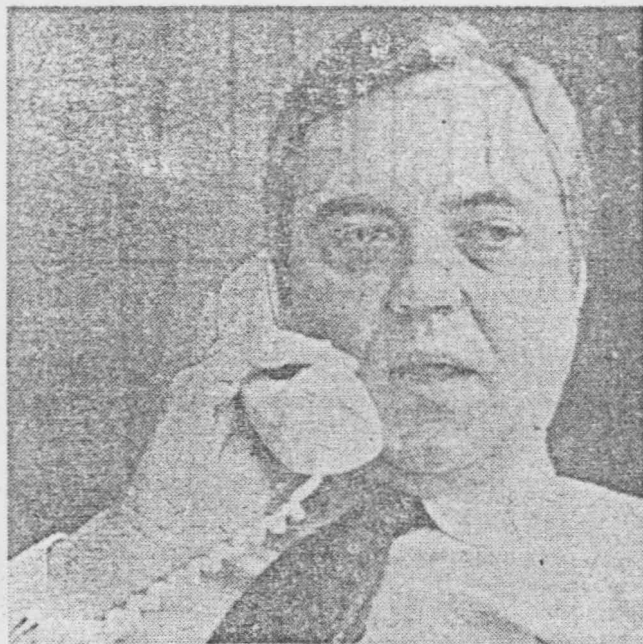
The man who engineered the Reagan drive

By David Nyhan
Globe Washington Bureau

WASHINGTON — The hottest hired gun of this political year is a 35-year-old lawyer who was dumped early by the Nixon White House and

tage," he muttered drolly, "that they only hear certain parts of it."

Beginning with North Carolina on March 23, the 65-year-old Reagan ripped off a total of 12 primary victories. Strengthened by



JOHN SEARS . . . hired political gun

GERALD R. FORD LIBRARY

★
C
h
H
r
c
le
h
A
th
vie
no
ch
pr
st

Some items in this folder were not digitized because it contains copyrighted materials. Please contact the Gerald R. Ford Presidential Library for access to these materials.

THE WHITE HOUSE

WASHINGTON

August 2, 1976

MEMORANDUM FOR THE PRESIDENT

THROUGH: DICK CHENEY

FROM: PHIL BUCHEN *P.*

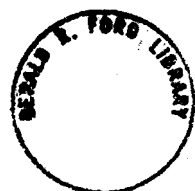
The amended election law permits Presidential candidates and their immediate families to spend up to \$50,000 of personal funds during the primary campaign period and an additional \$50,000 during the general election campaign. Although the \$50,000 which can be spent in the primary period is subject to the overall primary spending ceiling, the \$50,000 which can be spent in the general election is in addition to the \$21.8 million in Federal funds.

The PFC indicates that it soon will have raised funds equal to or in excess of the primary ceiling. Accordingly, the PFC suggests that you not now make further contributions to the PFC, even though you had once thought of doing so to make up for certain travel expenses of Jack, Susan, and Julius Rieckstins during the primary period which were paid or are payable by PFC. After the convention, you can assist your campaign efforts in the general election by personally covering travel expenditures by members of your family or friends, and such expenditures would be properly in addition to those possible from the \$21.8 million in Federal funds.

Therefore, I recommend no further contributions by you at this time to the PFC.

Approved _____

Disapproved _____



President Ford Committee

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

August 31, 1976

MEMORANDUM

FROM: Robert P. Visser, General Counsel
T. Timothy Ryan, Assistant General Counsel

RE: Expenditures by State and Local Republican Parties
Which are Exempt from PFC Expenditure Limitation

The Federal Election Commission (FEC) has recently issued its Opinion with regard to expenditures by state, county, city or congressional district Republican parties which may benefit the President's campaign but are not counted against the President Ford Committee expenditure limitation. This Opinion directed to the Carter-Mondale Campaign Committee, attached hereto, contains the following important information:

1. SLATE CARD EXEMPTION -- The payment for the distribution, display or mailing or other distribution of printed "slate cards", sample ballots, palm cards or other printed listings is not considered a contribution or expenditure on behalf of the candidates listed. Accordingly, "slate cards" will not count against the President's expenditure limitation.

