



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 538

Date Filmed 4/18/79 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Memo

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

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

Signed *J. Shepard*
date 1-31-79

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

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

January 30, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John H. Hodgson II
Dobbs and Nielsen
1225 Eighth St.
Suite 550
Sacramento, CA 95814

RE: MUR 538

Dear Mr. Hodgson:

On January 25, 1979, the Federal Election Commission voted to terminate its investigation of your clients, Gun Owners of America Campaign Committee and Computer Caging Corporation. A copy of the Commission's certification is enclosed for your information. Accordingly, the Commission intends to close its file in this matter.

If you have any further questions, please contact Judy Thedford at 202/523-4057.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker".

William C. Oldaker
General Counsel

Enclosure
Commission's Certification

79040113321



FEDERAL ELECTION COMMISSION

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

January 30, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David B. Goodstein
The Advocate
1730 South Amphlett
Suite 225
San Mateo, CA 94402

RE: MUR 538 (78)

Dear Mr. Goodstein:

On January 25, 1979, the Federal Election Commission voted to terminate its investigation of MUR 538. A copy of the Commission's certification is enclosed for your information. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", written over a circular stamp.

William C. Oldaker
General Counsel

Enclosure

Commission Certification

79040113322

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gun Owners of America) MUR 538
Campaign Committee)
Computer Caging Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on January 25, 1979, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 4-0 to take the following actions in MUR 538:

1. Find no reasonable cause to believe that GOACC violated 2 U.S.C. §§434, 441a and 441b.
2. Find no reasonable cause to believe that CCC violated 2 U.S.C. §441b.
3. Send the letters attached to the General Counsel's Report signed January 20, 1979.
4. Close the file

Commissioners Aikens, McGarry, Springer, and Thomson voted affirmatively for the above determination. Commissioners Harris and Tiernan were not present at the time of the vote.

Attest:

1/25/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION
January 12, 1979

In the Matter of)
)
Gun Owners of America) MUR 538
Campaign Committee)
Computer Caging Corporation)

GENERAL COUNSEL'S REPORT

I. Background

On April 25, 1978, the Commission found reason to believe that Gun Owners of America Campaign Committee (hereinafter "GOACC") may have violated 2 U.S.C. §§434, 441a, and 441b; and that Computer Caging Corporation (hereinafter "CCC") may have violated 2 U.S.C. §441b. The findings were based on a notarized complaint filed with the Commission by David B. Goodstein publisher of The Advocate. Reason to believe notices were sent to the respondents on April 27, 1978. We received a response from the respondents' counsel on July 6, 1978 denying the allegations.

On August 4, 1978, orders to answer interrogatories and subpoenas to produce documents were sent to GOACC and CCC. The respondents' counsel, John Hodgson, requested a ten day extension in which to reply. The extension was granted on August 24, 1978. On September 27, 1978, a motion to quash the orders and subpoenas was filed with the Commission; the motion was denied.

II. Litigation

The Commission filed an Order to Show Cause, a Petition To Enforce Orders and Subpoenas of the Federal Election Commission, and a Brief In Support of Petition To Enforce Orders and Subpoenas of the Federal Election Commission on October 17, 1978 in the United States District Court for the Eastern of District of California.

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On October 27, 1978, an agreement was reached between the Commission and the respondents to extend the Show Cause Order indefinitely, contingent upon GOACC and CCC making available for inspection "any and all materials" pertaining to the subpoenaed information. A stipulation to this effect was filed with the court on November 16, 1978. On November 27, 28 and 29, 1978, the records of GOACC and CCC were reviewed by the Commission.

III. Analysis

The investigation of this matter followed the three issues on which the Commission found reason to believe:

- (a) GOACC received services from CCC at a price below the "usual and normal charge."
- (b) GOACC failed to report in-kind contributions from its landlord in the form of reduced rent, cost of office furniture, and subsidized rent.
- (c) Services performed by Ron Biron to political candidates while on GOACC's payroll constituted an expenditure by GOACC and was required to be reported.

The allegations will be discussed in the same order below:

Allegation I

CCC was created by GOACC in 1977 to handle the caging operations which had previously been performed by GOACC. Caging operations include the intake and processing of contributions resulting from direct mailings. The mailings for GOACC, both before and after the creation of CCC, have been handled by Richard Viguerie's RAVCO. At the time CCC was formed, GOACC sold all of its office equipment and computer capability to CCC. Practically all of GOACC's staff was transferred to CCC's payroll.

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This unique and close relationship of a PAC having created a corporation, and the corporation, in turn, providing services to the PAC warrants close scrutiny in order to assure that the corporate status of CCC does not unlawfully benefit GOACC. In support of this, the complaint alleged that GOACC's administrative expenses (which consisted largely of caging services) were reduced when GOACC contracted with CCC for the same services. Additionally, appearance of disproportionate prices being charged by CCC to two client committees, GOACC, a federal committee, and the Law and Order Campaign Committee (hereinafter "LOCC"), a state committee, raised the distinct possibility of an in-kind corporate contribution.

Our investigation, therefore, was designed to:

- (a) establish what services CCC was providing to GOACC and to LOCC;
- (b) how the costs of those services were determined;
- (c) tracking whether there was money transferred from LOCC to CCC which was over and above the actual cost of services performed; and
- (d) tracking transfers of money between CCC and GOACC to determine whether the charges were less than the value of the services performed.

From our investigation the following facts were revealed:

In reviewing CCC's billings, daily logs, and contracts with respect to LOCC and GOACC, we concluded that both committees were charged the "usual and normal charge" for services performed by CCC. There was no indication that LOCC was overpaying CCC for its services to benefit GOACC or that LOCC and GOACC were charged

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anything but the "usual and normal charge" for CCC's services. Furthermore, we concluded that GOACC was not extended a greater amount of credit than LOCC.

The allegation in the complaint that LOCC paid CCC 30¢ on every dollar it received while GOACC paid 11¢ on every dollar it received is misleading in that CCC charges on a per letter basis, not according to the amount contributed. (See contracts - LOCC-GOACC - Exhibit A). When CCC began operations in February of 1977, it charged its clients \$1.25/.65 per letter processed. As CCC contracted with more clients and developed a more sophisticated processing system, it was able to offer services at a reduced rate. The rates were decreased and increased in 1977 and 1978 at various intervals according to efficiency and volume (See Exhibit B - Notice of rate changes).

The more successful a mailing (i.e. amount of money raised) the less the caging cost would appear to be per dollar contributed. There is no evidence that CCC ever charged GOACC a rate different than that charged to LOCC. Any difference in cost per dollar contributed to these committees is attributed to the difference in the volume of mailings and the amount of contributions raised. It is not therefore contradictory for the actual cost per letter to be the same for both committees and yet, as the complaint stated, the relative cost for every dollar received to vary.

CCC also charged GOACC and LOCC for administrative services it performed for each committee. Our investigation included a review of CCC's invoices for administrative services to GOACC and LOCC. We concluded that the rates charged to both GOACC and LOCC were applied equally and consistent with the services performed.

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It is recommended that the Commission find no reasonable cause to believe that GOACC received services from CCC at a price below the "usual and normal" in violation of 2 U.S.C. §441b, and no reasonable cause to believe that CCC violated 2 U.S.C. §441b.

Allegation II

The second allegation stated that GOACC received reduced rent, cost of office furniture, and subsidized bills from its landlord. The Commission audited GOACC in April and August of 1977. The auditors reviewed rent and utility payments and found that they were uniformly paid. The rate GOACC paid for rent was under contract. Therefore, the rent did not increase when the number of employees increased or new equipment was installed. The rent was increased when the building changed hands and a new rent contract negotiated.

It is recommended that the Commission find no reasonable cause to believe that GOACC violated 2 U.S.C. §434 for failing to report in-kind contributions from its landlord and no reasonable cause to believe that GOACC violated §441a for accepting contributions in excess of \$5000 from its landlord.

Allegation III

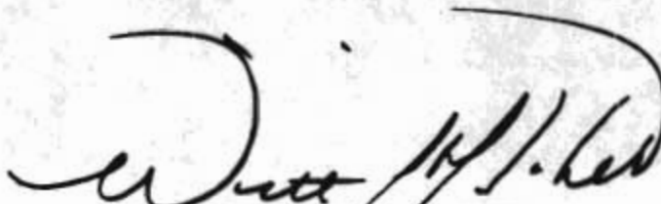
The Commission found reason to believe that GOACC may have violated 2 U.S.C. §434 for failing to report services performed by Ron Biron, while on GOACC's payroll, to other political candidates. The complaint neither identified the political candidates to whom the services were performed nor indicated whether the recipients were federal candidates. The respondent stated that the services performed by Ron Biron pertain solely to political activity at the state level. The Office of the General Counsel therefore recommends finding no reasonable cause to believe that GOACC violated 2 U.S.C. §434.

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IV. Recommendation

1. Find no reasonable cause to believe that GOACC violated 2 U.S.C. §§434, 441a and 441b.
2. Find no reasonable cause to believe that CCC violated 2 U.S.C. §441b.
3. Send the attached letters.
4. Close the file.

7 9 0 4 0 1 1 3 3 2 1
1/20/79
Date


William C. Oldaker
General Counsel

ATTACHMENTS:

- Exhibit A-GOACC and LOCC Contracts
- Exhibit B- Schedule of CCC's Rates
- Letters

AGREEMENT

THIS AGREEMENT made and entered into this 2th day of September, 1977 by and between COMPUTER CAGING CORPORATION, a corporation organized and existing under the laws of the State of California and having its principal place of business at 2248 Erickson Street, Sacramento, California 95815 (hereinafter referred to as CCC) and Gun Owners of America Campaign Committee, an organization existing under the laws of the State of California and having its principal place of business at 455 Capitol Mall, Suite 315; Sacramento, CA 95814 (hereinafter referred to as GOACC).

WITNESSETH THAT:

SECTION 1. GOACC hereby retains CCC as its consultant and assistant in processing direct mail returns.

SECTION 2. Specifically, CCC agrees to provide the following services for GOACC, including:

- 1) CAGING - Picking up the mail at Sacramento Post Office 95813, sorting mail, counting, opening and depositing all contributions in local bank in designated account.
- 2) STATISTICS - Providing pertinent analytical data of all mailing results from mail received.
- 3) DATA ENTRY - Entering and balancing described data to computer files.
- 4) MICRO/LIBRARIES - Original contributor documents each microfilmed and categorized for auditing.
- 5) ACCOUNTING - Provides all accounting, bookkeeping, deposit records and bill-paying functions for fund raising accounts.
- 6) POLITICAL REPORTING - Provides all contributor data in the required report format for the Federal Election Commission or the Fair Political Practices Commission.
- 7) DATA PROCESSING - Includes maintenance of all contributor and non-contributor files on computer with one file up-date per month.

SECTION 3. CCC shall receive \$00.55 for each contributor envelope received and processed and \$00.38 for each non-contributor envelope received and processed by CCC. CCC may raise or lower the current price for mail processing because of changes in production costs. CCC will report in writing to GOACC any change in mail processing cost 30 days before such change takes place.

SECTION 4. Either party may cancel this Agreement by written notice at any time.

SECTION 5. GOACC shall pay an additional, mutually agreed upon fee for any services that GOACC asks for that are not provided for in the current Agreement. Such services may include, but are not limited to, special graphic art work, public relations (news release preparation, etc.), special computer work, consultation, etc.

SECTION 6. Monthly checks shall be written to CCC for all agreed upon services.

SECTION 7. The current price schedule became effective May 2, 1977. Prices prior to May 2, 1977 were as follows:

<u>Contributor</u>		<u>Non-Contributor</u>	
2/1/77 - 3/7/77	\$1.25	2/1/77 - 3/17/77	\$.65
3/8/77 - 5/1/77	.77	3/18/77 - 5/1/77	.45
5/2/77 - Present	.55	5/2/77 - Present	.38

WHEREFORE, the parties hereto have caused this Agreement to be executed by their duly authorized officers as of the day and date first above written.

ATTEST:

COMPUTER CAGING CORPORATION

T. J. Macy

BY: Wayne Johnson

ATTEST:

Gen. Owners of America
BY: William E. Saracino
Political Director

T. J. Macy

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file

AGREEMENT

THIS AGREEMENT made and entered into this 2nd day of September, 1977 by and between COMPUTER CAGING CORPORATION, a corporation organized and existing under the laws of the State of California and having its principal place of business at 2248 Erickson Street, Sacramento, California 95815 (hereinafter referred to as CCC) and Law and Order Campaign Committee, an organization existing under the laws of the State of California and having its principal place of business at 2248 Erickson Street; Sacramento, CA 95815 (hereinafter referred to as LOCC).

WITNESSETH THAT:

SECTION 1. LOCC hereby retains CCC as its consultant and assistant in processing direct mail returns.

SECTION 2. Specifically, CCC agrees to provide the following services for LOCC, including:

- 1) CAGING - Picking up the mail at Sacramento Post Office 95813, sorting mail, counting, opening and depositing all contributions in local bank in designated account.
- 2) STATISTICS - Providing pertinent analytical data of all mailing results from mail received.
- 3) DATA ENTRY - Entering and balancing described data to computer files.
- 4) MICRO/LIBRARIES - Original contributor documents each microfilmed and categorized for auditing.
- 5) ACCOUNTING - Provides all accounting, bookkeeping, deposit records and bill-paying functions for fund raising accounts.
- 6) POLITICAL REPORTING - Provides all contributor data in the required report format for the Federal Election Commission or the Fair Political Practices Commission.
- 7) DATA PROCESSING - Includes maintenance of all contributor and non-contributor files on computer with one file up-date per month.

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SECTION 4. Either party may cancel this Agreement by written notice at any time.

SECTION 5. LOCC shall pay an additional, mutually agreed upon fee for any services that LOCC asks for that are not provided for in the current Agreement. Such services may include, but are not limited to, special graphic art work, public relations (news release preparation, etc.), special computer work, consultation, etc.

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5/2/77 - Present	.55	5/2/77 - Present	.38

WHEREFORE, the parties hereto have caused this Agreement to be executed by their duly authorized officers as of the day and date first above written.

ATTEST:

COMPUTER CAGING CORPORATION

T. Magy

BY: [Signature]

ATTEST:

T. Magy

BY: [Signature]

February 9, 1978

Mr. William Saracino
Gun Owners of America Campaign Committee
455 Capitol Mall, Suite 315
Sacramento, CA 95814

Dear Bill:

The following price changes for computer and caging processing services are effective February 1, 1978.

For political clients who must file regular reports with either the F.E.C. or the F.P.P.C.:

	<u>Previous Rate</u>	<u>New Rate</u>
Contributor	55¢ ea.	49¢ ea.
Non-Contributor	38¢ ea.	29¢ ea.

For non-political clients, who do not file with the above-noted agencies:

	<u>Previous Rate</u>	<u>New Rate</u>
Contributor	45¢ ea.	44¢ ea.
Non-Contributor	38¢ ea.	29¢ ea.

It is our intention, based upon projected 1978 volumes, to be able to hold these prices at least through calendar year 1978. Of course, if we are unable to do so, any price increase would not take effect until 30 days after notification. The above price decreases are retroactive to February 1, 1978. Thank you for your business. (PLEASE ATTACH THIS LETTER TO YOUR CURRENT CCC CAGING AGREEMENT.)

Sincerely,

Wayne C. Johnson
WCJ/kj

computer
caging
corporation

6060 SUNRISE VISTA DRIVE, SUITE 100 • CITRUS HEIGHTS, CA 95610 • 916/726-2422. 961-5674

EXHIBIT B pg 1

79040113334

Johnson, W.C.



July 31, 1978

NOTICE TO ALL CLIENTS OF COMPUTER CAGING CORPORATION

Due to extremely low mail flow during the summer months, CCC will continue to hold our current mail caging price schedule, but we will require a minimum of mail processed during a calendar month to meet the following scale:

- Contributor pieces - 2,000
- non-Contributor pieces - 500

This arrangement will not take effect until September 1, 1978. This minimum will not affect the overwhelming majority of CCC's caging clients, but will affect any client which only mails infrequently, yet must be carried by CCC. The minimum mailing level will cover the fixed monthly costs to maintain the computer files and perform the regular updates that have been regularly absorbed by CCC.

Sincerely,
Wayne C. Johnson
Vice-President and
General Manager

WCJ/ds

computer
caging
corporation

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AMENDMENT TO CAGING
SERVICES AGREEMENT (FALL)
EFFECTIVE OCTOBER 1, 1978

Hereinafter, CCC agrees to provide the following services for caging clients, including, but not limited to,

- 1) CAGING-Mail pick-up at Post Office 95813, sorting by mail code, counting, opening, preparation of deposits and deposit records, deposit in local bank to designated client account.
- 2) STATISTICS-Compile and provide pertinent analytical data of all mailing results from mail received.
- 3) DATA ENTRY-Entering and balancing described data to computer files.
- 4) MICRO/LIBRARIES-Complete microfilming services to produce micro-file of necessary contributor documents, categorized for easy audit access.
- 5) ACCOUNTING-Provides specified normal accounting services for those clients desiring such services, including bank statement reconciliation, bookkeeping, deposit recording, accounts payable, and monitoring of postage due accounts.
- 6) POLITICAL REPORTING-Provides all contributor data in the required report format to service bureau for preparation of FEC and/or FPPC reports. Special or additional non-required reports not included. Lawyer fees not included.

As before, either party is free to cancel this Agreement at any time upon written notice and no price increase can take place without prior notice of 30 days. Services not listed above which CCC may from time to time perform at the request of any client shall be re-imbursed according to a mutually established payment schedule. Only changes specifically noted herein constitute additions or deletions from the current CCC caging client Agreement. Below are listed the new sliding price schedules effective upon the effective date of this amendment:

POLITICAL CLIENTS	first 3,000	next 7,000	over 10,000
contributor	\$.64	\$.51	\$.47 (new low)
non-contributor	.40	.32	.27 (new low)
NON-POLITICAL CLIENTS			
contributor	.61	.47	.43 (new low)
non-contributor	.40	.32	.27 (new low)



SEPTEMBER 1, 1978

File w/
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clients
folder

NOTICE TO ALL CLIENTS OF COMPUTER CAGING CORPORATION

In an effort to keep costs down for CCC clients during the election season, prices were reduced for the spring and summer months. This was in anticipation of expected increased mail volume on the part of CCC clients. As we enter the Fall season, CCC will be implementing several changes and improvements in billing procedures in order to better serve our clients.

One of the side benefits of dealing directly with federal and state campaign law monitoring agencies is learning how to structure price and billing procedures to most accurately reflect service costs for reporting purposes. In our new schedules, several improvements have been made.

Rather than include computer and file maintenance costs in caging service billings, beginning October 1, 1978, all clients will receive billings from the computer service bureaus direct. To make this new direct billing procedure as favorable as possible to the client, THERE WILL BE NO COMMISSION, MARK-UP OR BROKERAGE FEE TO CCC FOR SERVICE BUREAU WORK FOR CCC CLIENTS. All savings or benefits will accrue directly to the individual client.

Another improvement you will notice in the new pricing schedules for the fall are the individual volume sliding scales. The sliding scale does not inhibit CCC from passing on cost savings during periods of heavy total mail volume for all clients. It does, however, allow individual clients to take advantage of special savings and lower prices during heavier individual mail periods. We feel, based upon 1977 and 1978 figures, that most clients will do much better on this system. Some clients which do not mail regularly will find the new system less advantageous, but our primary motive was to have actual charges reflect actual costs as nearly as possible to more properly conform to reporting requirements.

The attached Agreement shall be simply an amendment to the current CCC client agreement for caging services and it is effective October 1, 1978. Current schedules shall remain in effect until then.

THANK YOU

WJ

computer
caging
corporation



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John H. Hodgson II
Dobbs and Nielsen
1225 Eighth St.
Suite 550
Sacramento, CA 95814

RE: MUR 538

Dear Mr. Hodgson:

On January , 1979, the Federal Election Commission voted to terminate its investigation of your clients, Gun Owners of America Campaign Committee and Computer Caging Corporation. A copy of the Commission's certification is enclosed for your information. Accordingly, the Commission intends to close its file in this matter.

If you have any further questions, please contact Judy Thedford at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosure
Commission's Certification

70040113333



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David B. Goodstein
The Advocate
1730 South Amphlett
Suite 225
San Mateo, CA 94402

RE: MUR 538 (78)

Dear Mr. Goodstein:

On January , 1979, the Federal Election Commission voted to terminate its investigation of MUR 538. A copy of the Commission's certification is enclosed for your information. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification

79040113330



FEDERAL ELECTION COMMISSION

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

November 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hodgson II
Dobbs and Nielsen
1225 Eighth Street
Suite 550
Sacramento, CA 95814

RE: MUR 538 (78)

Dear Mr. Hodgson:

Enclosed with please find the Order of the Federal Election Commission denying your clients' motion to quash or modify the subpoena for production of documents and orders to submit written answers to interrogatories which were issued by the Commission to Computer Caging Corporation ("CCC") and Gun Owners of America Campaign Committee ("GOACC") on August 1, 1978.

§111.13(a) of the Commission's Regulations requires that the application to quash or modify a subpoena or order be submitted to the Commission "... in no event more than 5 days after the date of service of such subpoena,..." Your motion to quash is clearly outside of the prescribed time frame. The arguments made in the motion to quash may be made in your response to the Commission's pending petition to enforce the subpoena, (FEC v. Gun Owners of America Campaign Committee, et al., Civil Action No. S-78-560 PCW (E.D. Calif.))

If you have any questions, please contact Judy Thedford, at 202/523-4057.

Sincerely,

William C. Oidaker
William C. Oidaker
General Counsel

Enclosure
Commission Order

79040113340

BEFORE THE FEDERAL ELECTION COMMISSION

Computer Caging Corporation ,
Gun Owners of America Campaign)
Committee)

NOV 1978

COMMISSION ORDER

The application of Computer Caging Corporation and Gun Owners of America Campaign Committee, to quash or modify the Commission subpoenas and orders issued on August 1, 1978, and mailed on August 4, 1978, is in all respect denied. Movants failed to submit the application to quash or modify the subpoenas and orders within five days after the service of such subpoenas and orders.

