

THE WHITE HOUSE
WASHINGTON

Held

December 22, 1981

Dear Mr. Selden:

Thank you for your letter. I appreciate having the opportunity to review the publication which you enclosed. You can be sure that it will receive serious attention from the appropriate members of the Administration.

With best wishes,

Sincerely,

Michael K. Deaver

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. Harry W. Selden
Route 8, Box 80
Mechanicsville, VA 23111

*Just what have you said?
What are you writing about?
Is this all you have to say?
Harry Selden*

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Selden:

Thank you for your letter. I appreciate having the opportunity to review the publication which you enclosed. You can be sure that it will receive serious attention from the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Harry W. Selden
Route 8, Box 80
Mechanicsville, VA 23111

9404 Genesee Avenue
Suite 100
La Jolla, California 92037
(714) 457-2900
North County: 489-9213



Business Properties
Brokerage Company

file

December 22, 1981

Mr. Michael K. Deaver
Assistant to the President
Deputy Chief of Staff
The White House
Washington, D.C. 20500

Dear Mike:

Thank you for taking the time out of your busy schedule to see me last week and your thoughtfulness on the gift for my children.

I am sure you look forward to getting back to California with Caroline and the children and enter the private sector, but until that time good luck and keep up the good work.

Once again, thank you for your thoughtfulness, I look forward to seeing you in the future.

Sincerely,

Jan R. Anton
Senior Sales Executive

JRA:ims

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Lewin:

Thank you for your recent letter. I appreciate the time you have taken to share your views with me and I want you to know that your comments will be brought to the attention of the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. William A. Lewin
Building 6
Coatesville, PA 19320



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Balfrey:

Thank you for your recent message. I am grateful to receive your kind words of support. Your letter was very encouraging and I only hope to live up to the faith which you have placed in me.

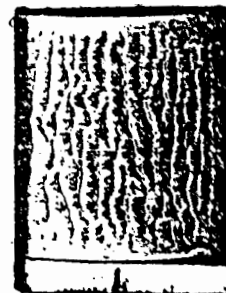
Again, thank you for your letter.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Thomas F. Balfrey
Three Arbor Road
North Clemsford, MA 01863



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Austin:

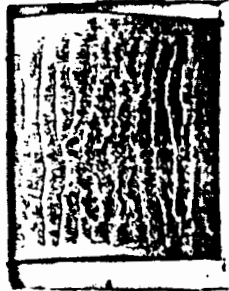
Thank you for your recent message concerning immigration. I appreciate the concern which prompted you to write on this subject and I am grateful to have the opportunity to review your proposal. I want you to know that your comments will be brought to the attention of the appropriate officials within the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Louis C. Austin
Box 642
Mojave, CA 93501



File

December 22

Dear Mike,

This is to wish you a sincere Merry Christmas and Happy New Year.

I have no Xmas card but I thought you might enjoy this column by my dad - a universal message of hope that seems relevant even twenty years later.

Thanks for helping make this year a special one for me. Here's hoping 1982 brings every joy and fulfillment to the Deavers.

All the best,

Pete

The Christmas Santa Nearly Stayed at Home

This column by Amusements Editor Hubert Roussel was first printed in *The Post* on Christmas of 1961.

"Well," said his wife, coming in from the kitchen, "if you've got to keep on, I guess that's just about everything. Here's your muffler, and I've made you some coffee in the jug. If I were you, I'd cut it as short as I could this time. And try to keep out of the way of those other horrible things flying around—the ones with the monkeys inside."

He put on the muffler and smiled. "I will, Mom," he said. "And thanks for understanding as usual." The stout little woman shook her head. "I'm not certain I do understand," she said. "But if you must, you must, I suppose. I just wish this business made a little more sense to me now."

The old man patted her arm.

"Maybe it never did make too much," he said. "Who knows? You have a job and you try to take care of it somehow. I don't know what we'd have done if we hadn't had this one."

The wind whistled over the roof, making the house shudder and creak. "It's nasty out there," his wife said. "A person your age shouldn't be running around in that cold at night. He ought to think of his health."

He tucked his beard in with his muffler. "I do Mom," he said. "I've lost 10 pounds this year."

Her shrug let him know that she didn't mean that.

"Some myths have known when to retire," she said. "Take the Trolls, for instance. Not a man in that family has hit a lick since I can remember. Who said you had to go on forever?"

"Nobody, I guess," he admitted.

"Well, that's it," his wife said.