"Slate cards" included in this exemption are limited to information such as the listing of the names of the candidates, the current office or position held by the candidate, the office sought, the party affiliation, and information about voting, such as the time and place of election or the method which may be used to vote a straight party ticket on November 2nd. Such "slate cards" must refer to at least three candidates for public office (federal, state or local) and may be distributed by the local party as many times as they deem necessary.

Included in this "slate card" exemption are outdoor signs clearly designating a party headquarters and noting the candidates which that party supports. For example, the FEC has decided that local party headquarters may have signs designating Ford/Dole or any other candidates they may desire. Expenses for such signs do not count against the PFC ceiling.

There is no requirement under the Federal election campaign laws to report expenditures by committees for "slate cards". If,



however, the payments are made from a committee which is presently reporting to the Federal Election Commission, then the payments must be reported as disbursements by the reporting committee but are not allocated to any of the candidates.

2. GENERAL PARTY EXPENDITURES -- Included as general party expenditures are the costs for rent for headquarters, salaries and expenses for field and headquarters staff, overhead costs, general administrative costs, and other day-to-day costs of running the party headquarters for educational campaign seminars for training campaign workers.

For example, under the general party expenditure provisions, a county headquarters may employ a headquarters and field staff to work for all Republican candidates, including the President, in that county. The payment of overhead costs, general administrative costs, salaries and expenses for these persons are not allocated to the individual candidates. If, however, activities are undertaken on behalf of a clearly identified candidate, such as running an office solely for one candidate on the ticket, the cost of running that office must be attributed to the candidate. Thus, if the county office is run for more than one candidate and personnel are involved in electing more than one candidate, none of the expenses for that headquarters or related expenses are counted against the candidates' limitation. Although the general operating expenses are not allocated among particular candidates, party committees who report to the Federal Election Commission must allocate these expenses on a reasonable basis between their federal and non-federal committees. Reasonable allocation plans are set forth in the attached memorandum.

3. REGISTRATION AND GET-OUT-THE-VOTE DRIVES -- As a general rule, costs for registration or get-out-the-vote drives of a Republican party committee are not attributed to individual candidates unless the drives are made on behalf of particular candidates. Since most get-out-the-vote drives are made on behalf of particular candidates, the costs of the drives must be divided among the candidates supported and will be considered an expenditure on behalf of those candidates. For example, if a voter registration drive is conducted on behalf of the President, the local Senatorial candidate, congressional candidate and two state party candidates, one-fifth of the cost of the voter registration drive is allocated to each one of those candidates. However, of special significance is the fact that funds for federal candidates must be used to pay for the drive allocated to the federal candidates and funds from the state fund will be used for the state candidates. Thus, in states where corporate contributions are permitted for state candidates, using the above example, two-fifths of the cost of the voter registration drive may be paid from funds derived from corporations or labor unions.

**STATE OR LOCAL PARTY ACTIVITIES ON BEHALF OF
A PRESIDENTIAL CANDIDATE --**

Each political party committee of a state, county, city or congressional district may make expenditures up to \$1,000 which further the general election campaign. These committees must be part of the official party structure. Each separate committee has a \$1,000 limitation. Committees may not pool their money for media buys; however, committees may pool their money for mass buys, for example, for buttons or bumper stickers. If the money is combined for this purpose, then each committee must receive a portion of material equal to the amount purchased with its contribution or money.

Of special significance is the fact that the \$1,000 contribution expended by each of these committees does not count against the President's expenditure limitation nor is it reportable to the Federal Election Commission. If, however, the payments are made from a committee which is presently reporting to the Federal Election Commission, then the payments must be reported as disbursements by the reporting committee but are not allocated to any of the candidates.