Subpoenas were served with the subpoenas and orders on August 10, 1978. The motion to quash or modify such subpoenas and orders was received by the Commission on September 27, 1978. The staff of the Office of the General Counsel is directed to take all necessary and proper steps to insure that the requests contained in the subpoenas and the written answers to the interrogatories contained in the orders are fully complied with.

October 13, 1978
Date

Joan D. Aikens
Joan D. Aikens, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Edmons
Marjorie W. Edmons
Secretary to the Commission

79010113341

MUR 538 - Theford

PS Form 3811, Apr 1977 RETURN RECEIPT REGISTERED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1 The following service is requested (check one):
 Show to whom and date delivered c
 Show to whom, date, and address of delivery c
 RESTRICTED DELIVERY Show to whom and date delivered c
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)

2 ARTICLE ADDRESSED TO
 John Hoogan II
 Doherty and Neilson
 125 North St. Quincy 530
 Sacramento, CA 95814

3 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943415

(Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE Addressee Authorized agent
 Brenda Wise

4 DATE OF DELIVERY 11-6-78

5 ADDRESS (Complete only if required)

6 UNABLE TO DELIVER BECAUSE

POSTMARK NOV 6 1978 STA
 SACR CLERKS INITIALS



FEDERAL ELECTION COMMISSION

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

November 1, 1978

MEMORANDUM

TO: Robert J. Costa

Thru O.B. Doherty

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Request for Auditor's Time to Implement the
Investigation of MUR 538

The Office of the General Counsel requests the Audit Division to allot time for Craig Russell to assist us in the investigation of Gun Owners of America Campaign Committee. Mr. Russell previously lead an audit of GOACC in 1977; his audit background and familiarity with records of GOACC are invaluable to the Commission's investigation.

Thank You

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CCC 5396
mur 536

DOBBS & NIELSEN
Attorneys and Counselors at Law
SUITE 550, 1225 EIGHTH STREET
SACRAMENTO, CA 95814
(916) 446-6782

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 OCT 30 PM 4:22

October 26, 1978

807495

Hal Ponder, Attorney
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Ponder:

Enclosed is the original and two copies of the stipulation per our phone conversation. The original should be signed and returned to this office so that I can file it with the federal court.

Please advise if you have any questions. Thank you for your assistance in this matter.

Very sincerely,

John H. Hodgson II
JOHN H. HODGSON II

JHH:laj

70043011341

1 DOBBS & NIELSEN
2 JOHN H. HODGSON II, ESQ.
3 THOMAS M. CECIL, ESQ.
4 1225 Eighth Street, Suite 550
5 Sacramento, California 95814
6 916/446-6752

7 Attorneys for Respondent

8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 FEDERAL ELECTION COMMISSION,)
12)
13 Petitioner,) CIV. S-78-560 PCW
14)
15 v.) STIPULATION
16)
17 GUNOWNERS OF AMERICA CAMPAIGN)
18 COMMITTEE AND COMPUTER CAGING)
19 CORPORATION,)
20)
21 Respondents.)

22 It is stipulated by petitioner and respondents that
23 the above entitled action, set for hearing on November 6, 1978,
24 is to be continued for thirty (30) days without prejudice to the
25 parties.

26 DOBBS & NIELSEN
27 Dated: 10/26/78 By John H. Hodgson II
28 John H. Hodgson II, Esq.
29 Attorneys for Respondents

30 FEDERAL ELECTION COMMISSION
31 Dated: By _____
32 Hal Ponder, Esq.

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DOBBS & NIELSEN
JOHN H. HODGSON II, ESQ.
THOMAS M. CECIL, ESQ.
1225 Eighth Street, Suite 550
Sacramento, California 95814
916/446-6752

Attorneys for Respondent

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

FEDERAL ELECTION COMMISSION,)	
)	
Petitioner,)	CIV. S-78-560 PCW
)	
v.)	STIPULATION
)	
GUNOWNERS OF AMERICA CAMPAIGN)	
COMMITTEE AND COMPUTER CAGING)	
CORPORATION,)	
)	
Respondents.)	

It is stipulated by petitioner and respondents that the above entitled action, set for hearing on November 6, 1978, is to be continued for thirty (30) days without prejudice to the parties.

	DOBBS & NIELSEN
Dated: 10/26/78	By <u>John H. Hodgson II</u>
	John H. Hodgson II, Esq.
	Attorneys for Respondents

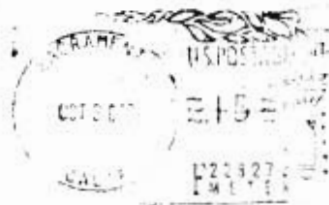
	FEDERAL ELECTION COMMISSION
Dated:	By _____
	Hal Ponder, Esq.

OBBS & NIELSEN

Attorneys and Counselors at Law

SUITE 550, 1225 EIGHTH STREET
SACRAMENTO, CA 95814

POSTAGE WILL BE PAID BY ADDRESSEE



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Hal Ponder, Attorney
FEDERAL ELECTION COMMISSION
1325 K Street, N. W.
Washington, DC 20463

DOBBS AND NIELSEN L
1225 8 ST SUITE 550
SACRAMENTO CA 95814

MAILGRAM



4-065998E299 10/26/78 ICB IPMRNCZ CSP WSHB
9164466752 MGM TDRN SACRAMENTO CA 118 10-26 0657P EST
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MR HAL PONDER, ATTORNEY
FEDERAL ELECTION COMMISSION 1325 K ST
NORTHWEST
WASHINGTON DC 20463

807378

REGARDING MUR538 (78)

DEAR MR PONDER

THIS LETTER WILL CONFIRM OUR PHONE CONVERSATION OF TODAY OF WHICH WE
WILL CONTINUE THE ORDER TO SHOW CAUSE HEARING 30 DAYS FROM THE
ORIGINALLY SCHEDULED DATE NOVEMBER 6 1978. IT IS UNDERSTOOD YOU AND AN
FEC AUDITOR WILL ARRANGE TO COME TO SACRAMENTO DURING THE MONTH OF
NOVEMBER TO AUDIT ANY AND ALL MATERIALS THAT ARE THE SUBJECT OF THE
ORDERS AND SUBPOENAS DATED AUGUST 2 1978 FROM THE FEDERAL ELECTION
COMMISSION.

BY SEPARATE LETTER I AM SENDING THE ORIGINAL AND TWO COPIES OF THE
STIPULATION CONTINUING THE MATTER FOR YOUR SIGNATURE, PLEASE RETURN TO
THIS OFFICE FOR FILING WITH THE FEDERAL COURT.

THANK YOU FOR YOUR COOPERATION.

SINCERELY

JOHN H HODGSON, II
DOBBS AND NIELSEN
ATTORNEYS FOR GUN OWNERS OF AMERICA AND COMPUTER CAGING CORPORATION
1225 8 ST SUITE 550
SACRAMENTO CA 95814

18157 EST

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Mailgram



MAILGRAM POSTAL
CHARGES PAID

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THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Computer Caging Corporation)	MUR 538 (78)
Gun Owners of America Campaign)	
Committee)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 11, 1978, the Commission approved by a vote of 6-0 the General Counsel's recommendation, as set forth in the memorandum dated October 6, 1978, to deny the motion to quash received September 27, 1978 regarding the above-captioned matter.

Attest:

10/11/78
Date

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

Received in Office of Commission Secretary: 10-6-78, 11:43
Circulated on 48 hour vote basis: 10-6-78, 5:15

70040113359



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: OCTOBER 13, 1978
SUBJECT: COMMISSION ORDER IN RELATION TO
MUR 538 (78)

The attached order, approved October 11, 1978,
has been signed and sealed this date.

ATTACHMENT:
Order (Computer Caging Corp.
Gun Owners of America
Campaign Committee)

7 0 0 4 0 1 1 3 5 5 1

October 6, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 538

Please have the attached Memo in response to a Motion to quash distributed to the Commission on a 48 hour tally basis.

Thank you.

79040113352



RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
FEDERAL ELECTION COMMISSION

8 OCT 8 STRAINWJ3
WASHINGTON, D.C. 20463

October 6, 1978

MEMORANDUM

TO: THE COMMISSIONERS
FROM: WILLIAM C. OLDAKER *[Signature]*
SUBJECT: MUR 538 (78)

On September 27, 1978, a motion to quash subpoenas for production of documents and order to submit written responses to interrogatories was received from John Hodgson II, counsel for Computer Caging Corporation ("CCC") and Gun Owners of America Campaign Committee ("GOACC"). (Attachment I)

Under §111.13(a) of the Commission's Regulations, Mr. Hodgson, upon whom the subpoenas and orders were served, may apply to the Commission to quash or modify the subpoenas and orders. However, such a motion is required to be filed "...in no event more than five (5) days after the date of service of such subpoena,..." Mr. Hodgson was served the subpoenas and orders on August 10, 1978; the September 27, 1978 motion to quash is clearly outside the time frame prescribed for such action in 11 C.F.R. §111.13(a).

Accordingly, the Commission should deny the application.

7004011355

DOBBS & NIELSEN
John H. Hodgson II
1225 Eighth Street, Suite 550
Sacramento, California 95814

10 SEP 27 AM 11:41

806540

Attorneys for GOACC and CCC

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of Gun Owners of
America Campaign Committee (GOACC)
and Computer Caging Corporation (CCC).

MUR 538 (78)

MOTION OF GOACC AND CCC TO QUASH
SUBPOENAS FOR PRODUCTION OF DOCUMENTS AND
ORDER TO SUBMIT WRITTEN ANSWERS TO INTERROGATORIES

TO JOAN D. AIKENS, CHAIRMAN:

On August 10, 1978, John H. Hodgson II as attorney for Computer Caging Corporation (hereinafter referred to as CCC) and Gun Owners of America Campaign Committee (hereinafter referred to as GOACCC) was served with orders requiring answers to written interrogatories and subpoenas requesting production of certain documents.

For the reasons stated below, GOACC and CCC move to quash said orders and subpoenas in their entirety or have them modified pursuant to the arguments raised herein.

(ATTACHMENT I pg. 1)

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Hodgson 3
MUR 538/78

I. INTRODUCTION

On or about April 27, 1978, the Federal Election Commission ("FEC") through its General Counsel William Oldaker sent letters to GOACC and CCC alleging that "reason to believe" had been found by the FEC that certain violations of the Federal Elections Campaign Act of 1971 had occurred. These alleged violations, as detailed in the FEC letter of April 27, 1978, are as follows:

1. CCC violated 2 USC §441b by charging GOACC a price below the "usual and normal charge" for its services.
2. GOACC received services from CCC at a price below the "usual and normal charge" violating 2 USC §441b.
3. GOACC failed to report in-kind contributions from the landlord in violation of 2 USC §434.
4. Services performed by Ron Biron to other political committees while on GOACC payroll constitutes an expenditure by GOACC and is required to be reported under 2 USC §434.

The FEC letter of April 27, 1978, contained two attachments, a letter from Mr. David B. Goodstein to the FEC dated February 15, 1978, and a reprinted article from the Advocate, a homosexual newspaper, which was represented to have gone to press on February 17, 1978.

It should be noted initially that the letter written by Mr. Goodstein and properly notarized as required by the Federal Election Campaign Act does not contain any evidence that would substantiate the allegations which are raised in the FEC letter of April 27, 1978. There is no mention of any GOACC/CCC relationship where services are being received at below the "usual and normal charge". There is nothing in Mr. Goodstein's letter alleging GOACC received anything of value from the landlord nor is there anything in Mr. Goodstein's letter regarding any kind of services performed by Ron Biron to other political committees while on GOACC's payroll.

In fact, only when one goes to the Advocate article and wades through the numerous legal and factual inaccuracies contained throughout the article does one find some sort of indirect mention to the allegations raised in the FEC's letter of April 27, 1978. The specific language that the article uses is "it is reasonable to speculate that LOCC... and other committees as well, are now subsidizing Computer Caging Corporation, which... may be subsidizing Gun Owners of America". The Advocate article also discusses the alleged "in-kind contribution" that GOACC received from its landlord that it did not report. The article itself notes that "this is a charge that can only be supported, not documented". The article in the Advocate also briefly mentions that GOACC "provided in-kind services to political candidates that were not reported..."

(ATTACHMENT I pg. 2)

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services... (that) were provided by a GOA-paid consultant, Ron Biron". The article continues by saying that "again, this charge is difficult to substantiate". All of the allegations raised in the FEC letter of April 27, 1978, supposedly came from the complaint registered by Mr. David B. Goodstein and the article written in the Advocate, the homosexual newspaper, as mentioned above. There is no reason to address the Goodstein letter since none of the allegations in the letter are addressed in this matter under review. The Advocate article itself mentions the fact that the charge regarding CCC subsidizing GOACC is speculation. The article also notes that the allegation regarding in-kind contributions from the landlord cannot be documented. Also, the Advocate article mentions that the alleged services provided by GOACC consultant to candidates is difficult to substantiate.

John H. Hodgson II, Attorney for CCC and GOACC, confirmed with the Federal Election Commission in a mailgram letter to the Federal Election Commission on July 5, 1978, that the Commission had no further information on the specific allegations of this matter under review other than the actual letter sent by David B. Goodstein and the article published in the Advocate newspaper. At that time the FEC was advised that neither GOACC nor CCC (was) aware of any situation where GOACC received services from CCC at a price below the "usual and normal charge". Further, that letter advised the FEC that there were no "in-kind contributions" nor any "services performed by Ron Biron to other political candidates" reported because none of those reportable activities existed.

On August 10, 1978, GOACC and CCC received orders and subpoenas issued by the FEC requiring them to answer questions and submit documents. On August 21, 1978, a letter was sent to the Federal Election Commission requesting an additional ten (10) days to prepare a response to this matter. No additional correspondence or request for information had been sent by the FEC prior to the issuing of the orders or the subpoenas.

On or about September 20, 1978, John H. Hodgson II, Attorney for CCC and GOACC, talked by phone with Hal Ponder, Esq. of the Federal Election Commission. At that time, Mr. Hodgson noted the difficulty in answering the orders and subpoenas because the FEC had not specifically shown what the alleged violations were. Mr. Hodgson noted that there were contracts between CCC and GOACC at the same rates as other CCC clients. Those contracts were offered as proof of compliance. Mr. Hodgson noted also his clients' willingness to have any of the GOACC/CCC relationship audited by an FEC auditor as could normally be done by a regular FEC audit. Mr. Hodgson noted at that time the lack of specificity of the alleged violations, the considerable overbreadth of the orders and subpoenas and the concern of his clients in attempting to comply with the Federal Election Commission's request without unduly and unreasonably interrupting all of its activities.

(ATTACHMENT I pg. 3)

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II. THE COMPLAINT DOES NOT COMPLY WITH
FEC REGULATION 11 CFR §111.2.

11 CFR §111.2(a) requires that any person may file a complaint and that the "...complaint shall be in writing and signed, and shall be sworn to and notarized". As noted in the introduction to these points and authorities, the reason to believe letter sent by the FEC on April 27, 1978, contained two separate documents. A complaint sent in a letter from Mr. David B. Goodstein and an article which allegedly was published in the Advocate, the homosexual newspaper, on February 17, 1978. As noted before in the introduction, the complaint by Mr. Goodstein provides no evidence nor allegations which are used in the FEC reason to believe letter of April 27, 1978. The only allegations which provide any basis for the FEC's letter of April 27, 1978, comes from the Advocate article. It should be noted that this article has not been sworn to nor has it been notarized. Therefore, it is in violation of the Federal Election Commission's own Regulation §111.2(a).

Furthermore, the "complaint" of Mr. Goodstein is in violation of §111.2(b) because it fails to contain, as required by the Federal Regulation, "a clear and concise statement of the acts which are alleged to constitute a violation of the Act". Nor does it contain any "documentation of allegations of the complaint available to the complainant". Nor does it contain "an assertion that the person complaining, if not a candidate, is not filing the complaint on behalf of or at the request of or suggestion of a candidate..." all of which are required by §111.2. The Goodstein complaint is obviously unclear and not concise because the FEC reason to believe letter of April 27, 1978, does not list as alleged violations any of the allegations as raised in Mr. Goodstein's letter.

Furthermore, should the Advocate article be construed to be a "complaint" it does not comply with any of the four requirements of Federal Regulation §111.2(b) since 1) there is no full name, address, nor telephone number of the complainant, 2) there is no clear and concise statement of the facts which are alleged to constitute a violation of the Act, 3) there is no documentation of allegations of the complaint available to the complainant, nor 4) is there an assertion that the person complaining... is not filing the complaint on behalf of or at the request or suggestion of a candidate.

The Advocate article itself does not provide a clear and concise statement of the acts which are alleged to constitute a violation of the Act. There is much confusion and innuendo that can be inferred from the article but no specific detail alleging violations. There is no mention of who is the "landlord". There is no mention as to what type of activities either GOACC or CCC allegedly were involved in as it relates to the "lower than normal payment" for services rendered. There is a complete

(ATTACHMENT I pg.4)

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lack of precision or clarity which Regulation §111.2 calls for. There is no mention as to the dates, nor to the specific candidates which allegedly were being benefited by the activities of a GOACC consultant.

Based on the above-mentioned failure by the complainants to comply with the Federal Regulations (11 CFR §111.2) and the failure of the FEC letter of April 27, 1978 (and FEC's subsequent acts) to provide any further detail regarding the alleged "violations", respondents GOACC and CCC respectfully submit this matter should be dropped or alternatively the alleged violations should be redrafted with sufficient clarity and precision to comply with the Federal Regulations and provide the respondents with specific notice of alleged violations of Federal Law or Regulations.

III. THE SUBPOENAS AND ORDER FOR WRITTEN ANSWERS TO INTERROGATORIES ARE OVER BROAD AND VIOLATE FIRST AMENDMENT AND DUE PROCESS RIGHTS

The scope of materials requested in the subpoenas for production of documents and the orders for written answers to interrogatories are extremely broad. The subpoenas request copies of nearly all business agreements between CCC and its clients. It asks for the identification of clients of CCC other than GOACC. It asks for an itemization of all corporate funds received by CCC, a detailed cost analysis, and other extremely broad orders which are confidential as well as basically irrelevant to the matters at hand. There is no justification for any of the detailed questions asked by the Federal Election Commission in this investigation other than what would appear to be burdensome.

As mentioned in sections II and III of this Motion, there is little or no detail in the "complaints" regarding the specific "alleged violations". Respondents GOACC and CCC submit it is not their responsibility to provide extraordinary amounts of expensive data to the Federal Election Commission until there are some more clearly defined allegations of violations. Moreover, to comply with these subpoenas and orders raises broad constitutional concerns regarding freedom of speech and freedom of association which would have to be dealt with in a court of law.

For the above-mentioned reasons respondents GOACC and CCC request the FEC to quash said orders and subpoenas in their entirety or have them modified, along with the alleged violations, as argued herein.

Dated: September 25, 1978

Respectfully submitted,

DOBBS & NIELSEN

By: John H. Hodgson II
John H. Hodgson II

(ATTACHMENT 1 OF 5)

79040113358



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hodgson II
Dobbs & Nielsen
1225 Eighth Street
Suite 550
Sacramento, CA 95814

RE: MUR 538 (78)

Dear Mr. Hodgson:

Enclosed herewith please find the Order of the Federal Election Commission denying your clients' motion to quash or modify the subpoenas for production of documents and orders to submit written answers to interrogatories which were issued by the Commission to Computer Caging Corporation ("CCC") and Gun Owners of America Campaign Committee ("GOACC") on August 1, 1978.

§111.13(a) of the Commission's Regulations requires that the application to quash or modify a subpoena or order be submitted to the Commission, "... in no event more than 5 days after the date of service of such subpoena, ..." Your motion to quash is clearly outside of the prescribed time frame.

If you have any questions, please contact Judy Thedford, at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Order

7904011335

CCC
5032

HAND DELIVERED

RECEIVED
FEDERAL ELECTION
COMMISSION

DOBBS & NIELSEN
John H. Hodgson II
1225 Eighth Street, Suite 550
Sacramento, California 95814

'78 SEP 27 AM 11:41 806540

Attorneys for GOACC and CCC

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of Gun Owners of
America Campaign Committee (GOACC)
and Computer Caging Corporation (CCC).

MUR 538 (78)

MOTION OF GOACC AND CCC TO QUASH
SUBPOENAS FOR PRODUCTION OF DOCUMENTS AND
ORDER TO SUBMIT WRITTEN ANSWERS TO INTERROGATORIES

TO JOAN D. AIKENS, CHAIRMAN:

On August 10, 1978, John H. Hodgson II as attorney for
Computer Caging Corporation (hereinafter referred to as CCC) and
Gun Owners of America Campaign Committee (hereinafter referred
to as GOACCC) was served with orders requiring answers to
written interrogatories and subpoenas requesting production of
certain documents.

For the reasons stated below, GOACC and CCC move to quash
said orders and subpoenas in their entirety or have them modified
purusant to the arguments raised herein.

7904011360

I. INTRODUCTION

On or about April 27, 1978, the Federal Election Commission ("FEC") through its General Counsel William Oldaker sent letters to GOACC and CCC alleging that "reason to believe" had been found by the FEC that certain violations of the Federal Elections Campaign Act of 1971 had occurred. These alleged violations, as detailed in the FEC letter of April 27, 1978, are as follows:

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2. GOACC received services from CCC at a price below the "usual and normal charge" violating 2 USC §441b.