"This is 1961, Kris. It's a different place out there than it was when we opened the shop. They were all like children then. Look at the things they're up to now, and ask yourself whether you've got any business with that mess. Santa Claus! Saint Nicholas! Who buys that line any more?"

He was forced to laugh.

"You sound like one of them, Mom."

"Maybe I do, and it's no wonder. Things change, Kris. It's a sign of old age if you don't notice the fact."

"I notice it sometimes," he replied.

She smiled sadly and looked down at her hands.

"I think of how it used to be," she said. "They seemed so innocent then. They made their own toys and went out in the woods to cut greens. It was all very still, and they sang such beautiful songs."

"Now they've got things of their own that fly around faster than you ever did with a williwaw helping you on

They're afraid of each other and afraid of the sky. They teach little children to hide in the earth if they hear any strange sound in the air. What do you make of all that?"

He could think of no answer to offer.

"Give it up, Kris," she said. "You've done a wonderful job, but it's over. They don't believe any more—they can't. And they'll never, never be able to do it again."

"That's a hard thing to say, Mama."

"It is, and I hate to say it," she answered. "But I think it's the truth. If you quit, they wouldn't notice the difference. The real gift you try to leave is the one they can't receive any more."

He was silent a while, rubbing his chin. Then he saw that his wife had begun weeping.

"I don't know, I don't know, Kris," she cried. "I used to be so happy on this night when you were ready to start—"

The old man put his arm around her. "Don't Mama," he said. "You're tired. And I think you're perfectly right. I'm foolish and out of date. They don't need me and I'm going to stay in tonight."

She was almost too startled to speak. "But Kris," she said weakly. "I mean you mustn't let me—Why—why, the sleigh's all ready and—Oh, I don't know!"

"Never mind," he said gently. "I'll unhitch later. I'm tired myself. It's a silly job now, I agree, and I'm sure they'll never notice my absence. This fire feels mighty darned good."

"But Kris—" she said again.

"Don't argue. I've always wondered what it was like to spend Christmas at home. Let's find out, Mom."

He took off his muffler, unbuttoned his red coat, and stretched out in the big chair by the fireplace. She was too bewildered to think. She sat down at his feet, resting her head on his

knee. The minutes ticked off on the clock.

"Christmas at home," he repeated. "I see what they meant now. There's a good deal to be said for the idea."

She murmured something he could not understand. When he looked down she was falling asleep.

A little while later, certain that the sleep was sound, he carefully shifted his position, put a cushion under her head, and got up from the chair.

She looked like a tired child in the soft glow from the fireplace. He covered her with a blanket, buttoned his coat, and quietly let himself out of the house.

The sleigh stood at the door, its team stamping the ground with impatience. There was one star in the blackness. The old man hesitated a long moment. He turned back to the door, opened it slightly and looked in. The figure by the fire had not moved.

He closed the door and stepped into the sleigh.

"Giddap, Prancer," he said softly.

Written and Edited
TO MERIT YOUR Confidence

THE HOUSTON POST

HOUSTON, TEXAS 77001, SATURDAY, DECEMBER 25, 1965

Drive Safely

"Drive with your headlights on," a reminder to all you meet to drive with care—and enjoy this Christmas Day and many more!

1st YEAR, NUMBER 29,488

FOUR SECTIONS

DIAL W-A-N-T A-D-S

TELEPHONE FA 8-3131

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Second Class Postage Paid at Houston, Texas

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Gigs Peace Pickets

Hope Springs With
The Eternal Quips,
Keeps Cl... Howd...



Christmas Dawns
As Day of Peace

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Buckley:

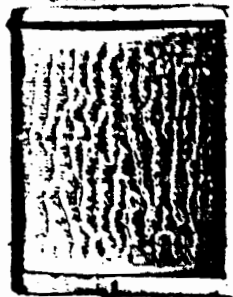
Thank you for your recent message concerning the Urban Development Action Grant program. I appreciate the interest which prompted you to write on this subject and I want you to know that your comments will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. Michael P. Buckley
President
Halcyon, Ltd.
55 High Street
Hartford, CT 06103



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Wyman:

Thank you for your recent message. I know that President Reagan will be as pleased by your support as I am. Your willingness to take the time to convey your views to others is deeply appreciated.

Again, thank you for writing and allowing me the opportunity to review your correspondence with the news media.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. Kenneth E. Wyman
909 Riviera Avenue
Huntsville, AL 35802



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Albertine:

Thank you for your recent letter of support. It was especially good of you to bring the Business Week article concerning Arthur Levitt to my attention. All of us within the Administration look forward to his participation in the President's Task Force on Private Initiatives.