5. INDEPENDENT EXPENDITURES -- Party committees, as set forth above, may not make independent expenditures on behalf of the President.

If there are any questions with regard to this memorandum or the attached letter to the Carter-Mondale Campaign Committee, please contact the office of the General Counsel of The President Ford Committee at (202) 457-6424.



FEDERAL ELECTION COMMISSION

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

August 31, 1976

O/R #715

Mr. Douglas Huron
Carter-Mondale Campaign
Legal Department
Box 1976
Atlanta, Georgia 30301

Dear Mr. Huron:

This letter is in response to your letter of July 30, 1976, in which you raised a number of questions about activities of political parties. Your letter raised questions about slate card expenditures, general party expenditures, registration and get-out-the-vote drives, and State or local party activities on behalf of Presidential candidates. Each general area is addressed separately.

I. SLATE CARD EXEMPTION

(A) Type of Expenditures

The payment for the preparation, display, or mailing or other distribution of printed slate cards, sample ballots, palm cards, or other printed listings is not considered a contribution or expenditure on behalf of the candidates listed. §100.4(b)(7), §100.7(b). The materials must refer to at least three candidates for public office (Federal, State or local). Listings in general political advertising, such as television, radio, newspapers, magazines, and outdoor advertising which is accessible to the general public, such as billboards, signs (bus, taxi and car tops), bumper stickers, and other types of posters, which are clearly in view of the general public are not included within this exemption. However, outdoor signs clearly designating a party headquarters are allowed under this exemption.

The phrase "or other printed listing" does not include the printing of pamphlets or brochures giving background information or the positions of the candidates on the issue. Rather the exemption is limited to information such as the listing of the names of the candidates, the current office or position held by the candidate, the office sought, the party affiliation, and information about voting, such as the time and place of election or the



Mr. Douglas Huron
August 31, 1976
Page Two

method which may be used to vote a straight party ticket. The slate card exemption is not intended as a device for party committees to circumvent the reporting provisions and the limitations on contributions and expenditures by undertaking extensive campaigning on behalf of the candidates. See statement of Congressman Frenzel, 120 Cong. Record H10334 (daily ed. October 10, 1974). Rather, the purpose of this exemption is to allow State and local parties "to educate the general public as to the identity of the candidates of the party." H. Conf. Rept. 1438, 93d Congress, 2d Sess., p. 65 (1974). The party expenditure provisions, §110.7, provide a means for political parties to do overt campaigning for their party nominees.

(B) Allocation of Costs

The costs of the materials permitted under this exemption need not be allocated among the candidates since the exemption from the definition of contribution and expenditure means that the cost is not a contribution to or an expenditure on behalf of the candidates.

(C) Reporting

A party committee will not, by reason of payments for "slate cards," become a reporting political committee under the Act. If however, the payments are made from a Federal committee which already has a reporting obligation under the Act, the payments must be reported as disbursements by the reporting committee. §104.2(b).

II. GENERAL PARTY EXPENDITURE

(A) Types of Expenditures

The types of expenditures under this heading include rent for party headquarters, party staff, overhead costs, general administrative costs, other day-to-day costs of running the party headquarters and expenditures for educational campaign seminars for training campaign workers.

(B) Allocation of expenditures among or between candidates

The general operating expenses of running the party headquarters need not be allocated to individual candidates. §106.1(c). If however, activities are undertaken on behalf of a clearly identified candidate, such as running an office solely for one of the candidates on the ticket, the cost of running that office must be attributed to that candidate both for reporting and limitation purposes.