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In fact, only when one goes to the Advocate article and wades through the numerous legal and factual inaccuracies contained throughout the article does one find some sort of indirect mention to the allegations raised in the FEC's letter of April 27, 1978. The specific language that the article uses is "it is reasonable to speculate that LOCC... and other committees as well, are now subsidizing Computer Caging Corporation, which... may be subsidizing Gun Owners of America". The Advocate article also discusses the alleged "in-kind contribution" that GOACC received from its landlord that it did not report. The article itself notes that "this is a charge that can only be supported, not documented". The article in the Advocate also briefly mentions that GOACC "provided in-kind services to political candidates that were not reported...".

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On or about September 20, 1978, John H. Hodgson II, Attorney for CCC and GOACC, talked by phone with Hal Ponder, Esq. of the Federal Election Commission. At that time, Mr. Hodgson noted the difficulty in answering the orders and subpoenas because the FEC had not specifically shown what the alleged violations were. Mr. Hodgson noted that there were contracts between CCC and GOACC at the same rates as other CCC clients. Those contracts were offered as proof of compliance. Mr. Hodgson noted also his clients' willingness to have any of the GOACC/CCC relationship audited by an FEC auditor as could normally be done by a regular FEC audit. Mr. Hodgson noted at that time the lack of specificity of the alleged violations, the considerable overbreadth of the orders and subpoenas and the concern of his clients in attempting to comply with the Federal Election Commission's request without unduly and unreasonably interrupting all of its activities.

II. THE COMPLAINT DOES NOT COMPLY WITH
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11 CFR §111.2(a) requires that any person may file a complaint and that the "...complaint shall be in writing and signed, and shall be sworn to and notarized". As noted in the introduction to these points and authorities, the reason to believe letter sent by the FEC on April 27, 1978, contained two separate documents. A complaint sent in a letter from Mr. David B. Goodstein and an article which allegedly was published in the Advocate, the homosexual newspaper, on February 17, 1978. As noted before in the introduction, the complaint by Mr. Goodstein provides no evidence nor allegations which are used in the FEC reason to believe letter of April 27, 1978. The only allegations which provide any basis for the FEC's letter of April 27, 1978, comes from the Advocate article. It should be noted that this article has not been sworn to nor has it been notarized. Therefore, it is in violation of the Federal Election Commission's own Regulation §111.2(a).

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lack of precision or clarity which Regulation §111.2 calls for. There is no mention as to the dates, nor to the specific candidates which allegedly were being benefited by the activities of a GOACC consultant.

Based on the above-mentioned failure by the complainants to comply with the Federal Regulations (11 CFR §111.2) and the failure of the FEC letter of April 27, 1978 (and FEC's subsequent acts) to provide any further detail regarding the alleged "violations", respondents GOACC and CCC respectfully submit this matter should be dropped or alternatively the alleged violations should be redrafted with sufficient clarity and precision to comply with the Federal Regulations and provide the respondents with specific notice of alleged violations of Federal Law or Regulations.

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As mentioned in sections II and III of this Motion, there is little or no detail in the "complaints" regarding the specific "alleged violations". Respondents GOACC and CCC submit it is not their responsibility to provide extraordinary amounts of expensive data to the Federal Election Commission until there are some more clearly defined allegations of violations. Moreover, to comply with these subpoenas and orders raises broad constitutional concerns regarding freedom of speech and freedom of association which would have to be dealt with in a court of law.

For the above-mentioned reasons respondents GOACC and CCC request the FEC to quash said orders and subpoenas in their entirety or have them modified, along with the alleged violations, as argued herein.

Dated: September 25, 1978

Respectfully submitted,

DOBBS & NIELSEN

By: John H. Hodgson II
John H. Hodgson II

79043113361

41-715

FEDERAL EXPRESS

Account Number 715-0000-9		Date 9/26/78	Airbill No 01737729
Account Name (Shipper) Lobbs & Nielsen		Consignee Attn of Federal Election Commission	
Street 1822 5th St #260		Street 1302 K St. N.W.	
City SAN ANTONIO, CALIF		City WASHINGTON DC	
Ref. No. / P.O. No. EX 814		Location (floor, office no., etc.)	
Payment: <input type="checkbox"/> Bill to Shipper <input type="checkbox"/> Cash in Advance <input type="checkbox"/> Bill to 3rd Party (Bill to no. _____)		NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS OF CONTRACT SET FORTH ON REVERSE OF SHIPPER'S COPY.	
<input type="checkbox"/> Address Correction <input type="checkbox"/> Third Party <input type="checkbox"/> Return Shipment		Freight Charges	
Auth. by _____ Street _____ City _____		DA FOURIER PAK®	
<input type="checkbox"/> Cash Rec'd. Empl. Sig. _____ Emp. No. _____		Advance Origin	
Service: <input type="checkbox"/> SSS <input type="checkbox"/> Other _____		Advance Destination	
Delivery Instructions: <input type="checkbox"/> HOLD AT STATION AND NOTIFY _____		Other _____	
FEI No. _____		Total Charges	

EXCEPTION COPY

This envelope contains first class or letter material as defined by the United States Postal Service

Yes _____ No _____

If yes, please affix the proper amount of postage for the letter material only and cancel by lining through in ink

DOBBS & NIELSEN

Attorneys and Counselors at Law

SUITE 550, 1225 EIGHTH STREET
SACRAMENTO, CA 95814

HAND DELIVERED

ATTENTION: Hal Ponder, Esq.

FEDERAL ELECTION COMMISSION
Office of General Counsel
1325 K Street, Northwest
Washington D. C. 20463



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: SEPTEMBER 26, 1978
SUBJECT: MUR 538 (78) - Interim Report dated
9-22-78. Received in
OCS 9-22-78, 2-33

The above-named document was circulated on a 24
hour no-objection basis at 10:00 a.m., September 25, 1978.

The Commission Secretary's Office has received
no objections to the Interim Report as of 11:30 this
date.

79040113367

September 22, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 538

Please have the attached Interim Report on MUR 538
distributed to the Commission.

Thank you.

79040113368

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gun Owners of America Campaign)
Committee) MUR 538 (78)
Computer Caging Corporation)

INTERIM REPORT


On August 10, 1978, the respondents' counsel, John Hodgson, received the orders and subpoenas issued to his clients, Gun Owners of America Campaign Committee and Computer Caging Corporation. On August 21, 1978, Mr. Hodgson sought an extension of ten days in which to reply. It was our understanding that the extension was necessary to compile the information we requested. There was a total of thirty-one interrogatories and five document requests. In conversation with counsel, Mr. Hodgson stated that he hoped to have the responses in the mail by Friday, August 25, 1978. Our August 24, 1978 letter to counsel confirmed the ten day extension and stated, "your responses and subpoenaed documents should be mailed no later than August 30, 1978".

Mr. Hodgson had indicated that when the subpoenaed information was mailed on or around August 30, there would be a time lag due to the bulkiness of the subpoenaed documents. Therefore it was not until September 18 that this office contacted Mr. Hodgson in order to inquire into our receipt of the information. We were informed that the information was not yet prepared, but that it would be completed shortly. On September 19, this office again contacted Mr. Hodgson to ascertain when the information was to be mailed. At that time, Mr. Hodgson stated that his response

would be partial in that he considered the Commission's information demand to be overbroad and therefore outside of the Commission's jurisdiction. Mr. Hodgson committed himself to have the partial response in our hands by September 22. At that time, we will take the necessary action to have the unsatisfied portions of our orders and subpoenas court enforced.

22 Sept 1978

Date



William C. Oldaker
General Counsel

790101067



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwc*
DATE: AUGUST 25, 1978
SUBJECT: MUR 538 - Interim Report dated 8-22-78
Signed: 8-24-78, Received in
Office of Commission Secretary:
8-24-78, 1:22

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4 30 p.m., August 24, 1978.

There were no objections to the Interim Report.

79040113371

August 24, 1978

MEMORANDUM TO: Marge Emmons
FROM: Blissa T. Carr
SUBJECT: MUR 538

Please have the attached Interim Report on MUR 538 distributed to the Commission.

Thank you.

79040113372


BEFORE THE FEDERAL ELECTION COMMISSION
August 22, 1978

In the Matter of)
)
Gun Owners of America Campaign) MUR 538 (78)
Committee)
Computer Caging Corporation)

INTERIM REPORT

On August 10, 1978, the respondents' counsel received the orders and subpoenas issued by the Commission. On August 22, 1978, we received a mailgram from the respondents' counsel stating that "Due to the complexity to the issues raised, an additional ten days will be needed to prepare a response in this matter". Therefore, the subpoenaed documents and the required responses should be mailed to us by August 30, 1978.

8/24/78
Date



William C. Oldaker
General Counsel

7 2 0 0 4 0 1 1 3 3 7 3



FEDERAL ELECTION COMMISSION

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

August 24, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hodgson
Dobbs and Nielsen
1225 Eighth Street
Suite 550
Sacramento, CA 95814

Re: MUR 538 (78)

Dear Mr. Hodgson:

This letter is to acknowledge receipt of your mailgram dated August 21, 1978 which stated that "an additional ten days will be needed to prepare a response in this matter". Therefore, your responses and subpoenaed documents should be mailed no later than August 30, 1978.

If you have any questions, contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William C. Olsaker
William C. Olsaker
General Counsel

PS Form 3811, Rev. 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

1. The following services is requested (check one):
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

ARTICLE ADDRESSED TO:
Mr. John Hodgson
1225 Eighth Street
Suite 550
Sacramento, CA 95814

2. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO.
95381

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE: Addressee Authorized agent
William C. Olsaker
 DATE OF DELIVERY: *8/24/78*

3. ADDRESS: (Complete only if requested)
 4. UNABLE TO DELIVER BECAUSE:
 5. POSTOFFICE
 6. ZIP CODE
 7. CARRIER
 8. INITIALS

BOBBE AND NIELSEN JM
125 K ST SUITE 550
SACRAMENTO CA 95814

 Mailgram 

4-024026E233 08/21/78 ICS IPMRNCZ CSP WSHB

9164466752 MGM TDRN SACRAMENTO CA 100 08-21 1100A

acc # 4607
18 AUG 22 AM 11:27

FEDERAL ELECTION COMMISSION
ATTN WILLIAM C OLDAKER
1325 K ST NORTHWEST
WASHINGTON DC 20463

805580

RE MUR 538 (78)

GENTLEMEN

THIS OFFICE REPRESENTS GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE AND
COMPUTER CAGING CORPORATION IN THE ABOVE MENTIONED MATTER. DUE TO THE
COMPLEXITY TO THE ISSUES RAISED, AN ADDITIONAL TEN DAYS WILL BE NEEDED
TO PREPARE A RESPONSE IN THIS MATTER. YOUR COURTESY AND COOPERATION IS
APPRECIATED.

PLEASE NOTE THAT THIS LAW OFFICE'S ADDRESS HAS MOVED TO 1225 EIGHTH
STREET, SUITE 550, SACRAMENTO CALIFORNIA 95814. OUR PHONE NUMBER
REMAINS THE SAME (916) 446-6752. VERY SINCERELY

JOHN HODGSON

11100 EST

MGMCOMP MGM



western union

Mailgram[®]



MAILGRAM POSTAL
CHARGES PAID

THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY





FEDERAL ELECTION COMMISSION

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

August 4, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

Re: MUR 538 (78)

Dear Mr. Hodgson:

Enclosed are orders and subpoenas issued by the Federal Election Commission requiring you to answer questions and submit documents for your clients, Computer Caging Corporation and Gun Owners of America Campaign Committee, in connection with MUR 538 (78). Your responses and documents should be submitted within 10 days of your receipt of this letter.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oidaker", written over the typed name and title.

William C. Oidaker
General Counsel

Enclosures

7 9 0 4 0 1 1 3 7 3

538 Theford

PS Form 3811, Apr. 1977
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY Show to whom and date delivered
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
 Mr. John Hodgson
 1225 8TH ST STE 550
 SACRAMENTO CA 95814

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943992	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 8-10-78	POSTMARK AUG 10
--------------------------------	--------------------

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO : 1977-O-234-337

MOE 538 Theford

PS Form 3811, Apr. 1977
RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY Show to whom and date delivered
 RESTRICTED DELIVERY Show to whom, date, and address of delivery \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
 MR. JOHN HODGSON
 1225 8TH ST
 SACRAMENTO, CA

REGISTERED NO.	CERTIFIED NO.	INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 8-22-78	POSTMARK AUG 22
--------------------------------	--------------------

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO 1977-O-234-337



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California

Re: MUR 538 (78)

Dear Mr. Hodgson:

Enclosed are orders and subpoenas issued by the Federal Election Commission requiring you to answer questions and submit documents for your clients, Computer Caging Corporation and Gun Owners of America Campaign Committee, in connection with MUR 538 (78). Your responses and documents should be submitted within 10 days of your receipt of this letter.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

OK 2-78

79740113379

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gun Owners of America) RE: MUR 538 (78)
Campaign Committee)

SUBPOENA

TO: Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(3), hereby subpoenas the documents listed below and requires that they be sent by pre-paid certified mail, addressed to the Office of the General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Judy Thedford and postmarked within ten days of your receipt of this subpoena: 1. A copy of a letter from each mailing made by GOACC in 1976 and 1977. Identify the letter by mailing date. 2. A copy of a letter from each mailing which GOACC contracted through Computer Caging Corporation in 1977. Identify the letter by mailing date.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this *2nd* day of *August*, 1978.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

7 9 7 4 0 1 1 3 3 8 1
UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)
Computer Caging Corporation) RE: MUR 538 (78)

SUBPOENA

TO: John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

The Federal Election Commission, pursuant to its powers set forth in 2 U.S.C. §437d(a)(3), hereby subpoenas the documents listed below and requires that they be sent by pre-paid certified mail, addressed to the Office of the General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Judy Thedford and postmarked within ten days of your receipt of this subpoena:

1. A copy or copies of the contract(s) between GOACC and CCC.
2. A copy or copies of the contract(s) between LOCC and CCC.
3. A copy of a letter from each mailing which LOCC contracted through CCC for mailing in 1977. Identify the letter with respect to the mailing date.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C., 20463, this *2nd* day of *August* 1978.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gun Owners of America)
Campaign Committee) RE: MUR 538 (78)

ORDER

TO: Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

PURSUANT to the authority set forth in Section 437d(a)(1) of Title 2, United States Code, and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the attached interrogatories. The answers must be submitted under oath, within ten (10) days of your receipt of this Order, to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of the General Counsel.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this , the *2nd* day of *August* 1978.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

ORDER - GOACC

1. How many mailings were made by GOACC in 1976?
2. How many mailings were made by GOACC in 1977?
3. How many of the 1977 mailings were contracted through CCC?
4. How many of the 1977 mailings were not contracted through CCC?
5. How many names were on each mailing list used by GOACC and CCC in 1976 and 1977? Identify the number of names with respect to the mailing date.
6. What was the price per letter for each of GOACC's 1976 mailings? Identify the price per letter with respect to the mailing date.
7. What was GOACC's total cost for each mailing in 1976? Identify the cost of each mailing with respect to the mailing date.
8. What was GOACC's total cost for all of the mailings in 1976?
9. What was the price per letter of GOACC's 1977 mailings not contracted through CCC? Identify the price with respect to the mailing date.
10. What was GOACC's total cost for each mailing in 1977 not contracted through CCC? Identify the price with respect to the mailing date.
11. What was GOACC's total cost for all of the 1977 mailings not contracted through CCC?
12. What was the price per letter for each of GOACC's 1977 mailings contracted through CCC? Identify the price per letter with respect to the mailing date.
13. What was GOACC's total cost for each mailing contracted through CCC in 1977? Identify the cost per mailing with respect to the mailing date.
14. What was GOACC's total cost for all of the 1977 mailings contracted through CCC?
15. Account for all money transfers between GOACC and CCC in 1976.
16. Account for all money transfers between GOACC and CCC in 1977.
17. List the personnel of GOACC as of October 31, 1976.
18. List the personnel of GOACC as of March 1, 1977.

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

In the Matter of)
)
Computer Caging) RE: MUR 538 (78)
Corporation)

ORDER

TO: Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

PURSUANT to the authority set forth in Section 437d(a)(1) of Title 2, United States Code, and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the attached interrogatories. The answers must be submitted under oath, within ten (10) days of your receipt of this Order, to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this, the *2nd* day of *August*, 1978.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

ORDER - CCC

1. What factors influence the rate clients are charged for your services?
2. Does CCC offer mailing services to its' clients as well as caging operations?
3. If CCC offers mailing services to its' clients, what rates are charged and what factors influence this rate?
4. If CCC does not offer mailing services to its' clients, does CCC contract mailings for its' client committees? If so, to whom do they contract for mailings?
5. Account for all the money transfers between GOACC and CCC in 1976.
6. Account for all the money transfers between GOACC and CCC in 1977.
7. Account for all the money transfers between LOCC and CCC in 1977.
8. What was the cost per letter for each of the 1977 mailings LOCC contracted through CCC? Identify the price with respect to the mailing date.
9. What was the total cost per mailing of the 1977 mailings LOCC contracted through CCC? Identify the price with respect to the mailing date.
10. How many mailings did LOCC contract through CCC in 1977?
11. List the personnel of CCC as of March 1, 1977.
12. Identify other CCC clients.
13. List all corporate funds received by CCC since its inception, including an itemization of amount and contributor.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gun Owners of America) MUR 538 (78)
Campaign Committee)
Computer Caging Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 1, 1978, the Commission approved by a vote of 6-0 the issuance of subpoenas and orders in the above-captioned matter as follows:

1. Gun Owners of America Campaign Committee:

Mr. John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

2. Computer Caging Corporation:

John Hodgson
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date: 8/2/78

79040113385

July 28, 1978

MEMORANDUM TO: Marye Brown
FROM: Elissa T. Carr
SUBJECT: MUR 538

Please have the attached request for subpoenas and orders distributed to the Commission on a 48 hour tally basis.

Thank you.

79040113387



FEDERAL ELECTION COMMISSION

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

July 28, 1978

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker

SUBJECT: MUR 538 (78)

Attached for the Commission's approval are proposed subpoenas and orders to be issued to the respondents in furtherance of the investigation in this matter.

79040113388



FEDERAL ELECTION COMMISSION

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

AUTHORIZATION TO ISSUE SUBPOENAS AND ORDERS TO FACILITATE
THE INVESTIGATION OF GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE
AND COMPUTER CAGING CORPORATION:

The Commission hereby authorizes orders and subpoenas
to be issued to John Hodgson, Counsel for Gun Owners of
America Campaign Committee and Computer Caging Corporation.

Address: Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, California 95814

Joan D. Aikens
Joan D. Aikens, Chairman

William L. Springer, Commissioner

Robert O. Tiernan, Vice Chairman

Neil O. Staebler, Commissioner

Thomas E. Harris, Commissioner

Vernon W. Thomson, Commissioner

79040113389

DOBBS AND NIELSEN LJ
1127 11 ST SUITE 544
SACRAMENTO CA 95814

 Mailgram



1-034659E166 07/05/78 ICS IPMRNCZ CSP WSHA
9164466752 MGM TDRN SACRAMENTO CA 200 07-05 0125P 78 JUL 6 AM 8:19

HAL PONDER, ESQUIRE FEDERAL ELECTION
COMMISSION
1325 K ST NORTHWEST
WASHINGTON DC 20463

804251

RE MUR 538 (78)

DEAR MR PONDER,

THIS LETTER IS IN RESPONSE TO THE LETTERS RECEIVED FROM YOUR OFFICE
DATED APRIL 27 1978 AND SENT TO THE GUN OWNERS OF AMERICA CAMPAIGN
COMMITTEE AND COMPUTER CAGING CORPORATION REGARDING THE ABOVE MATTER
UNDER REVIEW.

IN MY PHONE CONVERSATION WITH YOUR OFFICE WHILE I WAS IN WASHINGTON
D.C. ON JUNE 20 1978, YOU ADVISED ME THAT YOUR OFFICE HAD NO FURTHER
INFORMATION ON THE SPECIFIC ALLEGATIONS OTHER THAN THE ACTUAL LETTER
SENT BY MR. DAVID B GOODSTEIN AND THE ARTICLE PUBLISHED IN THE
ADVOCATE. PLEASE BE ADVISED THAT NEITHER GUN OWNERS OF AMERICA CAMPAIGN
COMMITTEE (GOACC) NOR COMPUTER CAGING CORPORATION (CCC) IS AWARE OF ANY
SITUATION WHERE GOACC RECEIVED SERVICES FROM CCC AT A PRICE BELOW THE
"USUAL AND NORMAL CHARGE".

BE ADVISED ALSO THAT GOACC DID NOT REPORT "IN-KIND CONTRIBUTIONS" NOR
DID IT REPORT "SERVICES PERFORMED BY RON BIRON TO OTHER POLITICAL
CANDIDATES WHILE ON GOACC'S PAYROLL" BECAUSE THERE WERE NONE.

SHOULD YOU REQUIRE ANY ADDITIONAL INFORMATION REGARDING THIS MATTER
PLEASE CONTACT THIS OFFICE DIRECTLY.

VERY SINCERELY,

JOHN H HODGSON, ESQUIRE
DOBBS AND NIELSEN

13:24 EST

MGMCOMP MGM



MailgramSM



MAILGRAM POSTAL
CHARGES PAID

THIS MAILGRAM WAS TRANSMITTED ELECTRONICALLY BY WESTERN UNION TO A POST OFFICE NEAR YOU FOR DELIVERY



FEDERAL ELECTION COMMISSION

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

July 7, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 538 (78) - Interim Report dated 6-30-78
Signed 7-5-78
Received in Office of Commission
Secretary 7-5-78, 2:28

The above-mentioned document was circulated on a 24
hour no-objection basis at 9:00 a.m., July 6, 1978.

As of 9:00 a.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim
Report.

7 2 7 4 0 1 1 3 9 2

July 5, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 538

Please have the attached Interim Report on MUR 538
distributed to the Commission.

Thank you.