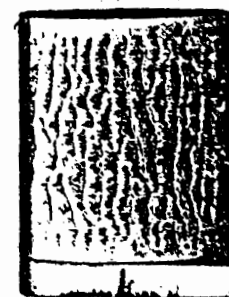
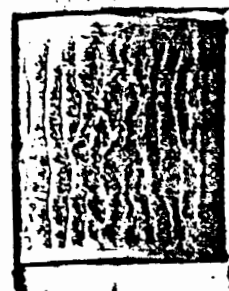
Again, thank you for your message.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. John M. Albertine
President
American Business Conference, Inc.
Suite 209
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Sullivan:

Thank you for your recent message concerning continued reductions in the Federal budget and future appropriations for the Legal Services Corporation. This Administration shares your concern for the efficient use of Federal funds. All too often the hard earned dollars of American taxpayers are spent unwisely by their government. You can be sure that your comments will be brought to the attention of the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. I. J. Sullivan
718 15th Street
Lewiston, Idaho 83501



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Rothberg:

Thank you for your message. I appreciate the support which you expressed for President Reagan and your commitment to his philosophy of government. I want you to know that your views have been carefully noted by the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. Michael Rothberg
Conservative Union
Bard College
Annandale-on-Hudson, NY 12504

THE WHITE HOUSE
WASHINGTON

December 22, 1981

Dear Mr. Hagan:

Thank you for your recent message concerning future appropriations for the Government National Mortgage Association. I appreciate the concern which prompted you to write on this subject and want you to know that your comments will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. James C. Hagan
Executive Vice President
and General Counsel
Oklahoma Mortgage Company, Inc.
5100 North Brookline Avenue
Oklahoma City, Oklahoma 73112

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Case:

Thank you for your recent message concerning the Export-Import Bank. I appreciate the interest which prompted you to write on this subject and I want you to know that your comments will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. W. Evans Case
1001 South Melpomene Way
Tucson, AZ 85710

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Ambers:

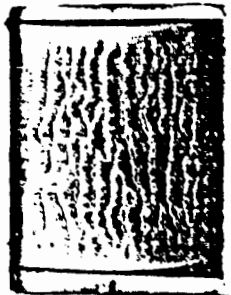
Thank you for your recent message. I enjoyed having the opportunity to review your publication concerning dirigibles. I appreciate your interest in this topic and I want you to know that your comments will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Henry J. Ambers
c/o C.M. Scott
Apartment 1-B
405 East 63rd Street
New York, NY 10021



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Miss Mougado:

Thank you for your recent letter. I appreciate the interest which prompted you to write and I want you to know that I will keep your concerns in mind during the deliberations that take place here in Washington.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Miss Kathleen A. Mougado
860 Sutter Manor
San Francisco, CA

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Chisholm:

Thank you for your recent message. I appreciate the time you have taken to send me your views. You can be sure that they will be brought to the attention of the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Harry Chisholm
512 North Union
Tecumseh, MI 49286

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mrs. Sutton:

Thank you for your letter. I appreciate the time you have taken to bring the Volunteer Mileage Bill to my attention. You can rest assured that, should this piece of legislation be presented to the President for his signature, it will receive careful attention from the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mrs. John V. Sutton
President
North Carolina Federation
of Women's Clubs, Inc.
3509 Haworth Drive
Raleigh, NC 27609

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Green:

Thank you for your recent message concerning defense and foreign policy. I appreciate the concern which prompted you to write on this subject and I want you to know that your comments will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Mr. Roy H. Green
Roy H. Green Investments
326 Washington Street
Decorah, Iowa 52101

THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Mr. Wells:

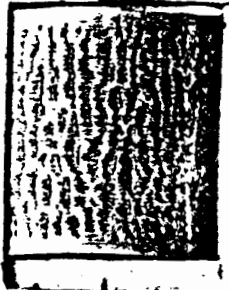
Thank you for your recent message. I appreciate the concern which prompted you to write and I want you to know that your comments and opinions will be brought to the attention of the appropriate members of this Administration.

With best wishes,

Sincerely,

MICHAEL K. DEAVER
Assistant to the President
Deputy Chief of Staff

Mr. Wilson Wells
663 Springridge Drive
Lexington, KY 40503



THE WHITE HOUSE

WASHINGTON

December 22, 1981

Dear Miss Ashton:

Thank you for your recent message concerning the minimum wage and mandatory retirement. I appreciate the interest which prompted you to write on these subjects and want you to know that your comments will be brought to the attention of the appropriate members of the Administration.