Mr. Douglas Huron
August 31, 1976
Page Three

(C) Allocation of General Operating Costs between State and Federal Purposes

Although the general operating expenses of the party headquarters and activities need not be allocated among particular candidates, party committees which have established Federal campaign committees pursuant to §102.6 must allocate the administrative expenses on a reasonable basis between their Federal and non-Federal committees. Reasonable allocation plans include, but are not limited to, the number of ballot positions for Federal office and the number of ballot positions for comparable State offices or the amount of funds expended for Federal election purposes in proportion to the amount of funds spent for non-Federal election purposes. That portion of administrative expenses attributable to Federal elections must come from money contributed in accord with §102.6(b). - that is, the money contributed for such purposes is subject to the limitations on contributions to the party committee under the Act and the prohibitions on contributions such as contributions from corporations and labor organizations.

If the political committee has not created a separate Federal campaign committee but is itself a "political committee" under the Act, all expenditures for operating expenses would be reportable. If the party committee has a separate Federal campaign committee, the reporting Federal committee need only report those expenditures generally allocable to Federal election purposes.

III. REGISTRATION AND GET-OUT-THE-VOTE DRIVES

As a general rule, costs for registration or get-out-the-vote drives of party committees need not be attributed to individual candidates unless the drives are made on behalf of particular candidates. §106.1(c)(2). If the drive is made on behalf of a particular candidate or candidates, then the cost of the drive must be divided among the particular candidate or candidates supported and will be considered either a contribution to or an expenditure on behalf of those particular candidates.

The drive will be considered to be made on behalf of a particular candidate or candidates if, for example, the purpose of the drive and the printed material used for the drive suggests that the voter, "Vote for Smith," or "Vote for Smith and Jones."

A party may identify all or a portion of its candidates by using the slate card exemption and the registration and get-out-the-vote drive in conjunction. For example, if the printed material

Mr. Douglas Huron
August 31, 1976
Page Four

distributed during the drive is exempted from allocation requirements because of the slate card exemption, the use of such literature will not make the costs of the drive allocable.

Again, although a registration or get-out-the-vote drive may not be allocable among or between candidates, party committees which have established Federal campaign committees may consider a portion of the expenditures made for the purpose of influencing a Federal election and a portion made for the purpose of influencing State election. The party committee may divide the costs on a reasonable basis. A reasonable apportionment formula to use is the number of ballot positions for Federal office and the number of ballot positions for comparable State offices on the ballot in the next election.

IV. STATE OR LOCAL PARTY ACTIVITIES ON BEHALF OF PRESIDENTIAL CANDIDATES

Each political party committee of a State, county, city, or congressional district may make expenditures not to exceed \$1,000 which further the general election campaign of the party's nominee or nominees, including the Presidential and Vice-Presidential nominees. These committees must be part of the official party structure. There is one limitation at each level of the party - i.e., State, county, city or congressional district. Multiple party committees occupying the same level (i.e., two district-level committees in the same Congressional district) would be entitled to only one limit, even if the committees are independent. The expenditure right is not applicable to party committees which are established just for the purpose of making such expenditures.

There is no qualification on the type of expenditure that may be made under this provision. Radio or newspaper ads or billboards - expenditures which would not come within the "slate card" exemption - may be made.

There is no minimum number of candidates that have to be named in such expenditures, except the Presidential nominee must be named. Any materials purchased under this exemption, may, of course, list all or a limited group of the party's nominees. If for example, a bumper sticker or local newspaper ad contained the name of the Presidential candidate, a Senatorial candidate, and a House candidate, the total cost of the bumper stickers or ads could not exceed \$1,000. The party committee need not attribute the cost among the three

Mr. Douglas Huron
August 31, 1976
Page Five

Federal candidates since the \$1,000 expenditure limitation is over and above any other limitations which the party has with respect to contributions to or expenditures on behalf of Congressional candidates.

The expenditures under this limitation apply separately to each party committee within the official party structure. Party committees may consult with each committee or the nominees concerning their expenditure. The committees may not, however, "pool" this expenditure limitation as, for example, by making a single media buy of \$10,000. This is in contrast to the limitations in §110.7(b)(2) which, as a general rule, apply to all of the party committees in the State.