79040113393

BEFORE THE FEDERAL ELECTION COMMISSION
June 30, 1978

In the Matter of)
)
Gun Owners of America Campaign) MUR 538 (78)
Committee)
Computer Caging Corporation)

INTERIM REPORT

On June 20, 1978, Mr. Hodgson, the respondents' counsel, contacted the Commission. He requested clarification of the allegation #2 and #3 stated in the April 27, 1978 reason to believe letter to Gun Owners of America Campaign Committee.

Mr. Hodgson was reminded of his delinquency in responding and said the response would be in by the 7th of July.

5 July 1978

Date



William C. Oldaker
General Counsel

W-C-O

7904011391



FEDERAL ELECTION COMMISSION

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

June 20, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

SUBJECT: MUR 538 (78) - Interim Report dated 6-16-78
Received in OCS: 6-16-78, 3:13

The above-mentioned document was circulated on a 24 hour no-objection basis at 2:00p.m., June 19, 1978.

As of 3:00 p.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

79010113395



June 16, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 538

Please have the attached Interim Report on MUR 538
distributed to the Commission.

Thank you.

79040113396

BEFORE THE FEDERAL ELECTION COMMISSION
June 14, 1978


In the Matter of)
)
Gun Owners of America Campaign) MUR 538 (78)
Committee)
Computer Caging Corporation)

Interim Report

On May 16, 1978, we received notification from the respondents' counsel that they were preparing a detailed response to the allegations in our April 27, 1978 letters. On June 5, 1978, a letter was sent to the counsel stating that we had not received the responses which were due ten days after their receipt of the notification and that we would appreciate their attention in this matter so that we may conclude our investigation expeditiously.

7 9 0 4 0 1 1 3 3 9 7
16 June 1978

Date


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

June 5, 1978

EXPRESS MAIL

Mr. John Hodgson II
Dobbs and Nielsen
Suite 544
1127 Eleventh Street
Sacramento, CA 95814

Re: MUR 538 (78)

Dear Mr. Hodgson:

This letter is in reference to our April 27, 1978 letters to Gun Owners of America Campaign Committee ("GOA") and Computer Caging Corporation ("CCC") which notified GOA and CCC that the Commission had found reason to believe that they violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The responses were due ten days after their receipt of the letters. To date we have not received the responses. We would appreciate your attention in this matter so that we may conclude our investigation expeditiously.

Sincerely,

William C. Oldaker
General Counsel

PS Form 3811, Apr. 1977

True copy attached

1. The following service is requested (check one):
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE, ADDRESS, REGISTERED NO., CERTIFIED NO., INSURED NO.
 REGISTERED NO. 49531 INSURED NO.
 ARTICLE DESCRIPTION: Mr. John Hodgson II, 1127 Eleventh Street, Sacramento, CA 95814

3. I have received the article described above.
 SIGNATURE: Address Authorized agent
John Hodgson II

4. DATE OF DELIVERY: 6-2-78

5. ADDRESS (Completed only if requested)
 1127 Eleventh Street
 Sacramento, CA 95814

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★ GPO : 1977-O-334-337



FEDERAL ELECTION COMMISSION

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

May 24, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

MJE by pc

SUBJECT: MUR 538 - Interim Report dated 5-17-78
Signed by GC: 5-18-78
Received in Office of Commission
Secretary: 5-19-78

The above-mentioned document was circulated on a 24
hour no-objection basis at 12:30 p.m., May 23, 1978.

There were no objections to the Interim Report.

79030113399

May 19, 1978

MEMORANDUM TO: Marge Hanson
FROM: William T. Gurr
SUBJECT: MR 538

Please have the attached Trosier Report on MR 538 distributed to the Commission.

Thank you.

79040113400

BEFORE THE FEDERAL ELECTION COMMISSION
May 17, 1978

In the Matter of)
)
Gun Owners of America Campaign) MUR 538 (78)
Committee)
Computer Caging Corporation)


INTERIM REPORT

On April 27, 1978, reason to believe letters were sent to the respondents, Gun Owners of America Campaign Committee and Computer Caging Corporation. On May 16, 1978, a letter was received from the respondents' counsel advising the Commission that they will be representing the respondents in this matter and that their office is preparing a detailed response.

After our receipt and analysis of their response, we will present our recommendation to the Commission.

7004011471
5/18/78

DATE



WILLIAM C. OLDAKER
GENERAL COUNSEL

ACC3561

RECEIVED
FEDERAL ELECTION
COMMISSION

DOBBS & NIELSEN
Attorneys and Counselors at Law
SUITE 544, 1127 ELEVENTH STREET
SACRAMENTO, CA 95814
(916) 446-6752

'78 MAY 16 AM 9:19

May 11, 1978

002785

70040113400

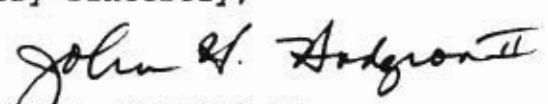
William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N W
Washington, D. C. 20463

Re: MUR 538 (78)

Dear Mr. Oldaker:

Please be advised that this law office will be representing the Gun Owners of America Campaign Committee and Computer Caging Corporation in the above mentioned matter under review. This office will be preparing a detailed response to the allegations raised in your letters.

Very sincerely,



JOHN H. HODGSON II

JHH:laj

DOBBS & NIELSEN

Attorneys and Counselors at Law

SUITE 544, 1127 ELEVENTH STREET

SACRAMENTO, CA 95814



78 MAY 10 AM 9:14

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



FEDERAL ELECTION COMMISSION

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

April 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John H. Hodgson, II
Treasurer
Gun Owners of America Campaign
Committee
455 Capitol Mall, Suite 315
Sacramento, CA 95815

Re: MUR 538 (78)

Dear Mr. Hodgson:

The Federal Election Commission has received a complaint which alleges that your committee committed certain violations of the Federal Election Campaign of 1971, as amended, ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 538 (78).

The Commission has found reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §§434, 441a, and 441b. Specifically, it appears that:

- 1) Gun Owners of America Campaign Committee's ("GOA") receipt of services from Computer Caging Corporation at a price below the "usual and normal charge" violates 2 U.S.C. §441b. [11 C.F.R. §100.4(a)(1)].
- 2) The failure of GOA to report in-kind contributions in the form of reduced rent and cost of office furniture, and subsidized bills from the landlord violated 2 U.S.C. §434. In addition, if these in-kind contributions exceeded \$5,000 per year, a violation of 2 U.S.C. §441a may have been committed.
- 3) Services performed by Ron Biron to other political candidates, while on GOA's payroll, constitutes an expenditure by GOA and is required to be reported under 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate



79040113401

that no further action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

538 Thedford

PS Form 3811, Nov. 1977

1. The following service is requested (check one).
 Show to whom and date delivered.
 Show to whom, date, and address of delivery.
 RESTRICTED DELIVERY
 Show to whom and date delivered.
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery.
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*Mr. William C. Oldaker, Jr., Esq.
 455 Chapel Hill
 Durham, N.C. 27815*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *948870* CERTIFIED NO. _____ INSURED NO. _____
 (Always obtain signature of addressee or agent)

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

4. *B. Richardson*
 DATE OF DELIVERY *MAY - 2 1978*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK: KNOX TN MAY 2 1978

☆ GPO : 1977-O-234-987



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John H. Hodgson, II
Treasurer
Gun Owners of America Campaign
Committee
455 Capitol Mall, Suite 315
Sacramento, CA 95815

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The Commission has found reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §§434, 441a, and 441b. Specifically, it appears that:

1) Gun Owners of America Campaign Committee's ("GOA") receipt of services from Computer Caging Corporation at a price below the "usual and normal charge" violates 2 U.S.C. §441b. [11 C.F.R. §100.4(a)(1)].

2) The failure of GOA to report in-kind contributions in the form of reduced rent and cost of office furniture, and subsidized bills from the landlord violated 2 U.S.C. §434. In addition, if these in-kind contributions exceeded \$5,000 per year, a violation of 2 U.S.C. §441a may have been committed.

3) Services performed by Ron Biron to other political candidates, while on GOA's payroll, constitutes an expenditure by GOA and is required to be reported under 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate



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The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

gt 4/26/78

79040113407



FEDERAL ELECTION COMMISSION

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

April 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barbara A. Richardson
Secretary/Treasurer
Computer Caging Corporation
6060 Sunrise Vista Drive, Suite 100
Citrus Heights, CA 95610

Re: MUR 538 (78)

Dear Ms. Richardson:

The Federal Election Commission has received a complaint which alleges that your corporation committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 538 (78).

The Commission has reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. § 441b. Specifically, it appears that your corporation may have violated 2 U.S.C. §441b by charging Gun Owners Of America Campaign Committee a price below the "usual and normal charge" for your services.[11 C.F.R.§100.4(a)(1)].

Under the Act, you have an opportunity to demonstrate that no further action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your responses should be submitted within ten days after your receipt of this notification. If you have any questions, please contact Judy Thdeford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance



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with 2 U.S.C. §437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

Enclosure

79040113407

MUS 538 Shepard

PS Form 3811, Nov. 1977

1. The following service is requested (check one).
 Show to whom and date delivered
 Show to whom, date, and address of delivery
 RESTRICTED DELIVERY
 Show to whom and date delivered
 RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*Robert A. Shepherd
 Computer Casing Corp.
 6060 Sunrise Vista Dr. Ste 100
 Citrus Heights, CA 95610*

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
443872

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Robert A. Shepherd

4. DATE OF DELIVERY
5/1/78

5. ADDRESS (Complete only if requested)
6060 Sunrise Vista

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

CITRUS HEIGHTS CALIF
 MAY 1 1978

★ 870 - 187 - O - 234 - 337



FEDERAL ELECTION COMMISSION
FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20462

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barbara A. Richardson
Secretary/Treasurer
Computer Caging Corporation
6060 Sunrise Vista Drive, Suite 100
Citrus Heights, CA 95610

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Under the Act, you have an opportunity to demonstrate that no further action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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This matter will remain confidential in accordance



7 9 0 4 0 1 1 3 4 1 0



FEDERAL ELECTION COMMISSION

2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

1125 K STREET, N.W.
WASHINGTON, D.C. 20463

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

79040113411

JA 4/20/78



FEDERAL ELECTION COMMISSION

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

April 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David B. Goodstein
The Advocate
1730 South Amphlett, Suite 225
San Mateo, CA 94402

Re: MUR 538 (78)

Dear Mr. Goodstein:

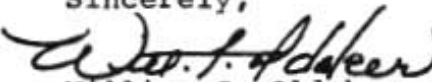
The Federal Election Commission has completed a preliminary review of your complaint and has numbered it as MUR 538 (78). Please refer to this number in any further correspondence.

A copy of your complaint has been forwarded to the respondents. If you have any further information you wish to make available to the Commission, please submit it within five days of your receipt of this letter.

The Commission's enforcement procedures are set forth in 2 U.S.C. §437g. Please note that 2 U.S.C. §437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the respondent.

If you have any questions, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,


William C. Oldaker
General Counsel



79040113412



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David B. Goodstein
The Advocate
1730 South Amphlett, Suite 225
San Mateo, CA 94402

Re: MUR 538 (78)

Dear Mr. Goodstein:

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A copy of your complaint has been forwarded to the respondents. If you have any further information you wish to make available to the Commission, please submit it within five days of your receipt of this letter.

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If you have any questions, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William C. Oldaker
General Counsel



[Handwritten signature]
10/20/78

79040113415

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Gun Owners of America,
Gun Owners of California,
Legislative Action Fund,
Computer Caging Corporation

MUR 538 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 25, 1978, the Commission approved without objection the recommendations in the First General Counsel's Report, undated, on the above-captioned matter as follows:

1. Find reason to believe that violations of 2 U.S.C. §§434, 441a, and 441b may have been committed by GOA.
2. Find reason to believe that a violation of 2 U.S.C. §441b may have been committed by CCC.
3. Send letters attached to First General Counsel's Report.

Date:

4-25-78

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Report dated:

Undated

Received in Office of Commission Secretary: 4-24-78, 11:10

Circulated on 24 hour no-objection basis: 4-24-78, 1:30

70740113414

April 24, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 538

Please have the attached 7 day report on MUR 538 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

79040113415

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION _____

MUR NO. 538 (78)
DATE COMPLAINT RECEIVED
BY OGC 2/28/78

STAFF MEMBER(S) Theford

COMPLAINANT'S NAME: David B. Goodstein

RESPONDENT'S NAME: Gun Owners of America, Gun Owners of California,
Legislative Action Fund, Computer Caging Corporation

RELEVANT STATUTE: 2 U.S.C. §§434, 441a, 441b

INTERNAL REPORTS CHECKED: GOA, GOC

FEDERAL AGENCIES CHECKED: NONE

SUMMARY OF ALLEGATIONS

This complaint, brought by the publisher of The Advocate, involves four respondents of which three respondents, Gun Owners of America ("GOA"), Gun Owners of California ("GOC"), and Legislative Action Fund ("LAF"), are the subject of MUR 413, as to which RCTB has been found. The instant allegations concerning these three respondents are either identical to, or are interrelated to, the violations determined by the Commission in MUR 413.

In addition, this complaint named another entity, Computer Caging Corporation ("CCC"). The allegations in the complaint are unfocused, but they, along with the allegations in the newspaper article furnished in the complaint (See Attachments I and II), indicate that Computer Caging was set up as a dummy for GOA. Evidence of this is that at the time of Computer Caging Corporation's creation in 1976, GOA transferred its personnel, office equipment, and computer programs to Computer Caging, as well as giving Computer Caging money, in the form of pre-payments for services, to start its operation. In addition, the creator, president, and sole stockholder of Computer Caging is H.L. Richardson, who is also the creator and president of GOA.

PRELIMINARY LEGAL ANALYSIS

The reason for GOA's creation of CCC would appear to be for the advantage of CCC's corporate status. CCC can obtain and subsidize the huge expenses of GOA's political mailings with corporate money

79040113415

which GOA is prohibited by law from accepting. As a result, it appears that the administrative cost of mailings went from 11 cents per dollar when GOA handled its own mailings in 1976, to 9 cents per dollar when CCC handled GOA's mailings in 1977. To support this allegation, the article specifically reports that another Richardson committee, the Law and Order Campaign Committee ("LOCC"), paid CCC 30 cents on every dollar in 1977. It is possible that the difference in charges assessed is based on LOCC's ability to obtain corporate money and, thus, afford a higher price, thereby allowing cut rate prices to be offered to GOA. Since CCC appears to be a conduit for corporate contributions to GOA, both GOA and CCC appear to be acting in violation of 2 U.S.C. §441b.

Another allegation in the article deals with GOA's failure to report in-kind contributions and expenditures. Thomas E. Hall, former controller of GOA and GOC, alleges that GOA received in-kind contributions in the form of reduced rent and cost of office furniture, as well as subsidized utility bills from its landlord. The reduced prices and subsidized bills are required to be reported by 2 U.S.C §434 and 11 C.F.R. § 104.3. A violation of 2 U.S.C. §441a may have also been committed if the in-kind contributions exceeded \$5,000 per year.

Mr. Hall further alleges in the article, that a GOA paid consultant, Ron Biron, provided in-kind services to political candidates. If such services were rendered to political candidates by GOA, the expenditure should have been reported. Until such time as the candidates are identified, the disclosure reports can not be reviewed. Therefore, we are recommending that the Commission find reason to believe on 2 U.S.C. §434.

RECOMMENDATION

1. Find reason to believe that violations of 2 U.S.C. §§434, 441a, and 441b may have been committed by GOA.
2. Find reason to believe that a violation of 2 U.S.C. § 441b may have been committed by CCC.
3. Send the attached letters.

79040113417



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John H. Hodgson, II
Treasurer
Gun Owners of America Campaign
Committee
455 Capitol Mall, Suite 315
Sacramento, CA 95815

Re: MUR 538 (78)

Dear Mr. Hodgson:

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The Commission has found reason to believe that the matters alleged in the complaint state a violation of 2 U.S.C. §§434, 441a, and 441b. Specifically, it appears that:

- 1) Gun Owners of America Campaign Committee's ("GOA") receipt of services from Computer Caging Corporation at a price below the "usual and normal charge" violates 2 U.S.C. §441b. [11 C.F.R. §100.4(a)(1)].
- 2) The failure of GOA to report in-kind contributions in the form of reduced rent and cost of office furniture, and subsidized bills from the landlord violated 2 U.S.C. §434. In addition, if these in-kind contributions exceeded \$5,000 per year, a violation of 2 U.S.C. §441a may have been committed.
- 3) Services performed by Ron Biron to other political candidates, while on GOA's payroll, constitutes an expenditure by GOA and is required to be reported under 2 U.S.C. §434.

Under the Act, you have an opportunity to demonstrate



7904013413

that no further action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification. If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barbara A. Richardson
Secretary/Treasurer
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6060 Sunrise Vista Drive, Suite 100
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Under the Act, you have an opportunity to demonstrate that no further action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your responses should be submitted within ten days after your receipt of this notification. If you have any questions, please contact Judy Thdeford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance



70010113420

with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 1 1 3 4 2 1



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David B. Goodstein
The Advocate
1730 South Amphlett, Suite 225
San Mateo, CA 94402

Re: MUR 538 (78)

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The Commission's enforcement procedures are set forth in 2 U.S.C. §437g. Please note that 2 U.S.C. §437g(a)(3)(B) prohibits any person from making public the fact of "any notification or investigation" by the Commission without the written consent of the respondent.

If you have any questions, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William C. Oldaker
General Counsel



79040113422

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gun Owners of America Campaign) MUR 538 (78)
Committee)
Computer Caging Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on _____, 1978, the Commission accepted the recommendation of the General Counsel in reference to the above captioned matter:

- 1) Find reason to believe that violations of 2 U.S.C. §434, §441a, and §441b may have been committed by Gun Owners of America Campaign Committee.
- 2) Find reason to believe that a violation of 2 U.S.C. §441b may have been committed by Computer Caging Corporation.
- 3) Send the attached letters.

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ALL

MUR 538

THE ADVOCATE

FED. ELECTIONS COMMISSION

1730 South Amphlett, Ste. 225 • San Mateo, California 94402 • Telephone (415) 733-7100

FEB 22 AM 11:27

15 February 1978

MCC 2776

Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 30463

Attention: Director of Enforcement

Dear sir:

Certain facts have come to our attention regarding a political action committee under FEC jurisdiction which might constitute violations of federal laws.

Briefly, these apparent violations focus on Gun Owners of America (GOA), a federal committee based in California; Gun Owners of California (GOC), a state campaign committee; Legislative Action Fund, a lobbyist fund; and California State Senator H. L. Richardson, the chairman of GOA and GOC.

In early 1977,

1) Gun Owners of America appears to have given many of its assets -- an estimated total of approximately \$28,000 -- to a California corporation, Computer Caging Corporation. H. L. Richardson is the sole shareholder in Computer Caging, as well as the chairman of GOA and GOC. This apparent expenditure was not reported as an expenditure on GOA's reports in possible violation of 11 C.F.R. Sections 100.7, 102.9, 104.2 and 104.6.

2) Additionally, if Gun Owners of America sold the assets to Computer Caging Corporation, there is no report of receipts of such sale in GOA's FEC reports as far as we are able to determine. Had such a sale been transacted, we believe that the receipt of money from the sale should have been listed as a contribution under the "Wallace Watch" decision. Such a contribution would appear to be an illegal corporate contribution.

In its report for November 1977, GOA reports receiving \$8,017.50 for "purchase of programming" from Computer Caging. Selling such a program is much like selling a good, and appears to be an illegal corporate contribution to GOA.

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3) Gun Owners of America reported it received from Gun Owners of California, a state political action committee, approximately \$300,000. GOA reported these receipts as GOC's share of administrative expenses for services supplied by GOA. Our information suggests, however, that the amount GOA received from the state committee was approximately \$157,000 in excess of its actual administrative expenses. This transfer of funds from the state committee to the federal committee is, we believe, violative of, inter alia, 11 C.F.R. Section 102.6.

4) Additionally, Gun Owners of America received from a lobbying arm, the Legislative Action Fund, monies which were reported as the fund's share of administrative expenses paid to GOA. The amounts paid by the fund to GOA, we believe, were in excess of the Legislative Action Fund's true burden of administrative expenses. This may constitute an illegal contribution to GOA in violation of 11 C.F.R. Section 106 and other as yet unascertained sections.

5) Tom Hall, the controller for Gun Owners of America during 1976, has asserted to this publication that the federal committee received contributions it may have been legally barred from accepting by funneling such contributions into one of its bank accounts -- the Gun Owners of America Legislative Action Fund holding account. The monies from the holding account were subsequently transferred in part to GOA, in apparent violation of as yet unascertained regulations concerning the source of acceptable contributions.

6) Gun Owners of America has solicited funds from the public calling for political contributions, and then has apparently transferred part of those funds in the form of assets to Computer Caging for the personal profit of H. L. Richardson. We believe such transference might be fraudulent and in violation of 11 C.F.R. Section 113.2 controlling the use of campaign funds.

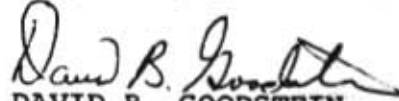
The details of these allegations and the facts of which we have become aware are found in the attached article

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with which we are going to press on February 17. We are enclosing copies of the documents we have in our possession which support the statements made in the article.

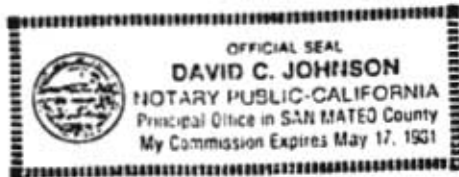
Very truly yours,


DAVID B. GOODSTEIN
Publisher

DBG:rt
Enclosures

STATE OF CALIFORNIA
COUNTY OF SAN MATEO

On February 15, 1978, before the undersigned, a Notary Public for the State of California, personally appeared David B. Goodstein, known to me to be the person whose name is subscribed to above, and acknowledged that he executed the same.