With best wishes,

Sincerely,

MICHAEL K. DEEVER
Assistant to the President
Deputy Chief of Staff

Miss Sherley Ashton
General Delivery
Carmel, CA 93921

MEMORANDUM

MKD

THE WHITE HOUSE

WASHINGTON

December 23, 1981

TO: FRED FIELDING
FROM: MICHAEL K. DEEVER
SUBJECT: Letter of December 2, 1981 From
Edward Weidenfeld Regarding FEC
Subpoena and Interrogatories

This is in response to your memo of December 11, 1981, regarding Edward Weidenfeld's letter of December 2, 1981 advising we report the disposition of our campaign files. I have no files from the campaign.

My principal duty with the campaign was to accompany the President on the campaign, and all my paperwork was done by Charles Tyson.

THE WHITE HOUSE

WASHINGTON

December 11, 1981

MEMORANDUM FOR JAMES A. BAKER III
EDWIN MEESE III
MICHAEL K. DEEVER

FROM: FRED F. FIELDING 
COUNSEL TO THE PRESIDENT

SUBJECT: Letter of December 2, 1981 From
Edward Weidenfeld Regarding FEC
Subpoena and Interrogatories

I am advised that the above-referenced letter has been sent to each of you. Given the presumption that most, if not all, Reagan-Bush campaign related documents have been sent to the Hoover Institute at Stanford, I will advise Ed Weidenfeld to contact Molly Sturges Tuthill in order to coordinate his review of any applicable materials located at the Hoover Institute.

While I do not think it is advisable for the Counsel's Office to become involved with the substantive aspects of this matter inasmuch as it concerns events which occurred before January 20, 1981, I would recommend that this Office be the "contact" for coordinating responses to Ed's letter on compliance with the FEC requests. Therefore, please advise me at your very earliest convenience as to the disposition of your campaign files. If your files located in the White House contain campaign related materials, I recommend that they be clearly segregated from any "official" files before we permit their perusal by Mr. Weidenfeld or his staff.

I would urge that you attempt to comply with Ed Weidenfeld's request as soon as possible. Please let me know if I can be of assistance in any regard.

LAW OFFICES
MCKENNA, CONNER & CUNEO

1575 EYE STREET, N. W.
WASHINGTON, D. C. 20005

(202) 789-7500

CABLE ADDRESS: MCKENCONN WASHDC

TELEX (TWX) 710-822-0149

TELECOPIER (202) 789-7594

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JOHN D. CONNER, JR.
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C. STANLEY DEES
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DEL STILTNER
BONNIE A. SULLIVAN
CURTIS ULLMAN*
CHRISTIAN VOLZ
CHARLES E. WASHBURN, JR*
ROBERT M. WAXMAN*
BARBARA G. WERTHER
LOUISE P. WISE
RENIE E. YOSHIDA*
DEAN J. ZIPSER*

*NOT ADMITTED IN D.C.

WRITER'S DIRECT DIAL NUMBER

December 2, 1981

(202) 789-7640

The Honorable Michael K. Deaver
Deputy Chief of Staff
Assistant to the President
The White House
Washington, D. C. 20500

051542

Re: Reagan Bush Committee: FEC Subpoena and
Interrogatories dated October 1, 1980

Dear Mike:

Last year the Federal Election Commission ("FEC") served a subpoena and interrogatories on the Reagan Bush Committee ("RBC") requesting information relating to the Committee's possible affiliation with certain independent committees. (See Attachment 1.) In a recent letter, the Commission requested the RBC to supplement its response to the subpoena and interrogatories. (See Attachment 2.)

Although the FEC's inquiry is directed to the Reagan General Election Committee ("RGEN"), RGEN is defined in the subpoena to include:

The principal campaign committee . . . of Ronald Reagan, the 1980 Republican nominee for the office of President, the Committee's predecessors . . . its officers, agents, employees, staff and volunteers.

It is necessary to identify all the information in the possession of the Committee or its agents which may be responsive to this

request. After we have collected and reviewed the relevant documents, we will be better able to determine whether such information is privileged or otherwise exempt from disclosure.

To date, we have conducted a search of the Committee's financial files, which have been transferred to our offices, and interviewed Bay Buchanan, Loren Smith and Scott Mackenzie. Although this effort has uncovered a number of documents which are relevant to the FEC's inquiry, the Committee has an obligation to pursue all avenues which may lead to the discovery of additional responsive information. As a result, we require your assistance in identifying information in your files which is relevant to the following matters.