Although the \$1,000 expenditure in §110.7(b)(5) is not considered a contribution or expenditure for the purpose of limitations, there is not a corresponding exemption to the definition of contribution or expenditure in the disclosure definitions. Accordingly, receipts and payments for the purpose of the \$1,000 expenditure count toward the threshold registration and reporting requirements. 2 U.S.C. §§433, 434.

Party committees may not make independent expenditures on behalf of the party nominees. §110.7(a)(5) and (b)(4).

This response is for informational purposes only and should not be regarded as an Advisory Opinion. 2 U.S.C. §437f. It may however, be regarded as an informal expression of the Commission's views as to how the proposed regulations would apply to the various situations described in your letter. The proposed regulations were submitted to the Congress on August 3, 1976 and may be prescribed by the Commission in final form after expiration of 30 legislative days without disapproval by either the House or the Senate.

Sincerely yours,

(signed)

Vernon W. Thomson
Chairman for the
Federal Election Commission

September 27, 1976

MEMORANDUM FOR:

PHIL BUCHEN

FROM:

JACK MAESTRI

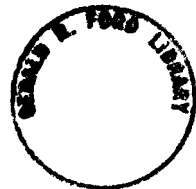
I have been asked by Stan Parris to serve as a member of the Steering Committee for the Ford campaign in the State of Virginia.

This is something I would like to do, but I thought I better touch base with you to get a clearance beforehand.

Advice please?

cc: Stan Parris

*Called him 9/27
& told him "O.K."
P.*





October 2, 1976

MEMORANDUM

TO: Phil Buchen

FROM: Elly Peterson/Judy McLennan *JMS* Volunteer Desk

RE: Kathy Dearborn

After a great deal of trouble trying to reach Kathy due to her line being busy or not answering, I talked with her today. I gave her the names, addresses and phone numbers of the People for Ford Chairman and the President Ford Committee Chairman in Illinois. I have also sent her resume to the People for Ford Chairman with an attached note. Thank you for forwarding her name to me.



The logo consists of a solid black circle. Inside the circle, the words "People", "for", and "Ford" are stacked vertically in a white, sans-serif font. "People" is at the top, "for" is in the middle, and "Ford" is at the bottom.

October 2, 1976

Mary Alice Erickson
6707 North Greenmont
Peoria, Illinois

Dear Mary Alice:

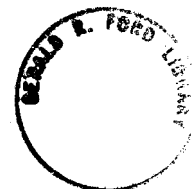
Please find enclosed the resume of Kathy Dearborn. She is a personal friend of Mr. Phillip Buchen, Counsel to the President, and she is most anxious to help. I'm sure her talents and enthusiasm will be to your benefit.

I spoke with Kathy today and gave her your name and address, so I'm sure you will be hearing from her.

Sincerely,

Judy McLennan
National Volunteer Chairman
People for Ford

cc: Phil Buchen



President Ford Committee

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

October 26, 1976

MEMORANDUM

TO: Jim Baker
Phil Buchen ✓

FROM: Bob Visser *RPV*

RE: Department of Justice Investigation re
Delegates

This is to advise you that Tom Henderson, Chief, Public Integrity Section of the Department of Justice, advised me by telephone today that the Department of Justice has now officially closed its files on this matter. Mr. Henderson further stated that as soon as a letter has been cleared through the "chain of command" in the Department of Justice we would receive a formal letter confirming this advice.

RPV/nh

CC: Dick Cheney



President Ford Committee

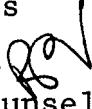
1828 L STREET, N.W., SUITE 250, WASHINGTON, D.C. 20036 (202) 457-6400

November 15, 1976

CONFIDENTIAL

MEMORANDUM

TO: Phil Buchen
Ed Schmults

FROM: Bob Visser 
General Counsel

RE: Department of Justice Investigation

Attached is a copy of the letter from the Department of Justice regarding the above matter for your information and files. This letter advises the President Ford Committee that the Department of Justice has officially closed its files on this investigation.