David C. Johnson

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THE ADVOCATE

1730 South Amphlett, Ste. 225 • San Mateo, California 94402 • Telephone (415) 573-7100

15 February 1978

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"The businessman has done more to build America than all the politicians and bureaucrats put together... The businessman's ethics, word and values exceed those who represent him in the bureaucracy and public office."

—California state Sen. H.L. Richardson (R-Arcadia)

Sen. Richardson's Lemonade Machine: For Principle, Politics or Personal Profit?

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by Sasha Gregory Lewis

with research assistance from George Mendenhall & Judith Schwarz

"On July 2, 1976," wrote Virginia C. McNulty to state Sen. H.L. Richardson, "my aunt—88 years old—was brutally raped and killed. The man who did it was on parole (seven days out of prison) having been convicted of [a] previous similar offense.

"On behalf of my aunt, Grace Ellen Parent of Claremont, California, I urge that you support legislation to restore the death penalty. You have my permission to use any details of this murder if it will help...

"P.S. I have sent a contribution to the Law and Order Campaign Committee..."

Richardson, founder of the Law and Order Campaign Committee (LOCC), did indeed use the details of the "murder" described by McNulty. Within days after California's governor had vetoed the state legislature's 1977 death penalty bill, McNulty's letter was in the mail to tens of thousands of Californians along with a gripping fund-raising appeal for LOCC's "Campaign to Defeat the Veto and Restore the Death Penalty."

Elaborating on McNulty's letter, Richardson wrote to potential contributors, "I just received a heartbreaking letter from a woman in Pasadena. Her 88-year-old aunt was raped and murdered by a vicious killer... Here's the tragic background story on this terrible murder. In 1970 this man raped and savagely beat a 67-year-old woman. During his trial, he openly said in court that he wouldn't leave his next victim alive. Six years later, he was back on the street... Her letter sums up, better than I ever could, why we must get a fair and just death-penalty law passed immediately. And why I'm counting so heavily on your financial support."

Gubernatorial hopeful Edward Davis, then still chief of the Los Angeles Police, also endorsed the LOCC appeal. Wrote Davis, honorary LOCC chairman, "I believe in what LOCC is doing. And I think it deserves your financial support. I have already sent my personal contribution to help. I sincerely hope you will... do the same today."

McAnulty, Davis and tens of thousands of other Californians who sent money to LOCC might have chosen a different way of fighting for death penalty legislation had they known these facts:

- During 1976, less than nine cents of every dollar contributed to LOCC was spent on political activities, while nearly all of the money LOCC raised went to pay for direct-mail solicitations.

- During the first eight months of 1977, Richardson's LOCC reported that it had paid \$99,347 to a six-month-old for-profit corporation owned and controlled by the senator.

- After paying this amount, LOCC reported that it still owed the Richardson corporation \$28,847, bringing LOCC's total bill to \$128,194 for the period.

- LOCC, during the same period, reported contributions of \$446,000.

The Richardson corporation, therefore, was charging the committee almost 29 cents for every dollar sent to LOCC. This was almost three times as much as the company charged other political committees.

The Lemon Juice Story

The Richardson business receiving LOCC's cash was Computer Caging Corporation, formed in late 1976 to count and report the money raised by political committees. This reporting process has grown increasingly time-consuming as campaign finance reporting laws have become more strict. Computer Caging offers to take the reporting burden from political campaigns and committees for a fee.

Richardson, ironically, originally opposed California's campaign finance reporting reforms, but in 1977, he told a *Sacramento Bee* reporter, he saw the light. "Of course I'm taking advantage of the laws," said Richardson. "Look, I'm a great believer in this: If I'm presented with a lemon, [I'll] make lemonade out of it. And that's what I've done. I've built the biggest lemonade machine in California."

Aside from his own political action committees, Richardson, Computer Caging's sole stockholder and chairman of the board, has added other clients to his juice machine. These include the right-wing California Republican Assembly; the National Tax Limitation Committee run by his former campaign aide Lewis Uhler; Ed Davis's funding arm, the Committee to Elect a Responsible Governor, headed by Richardson's former legislative aide; and others Richardson declines to name.

The lemon juice story, however, is only one of the latest curiosities in the tangled multi-million dollar tale of Richardson's political committee activities. It is a tale that could take investigators and auditors months to unscramble, even with help from a man who may turn out to be Richardson's nemesis. Thomas E. Hall, who began working as the controller for two of Richardson's biggest political committees in 1976, was fired after he tried to blow

the whistle on what he thought were unethical and illegal practices. Hall makes these major charges:

- One of Richardson's state committees loaned a nearly bankrupt federal committee—also run by Richardson—more than \$150,000 during 1976, in apparent violation of federal election laws.

- The state committee making the alleged loans, Gun Owners of California (GOC), lied in at least one of its direct-mail funding appeals, telling potential contributors that it was deeply in debt and about to suspend its operations while it had thousands of dollars in its bank accounts and was, in reality, making a profit.

- The federal committee receiving the GOC money, Gun Owners of America (GOA), laundered money it was barred by law from accepting through yet a third Richardson committee, the Legislative Action Fund, a lobbying activity.

- Senator Richardson is building a private fortune in Computer Caging. Hall charges this fortune was capitalized by funds and assets from the senator's political committees.

Hall's charges are, in large measure, supported by reports on file with the Federal Elections Commission (FEC) and the California Fair Political Practices Commission (FPPC), as well as by copies of the committees' profit-and-loss statements, balance sheets and other committee documents in this reporter's possession.

GOA, a Fiscal Nightmare

Gun Owners of America, a committee set up to help elect anti-gun-control candidates to federal office, is a key to the entire Richardson committee story. Founded by Richardson in late 1975, GOA has always been on the verge of bankruptcy. It closed out 1976, according to its own profit-and-loss statement, almost a quarter of a million dollars in the hole. It was not until December 1977 that it was able to report to the FEC that it was no longer in the red, claiming cash on hand of \$80,118 and debts of only \$51,058, leaving it \$29,060 in the black. Even this figure is highly questionable. Other reports on file with the FEC indicate that GOA's real debt was in excess of \$100,000.

GOA's financial picture is similar to that of other political committees that, like it, rely on direct-mail fund-raiser Richard A. Viguerie for their survival. The question of how Viguerie affiliated committees can continue to operate while being tens of thousands of dollars in debt has perplexed journalists and investigators for more than a year. Some investigators have charged that Viguerie subsidized the near-bankrupt committees in violation of federal law. GOA, however, was apparently not subsidized by Viguerie.

Explains Tom Hall, "You paid Richard Viguerie first. On a daily basis, Richard A. Viguerie would phone and ask, 'How much money do you have in all the accounts?' Then he says, 'O.K., I want you to pay bills numbered so-and-so to Diversified Mailing, Richard A. Viguerie Co.' and all other Viguerie organizations. I would say, 'Well, I don't have that much money.' He would say, 'Well, you pay this much.'"

"And every time he made a mailing, he would tell us, 'Within a month you're going to have this amount of dollars coming in.' And sometimes he was pretty damn close."

It was Viguerie, according to Hall, who made decisions about which mailings would be sent for the two gun committees and when they would be sent, without regard for whether or not the Richardson committees could afford to pay for them at the time.

"Viguerie was running the show—'You run with me, or you don't run with anybody.' There's no one else that could handle this type of operation except Viguerie."

GOA and GOC's reports on file with the FEC and FPPC also indicate that Viguerie and his affiliated companies were paid promptly, as were most of the committee's bills.

Who, then, subsidized GOA's massive losses?

Says Hall, "This started right from the very beginning. GOA did not have funds in their bank account, and Viguerie would phone up and say, 'O.K., we're going to make a mailing, a 200,000-piece mailing. Next week we need the postage in advance.' Not only did we have to pay it in advance, we had to wire it to him."

"I said, 'Well, GOA doesn't have the money.' They would say, 'That's O.K.,' and we would get it from Gun Owners of California."

"Gun Owners of California was supporting them [GOA]... We kept on transferring funds from the GOC account to the GOA. At one time I said, 'Look, GOC has loaned GOA at this point \$140,000...'

"Richardson will keep coming back and telling the FEC and everybody that it wasn't a loan, that it was 'an advance payment of allocated administrative expenses,' but at no time was there a correlation between the transfer of funds from GOC to GOA and any allocated administrative expenses."

On the surface, this allocation seems logical because GOA paid all of the overhead costs—rent, telephone and salaries—for both itself and GOC. The FEC had given the plan its blessing, with the caveat that the amount paid by GOC to GOA should not exceed actual expenses in violation of federal laws.

Acronym Soup

CCC: Computer Caging Corporation
FEC: Federal Elections Commission
FPPC: California Fair Political Practices Commission
GOA: Gun Owners of America
GOC: Gun Owners of California
LOCC: Law and Order Campaign Committee

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FEC reports show that by the end of 1976, Gun Owners of California had transferred more than \$300,000 to GOA. According to GOA's own reckoning, GOC's share of the overhead came to about \$151,000, leaving GOA with an outstanding loan from GOC of approximately \$150,000.

GOA's final report to the FEC for 1976 noted that the obligation totalled \$157,000. This loan, or "advance payment of allocated administrative expenses," was not, as of Nov. 30, 1977, repaid to GOC. In fact, it appears, in amended reports filed with the FEC during 1977, to have been simply forgotten.

Another committee being subsidized by California gun owners, and perhaps by the federal gun committee as well, was the Law and Order Campaign Committee (LOCC). It received \$20,804 from GOC during 1976. Additionally, it reported receiving in-kind contributions of services from GOC totalling \$1,080. LOCC, however, did not report any "allocated administrative expenses" charged by Gun Owners of America, the only Richardson operation with the capability of counting and reporting its contributions. Had GOA charged LOCC for these services at the same rate it charged GOC, approximately 11.6 cents per dollar contributed, LOCC's share of GOA's administrative expenses would have been about \$19,000. Since LOCC was also in bad financial shape, closing out 1976 with unpaid bills totalling about \$43,000, the GOA charge would have to have been reported as either a loan or a contribution. In either case, GOA, as a federal committee, is barred by law from giving or loaning that much money to another committee. (During 1977, LOCC's financial picture apparently took a turn for the better.)

An Urgent Plea for Funds

Richardson, or perhaps Viguere, apparently recognized the sorry state of GOA's financial affairs late in 1976, when both GOC and GOA sent letters to contributors saying they would have to shut down operations unless they received a total of \$157,000 (the same amount GOA reported it owed GOC) by Feb. 14, 1977. These letters, one from GOA and one from GOC, seriously misconstrued the committees' financial pictures.

Wrote Sen. Richardson to Gun Owners of California members:

I knew that if our pro-gun candidates were to be successful, they would need money to pay for last-minute advertising, so in belief in our cause, Gun Owners of California postponed payment on its own expenses in order to provide the candidates with the money they needed. . . .

But now, this overdue debt is weighing heavily on my shoulders.

Unless I can raise \$55,000 to pay off this debt, I don't know what the future of our campaign committee will be. . . this debt could ruin GOC financially. . . .

Gun Owners of California, at the time this letter was mailed, was far from closing its doors. By far the more profitable of the two gun committees—it reported net income for the year of \$279,419.72 on its profit-and-loss statement—

Gun Owners of California finished out 1976 with a net account balance of nearly \$62,000. Its debts at the time totalled \$61,804.90. Meanwhile, GOA owed it about \$150,000.

Wrote Richardson to Gun Owners of America members:

I knew that money to pay for last-minute advertising was critical to the success of our pro-gun candidates, so in belief of our cause, Gun Owners of America borrowed \$122,000 in order to provide the candidates with the money they needed. . . .

But now, this loan is weighing heavily on my shoulders.

Unless I can raise . . . \$122,000 to pay off this loan, I don't know what the Campaign Committee can do . . . and this debt could ruin GOA financially. . . .

The money situation is absolutely desperate. . . I will be forced to shut down Gun Owners of America unless I receive funds to pay this heavy debt.

This is perhaps the only time that Richardson has admitted that Gun Owners of America had received a loan in such a high amount and in probable violation of federal law.

Laundering or Lobbying?

Gun Owners of California was not the only Richardson committee putting money into GOA's coffers. Money also came from the gun owners-affiliated Legislative Action Fund, which supported a lobbyist in Washington (D.C.). Again, the money was transferred to GOA in the guise of payments for "administrative expenses," but this, according to Hall and gun committee financial statements, is only half the story.

Says Hall, "When contributions [to GOA] were unidentified, if they were corporate, bank, financial or whatever, they were not acceptable [according to Federal law]. They [GOA] would write back and ask them to fill out the forms [to identify the contributor]. If they didn't send it back then we would return their contributions."

"I wrote out about 150 checks [to return] a total of about maybe \$1,300, and then they said, 'Well, wait a minute. Why should we return the money? We'll start a legislative action fund, so any questionable money, we'll put it here.'"

"And then, to get the money back out to GOA, GOA charged the Legislative Action Fund [LAF] administrative expenses."

The process was facilitated by setting up, under GOA, the Gun Owners of America Legislative Action Fund holding account. Money that the federal committee could not itself legally accept was deposited to the holding account. The holding account then wrote checks to LAF. LAF, in turn, wrote checks to GOA for so-called administrative expenses. Again, as with GOC, the amounts paid by the legislative fund for these expenses were vastly out of proportion to what the expenses really were.

LAF's profit-and-loss statement, which is not a part of public record, shows that it received a total of \$108,655.57 during 1976. Its own fund-raising expenses were only \$661.08. (LAF, according to Hall, never did funding solicitations such as those done by the gun committees. Neither did the gun committees, according to

Hall, solicit money on behalf of LAF. The \$600 "fund-raising expenses" went to pay for a small mailing urging the California governor to "intervene" on behalf of anti-gun control activities.) LAF, meanwhile, paid out \$27,974.07 for its lobbyist, rent, postage and other overhead expenses. It also paid out, during 1976, \$38,531.53 to GOA for "allocated administrative expenses."

These payments to GOA represented 35 cents of every dollar income to LAF, a much more substantial rate per dollar than even GOC was charged. For what was LAF paying 35 cents on the dollar? Apparently it paid only for the process of counting and depositing the "unidentified" and "unacceptable" contributions GOA was receiving. For every dollar LAF spent on lobbying, it paid \$1.38 to GOA.

Tom Hall explains the relationship: "In other words they were saying, 'It's tainted [unidentifiable money sent to the committees] so it would go over to the LAF holding account in GOA.' It would sit there and lie dormant for a while. Then we would transfer funds from the holding account to pay the lobbyist's wages, travel expenses and whatever; then LAF would pay GOA administrative expenses. So that's how they got the tainted money back into GOA."

According to an amended report for 1976 filed with the FEC, the LAF transfers were \$20,287.64 in excess of its actual share of GOA administrative expenses. The committee's private records, however, show the real excess paid by LAF to be \$25,813.36.

Making Lemonade for Profit: Computer Caging

GOA's financial plight was apparently about to catch up with it in early 1977. Says Hall, "When Richardson learned how poor GOA was, he came in and said, 'Next week we're closing down the doors. It'll be you, Tom, me and Tim Macy [GOA's executive director, and we're going to incorporate,' he says, 'because I still want to keep my house.'"

The plan, according to Hall, was to incorporate GOA and then declare it bankrupt.

This plan was never carried out. However, early in 1977, Hall recalls, GOA staff members "were all brought into this big room and they were given a form letter resigning. They said, 'We'd like to have you sign this form releasing you of being under the GOA payroll.' [The form showed] that people have agreed to be released from Gun Owners of America and join Computer Caging Corporation."

Then, says Hall, the employees returned to their desks and continued work, with nothing changed except the name of their employer.

Also transferring hands, according to Hall, were GOA's assets: "tables, chairs, all of the calculators, all the office machines . . . the computer programs, the mailing lists. . . They [Computer Caging] didn't pay for anything. They didn't have any money."

"It's just like my favorite aunt giving me a million dollars. I start a corporation and once it gets going then I have the money to pay her back."

Computer Caging's aunt in this case, according to Hall, was Gun Owners of America. GOA, howev-

er, according to its FEC reports, paid.

The nephew in the relationship was Computer Caging, which incorporated as a for-profit California business on Dec. 20, 1976. Directors were: Sen. Richardson, the senator's father and the senator's former administrative aide.

Named as president of Computer Caging Corporation (CCC) on a Feb. 18 filing was Dan Loeffler, the head of yet another Richardson-founded committee, the California Christian Campaign Committee, and treasurer of LOCC. Loeffler remained the Christian Campaign Committee head until Aug. 16, 1977, according to its reports with the FPPC.

Secretary-treasurer of Computer Caging was Barbara A. Richardson, the senator's wife.

Appearing on the Wells Fargo Bank "resolution authorizing signing and endorsing checks and other instruments" for the corporation were three additional names: H.L. Richardson, chairman of the board; Tom Hall, accountant; and assistant secretary-treasurer Tim Macy, a long-time friend of the Richardson family and a former field representative for the Senator's office. (Macy remained head of Gun Owners of America until the end of the month.)

Richardson, who admits that CCC is his operation, is reportedly its sole stockholder.

Making Something from Nothing

It is a rare business that can start without capital investment, but according to Richardson, that is what CCC did, with the exception of one \$1,000 loan, which Richardson claims CCC still owes to him. Where, for example, did CCC get the furniture it needed for its 20 or more employees? Where did it get the computer programs that kept track of various committees' contributions and their own accounting procedures? How did it attract experienced employees to run the operation? What start-up money did it use to cover overhead while it began operations?

All of this, according to Hall (whose charges are supported by reports on file with the FEC and FPPC) came from the various Richardson political committees. Clients were easy to get: all of the Richardson committees—GOA, GOC, California Christians and LOCC—became Computer Caging clients. Assets, apparently, came from GOA. Start-up money also came from the Richardson committees in the form of advance payments for the corporation's services.

GOA reports on file with the FEC show that all of its employees, with the exception of Macy, were removed from the GOA payroll as of Jan. 31, 1977. These, according to Hall, continued working for the new Richardson business, as did Hall.

GOA's FEC reports also show that in excess of \$28,000 of tangible assets were apparently transferred from GOA to Computer Caging. These assets, initially recorded as purchases by GOA, include:

- mailing equipment: \$10,498.31
- office furniture: \$3,058.38
- microfilm and camera equipment: \$5,063.32
- adding machines and calculators: \$1,002.84
- miscellaneous office equipment: \$470.71

GOA's FEC reports do not show that these tangible assets were either scrapped, leased, rented or sold to anyone, nor even stored, a fact that lends support to the contention that Richardson's Computer Caging received them without paying for them.

The value of GOA's computer programs, which are now apparently being used by CCC, are more difficult to determine. There are basically two programs involved: the program that keeps track of contributors, and an accounting program designed under Tom Hall's direction.

GOA, during 1976, reported spending \$27,479 for "computer processing." This, according to Hall, included not only the actual time to run programs for GOA and the other committees, but for programming and program debugging as well. The actual cost, then, for the GOA programs now being used by Richardson's business is buried in private GOA records.

GOA did, however, report a payment from Computer Caging of \$8,017.50 for "purchase of programming" in November 1977—10 months after CCC took over the GOA operations.

Assuming, then, that GOA's report represented the true cost of its computer programs, the tangible assets assumed by the Richardson business in February 1977 appear to total about \$28,120.06.

In addition to these tangible assets, Computer Caging also had the benefit of some less-tangible assets originally paid for by the political committee: the training and expertise of the GOA employees.

According to Tom Hall, this included not only Richardson's own expertise at running politically related fund-raising activities, but the training of GOA's employees who recorded contributions onto data entry machines leased from Sperry Univac (and now apparently leased by Computer Caging). These machines, known in the data processing trade as "key to tape" entry machines, are similar to typewriters but have several extra mechanisms to control the entry process. Assuming, then, that all of the GOA employees knew how to type when they began training on the machines in June 1976, approximately one week—minimum—of their time must have been spent learning the new data entry process. GOA's FEC reports indicate that one week of these employees' time costs about \$3,000, bringing the tangible assets absorbed by the Richardson corporation to more than \$30,000.

Computer Caging also got at least one intangible asset from GOA: a track record. Because Sen. Richardson could show prospective clients that Computer Caging was able to do the job—based on the experience it took from GOA—it gained a sales asset. No value can be placed on this.

Additionally, Tom Hall charges that the Richardson business also got the political committees' mailing lists, reportedly totalling more than half a million names. In the direct-mail industry, "good names"—that is, names of people who have already contributed money—can cost from \$10 to \$25 per name. If the Richardson business indeed has ownership or control of these lists, their probable value is in excess of \$5,000,000.

Little in public record supports the contention that Computer Caging now owns the Richardson

committee lists. In fact, other committees' experiences indicate the lists are probably jointly owned by the committees and Richard A. Viguiera—all, that is, with the exception of Richardson's own list, the law and order committee list and names from the California gun owners committee. These lists total almost 250,000 names. If Computer Caging is indeed offering them for sale or rent, as Tom Hall says, then the corporation has absorbed an asset worth approximately two and a half million dollars.

The true value of the assets absorbed by Richardson's business cannot be determined without a complete audit of records that are privately held by the committees and by the Richardson corporation. They probably range in value from a minimum of \$30,000 to a high in excess of \$2 million.

Comments Hall about the gift that "aunt" Gun Owners of America gave to nephew H.L. Richardson's Computer Caging. "I don't know what it was worth. It could have been in the millions."

Fringe Benefits from Lemon Juice

A personal nest egg is not the only potential reward for Senator H.L. Richardson through the Computer Caging operation. Because private corporations are not required to make public reports, financial transactions of the various Richardson committees that were previously reported to the public through the FEC and FPPC are no longer a matter of public record. Salaries, for example, previously paid and reported by GOA are now part of the lump-sum figure that goes to Computer Caging.

In addition, since Computer Caging took over most of GOA's activities, the national gun committee appears to have turned profitable. Because most records are no longer in the public domain, it is nearly impossible to determine whether or not this revised picture of GOA's fiscal state—from near bankruptcy to profit-making—is accurate, or whether the committee is still being subsidized. The transfers from the California gun committee have stopped, FEC reports show. Indeed, according to federal reports, Computer Caging has actually saved GOA some money.