SUBPOENA SPECIFICATION NO. 1

Subpoena Specification No. 1 requests all documents and materials concerning meetings, discussions, correspondence or other communications between the Reagan for President Committee and the following specified individuals and organizations which relate to President Reagan's primary and general election campaigns.

1. Republican National Committee
2. 1980 Republican Unity Committee
3. Fund for a Conservative Majority
4. Citizens for Reagan in '80
5. North Carolina Congressional Club
6. Americans for Reagan
7. National Conservative Political Action Committee
8. Ronald Reagan Victory Fund
9. Americans for Change
10. Reagan for President in '80
11. Americans for an Effective Presidency
12. Anna Chennault
13. Stuart Spencer
14. Senator Jesse Helms
15. James Lake
16. Bailey, Deardourff & Associates, Inc.
17. Ruth Jones, Ltd.

SUBPOENA SPECIFICATION NO. 2

Subpoena Specification No. 2 requests all documents and materials concerning certain specified expenditures reported by the Committee in FEC disclosure reports. Of the organizations listed, we have located all of the requested information except for the following:

1. Wiland and Associates - Expenditure reported on April 22, 1980 for "printing."

2. Arthur Finkelstein and Associates - Any polls or surveys received from Arthur Finkelstein and Associates in connection with two "consulting" expenditures reported by the Committee on April 9 and June 5, 1980.

SUBPOENA SPECIFICATION NO. 3

This specification requests all documents and materials relating to the contractual or professional relationship from January 1980 to the present between the Committee and the following entities:

1. Bailey, Deardourff & Associates, Inc.
2. Diversified Direct, Inc.
3. Wiland and Associates
4. Telepost
5. Arthur Finkelstein & Associates
6. Bedford Printing
7. Ruth Jones Ltd.

In response to this request, the Committee previously provided the FEC with a copy of its contract with Ruth Jones, Ltd. As to the remaining entities, we have informed the Commission that it is our understanding that the contracts with the above-referenced groups were made orally. Please verify if this comports with your understanding of the contractual relationship with these organizations.

INTERROGATORIES A AND E

Interrogatory A requests the identification of all officers, directors, employees, staff members, media time buyers, volunteers, consultants and other agents of the Committee from January 1980 to the present together with either the name of each person's supervisor or an organizational chart. Interrogatory E requests the phone numbers used by the Committee for each person identified in Interrogatory A.

In response to this request, the Committee previously supplied an alphabetical listing of the names of staff members of the primary and general election committees, a listing of coordinators and regional directors, a chart of the Committee's overall organization, an organizational chart of the political operations section, and a memorandum listing individuals authorized to obligate the Committee's funds. Although the Committee also promised to provide the FEC with copies of campaign phone directories and a list of headquarters volunteers, we have been unable to locate such information.

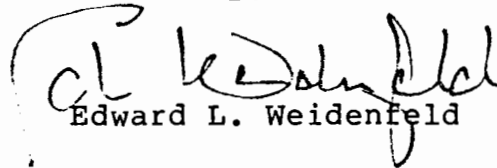
During our search of the Committee's files, we did locate a few telephone lists of individuals involved in the campaign which were not previously supplied to the FEC. However, we have taken the position that the Commission has been provided with the names of all of the individuals who served in a policy making capacity during the campaign and that the release of any additional names would unduly chill the First Amendment guarantee of freedom of association and expression of those involved as well as invade their basic right to privacy. Although we have claimed privilege from disclosure, we nevertheless believe we have an obligation to locate the information requested. As a result, please check your records to see if you have any materials relating to Interrogatories A and E.

With respect to the information summarized above, we realize that much of it is extremely specific and will require a thorough and time-consuming search of your files. In an effort to minimize the inconvenience to you, we will, if desired, make someone available from our office who is conversant with these issues in order to assist you in reviewing the pertinent information. Once the responsive documents have been collated, we will arrange a brief interview with you to discuss the matters raised in the FEC subpoena and interrogatories.

In summary, in order to adequately respond to the Commission's subpoena and interrogatories, we must determine (1) whether the documents requested do, in fact, exist; and (2) if so, where those materials are located. Once we have had an opportunity to collect and review the responsive documents, we can determine whether any of the information requested by the FEC is exempt from disclosure.

Your cooperation in assisting the Committee in satisfying its obligation is most appreciated. If you have any comments or suggestions concerning this matter, please feel free to call me at 789-7640.