/nh

CC: Dick Cheney
Rogers Morton
Jim Baker





UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the
Division Indicated

and Refer to Initials and Number
RLT:THH:RAH:ph
186-16-75

Robert P. Visser
General Counsel
President Ford Committee
1828 L Street, N.W.
Washington, D. C. 20036

Dear Mr. Visser:

As you know, a complaint was made to the Attorney General alleging that the use of the White House and its facilities for the purpose of entertaining prospective delegates to the Republican National Convention constituted possible violations of various election and political activities offenses set forth in Title 18 of the United States Code.

We have reviewed the facts set forth in this complaint carefully in the context of various election law statutes, and have concluded that violations are not indicated.

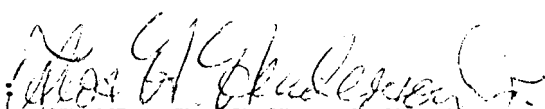
A close reading of the information contained in this complaint did indicate what we believe was a remote possibility that the White House appropriation may have been improperly used to defray the costs of the items and activities mentioned in the complaint. We have conducted what we believe has been a thorough investigation of this possibility, and have determined to our satisfaction that no White House funds were used in connection with the delegate visits last summer. These costs were born either by the President Ford Committee, or in the case of travel, by the delegates themselves.

For the reasons set forth above, we are closing this matter in the Criminal Division.

Sincerely,

RICHARD L. THORNBURGH
Assistant Attorney General
Criminal Division

BY:


THOMAS H. HENDERSON, JR.

Chief, Public Integrity Section





UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the
Division Indicated
and Refer to Initials and Number
RLT:THH:RAH:ph
186-16-75

076

Robert P. Visser
General Counsel
President Ford Committee
1828 L Street, N.W.
Washington, D. C. 20036

Dear Mr. Visser:

As you know, a complaint was made to the Attorney General alleging that the use of the White House and its facilities for the purpose of entertaining prospective delegates to the Republican National Convention constituted possible violations of various election and political activities offenses set forth in Title 18 of the United States Code.

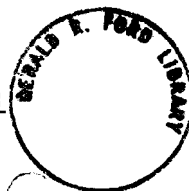
We have reviewed the facts set forth in this complaint carefully in the context of various election law statutes, and have concluded that violations are not indicated.

A close reading of the information contained in this complaint did indicate what we believe was a remote possibility that the White House appropriation may have been improperly used to defray the costs of the items and activities mentioned in the complaint. We have conducted what we believe has been a thorough investigation of this possibility, and have determined to our satisfaction that no White House funds were used in connection with the delegate visits last summer. These costs were born either by the President Ford Committee, or in the case of travel, by the delegates themselves.

For the reasons set forth above, we are closing this matter in the Criminal Division.

Sincerely,

RICHARD L. THORNBURGH
Assistant Attorney General
Criminal Division



BY:

Thomas H. Henderson, Jr.
THOMAS H. HENDERSON, JR.

Chief, Public Integrity Section



P. L.

I called
Viner & he said
he would consider a
Wentworth & will call
him. —

He will discuss
this bill with the
Q. N. C. —

THE WHITE HOUSE
WASHINGTON

Niel Weathers

(616) 459-1171

President Ford Committee

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

November 30, 1976

MEMORANDUM

TO: Ed Schmults
FROM: Tim Ryan *TR*
RE: Grand Rapids Legal Services

Attached hereto are copies of the Miller, Johnson, Snell and Cummiskey bills totaling \$7,020.40 and accompanying letters from Bob Eleveled. We would appreciate your assistance in determining if the President or any member of his staff requested these services or, in the event such had not been requested, whether the PFC should pay for the legal services. Finally, in order to ensure that these expenses would fall within the requirements of the Federal Election Campaign Laws, that is, as qualified campaign expenses, we have requested a detailed bill from the Miller, Johnson firm.