During 1976, GOA's approximate actual share of administrative expenses—now largely handled by the Richardson corporation—amounted to about 11 cents on every dollar contributed to it. Through November of 1977, however, Computer Caging charged GOA only about nine cents on every dollar, a possible saving to GOA of about \$15,922 during 1977.

At this rate, GOA would appear to have enough money finally to begin paying off some of its still-outstanding debt to GOC.

Did GOA's fiscal picture suddenly change for the better? Or is GOA still being subsidized?

The answers to these questions are no longer available on public record. However, the record of Richardson's Law and Order Campaign Committee suggests a possible answer. LOCC was, during 1977, paying Computer Caging about 30 cents for every dollar it received—three times more than GOA pays. It is reasonable to speculate that LOCC, perhaps the Legislative Action Fund and other committees as well, are now subsidizing Computer Caging Cor-

poration, which may be subsidizing GOA of America.

Unfortunately, the validity or invalidity of this scenario cannot be known except to the investigators and auditors of public agencies. Agencies under whose jurisdiction the Richardson operations may fall include: the Federal Elections Commission; the California Fair Political Practices Commission; the U.S. Attorney's office; officials responsible for prosecuting violations of postal regulations; and, perhaps, local government prosecutors.

And Yet Further Charges

The Richardson committee also appears to have made some smaller mistakes along the way. For example, the LOCC mailing featuring Virginia McNulty's letter did not include, as California law requires, a statement of who printed it. In 1975, GOC gave use of its 175,000-name mailing list to GOA. It was reported as an in-kind contribution to GOA of only \$165. At the industry's going rate for list rental, \$40 per 1,000 names, the true value of the GOC list would have been \$6,835 more than GOA reported.

Tom Hall makes additional charges against the Richardson operations. Says former gun committee controller Hall:

• GOA and GOC reports filed with the FEC and FPPC are so full of errors as to be completely meaningless. "We used to be a month or two months behind in counting the money coming in," recalls Hall. "They had a vault stacked high with mail, and they didn't want to hire people [to open it expeditiously]. So while we made our reports, we were always about two months behind in reporting contributions." GOA's FEC filings tend to substantiate this charge: amendment followed amendment, which followed amendment.

• Incorporation papers for Computer Caging were drawn up by a GOA employee on GOA time. We have been unable to locate the person who allegedly drafted the papers to confirm this charge.

• GOA received in-kind contributions from its landlord that it did not report. These contributions, says Hall, came in the form of reduced rent, reduced prices for office furniture and subsidies for the committee's electricity and heating bills. Again, this is a charge that can only be supported, not documented. GOA paid rent at a constant \$1,400, which included utilities. This amount did not vary even when the number of employees jumped from 24 to nearly 40. Nor did it change when GOA brought in new equipment. When GOA's landlord changed, rent was

increased by \$500 per month. GOA's first landlord sold the committee office furniture for \$1,087. To date, we have only Hall's statement that this figure was substantially less than the true value of the furniture.

• GOA meanwhile provided in-kind services to political candidates that were not reported according to Hall. These services, says Hall, were provided by a GOA-paid consultant, Ron Biron, directly to political candidates. Again, this charge is difficult to substantiate.

• Travel advances, according to Hall, were abused by Richardson and others. The money to pay for the actual incorporation of Computer Caging, according to Hall, was written off as a travel advance. Richardson, says Hall, got a travel advance for a new administrative aide who, on going on Richardson's official state payroll, learned his first check would not be coming for a month. The so-called "travel advance" carried the employee over until his first check arrived, according to Hall. Additionally, says Hall, Richardson himself did not file expense reports to justify many of his alleged travel advances. Again, only an examination of private records could substantiate these charges. FEC filings show only that a few advances were made in whole dollars, amounts such as \$40 and \$150. It is an extremely unusual trip that ends up costing such even sums. The unused portion of these advances, if there were any, were not reported as returned on either GOC's or GOA's reports.

• Hall also speculates that Richardson is using the prestige of his senate seat to get new clients for his CCC. The only difficulty with this theory is that Sen. Richardson is reportedly rated poorly by most of his colleagues. He has, however, built up a reputation through Gun Owners of America as an up-and-coming neo-right political power.

• And finally, Hall charges that Richardson is building an investment in his own fiscal future to cash in when he leaves office. This, of course, remains to be seen.

—SGL

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FEDERAL ELECTION COMMISSION

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

February 28, 1978

Mr. David B. Goodstein
Publisher
The Advocate
1730 South Amphlett, Ste. 225
San Mateo, California 94402

Dear Mr. Goodstein:

This is to acknowledge receipt of your complaint of February 15, 1978, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

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THE ADVOCATE

MUR 538
FEDERAL ELECTIONS COMMISSION

1730 South Amphlett, Ste. 225 • San Mateo, California 94402 • Telephone (415) 833-7100
FEB 22 AM 11:27

15 February 1978

Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 30463

MCC 2776

Attention: Director of Enforcement

Dear sir:

Certain facts have come to our attention regarding a political action committee under FEC jurisdiction which might constitute violations of federal laws.

Briefly, these apparent violations focus on Gun Owners of America (GOA), a federal committee based in California; Gun Owners of California (GOC), a state campaign committee; Legislative Action Fund, a lobbyist fund; and California State Senator H. L. Richardson, the chairman of GOA and GOC.

In early 1977,

1) Gun Owners of America appears to have given many of its assets -- an estimated total of approximately \$28,000 -- to a California corporation, Computer Caging Corporation. H. L. Richardson is the sole shareholder in Computer Caging, as well as the chairman of GOA and GOC. This apparent expenditure was not reported as an expenditure on GOA's reports in possible violation of 11 C.F.R. Sections 100.7, 102.9, 104.2 and 104.6.

2) Additionally, if Gun Owners of America sold the assets to Computer Caging Corporation, there is no report of receipts of such sale in GOA's FEC reports as far as we are able to determine. Had such a sale been transacted, we believe that the receipt of money from the sale should have been listed as a contribution under the "Wallace Watch" decision. Such a contribution would appear to be an illegal corporate contribution.

In its report for November 1977, GOA reports receiving \$8,017.50 for "purchase of programming" from Computer Caging. Selling such a program is much like selling a good, and appears to be an illegal corporate contribution to GOA.

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3) Gun Owners of America reported it received from Gun Owners of California, a state political action committee, approximately \$300,000. GOA reported these receipts as GOC's share of administrative expenses for services supplied by GOA. Our information suggests, however, that the amount GOA received from the state committee was approximately \$157,000 in excess of its actual administrative expenses. This transfer of funds from the state committee to the federal committee is, we believe, violative of, inter alia, 11 C.F.R. Section 102.6.

4) Additionally, Gun Owners of America received from a lobbying arm, the Legislative Action Fund, monies which were reported as the fund's share of administrative expenses paid to GOA. The amounts paid by the fund to GOA, we believe, were in excess of the Legislative Action Fund's true burden of administrative expenses. This may constitute an illegal contribution to GOA in violation of 11 C.F.R. Section 106 and other as yet unascertained sections.

5) Tom Hall, the controller for Gun Owners of America during 1976, has asserted to this publication that the federal committee received contributions it may have been legally barred from accepting by funneling such contributions into one of its bank accounts -- the Gun Owners of America Legislative Action Fund holding account. The monies from the holding account were subsequently transferred in part to GOA, in apparent violation of as yet unascertained regulations concerning the source of acceptable contributions.

6) Gun Owners of America has solicited funds from the public calling for political contributions, and then has apparently transferred part of those funds in the form of assets to Computer Caging for the personal profit of H. L. Richardson. We believe such transference might be fraudulent and in violation of 11 C.F.R. Section 113.2 controlling the use of campaign funds.

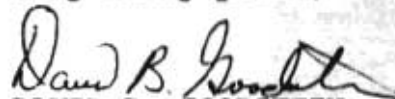
The details of these allegations and the facts of which we have become aware are found in the attached article

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Federal Elections Commission
15 February 1978
Page -3-

with which we are going to press on February 17. We are enclosing copies of the documents we have in our possession which support the statements made in the article.

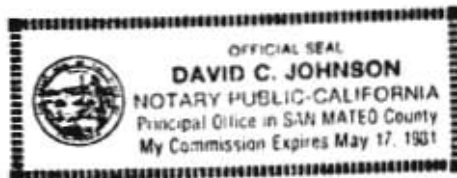
Very truly yours,


DAVID B. GOODSTEIN
Publisher

DBG:rt
Enclosures

STATE OF CALIFORNIA
COUNTY OF SAN MATEO

On February 15, 1978, before the undersigned, a Notary Public for the State of California, personally appeared David B. Goodstein, known to me to be the person whose name is subscribed to above, and acknowledged that he executed the same.




David C. Johnson

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THE ADVOCATE

1730 South Amphlett, Ste. 225 • San Mateo, California 94402 • Telephone (415) 573-7100

15 February 1978

Index of Documents Appended:

1. Article, "Sen. H. L. Richardson's Lemonade Machine,"
by Sasha Gregory-Lewis.
2. LOCC (Relative to Law and Order Campaign Committee)
 - A. 1977 mailing
 - B. 1976 in-house financial statements
 - C. 1977 payments and charges to/from Computer Caging
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 - A. ADVOCATE analysis of committees' administrative expenses
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"The businessman has done more to build America than all the politicians and bureaucrats put together... The businessman's ethics, word and values exceed those who represent him in the bureaucracy and public office."
—California state Sen. H.L. Richardson (R-Arcadia)

Sen. Richardson's Lemonade Machine: For Principle, Politics or Personal Profit?

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by Sasha Gregory Lewis

with research assistance from
George Mendenhall & Judith Schwarz

"On July 2, 1976," wrote Virginia C. McAnulty to state Sen. H.L. Richardson, "my aunt—88 years old—was brutally raped and killed. The man who did it was on parole (seven days out of prison) having been convicted of [a] previous similar offense.

"On behalf of my aunt, Grace Ellen Parent of Claremont, California, I urge that you support legislation to restore the death penalty. You have my permission to use any details of this murder if it will help...

"P.S. I have sent a contribution to the Law and Order Campaign Committee..."

Richardson, founder of the Law and Order Campaign Committee (LOCC), did indeed use the details of the "murder" described by McAnulty. Within days after California's governor had vetoed the state legislature's 1977 death penalty bill, McAnulty's letter was in the mail to tens of thousands of Californians along with a gripping fund-raising appeal for LOCC's "Campaign to Defeat the Veto and Restore the Death Penalty."

Elaborating on McAnulty's letter, Richardson wrote to potential contributors, "I just received a heartbreaking letter from a woman in Pasadena. Her 88-year-old aunt was raped and murdered by a vicious killer... Here's the tragic background story on this terrible murder. In 1970 this man raped and savagely beat a 67-year-old woman. During his trial, he openly said in court that he wouldn't leave his next victim alive. Six years later, he was back on the street... Her letter sums up, better than I ever could, why we must get a fair and just death-penalty law passed immediately. And why I'm counting so heavily on your financial support."

Gubernatorial hopeful Edward Davis, then still chief of the Los Angeles Police, also endorsed the LOCC appeal. Wrote Davis, honorary LOCC chairman, "I believe in what LOCC is doing. And I think it deserves your financial support. I have already sent my personal contribution to help. I sincerely hope you will... do the same today."

McAnulty, Davis and tens of thousands of other Californians who sent money to LOCC might have chosen a different way of fighting for death penalty legislation had they known these facts:

- During 1976, less than nine cents of every dollar contributed to LOCC was spent on political activities, while nearly all of the money LOCC raised went to pay for direct-mail solicitations.

- During the first eight months of 1977, Richardson's LOCC reported that it had paid \$99,347 to a six-month-old for-profit corporation owned and controlled by the senator.

- After paying this amount, LOCC reported that it still owed the Richardson corporation \$28,847, bringing LOCC's total bill to \$128,194 for the period.

- LOCC, during the same period, reported contributions of \$446,160.61.

The Richardson corporation, therefore, was charging the committee almost 29 cents for every dollar sent to LOCC. This was almost three times as much as the company charged other political committees.

The Lemon Juice Story

The Richardson business receiving LOCC's cash was Computer Caging Corporation, formed in late 1976 to count and report the money raised by political committees. This reporting process has grown increasingly time-consuming as campaign finance reporting laws have become more strict. Computer Caging offers to take the reporting burden from political campaigns and committees for a fee.

Richardson, ironically, originally opposed California's campaign finance reporting reforms, but in 1977, he told a *Sacramento Bee* reporter, he saw the light. "Of course I'm taking advantage of the laws," said Richardson. "Look, I'm a great believer in this: If I'm presented with a lemon, [I'll] make lemonade out of it. And that's what I've done. I've built the biggest lemonade machine in California."

Aside from his own political action committees, Richardson, Computer Caging's sole stockholder and chairman of the board, has added other clients to his juice machine. These include the right-wing California Republican Assembly; the National Tax Limitation Committee run by his former campaign aide Lewis Uthler; Ed Davis's fledgling arm, the Committee to Elect a Responsible Governor, headed by Richardson's former legislative aide; and others Richardson declines to name.

The lemon juice story, however, is only one of the latest curiosities in the tangled multi-million dollar tale of Richardson's political committee activities. It is a tale that could take investigators and auditors months to unscramble, even with help from a man who may turn out to be Richardson's nemesis, Thomas E. Hall, who began working as the controller for two of Richardson's biggest political committees in 1976, was fired after he tried to blow

the whistle on what he thought were unethical and illegal practices. Hall makes these major charges:

- One of Richardson's state committees loaned a nearly bankrupt federal committee—also run by Richardson—more than \$150,000 during 1976, in apparent violation of federal election laws.

- The state committee making the alleged loans, Gun Owners of California (GOC), lied in at least one of its direct-mail funding appeals, telling potential contributors that it was deeply in debt and about to suspend its operations while it had thousands of dollars in its bank accounts and was, in reality, making a profit.

- The federal committee receiving the GOC money, Gun Owners of America (GOA), laundered money it was barred by law from accepting through yet a third Richardson committee, the Legislative Action Fund, a lobbying activity.

- Senator Richardson is building a private fortune in Computer Caging. Hall charges this fortune was capitalized by funds and assets from the senator's political committees.

Hall's charges are, in large measure, supported by reports on file with the Federal Elections Commission (FEC) and the California Fair Political Practices Commission (FPPC), as well as by copies of the committees' profit-and-loss statements, balance sheets and other committee documents in this reporter's possession.

GOA, a Fiscal Nightmare

Gun Owners of America, a committee set up to help elect anti-gun-control candidates to federal office, is a key to the entire Richardson committee story. Founded by Richardson in late 1975, GOA has always been on the verge of bankruptcy. It closed out 1976, according to its own profit-and-loss statement, almost a quarter of a million dollars in the hole. It was not until December 1977 that it was able to report to the FEC that it was no longer in the red, claiming cash on hand of \$80,118 and debts of only \$51,058, leaving it \$29,060 in the black. Even this figure is highly questionable. Other reports on file with the FEC indicate that GOA's real debt was in excess of \$100,000.

GOA's financial picture is similar to that of other political committees that, like it, rely on direct-mail fund-raiser Richard A. Viguerie for their survival. The question of how Viguerie-affiliated committees can continue to operate while being tens of thousands of dollars in debt has perplexed journalists and investigators for more than a year. Some investigators have charged that Viguerie subsidized the near-bankrupt committees in violation of federal law. GOA, however, was apparently not subsidized by Viguerie.

Explains Tom Hall, "You paid Richard Viguerie first. On a daily basis, Richard A. Viguerie would phone and ask, 'How much money do you have in all the accounts?' Then he says, 'O.K., I want you to pay bills numbered so-and-so to Diversified Mailing, Richard A. Viguerie Co.' and all other Viguerie organizations. I would say, 'Well, I don't have that much money.' He would say, 'Well, you pay this much.'"

"And every time he made a mailing, he would tell us, 'Within a month you're going to have this amount of dollars coming in.' And sometimes he was pretty damn close."

It was Viguerie, according to Hall, who made decisions about which mailings would be sent for the two gun committees and when they would be sent, without regard for whether or not the Richardson committees could afford to pay for them at the time.

"Viguerie was running the show—'You run with me, or you don't run with anybody.' There's no one else that could handle this type of operation except Viguerie."

GOA and GOC's reports on file with the FEC and FPPC also indicate that Viguerie and his affiliated companies were paid promptly, as were most of the committee's bills.

Who, then, subsidized GOA's massive losses?

Says Hall, "This started right from the very beginning. GOA did not have funds in their bank account, and Viguerie would phone up and say, 'O.K., we're going to make a mailing, a 200,000-piece mailing. Next week we need the postage in advance.' Not only did we have to pay it in advance, we had to wire it to him."

"I said, 'Well, GOA doesn't have the money.' They would say, 'That's O.K.,' and we would get it from Gun Owners of California."

"Gun Owners of California was supporting them [GOA]... We kept on transferring funds from the GOC account to the GOA. At one time I said, 'Look, GOC has loaned GOA at this point \$140,000...'

"Richardson will keep coming back and telling the FEC and everybody that it wasn't a loan, that it was 'an advance payment of allocated administrative expenses,' but at no time was there a correlation between the transfer of funds from GOC to GOA and any allocated administrative expenses."

On the surface, this allocation seems logical because GOA paid all of the overhead costs—rent, telephone and salaries—for both itself and GOC. The FEC had given the plan its blessing, with the caveat that the amount paid by GOC to GOA should not exceed actual expenses in violation of federal laws.

Acronym Soup

CCC: Computer Caging Corporation
FEC: Federal Elections Commission
FPPC: (California) Fair Political Practices Commission
GOA: Gun Owners of America
GOC: Gun Owners of California
LOCC: Law and Order Campaign Committee

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FEC reports show that by the end of 1976, Gun Owners of California had transferred more than \$300,000 to GOA. According to GOA's own reckoning, GOC's share of the overhead came to about \$151,000, leaving GOA with an outstanding loan from GOC of approximately \$150,000.

GOA's final report to the FEC for 1976 noted that the obligation totalled \$157,000. This loan, or "advance payment of allocated administrative expenses," was not, as of Nov. 30, 1977, repaid to GOC. In fact, it appears, in amended reports filed with the FEC during 1977, to have been simply forgotten.

Another committee being subsidized by California gun owners, and perhaps by the federal gun committee as well, was the Law and Order Campaign Committee (LOCC). It received \$20,804 from GOC during 1976. Additionally, it reported receiving in-kind contributions of services from GOC totalling \$1,080. LOCC, however, did not report any "allocated administrative expenses" charged by Gun Owners of America, the only Richardson operation with the capability of counting and reporting its contributions. Had GOA charged LOCC for these services at the same rate it charged GOC, approximately 11.6 cents per dollar contributed, LOCC's share of GOA's administrative expenses would have been about \$19,000. Since LOCC was also in bad financial shape, closing out 1976 with unpaid bills totalling about \$43,000, the GOA charge would have to have been reported as either a loan or a contribution. In either case, GOA, as a federal committee, is barred by law from giving or loaning that much money to another committee. (During 1977, LOCC's financial picture apparently took a turn for the better.)

An Urgent Plea for Funds

Richardson, or perhaps Viguere, apparently recognized the sorry state of GOA's financial affairs late in 1976, when both GOC and GOA sent letters to contributors saying they would have to shut down operations unless they received a total of \$157,000 (the same amount GOA reported it owed GOC) by Feb. 14, 1977. These letters, one from GOA and one from GOC, seriously misconstrued the committees' financial pictures.

Wrote Sen. Richardson to Gun Owners of California members:

I knew that if our pro-gun candidates were to be successful, they would need money to pay for last-minute advertising, so in belief in our cause, Gun Owners of California postponed payment on its own expenses in order to provide the candidates with the money they needed. . . .

But now, this overdue debt is weighing heavily on my shoulders.

Unless I can raise \$55,000 to pay off this debt, I don't know what the future of our campaign committee will be. . . . this debt could ruin GOC financially. . . .

Gun Owners of California, at the time this letter was mailed, was far from closing its doors. By far the more profitable of the two gun committees—it reported net income for the year of \$279,419.72 on its profit-and-loss statement—

Gun Owners of California finished out 1976 with a bank account balance of nearly \$62,000. Its debts at the time totalled \$61,804.90. Meanwhile, GOA owed it about \$150,000.

Wrote Richardson to Gun Owners of America members:

I knew that money to pay for last-minute advertising was critical to the success of our pro-gun candidates, so in belief of our cause, Gun Owners of America borrowed \$122,000 in order to provide the candidates with the money they needed. . . .

But now, this loan is weighing heavily on my shoulders.

Unless I can raise . . . \$122,000 to pay off this loan, I don't know what the Campaign Committee can do. . . . and this debt could ruin GOA financially. . . .

The money situation is absolutely desperate. . . . I will be forced to shut down Gun Owners of America unless I receive funds to pay this heavy debt.

This is perhaps the only time that Richardson has admitted that Gun Owners of America had received a loan in such a high amount and in probable violation of federal law.

Laundering or Lobbying?

Gun Owners of California was not the only Richardson committee putting money into GOA's coffers. Money also came from the gun owners-affiliated Legislative Action Fund, which supported a lobbyist in Washington (D.C.). Again, the money was transferred to GOA in the guise of payments for "administrative expenses," but this, according to Hall and gun committee financial statements, is only half the story.

Says Hall, "When contributions [to GOA] were unidentified, if they were corporate, bank, financial or whatever, they were not acceptable [according to Federal law]. They [GOA] would write back and ask them to fill out the forms [to identify the contributor]. If they didn't send it back then we would return their contributions.

"I wrote out about 150 checks [to return] a total of about maybe \$1,300, and then they said, 'Well, wait a minute. Why should we return the money? We'll start a legislative action fund, so any questionable money, we'll put it here.'"