Sincerely,



Edward L. Weidenfeld

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

October 1, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick F. McCartan, Esquire
JONES, DAY, REAVIS & POGUE
1735 Eye Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review (MUR) 1252(80)

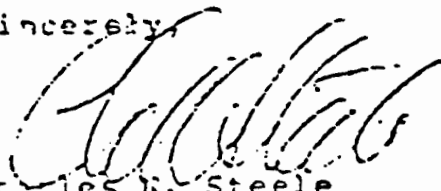
Dear Mr. McCartan:

Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission") to your client, Ronald Reagan and the Reagan for President General Election Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071 or Ms. Patricia F. Bak at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

Enclosures: Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:
Reagan for President General Election Committee
901 South Highland
Arlington, Virginia 22204

RE: MUR 1252

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 4375(a)(1) and (3), the Reagan for President General Election Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Reagan for President General Election Committee or of its officers, agents, staff members, volunteers or employees. Production is to be made at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W., Washington, D.C. on October 17, 1980, at 10:00 a.m. In addition, the Reagan for President General Election Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the Reagan for President Committee and the Reagan General Election Committee. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."
2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.
3. "Reagan General Election Committee" or "RGEC" shall mean the principal campaign committee (see 2 U.S.C. §431(5)) of Ronald Reagan, the 1980 Republican nominee for the office of President, the committee's predecessors (including, but not limited to the Reagan for President Committee), affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on its behalf and its officers, agents, employees, staff and volunteers.
4. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.
5. "FEC Disclosure Reports" shall mean any reports filed by FCM with the FEC pursuant to the requirements of 2 U.S.C. §§ 431-455.

6. "Agent" shall mean any person who has actual, oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate; or any person who has been placed in a position within the campaign organization where it could reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. See 11 C.F.R. § 109.1(b)(5).
7. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relative in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;
- (d) the name and title of the person to whom the document was addressed;
- (e) the name and title of the person to whom the document was actually sent;
- (f) the identity of any other person who read all or part of the document;
- (g) the number of pages;
- (h) the paragraph of this subpoena to which the document is otherwise responsive, and
- (i) the nature of the claimed privilege or objection.

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between RGEC and any of the of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of either RGEC or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Republican National Committee
1980 Republican Presidential Unity Committee
Fund for a Conservative Majority
Citizens for Reagan in '80
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake
Bailey, Dearbourn & Associates, Inc.
Ruth Jones, Ltd.

2. All documents and materials concerning the following expenditures reported by RGEC in FEC disclosure reports:

<u>Payee</u>	<u>Date</u>	<u>Reported Purpose</u>
Diversified Direct, Inc.	April 22, May 14 June 18, 1980	"Direct Mail"
Wiland and Associates	April 22, 1980	"Printing"
Telepost	April 17 and May 2,	"Direct mail"
Tri State Envelope Corp.	April 22, 1980	"Stationary" "Direct Mail"
Bedford Printing	May 16, 1980	"Printing"
Arthur Finkelstein and Associates	April 9, June 5, 1980	"Consulting"

a. Please provide a copy of all documents and materials received by RGEC as consideration for the above listed payments.

b. A copy of any (survey) results, poll, memoranda or report containing survey or polling information obtained by or on behalf of RGEC concerning the election of Ronald Reagan as the Presidential nominee of the Republican Party or his general election for President in 1980. As to each survey, poll, memoranda, or report, please note

the source of, or the vendor responsible for, the survey, poll, memoranda or report and the date on which the survey, poll, memoranda, or report was secured by RGEC.

3. All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to present between RGEC and the following entities, their agents, officers or employees undertaken in connection with efforts on the part of RGEC which relate in any way to the furtherance of the election of Ronald Reagan as the nominee of the Republican Party or Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

Bailey Deardourff & Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Wiland and Associates
Telepost
Bedford Printing
Ruth Jones, Ltd.

4. All documents and materials concerning a debt of \$2,200 listed in the RGEC, FEC disclosure reports as owed to the National Conservative Political Action Committee since February 22, 1980, for "office equipment" and a receipt of \$2,200 listed in the National Conservative Political Action Committee's report as paid on July 15, 1980, for a Xerox typewriter.

5. All telephone bills and/or reports of telephone calls made or received by RGEC from January 1980 to the present.

Please answer the following interrogatories:

512 664 0717 Tubridy, Martin

A. Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants or other agents of RGEC from January 1980 to the present. With respect to each individual identified, please identify that person's supervisor.^{1/}

(1) Please identify which of the above individuals or any other individuals who have participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any RGEC expenditures which relate in any way to the election of Ronald Reagan as the Presidential nomination of the Republican Party or his general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate in 1980.