TTR/nh
Attachments



19 November 1976

Mr. Tom Moran, Comptroller
President Ford Committee
1828 L Street NW Suite 708
Washington, D.C. 20036

Dear Tom:

Attached you will find original letters and bills for legal services rendered to the Kent County Republican Committee during the federal investigation of the President's campaign finances dating back to the days when he was a member of Congress.

Mr. Robert Eleveld and Mr. Steve Bransdorfer are your contact people for additional information. Mr. Eleveld is the Fifth District (Michigan) GOP Chairman. The billings were sent to the Kent County GOP, by them to Mr. Eleveld, by him to me, etc.

Your payment of these has been requested by both Kent County and the Fifth District GOP leadership. We concur.

Thank you for your attention to this matter.

Sincerely,



Richard D. Simonson
Director
PFC, Michigan



LAURENT K. VARNUM
CARL J. RIDDERING
OF COUNSEL

LAW OFFICES OF
VARNUM, RIDDERING, WIERENGO & CHRISTENSON
666 OLD KENT BUILDING
GRAND RAPIDS, MICHIGAN 49502

TELEPHONE 616 • 459-4186

JOHN L. WIERENGO, JR.
CLIFFORD C. CHRISTENSON
F. WILLIAM HUTCHINSON
JAMES N. DeBOER, JR.
GORDON B. BOOZER
EUGENE ALKEMA
PETER ARMSTRONG
ROBERT J. ELEVELD
CARL E. VER BEEK
JON F. DEWITT
DONALD L. JOHNSON
DANIEL C. MOLHOEK
GARY P. SKINNER
CARL R. FLEETWOOD

DIRK HOFFIUS
J. TERRY MORAN
THOMAS J. HEIDEN
THOMAS J. MULDER
THOMAS J. BARNES
DENNIS C. KOLENDA
JEFFREY L. SCHAD
STEPHEN R. SAWYER
THOMAS G. DEMLING
JAMES A. SCHRIEMER
JOHN W. PESTLE
FRANK G. DUNTEN

November 4, 1976

Mr. Peter Fletcher
Chairman
Michigan President Ford Committee
223 North Walnut
Lansing, Michigan 48933

Dear Peter:

I am enclosing herewith our statement for legal services rendered with regard to the investigation of the Kent County Republican Committee and Kent County Republican Finance Committee concerning President Ford's finances. The handling of this investigation clearly benefited President Ford's campaign, therefore, I think it would be a legitimate campaign expense. I look forward to hearing from you as soon as possible with regard to this expense.

Yours very truly,


Robert J. Eleveld

RJE:pm

Enclosure



MILLER, JOHNSON, SNELL & CUMMISKEY

465 OLD KENT BUILDING
GRAND RAPIDS, MICHIGAN 49502
616-459-8311

KENT COUNTY REPUBLICAN COMM.
666 OLD KENT BLDG.
GRAND RAPIDS, MI 49502

Attn: Mr. Robert Eleveld

DATE OCT. 14, 1976

I.D. NO. 38-1803110

FOR SERVICES RENDERED THROUGH SEPTEMBER 1976
IN CONNECTION WITH YOUR BUSINESS MATTERS

\$ 6,995.00

. . . . CASH DISBURSEMENTS

REPRODUCTIONS
TELEPHONE EXPENSE

\$ 21.00

4.40

25.40

AMOUNT DUE

\$ 7,020.40

Steve Bransdorfer.