"And then, to get the money back out to GOA, GOA charged the Legislative Action Fund [LAF] administrative expenses."

The process was facilitated by setting up, under GOA, the Gun Owners of America Legislative Action Fund holding account. Money that the federal committee could not itself legally accept was deposited to the holding account. The holding account then wrote checks to LAF. LAF, in turn, wrote checks to GOA for so-called administrative expenses. Again, as with GOC, the amounts paid by the legislative fund for these expenses were vastly out of proportion to what the expenses really were.

LAF's profit-and-loss statement, which is not a part of public record, shows that it received a total of \$108,655.57 during 1976. Its own fund-raising expenses were only \$661.08. (LAF, according to Hall, never did funding solicitations such as those done by the gun committees. Neither did the gun committees, according to

Hall, solicit money on behalf of LAF. The \$600 "fund-raising expenses" went to pay for a small mailing urging the California governor to "intervene" on behalf of anti-gun control activities.) LAF, meanwhile, paid out \$27,974.07 for its lobbyist, rent, postage and other overhead expenses. It also paid out, during 1976, \$38,531.53 to GOA for "allocated administrative expenses."

These payments to GOA represented 35 cents of every dollar income to LAF, a much more substantial rate per dollar than even GOC was charged. For what was LAF paying 35 cents on the dollar? Apparently it paid only for the process of counting and depositing the "unidentified" and "unacceptable" contributions GOA was receiving. For every dollar LAF spent on lobbying, it paid \$1.38 to GOA.

Tom Hall explains the relationship: "In other words they were saying, 'It's talented [unidentifiable money sent to the committees] so it would go over to the LAF holding account in GOA.' It would sit there and lie dormant for a while. Then we would transfer funds from the holding account to pay the lobbyist's wages, travel expenses and whatever; then LAF would pay GOA administrative expenses. So that's how they got the talented money back into GOA."

According to an amended report for 1976 filed with the FEC, the LAF transfers were \$20,287.64 in excess of its actual share of GOA administrative expenses. The committee's private records, however, show the real excess paid by LAF to be \$25,813.36.

Making Lemonade for Profit: Computer Caging

GOA's financial plight was apparently about to catch up with it in early 1977. Says Hall, "When Richardson learned how poor GOA was, he came in and said, 'Next week we're closing down the doors. It'll be you, Tom, me and Tim Macy [GOA's executive director], and we're going to incorporate,' he says, 'because I still want to keep my house.'"

The plan, according to Hall, was to incorporate GOA and then declare it bankrupt.

This plan was never carried out. However, early in 1977, Hall recalls, GOA staff members "were all brought into this big room and they were given a form letter resigning. They said, 'We'd like to have you sign this form releasing you of being under the GOA payroll.' [The form showed] that people have agreed to be released from Gun Owners of America and join Computer Caging Corporation."

Then, says Hall, the employees returned to their desks and continued work, with nothing changed except the name of their employer.

Also transferring hands, according to Hall, were GOA's assets: "tables, chairs, all of the calculators, all the office machines . . . the computer programs, the mailing lists . . . They [Computer Caging] didn't pay for anything. They didn't have any money."

"It's just like my favorite aunt giving me a million dollars. I start a corporation and once it gets going then I have the money to pay her back."

Computer Caging's aunt in this case, according to Hall, was Gun Owners of America. GOA, howev-

er, was according to its FEC reports.

The nephew in the relationship was Computer Caging, which incorporated as a for-profit California business on Dec. 20, 1976. Directors were: Sen. Richardson, the senator's father and the senator's former administrative aide.

Named as president of Computer Caging Corporation (CCC) on a Feb. 18 filing was Dan Loeffler, the head of yet another Richardson-founded committee, the California Christian Campaign Committee, and treasurer of LOCC. Loeffler remained the Christian Campaign Committee head until Aug. 16, 1977, according to its reports with the FPPC.

Secretary-treasurer of Computer Caging was Barbara A. Richardson, the senator's wife.

Appearing on the Wells Fargo Bank "resolution authorizing signing and endorsing checks and other instruments" for the corporation were three additional names: H.L. Richardson, chairman of the board; Tom Hall, accountant; and assistant secretary-treasurer Tim Macy, a long-time friend of the Richardson family and a former field representative for the Senator's office. (Macy remained head of Gun Owners of America until the end of the month.)

Richardson, who admits that CCC is his operation, is reportedly its sole stockholder.

Making Something from Nothing

It is a rare business that can start without capital investment, but according to Richardson, that is what CCC did, with the exception of one \$1,000 loan, which Richardson claims CCC still owes to him. Where, for example, did CCC get the furniture it needed for its 20 or more employees? Where did it get the computer programs that kept track of various committees' contributions and their own accounting procedures? How did it attract experienced employees to run the operation? What start-up money did it use to cover overhead while it began operations?

All of this, according to Hall (whose charges are supported by reports on file with the FEC and FPPC) came from the various Richardson political committees. Clients were easy to get: all of the Richardson committees—GOA, GOC, California Christians and LOCC—became Computer Caging clients. Assets, apparently, came from GOA. Start-up money also came from the Richardson committees in the form of advance payments for the corporation's services.

GOA reports on file with the FEC show that all of its employees, with the exception of Macy, were removed from the GOA payroll as of Jan. 31, 1977. These, according to Hall, continued working for the new Richardson business, as did Hall.

GOA's FEC reports also show that in excess of \$28,000 of tangible assets were apparently transferred from GOA to Computer Caging. These assets, initially recorded as purchases by GOA, include:

- mailing equipment: \$10,498.31
- office furniture: \$3,058.38
- microfilm and camera equipment: \$5,063.32
- adding machines and calculators: \$1,002.84
- miscellaneous office equipment: \$479.71

GOA's FEC reports do not show that these tangible assets were either scrapped, leased, rented or sold to anyone, nor even stored, a fact that lends support to the contention that Richardson's Computer Caging received them without paying for them.

The value of GOA's computer programs, which are now apparently being used by CCC, are more difficult to determine. There are basically two programs involved: the program that keeps track of contributors, and an accounting program designed under Tom Hall's direction.

GOA, during 1976, reported spending \$27,479 for "computer processing." This, according to Hall, included not only the actual time to run programs for GOA and the other committees, but for programming and program debugging as well. The actual cost, then, for the GOA programs now being used by Richardson's business is buried in private GOA records.

GOA did, however, report a payment from Computer Caging of \$8,017.50 for "purchase of programming" in November 1977—10 months after CCC took over the GOA operations.

Assuming, then, that GOA's report represented the true cost of its computer programs, the tangible assets assumed by the Richardson business in February 1977 appear to total about \$28,120.06.

In addition to these tangible assets, Computer Caging also had the benefit of some less-tangible assets originally paid for by the political committee: the training and expertise of the GOA employees.

According to Tom Hall, this included not only Richardson's own expertise at running politically related fund-raising activities, but the training of GOA's employees who recorded contributions onto data entry machines leased from Sperry Univac (and now apparently leased by Computer Caging). These machines, known in the data processing trade as "key to tape" entry machines, are similar to typewriters but have several extra mechanisms to control the entry process. Assuming, then, that all of the GOA employees knew how to type when they began training on the machines in June 1976, approximately one week—minimum—of their time must have been spent learning the new data entry process. GOA's FEC reports indicate that one week of these employees' time costs about \$3,000, bringing the tangible assets absorbed by the Richardson corporation to more than \$30,000.

Computer Caging also got at least one intangible asset from GOA: a track record. Because Sen. Richardson could show prospective clients that Computer Caging was able to do the job—based on the experience it took from GOA—it gained a sales asset. No value can be placed on this.

Additionally, Tom Hall charges that the Richardson business also got the political committees' mailing lists, reportedly totalling more than half a million names. In the direct-mail industry, "good names"—that is, names of people who have already contributed money—can cost from \$10 to \$25 per name. If the Richardson business indeed has ownership or control of these lists, their probable value is in excess of \$5,000,000.

Little in public record supports the contention that Computer Caging now owns the Richardson

committee lists. In fact, other committees' experiences indicate the lists are probably jointly owned by the committees and Richard A. Vigorito—all, that is, with the exception of Richardson's own list, the law and order committee list and names from the California gun owners committee. These lists total almost 250,000 names. If Computer Caging is indeed offering them for sale or rent, as Tom Hall says, then the corporation has absorbed an asset worth approximately two and a half million dollars.

The true value of the assets absorbed by Richardson's business cannot be determined without a complete audit of records that are privately held by the committees and by the Richardson corporation. They probably range in value from a minimum of \$30,000 to a high in excess of \$2 million.

Comments Hall about the gift that "sunt" Gun Owners of America gave to nephew H.L. Richardson's Computer Caging, "I don't know what it was worth. It could have been in the millions."

Fringe Benefits from Lemon Juice

A personal nest egg is not the only potential reward for Senator H.L. Richardson through the Computer Caging operation. Because private corporations are not required to make public reports, financial transactions of the various Richardson committees that were previously reported to the public through the FEC and FPPC are no longer a matter of public record. Salaries, for example, previously paid and reported by GOA are now part of the lump-sum figure that goes to Computer Caging.

In addition, since Computer Caging took over most of GOA's activities, the national gun committee appears to have turned profitable. Because most records are no longer in the public domain, it is nearly impossible to determine whether or not this revised picture of GOA's fiscal state—from near bankruptcy to profit-making—is accurate, or whether the committee is still being subsidized. The transfers from the California gun committee have stopped, FEC reports show. Indeed, according to federal reports, Computer Caging has actually saved GOA some money.

During 1976, GOA's approximate actual share of administrative expenses—now largely handled by the Richardson corporation—amounted to about 11 cents on every dollar contributed to it. Through November of 1977, however, Computer Caging charged GOA only about nine cents on every dollar, a possible saving to GOA of about \$15,922 during 1977.

At this rate, GOA would appear to have enough money finally to begin paying off some of its still-outstanding debt to GOC.

Did GOA's fiscal picture suddenly change for the better? Or is GOA still being subsidized?

The answers to these questions are no longer available on public record. However, the record of Richardson's Law and Order Campaign Committee suggests a possible answer. LOCC was, during 1977, paying Computer Caging about 30 cents for every dollar it received—three times more than GOA pays. It is reasonable to speculate that LOCC, perhaps the Legislative Action Fund and other committees as well, are now subsidizing Computer Caging Cor-

poration, which in turn may be subsidizing Gun Owners of America.

Unfortunately, the validity or invalidity of this scenario cannot be known except to the investigators and auditors of public agencies. Agencies under whose jurisdiction the Richardson operations may fall include: the Federal Elections Commission; the California Fair Political Practices Commission; the U.S. Attorney's office; officials responsible for prosecuting violations of postal regulations; and, perhaps, local government prosecutors.

And Yet Further Charges

The Richardson committee also appears to have made some smaller mistakes along the way. For example, the LOCC mailing featuring Virginia McAululty's letter did not include, as California law requires, a statement of who printed it. In 1975, GOC gave use of its 175,000-name mailing list to GOA. It was reported as an in-kind contribution to GOA of only \$165. At the industry's going rate for list rental, \$40 per 1,000 names, the true value of the GOC list would have been \$6,835 more than GOA reported.

Tom Hall makes additional charges against the Richardson operations. Says former gun committee controller Hall:

• GOA and GOC reports filed with the FEC and FPPC are so full of errors as to be completely meaningless. "We used to be a month or two months behind in counting the money coming in," recalls Hall. "They had a vault stacked high with mail, and they didn't want to hire people [to open it expeditiously]. So while we made our reports, we were always about two months behind in reporting contributions." GOA's FEC filings tend to substantiate this charge: amendment followed amendment, which followed amendment.

• Incorporation papers for Computer Caging were drawn up by a GOA employee on GOA time. We have been unable to locate the person who allegedly drafted the papers to confirm this charge.

• GOA received in-kind contributions from its landlord that it did not report. These contributions, says Hall, came in the form of reduced rent, reduced prices for office furniture and subsidies for the committee's electricity and heating bills. Again, this is a charge that can only be supported, not documented. GOA paid rent at a constant \$1,400, which included utilities. This amount did not vary even when the number of employees jumped from 24 to nearly 40. Nor did it change when GOA brought in new equipment. When GOA's landlord changed, rent was

increased by \$500 per month. GOA's first landlord sold the committee office furniture for \$1,087. To date, we have only Hall's statement that this figure was substantially less than the true value of the furniture.

• GOA meanwhile provided in-kind services to political candidates that were not reported according to Hall. These services, says Hall, were provided by a GOA-paid consultant, Ron Biron, directly to political candidates. Again, this charge is difficult to substantiate.

• Travel advances, according to Hall, were abused by Richardson and others. The money to pay for the actual incorporation of Computer Caging, according to Hall, was written off as a travel advance. Richardson, says Hall, got a travel advance for a new administrative aide who, on going on Richardson's official state payroll, learned his first check would not be coming for a month. The so-called "travel advance" carried the employee over until his first check arrived, according to Hall. Additionally, says Hall, Richardson himself did not file expense reports to justify many of his alleged travel advances. Again, only an examination of private records could substantiate these charges. FEC filings show only that a few advances were made in whole dollars, amounts such as \$40 and \$150. It is an extremely unusual trip that ends up costing such even sums. The unused portion of these advances, if there were any, were not reported as returned on either GOC's or GOA's reports.

• Hall also speculates that Richardson is using the prestige of his senate seat to get new clients for his CCC. The only difficulty with this theory is that Sen. Richardson is reportedly rated poorly by most of his colleagues. He has, however, built up a reputation through Gun Owners of America as an up-and-coming neo-right political power.

• And finally, Hall charges that Richardson is building an investment in his own fiscal future to cash in when he leaves office. This, of course, remains to be seen.

LOCC #A



& Order

CAMPAIGN COMMITTEE
2248 ERICKSON ST., SACRAMENTO, CA 95815

CAMPAIGN TO DEFEAT THE VETO AND RESTORE THE DEATH PENALTY

Dear Friend:

I'm sure by now you've heard the shocking news out of Sacramento: the new death penalty bill just passed by the State Legislature was vetoed by Governor Brown.

And thanks to Governor Brown's irresponsible action, 67 vicious and ruthless murderers on Death Row are celebrating their great victory right now.

Why? Because without the protection of this new death penalty law dangerous killers like these could get paroled to freely roam our streets in just 7 short years! Imagine, only 7 years for killing a human being. How's that for "criminal justice" in our state!

That's exactly why I'm writing you this urgent letter today. I need your full and immediate support in our state-wide drive to get the State Legislature to override the Governor's veto and restore the death penalty to protect California citizens from ruthless and vicious killers.

But I'm afraid we won't win this crucial battle in the State Legislature unless I have your help and the help of thousands of other citizens throughout California.

Here's why: In order to override the Governor's veto, it will take a 2/3 vote of the State Legislature. And, believe me, that's not going to be easy. But first let me tell you what's happened and where we stand now.

When Senator Deukmejian first introduced his tough, new death penalty bill in the State Senate, the Law and Order Campaign Committee went all out to help get it passed in the Senate. And it did.

Then our next big fight was getting the bill passed by the liberal State Assembly. In just a few weeks, LOCC directed a massive citizens' campaign to convince the Assembly to pass the bill.

We wrote to over 500,000 Californians and ran newspaper ads that reached 1.5 million voters urging them to join the fight. As a result, the State Assembly was literally flooded with signed petitions from voters all across the state demanding the death penalty be restored.

What's more, this bill had the full support of the Attorney General and such respected organizations as the California Peace Officers Association. But powerful anti-death penalty forces fought the bill right down to the wire.

7 2 0 4 0 1 3 4 4 0

X

Finally on May 10th, the Assembly barely passed the death penalty bill by 54 votes, (the exact number of votes that we will need to override the veto.)

Then on May 30th, Governor Brown, who retreated from his responsibility to protect law-abiding citizens, officially vetoed the bill.

As a result, we've now got the toughest fight yet on our hands. Let me explain. There are a lot of timid, self-seeking politicians sitting in Sacramento who are afraid to vote against Jerry Brown.

Thanks to pressure from Governor Brown a number of legislators have caved in and announced their intention to vote against the death penalty bill -- unless we act now.

So it just comes down to this: The only way to get the 2/3 vote we need to overturn Governor Brown's veto and restore the death penalty is to launch the most intensive citizens' lobbying campaign EVER in California history. These legislators must KNOW that Californians won't take "NO" for an answer on the death penalty.

But it won't be easy. Why?

Because we're up against criminal-coddling politicians and soft-on-crime social reformers and liberal activist groups like the American Civil Liberties Union (A.C.L.U.) who seem to care more about the "rights" of the convicted criminal than the rights of their innocent victims.

They've already stepped-up their behind the scenes pressure campaign to make sure the Legislature doesn't override the veto.

These soft-on-crime groups say Capital Punishment is not a deterrent to murder. Well, I say they're wrong--dead wrong.

We both know Capital Punishment is a strong deterrent to would-be killers. And criminals by their own admission know it.

A potential killer will think twice before deliberately killing a police officer or raping and murdering an innocent young girl if he knows his fate is sure and swift Capital Punishment. Because the death penalty is one sentence where the killer knows he can't get easy bail or early parole!

But frankly, we could easily lose this final battle unless I can count on your support and the support of others like you.

The death penalty opponents are powerful, influential and well-financed. They are dedicated to killing this death penalty legislation once and for all.

It will take organization, money and hard work to defeat them. We did it once before, and we can do it again. But I will need your immediate financial help. Otherwise, I honestly don't think we will succeed in restoring the death penalty to our criminal justice system.

Since the veto, I've met with key leaders and other citizen groups all over California, and we all agree that it will take money to win this fight. And LOTS OF IT!

7 9 0 4 0 1 1 3 4 4 1

We must raise at least \$275,000 in order to mobilize a citizens' campaign to convince the State Legislature to override the veto and put the death penalty back on the books.

We need these funds immediately so we can run newspaper and radio ads, circulate the death penalty petitions and contact thousands more Californians to enlist their help.

You know, as well as I do, how much the future safety of our citizens depends on a strong criminal justice system. And that's why we must restore the death penalty now.

What happens if we fail? If we do, I pledge to launch a massive effort to put this issue on the ballot in a state-wide voter referendum in November, 1978, just like we did in 1972 when 67% of the voters voted for a fair and just death penalty law.

I founded LOCC in 1976 because, as a State Senator for 10 years, I personally was fed up watching legislators pass laws that allow soft-on-crime judges, parole officials and prison bureaucrats to dump thousands of hardened criminals back onto the streets.

It was clear to me and many other Californians that we needed a political committee like LOCC to expose and defeat at the ballot box the soft-on-crime politicians and judges who have been directly responsible for the skyrocketing violent crime rate in our state.

In just 90 days of intense hard work before the November 1976 election, LOCC helped elect five strong, anti-crime legislators (all of whom voted FOR the death penalty).

We published and distributed a comprehensive CRIME VOTING INDEX which shows how politicians in Sacramento voted on important crime bills in the Legislature that affect your personal safety and security.

This crime voting index was distributed into more homes than any other index of its kind in the history of our state! We also wrote to over 600,000 Californians and told them about LOCC's campaign to defeat soft-on-crime politicians and judges. As a result, we signed up over 23,600 new supporters. And today, LOCC has over 40,000 members making it the largest anti-crime organization in California.

As a result of our work in the 1976 election and our all-out effort to help restore the death penalty in 1977 we have spent over \$350,000. We have used all our funds. Our bank account is exhausted!

Unless you decide to help us financially, there's no way we can fund a campaign to force the Legislature to override the veto.

As I said, many State Assemblymen are afraid to vote against the Governor. But I'm convinced they'll vote for the override if we can dramatically prove, through the petition and advertising blitz, that the vast majority of California voters demand it.

I want you to do two things:

- 1) Please sign the enclosed Official Petition to Restore the Death Penalty and rush it back to me as soon as you can.

7904011344?

I will present your petition, along with thousands of others, to the State Legislature and to our newspapers, T.V. and radio stations. We must dramatically demonstrate the vast majority of Californians want a fair and just death penalty law now--so please send me your petition today.

Your petition can have a major impact on how these legislators vote. I'm convinced it can swing enough votes to get us the 2/3 we need to override the veto. So, please mail it to me in the enclosed reply envelope.

- 2) Please send your maximum contribution to help our Campaign to Override the Veto and Restore the Death Penalty.


Without your contribution, we can't finance the petition drive or buy the advertising space we need to convince the Legislators to take immediate action to restore the death penalty.

I know that some of you can send \$500, \$250, or \$100 and I hope that you will. But it is also going to take many contributions of \$50, \$25, and \$15 and \$10 if we are going to win this battle against the soft-on-crime politicians and liberal pressure groups who are doing everything in their power to kill this death penalty bill.

I can't tell you how important your immediate contribution is to stop the anti-death penalty forces from defeating us.

I am really counting on your support. Because without it, there's not much any of us can do. But together you and I can restore a fair and just death penalty law and score a major victory for Law and Order in 1977.

Sincerely,


H.L. "Bill" Richardson, State Senator
Founder, Law & Order Campaign Committee

P.S. I just received a heartbreaking letter from a woman in Pasadena. Her 88 year old aunt was raped and murdered by a vicious killer. With her permission, I've enclosed a copy of her letter for you to read.

Here's the tragic background story on this terrible murder. In 1970, this man raped and savagely beat a 67 year old woman. During his trial, he openly said in court that he wouldn't leave his next victim alive. Six years later, he was back on the street. Just one week after he was released he raped and viciously murdered Mrs. McAnulty's aunt.

Incredibly, under existing California statutes, this killer will be eligible for parole again. Her letter sums up, better than I ever could, why we must get a fair and just death penalty law passed immediately. And why I'm counting so heavily on your financial support.

79040113443

79040113441



to the California State Legislature

To Override the Veto and Restore the Death Penalty

TO: California State Legislature

As a citizen and as a taxpayer, I formally PETITION the State Assembly of California to override Governor Brown's veto and immediately restore the death penalty to our criminal justice system.