(2) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials which relate in any to the election of Ronald Reagan as the Presidential nominee of the Republican Party or his general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

^{1/} In lieu of identifying the supervisor of each individual identified in response to interrogatory A, RGEC may provide the Commission with an organizational chart.

B. Please provide a list of all items (including, but not limited to, office equipment, machinery, furniture, and office supplies) transferred by National Conservative Political Action Committee to RGEC since January 1980, along with an item by item breakdown containing the amount paid, if any, by RGEC for each item.

C. Please provide the date(s) of all discussions, meetings, telephone calls, interviews, or other communications, oral and written, with Anna Chennault from the period of January 1980 to July 20, 1980 which relate in any way to the organization, structure, operation or activities of Americans for Change, the organization structure operation or activities of RGEC or her employment or association with the RGEC.

(1) Identify each participant in all of the above listed discussions, meetings, telephone calls, interviews, or other communications, oral or written.

(2) With respect to each discussion, meeting, telephone conversation, interview, or other communication, oral or written, identified by date and/or participant above, please note the topic of each such discussion, meeting, telephone conversation, interview or communication.

E. List the phone numbers and extensions used by RGEC from January, 1980 to the present, noting the extensions assigned to or used by each person identified in response to interrogatory A.

F. List by date and location all fundraisers held by RGEC since January, 1980 which related in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party.

s general election for President in 1980 or which related in any way to the defeat of any other 1980 Presidential candidate.

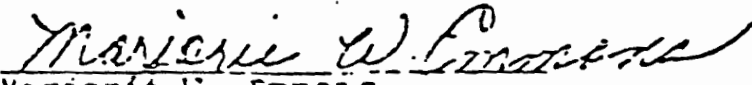
G. With respect to each individual identified in response to interrogatory A, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated and the position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic
Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Commitment 80

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at the offices of the Commission at 1325 K Street, Washington, D.C. this 24th day of September, 1980.

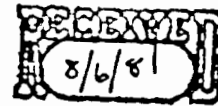

John W. McGarry
Vice Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



August 5, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward L. Weidenfeld, Esquire
McKenna, Conner and Cuneo
1575 Eye Street, N.W.
Washington, D.C. 20005

RE: MUR 1252/1299

Dear Mr. Weidenfeld:

On October 1, 1980, this Office mailed to counsel for the Reagan/Bush Committee ("the Committee") a subpoena to produce certain documents and materials and an order to answer written questions, such subpoena and order having been authorized by the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(1) and (3). Prior to and following the Commission's denial of the Committee's motion to modify the subpoena and interrogatories and to accept materials and answers submitted, the Committee complied with parts of the subpoena and order, but refused to comply with others. In addition, the Committee promised to furnish certain information which has not been forthcoming, and in other instances provided only partial responses. The purpose of this letter is to review the Committee's compliance with the subpoena and order, and to obtain clarification as to the Committee's present position on certain issues.

Subpoena Specification #1:

The first specification contained in the subpoena required the production of all documents and materials concerning meetings and other forms of communication between the Committee and any of the organizations and persons listed. In the memorandum presented in support of the respondent's motion to modify the subpoena and interrogatories, the Committee did stipulate to the holding of extensive meetings, discussions and consultations with the Republican National Committee, its own authorized committees, Anna Chennault and Stuart Spencer; however, the statement was also made that the Committee was "producing no documents regarding Request Number 1." Nor have any such documents been produced since the Commission's denial of the Committee's notion.

The Committee's response implied that there were in fact specific documents which were being withheld; however, no information was provided concerning the nature of such documents as required

on page three of the Commission's subpoena. Therefore, you are requested to inform this Office whether or not there do exist in the Committee's possession documents pertaining to meetings, discussions, etc., with the organizations, vendors and individuals listed in Specification #1, and, if such documents do exist, to provide a list identifying them, together with the additional information outlined in the subpoena, including the bases for any claims of privilege.

Subpoena Specification #2:

The second specification requires production of all documents and materials concerning expenditures made by the Committee to certain named vendors on specific dates. Also required are copies of the documents and materials received as consideration for these expenditures and of any survey results, polls and memoranda or reports containing survey or polling information, as well as information regarding the sources of such surveys, etc., and the dates they were secured by the Committee.

Regarding expenditures made to Diversified Direct, Inc., on April 22, May 14, and June 18, 1980, the Committee appears to have provided all requested documents. A reported expenditure made to Wiland and Associates on April 22, 1980 is supported only by an intra-Committee memorandum; the invoices provided relate solely to payments made to this vendor on June 6 and 11, 1979, and on February 22, 1980. Nor has the Committee submitted copies of documents and materials furnished by Wiland as consideration for the April 22, 1980 expenditure.