LAURENT K. VARNUM
CARL J. RIDDERING
OF COUNSEL

LAW OFFICES OF
VARNUM, RIDDERING, WIERENGO & CHRISTENSON
666 OLD KENT BUILDING
GRAND RAPIDS, MICHIGAN 49503

TELEPHONE 616 • 459-4186

JOHN L. WIERENGO, JR.
CLIFFORD C. CHRISTENSON
F. WILLIAM HUTCHINSON
JAMES N. DEBOER, JR.
GORDON B. BOOZER
EUGENE ALKEMA
PETER ARMSTRONG
ROBERT J. ELEVELD
CARL E. VER BEEK
JON F. DEWITT
DONALD L. JOHNSON
DANIEL C. MOLHOEK
GARY P. SKINNER
CARL R. FLEETWOOD
DIRK HOFFIUS
J. TERRY MORAN
THOMAS J. HEIDEN
THOMAS J. MULDER

THOMAS J. BARNES
DENNIS C. KOLENDA
JEFFREY L. SCHAD
STEPHEN R. SAWYER
THOMAS G. DEMLING
JAMES A. SCHRIEMER
JOHN W. PESTLE
FRANK G. DUNTEN
ROBERT A. PARKER
TERRANCE R. BACON

November 18, 1976

Mr. Rick Simonson
Michigan President Ford Committee
223 North Walnut
Lansing, Michigan 48933

Dear Rick:

In accordance with our telephone conversation, I am enclosing herewith an updated and what I consider to be final billing for legal services with regard to the investigation here in Grand Rapids. This is the amount we are requesting from the President Ford Committee. If I can provide you with anything further, please let me know.

Yours very truly,

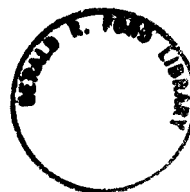
VARNUM, RIDDERING, WIERENGO & CHRISTENSON


Robert J. Eleveld

RJE:kh

Enclosure

cc: Steve Bransdorfer



MILLER, JOHNSON, SNELL & CUMMISKEY

465 OLD KENT BUILDING
GRAND RAPIDS, MICHIGAN 49502
616-459-8311

KENT COUNTY REPUBLICAN COM.
666 OLD KENT BLDG.
GRAND RAPIDS, MI 49502

DATE NOV. 15, 1976

I.D. NO. 38-1603110

FOR SERVICES RENDERED THROUGH OCTOBER 1976
IN CONNECTION WITH YOUR BUSINESS MATTERS

\$ 2,665.00

. . . . CASH DISBURSEMENTS

REPRODUCTIONS
TELEPHONE EXPENSE

\$ 2.30
29.61

31.91

\$ 2,696.91

. . . . PRIOR UNPAID BILLS

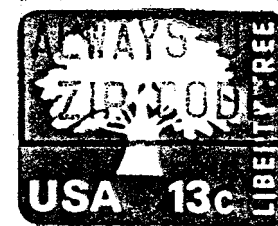
BILL ISSUED ON OCT. 14, 1976 FOR

7,020.40

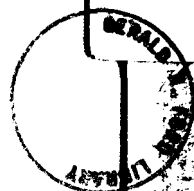
AMOUNT DUE

\$ 9,717.31

President Ford Committee, Michigan
223 N. Walnut
Lansing, Michigan 48933



Mr. Tom Moran
PRESIDENT FORD COMMITTEE
1828 L Street NW Suite 709
Washington, D.C. 20036



THE WHITE HOUSE
WASHINGTON

Campaign

January 11, 1977

MEMORANDUM FOR: JIM CONNOR

FROM: PHILIP W. BUCHEN *P.*

The attached bill from the University of Michigan is for the costs of copying and delivery of materials at the University of Michigan that were needed in connection with the campaign.

Please forward it to the President Ford Committee for direct payment to the University of Michigan, the Bentley Historical Library.

Attachment



The University of Michigan
Bentley Historical Library
Michigan Historical Collections

ERT M. WARNER, Director

See
to
have
reimbursement

INVOICE FOR XEROX SERVICES

October 4, 1976

The Hon. Gerald R. Ford
President of the United States
The White House
Washington, D.C. 20501

Attention: The Hon. Philip Buchen

159 pages, regular size, 10¢ each	15.90
Round trip to Metro airport 46 Mi. at 14¢	7.84
Airline charges on small package	25.00
First class postage	2.78
	<hr/>
Total	\$51.52

Kent City 2-2 (11)