The two expenditures to Telepost for which documentation was requested were reported as having been made on April 17, 1980, in the amount of \$20,000 and on May 2, 1980 in the amount of \$7,021.17. The invoices supplied by the Committee appear to document these two expenditures adequately; however, a copy of the Group 1 RFR-HF Mailing apparently paid for in part by the May 2 expenditure has not been supplied.

The fourth vendor regarding which expenditure documentation was requested is Tri-State Envelope Corporation. The particular expenditure cited was one made on April 22, 1980, in the amount of \$6,921.71. The invoices and shipping forms provided concern expenditures totaling \$4,698.07 which is the amount of a Committee expenditure made to this vendor on June 18, 1980. Notations on several of the invoices cite this latter date as the date of payment. Therefore, it appears that the Committee has not supplied the specific documentation requested.

Page 3
No documentation has been furnished regarding a reported expenditure on May 16, 1980 to Bedford Printing.

Finally, the Committee has supplied four letters from Arthur J. Finkelstein and Associates which fulfill in part the request in this specification for documents related to expenditures of \$3,000 and \$3,044 made to that vendor on April 9 and June 5, 1980. The Committee has not provided copies of the materials received as consideration for these expenditures as required by subsection (a) of the specification.

Regarding subsection (b), the Committee has claimed that poll and survey results are subject to privilege, the exact privilege meant being unspecified. Does the Committee continue to assert such a claim? If so, the Commission may pursue this issue via subpoena enforcement.

Subpoena Specification #3:

The Committee's sole response to this specification, which involves a request for contracts or other documents relating to the relationship between the Committee and certain named vendors, has been to supply the agreement entered into with Ruth Jones, Ltd. on September 2, 1980. Please inform this office as to whether such documents exist with regard to the remaining vendors cited and, if they do, whether the Committee will provide copies of such contracts, etc. If no written agreements were entered into, please state the terms under which the services of these vendors were contracted.

Subpoena Specification #4:

The Committee has apparently fulfilled this request.

Subpoena Specification #5:

The Committee has apparently fulfilled this request.

Interrogatory A:

This interrogatory requested the identification of all officers, directors, employees, staff members, media time buyers, volunteers, consultants and other agents of the Committee from January 1980 to the present, together with either the name of each such person's supervisor or an organizational chart. Also requested was the identification of all persons who participated in the authorization of expenditures and in the production, etc., of campaign materials.

In response, the Committee has supplied an alphabetical listing of the names of staff members of the primary and general election committees, a listing of coordinators and regional directors, an organizational chart of the Committee's overall organization, an organizational chart of the political operations section, and a memorandum listing individuals authorized to obligate funds. In the letter from counsel dated December 22, 1980, it was promised that the Commission would receive campaign phone directories and a list of headquarters volunteers; however, these documents have not been received. The Committee has also not responded to the portion of the interrogatory which concerns persons involved with the production and dissemination of campaign materials.

Interrogatory B:

The Committee has apparently fulfilled this request.

Interrogatory C:

The Committee has apparently fulfilled this request.

Interrogatory E:

Although promised, no campaign phone directories have been provided.

Interrogatory F:

The Committee has apparently fulfilled this request.

Interrogatory G:

The Committee has apparently fulfilled this request.

In summary, it is requested that the Committee confirm the existence or non-existence of the documents requested in Specification #1, complete the production of documents related to the April 22, 1980 expenditure to Wiland and Associates, provide a copy of the Group 1 RFP-HF Mailing undertaken by Telepost, provide the specific documentation requested regarding Tri-State Envelope Corporation, either provide copies of all surveys and poll results requested or expand upon the claim of privilege made earlier, and confirm the existence or non-existence of contracts or other, similar documents entered into by the Committee and Diversified Direct, Inc., Bailey-Deardourff and Associates, Inc., Wiland and Associates, Telepost, Bedford Printing and Arthur J. Finkelstein and Associates. In connection with the Commission's

interrogatories, the Committee is requested to provide the telephone directories and list of headquarters volunteers promised earlier, and to state which persons connected with the Committee participated in the production, etc., of campaign materials.

Production of the above documents and information should be undertaken no later than August 15, 1981, at which time this Office will again review the Committee's compliance with the subpoena and order.

Sincerely,



Charles N. Steele
General Counsel