Today, cold-blooded killers are protected from punishment by permissive parole and sentencing laws.

I strongly urge the State Assembly to use its legislative power to change that by restoring the death penalty bill sponsored by Senator Deukmejian.

Innocent, law-abiding citizens must have protection against these ruthless and vicious killers who show no mercy to their victims.

Further, I want to make sure that my Assemblyman knows that I will watch how he votes on the death penalty issue. That will determine how I VOTE in the State legislative races in 1978.

Signature

Address

City

State

Zip

79040113445

7 9 0 4 0 1 1 3 4 4 5

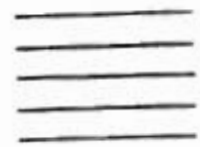
FIRST CLASS
PERMIT NO. 5055
SACRAMENTO, CA

BUSINESS REPLY MAIL NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

POSTAGE WILL BE PAID BY



Law & Order
CAMPAIGN COMMITTEE
2248 ERICKSON STREET
POST OFFICE BOX 13150
SACRAMENTO, CA 95815



SPECIAL ATTENTION: SENATOR BILL RICHARDSON

Campaign to

**DEFEAT THE VETO
and RESTORE THE
DEATH PENALTY**

a special statewide pro



OCCUPATION _____

PLACE OF BUSINESS _____

BUSINESS ADDRESS (if self-employed)
(The above information is necessary
under California Law)

FROM: _____

NAME

ADDRESS _____

CITY _____

STATE _____

ZIP _____

TO: Senator Bill Richardson

- YES, Senator Richardson, I want to do all I can to help restore the death penalty to protect innocent people from vicious, ruthless killers.

I have enclosed my maximum contribution for your state-wide campaign to get the State Legislature to override the Governor's veto and immediately restore the death penalty.

- \$ _____ \$500 \$250 \$100
 \$50 \$25 \$10

(P.S., I've made my check payable to: Law & Order Campaign Committee)

- YES, I have signed my petition. Please use it to demonstrate to the State Legislature and to the press, radio and TV that California citizens want the death penalty passed into law.

79040113447

79010113448

This is a copy of the letter
exactly as I received it
from Mrs. McAnulty.
I've scratched out her
address for obvious reasons.

Bill

To Senator Bill Richardson:

On July 2nd, 1976, my aunt - 88 years old - was brutally raped and killed. The man who did this was on parole (7 days out of prison) having been convicted of previous similar offense.

On behalf of my aunt, Grace Ellen Parent, of Claremont, California, I urge that you support legislation to restore the death penalty. You have my permission to use any details of this murder if it will help.

Virginia C. McAnulty
~~Virginia C. McAnulty~~
~~Virginia C. McAnulty~~
~~Virginia C. McAnulty~~

P.S. I have sent a contribution to the Law and Order Campaign Committee in a separate envelope and I've also sent a copy of this letter to Governor Brown.

70040113443

79040113450

[Faint, illegible text, possibly bleed-through from the reverse side of the page]

Do Not Open this
Note Unless You've
Decided Not To
Help LOCC!!

LOS ANGELES POLICE DEPARTMENT

EDWARD M. DAVIS
Chief of Police



Dear Friend:

I strongly urge you to reconsider your decision not to support our statewide campaign to restore the death penalty.

As Chief of Police in Los Angeles City for 8 years and as a peace officer for 36 years, I know Capital Punishment is an effective and powerful deterrent to potential killers. From my day to day experience in handling thousands of hardened criminals over these years, I know Capital Punishment works.

But unless you act, and act now, we may never have a new death penalty bill to adequately protect innocent people from these ruthless murderers.

As you know, Governor Brown has totally ignored the will of the vast majority of people by vetoing the new death penalty bill that had been passed by the State Legislature.

As Bill Richardson told you in his letter, LOCC is now leading the fight to get 2/3rds of our State Legislators to override the Governor's reckless and irresponsible veto. If we don't override this veto, you and I may never see an effective death penalty law to protect innocent people from ruthless and vicious killers.

I believe in what LOCC is doing. And I think it deserves your financial support. I have already sent my personal contribution to help. I sincerely hope you will reconsider and do the same today.

Without your support, I know LOCC can't successfully wage a campaign to restore a fair and just death penalty law to our criminal justice system.

We need this law. All of us.

Sincerely,

A handwritten signature in cursive script that reads "E M Davis".

Ed Davis

Not Prepared or Mailed at Government Expense

79040113451

LOCC #13

COMPARATIVE INCOME
AS OF 12/31/76

	CURRENT MONTH		
	DOLLAR AMOUNT	PERCENT REVENUE	PERCENT EXPEN
INCOME			
CONTRIBUTIONS-CASH	11,241.81-	100.0	23.
TOTAL INCOME	11,241.81-	100.0	23.
FUND RAISING EXPENSES			
MAILING LISTS	.00	.0	.0
POSTAGE-MASS MAILING	745.70	6.6-	1.5
DIRECT MAILING SUPPLIES	13,647.83	121.4-	29.0
DIRECT MAILING EXPENSES	29,988.09	266.8-	61.5
OTHER EXPENS ASSOC/DIR MAILING	.00	.0	.0
TOTAL FUND RAISING EXPENSES	44,381.62	394.8-	91.1
INCOME BEFORE OPERATING EXPENSES	33,139.81	294.8-	68.0
OPERATING EXPENSES			
AUTO EXPENSE	.00	.0	.0
CONSULTNG FEES OTHER THAN LEGAL	.00	.0	.0
CONTRIBS MADE TO COMMITTEES	.00	.0	.0
DATA PROCESSING CHARGES	426.18	3.8-	.9
DUES & SUBSCRIPTIONS	.00	.0	.0
FREIGHT & SHIPPING COSTS	.00	.0	.0
OFFICE EQUIPMENT	.00	.0	.0
OFFICE CLEANING SUPPLIES & MAIN	.00	.0	.0
OFFICE SUPPLIES & EXPENSE	8.26-	.1	.0
OUTSIDE LABOR	.00	.0	.0
PAYROLL TAXES	.00	.0	.0
POSTAGE DUE ACCT	.00	.0	.0
POSTAGE-OTHER	.00	.0	.0
PRINTING	463.59	4.1-	1.0
PROFESSIONAL SERVICES-LEGAL	.00	.0	.0
HOUSE MAILING EXPENSES	1,678.85	14.9-	3.4
SALARIES	1,800.00	16.0-	3.7
TELEPHONE	.00	.0	.0
TRAVEL & ENTERTAINMENT	.00	.0	.0
XEROX CHARGES	.00	.0	.0

70040113450

COMPARATIVE INCOME STATEMENT
AS OF 12/31/76

-----CURRENT MONTH-----				-----YEAR-TO-DATE-----			
AMOUNT	PERCENT AS OF			DOLLAR AMOUNT	PERCENT AS OF		
	REVENUE	EXPENSE	INCOME		REVENUE	EXPENSE	INCOME
1.81-	100.0	23.1-	30.0-	162,885.09-	100.0	78.8-	372.4-
1.81-	100.0	23.1-	30.0-	162,885.09-	100.0	78.8-	372.4-
.00	.0	.0	.0	216.50	.1-	.1	.5
5.70	6.6-	1.5	2.0	61,656.69	37.9-	29.8	141.0
7.83	121.4-	28.0	36.4	41,342.66	25.4-	20.0	94.5
8.09	266.8-	61.5	80.0	60,378.78	37.1-	29.2	138.0
.00	.0	.0	.0	1,961.61	1.2-	.9	4.5
1.62	394.8-	91.1	118.4	165,556.24	101.6-	80.1	378.5
9.81	294.8-	68.0	88.4	2,671.15	1.6-	1.3	6.1
.00	.0	.0	.0	29.00	.0	.0	.1
.00	.0	.0	.0	700.00	.4-	.3	1.6
.00	.0	.0	.0	14,493.00	8.9-	7.0	33.1
6.18	3.6-	.9	1.1	918.95	.6-	.4	2.1
.00	.0	.0	.0	.70	.0	.0	.0
.80	.0	.0	.0	81.63	.1-	.0	.2
.00	.0	.0	.0	901.14	.6-	.4	2.1
.00	.0	.0	.0	5.00	.0	.0	.0
8.26-	.1	.0	.0	970.66	.5-	.5	2.2
.00	.0	.0	.0	37.25	.0	.0	.1
.00	.0	.0	.0	832.39	.5-	.4	1.9
.00	.0	.0	.0	3,000.00	1.8-	1.5	6.9
.00	.0	.0	.0	1,501.21	.9-	.7	3.4
3.59	4.1-	1.0	1.2	2,475.97	1.5-	1.2	5.7
.00	.0	.0	.0	316.70	.2-	.2	.7
8.85	14.9-	3.4	4.5	1,678.85	1.0-	.8	3.8
0.00	16.0-	3.7	4.8	12,849.44	7.9-	6.2	29.4
.00	.0	.0	.0	42.04	.0	.0	.1
.00	.0	.0	.0	205.63	.1-	.1	.5
.00	.0	.0	.0	29.24	.0	.0	.1

RUN-DATE 02/28/77

AND ORDER CA

COMPARATIVE INCOME ST
AS OF 12/31/76

	CURRENT MONTH	
	DOLLAR AMOUNT	PERCENT AS REVENUE EXPENSE
TOTAL OPERATING EXPENSES	4,360.36	38.8- 8.9
NET INCOME * GAIN OR LOSS *	37,500.17	333.6- 76.9

79040113451

----- LIABILITIES AND EQUITIES -----

LIABILITIES

INCOME TAXES WITHHELD		
FEDERAL INCOME TAX WITHHELD	\$	449.20-
STATE INCOME TAX WITHHELD		122.40-
FICA TAX WITHHELD		203.01-
SDI TAX WITHHELD		49.70-

LOANS PAYABLE
ACCRUED ACCOUNTS PAYABLE

TOTAL LIABILITIES

EQUITIES

RETAINED EARNINGS
YTD NET INCOME * LOSS *

TOTAL EQUITIES

TOTAL LIABILITIES AND EQUITIES

70040113455

BALANCE SHEET
AS OF 12/31/76

----- ASSETS -----

ASSETS

CASH

PETTY CASH	\$	50.00
CASH-LOCC SUPPORT FUND		10,583.76
CASH-LOCC ADMIN		867.97
CASH-LOCC S.W.A.		2,007.68

DRAWING ACCOUNTS

DRAWING-LOCC ADMIN		24,000.00
DRAWING-LOCC SUPPORT FUND		81,300.00
DRAWING-LOCC S.W.A.		57,300.00

TOTAL ASSETS

79040113458

BALANCE SHEET
AS OF 12/31/76

ASSETS

\$	50.00
	10,583.76 /
	867.97 /
	2,007.68 /

\$ 13,509.41

24,000.00-
81,300.00
57,300.00-

.00

\$ 13,509.41

UNO

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SCHEDULE E, FORM 420

PART TWO, MADE TO OTHERS

LOCC #C

FULL NAME & ADDRESS OF PAYEE	DESCRIPTION OF PAYMENT	AMOUNT THIS PERIOD
COMPUTER CAGING CORPORATION 2248 ERICKSON STREET SACRAMENTO, CA 95815	ADMIN, DATA, MAIL CHARGES → to May 1977	37,268.13
LONG BEACH INDEPENDENT PRESS TELEGRAM 604 PINE AVENUE LONG BEACH, CA 90844	ADVERTISING-DEATH PENALTY	1,197.00
ENVELOPES UNLIMITED 649 NORTH HORMER ROAD ROCKVILLE, MD 20850	ENVELOPES	10,928.19
BOND OFFICE SERVICES 8930 TELEGRAPH ROAD LORTON, VA 22079	DIRECT MAIL EXPENSE	5,406.18
SMITH LITHOGRAPH 1029 EAST GUDE DRIVE ROCKVILLE, MD 20850	PRINTING	2,399.28
WILAND & ASSOCIATES P.O. BOX 899 CULPEPER, VA 22701	MAILING LISTS/COMPUTER PROCESSING	7,266.20
STUDIO PRINTING INC. 2387 LEWIS AVENUE ROCKVILLE, MD 20851	CONTRIBUTOR FORMS, POSTCARDS	4,567.54
STEPHEN WINCHELL & ASSOCIATES 2100 M STREET, N.W. WASHINGTON, D.C. 20037	DIRECT MAIL EXPENSE/MAIL LISTS	14,251.04
DIVERSIFIED MAIL MKTG. 7777 LEESBURG PIKE FALLS CHURCH, VA 22043	PRINTING	7,722.93
ATLANTIC LIST COMPANY 2100 M STREET, N.W. WASHINGTON, D.C. 20037	MAILING LISTS	5,831.94
EXECUTIVE PRINTING 2141 INDUSTRIAL PARKWAY SILVER SPRINGS, MD	CONTRIBUTOR FORMS	230.70
GENERAL TYPOGRAPHERS 927 H STREET WASHINGTON, D.C. 20001	TYPESETTING	113.00
THA BAUMGARTEN COMPANY 925 11th STREET, N.W. WASHINGTON, D.C. 20001	RUBBER STAMP MATS	13.39

SUB-TOTAL THIS PAGE \$97,195.52

FULL NAME & ADDRESS OF PAYEE	DESCRIPTION	AMOUNT
CHARLES "JACK" GIBBS P.O. BOX 5294 SACRAMENTO, CA 95817	PHOTOGRAPHY	178.18
DOBBS & NIELSEN SUITE 2500, THE ALCOA BLDG. ONE MARITIME PLAZA SAN FRANCISCO, CA 94111	LEGAL SERVICES	644.60
M SPACE 3219 FOLSOM BLVD. SACRAMENTO, CA 95816	TYPESETTING	148.00
CUBIC DATA SYSTEMS 8248 RONSON ROAD SAN DIEGO, CA 92138	MAIL SERVICE	2,778.14
COUNTY OF LOS ANGELES 808 NORTH SPRING STREET LOS ANGELES, CA 90012	PENALTY	60.00
COMPUTER CAGING CORPORATION 2248 ERICKSON STREET SACRAMENTO, CA 95815	ADMIN. SERVICES/MAIL PROCESSING FEE	62,079.58
U.S. POSTMASTER SACRAMENTO, CA 95813	POSTAGE	17,522.00
PATTERSON TRAVEL AGENCY 1501 ARDEN WAY SACRAMENTO, CA 95815	AIRLINE TICKETS	502.00
WAYNE JOHNSON 6818 BUTTERBALL WAY SACRAMENTO, CA 95842	EXPENSES	232.69
SACRAMENTO APPLICATIONS SYSTEMS 2220 J STREET SACRAMENTO, CA 95814	COMPUTER PROCESSING	2,402.14
K.C.R.A. NEWS RADIO 2225 19th STREET SACRAMENTO, CA 95814	ADVERTISING	1,370.00
THE SACRAMENTO UNION 301 CAPITOL MALL SACRAMENTO, CA 95804	ADVERTISING	999.60
MEDIA PACIFIC 1225 EIGHTH STREET SACRAMENTO, CA 95814	ADVERTISING	1,070.40
JOSEPH SPANGLER 4709 PASADENA AVE SACRAMENTO, CA 95841	SALARY .	271.74
SISK MAILING SERVICE 9800 GEO. PALMER HIGHWAY LANHAM, MD	ADVANCE POSTAGE	121,511.00

SUB-TOTAL THIS PAGE 211,708.07

Statement covers period from 5-6-77 through 8-25-77

SCHEDULE F, FORM 420 or 430
ACCRUED EXPENSES (Unpaid Bills)
 (Amounts may be rounded off to whole dollars)

See information manual for directions and examples

FULL NAME AND ADDRESS (Street, City, State)*	DESCRIPTION OF ACCRUED EXPENSES	AMOUNT ACCRUED THIS PERIOD
COMPUTER CAGING CORPORATION 2248 ERICKSON STREET SACRAMENTO CA 95815	ADMIN. SERVICES/MAIL PROCESSING FEE	28,947.53
GUN OWNERS OF CALIFORNIA #746018 951 ARDEN WAY SACRAMENTO, CA 95815	LOANS ALLOCATED ADMIN. EXPENSES	20,350.00 24,750.65
ATLANTIC LIST COMPANY 2100 M STREET, N.W. WASHINGTON, D.C. 20037	MAILING LISTS	8,568.33
DIVERSIFIED MAIL MARKETING INC. 7777 LEESBURG PIKE FALLS CHURCH, VA 22043	CONTRIBUTOR FORMS	939.79
KAUFMANN GRAPHICS 1110 OHIE STREET WASHINGTON, D.C. 20002	CONTRIBUTOR FORMS	7,415.34
MATTERA LITHO 5124 FROLICH LANE CHEVERLY, MD 20809	CONTRIBUTOR FORMS	15,919.63
SISK MAILING SERVICES 9800 GEO. PALMER HIGHWAY LANHAM, MD 20809	DIRECT MAIL EXPENSE	18,337.74
WILAND & ASSOCIATES P.O. BOX 899 CULPEPER, VA 22701	COMPUTER PROCESSING	6,075.30
STEPHEN WINCHELL & ASSOCIATES 2100 M STREET, N.W. WASHINGTON, D.C. 20037	DIRECT MAIL EXPENSE/MAILING LISTS	13,997.28
Subtotal		145,710.57

Attach additional information on appropriately labeled continuation sheets.

SUBTOTAL \$

145,710.57

* If the accrued expense is owed to a committee, list the committee's name and I.D. number (or the full name and address of the treasurer). If the person providing the goods or services was different from the payee, list each person's full name, street address, city and state.

SUMMARY

1. ACCRUED EXPENSES OF \$50 OR MORE THIS PERIOD	\$ 145,710.57
2. ACCRUED EXPENSES OF UNDER \$50 THIS PERIOD. (Not Itemized)	6.93
3. TOTAL ACCRUED EXPENSES INCURRED THIS PERIOD (Line 1 + 2)	\$ 145,717.50
4. ACCRUED EXPENSES PAID THIS PERIOD (Not Itemized, Enter on Line 5, Part 3, Schedule E)	\$ 64,320.34
5. NET CHANGE THIS PERIOD (Line 3-4, Enter on Line 9, Column B of the Summary Page, This may be a negative amount)	\$ 81,397.16

LAF # A

	-----CURRENT MONTH-----	
	DOLLAR AMOUNT	PERCENT AS REVENUE EXPENSE
INCOME		
CONTRIBUTIONS-CASH	2,138.00-	100.0 40.7-
TOTAL INCOME	2,138.00-	100.0 40.7-
FUND RAISING EXPENSES		
POSTAGE-MASS MAILING	.00	.0 .0
DIRECT MAILING SUPPLIES	.00	.0 .0
OTHER EXPENS ASSOC/DIR MAILING	.00	.0 .0
TOTAL FUND RAISING EXPENSES	.00	.0 .0
INCOME BEFORE OPERATING EXPENSES	2,138.00-	100.0 40.7-
OPERATING EXPENSES		
ANALYSES&SURVEYS	.00	.0 .0
DATA PROCESSING CHARGES	.00	.0 .0
DUES&SUBSCRIPTIONS	.00	.0 .0
FREIGHT&SHIPPING COSTS	.00	.0 .0
MISCELLANEOUS	.00	.0 .0
OFFICE EQUIPMENT	.00	.0 .0
OFFICE SUPPLIES&EXPENSE	33.19	1.6- .6
OUTSIDE LABOR	.00	.0 .0
PAYROLL TAXES	.00	.0 .0
POSTAGE-OTHER	.00	.0 .0
PRINTING	41.60	1.9- .8
PROFESSIONAL SERVICES-LEGAL	525.69	24.6- 10.0
HOUSE MAILING SUPPLIES	.00	.0 .0
RENT-OFFICE	200.00	9.4- 3.8
SALARIES	4,112.00	192.3- 78.3
TELEPHONE	326.46	15.3- 6.2
TRAVEL&ENTERTAINMENT	13.57	.6- .3
ALLOCATED ADMINSTRATV EXPENSES	.00	.0 .0
TOTAL OPERATING EXPENSES	5,252.51	245.7- 100.0
NET INCOME * GAIN OR LOSS *	3,114.51	145.7- 59.3

79040113463

COMPARATIVE INCOME STATEMENT
AS OF: 12/31/76

-----CURRENT MONTH-----				-----YEAR-TO-DATE-----			
AMOUNT	PERCENT AS OF			DOLLAR AMOUNT	PERCENT AS OF		
	REVENUE	EXPENSE	INCOME		REVENUE	EXPENSE	INCOME
38.00-	100.0	40.7-	68.6-	108,655.57-	100.0	161.8-	261.9
38.00-	100.0	40.7-	68.6-	108,655.57-	100.0	161.8-	261.9
.00	.0	.0	.0	296.80	.3-	.4	.7-
.00	.0	.0	.0	345.20	.3-	.5	.8-
.00	.0	.0	.0	19.08	.0	.0	.0
.00	.0	.0	.0	661.08	.6-	1.0	1.6-
38.00-	100.0	40.7-	68.6-	107,994.49-	99.4	160.8-	260.3
.00	.0	.0	.0	3.00	.0	.0	.0
.00	.0	.0	.0	117.63	.1-	.2	.3-
.00	.0	.0	.0	70.00	.1-	.1	.2-
.00	.0	.0	.0	3,000.00	2.8-	4.5	7.2-
.00	.0	.0	.0	11.45	.0	.0	.0
.00	.0	.0	.0	807.87	.7-	1.2	1.9-
33.19	1.6-	.6	1.1	81.58	.1-	.1	.2-
.00	.0	.0	.0	48.00	.0	.1	.1-
.00	.0	.0	.0	64.25	.1-	.1	.2-
.00	.0	.0	.0	117.00	.1-	.2	.3-
41.60	1.9-	.8	1.3	149.68	.1-	.2	.4-
25.69	24.6-	10.0	16.9	2,171.23	2.0-	3.2	5.2-
.00	.0	.0	.0	291.29	.3-	.4	.7-
00.00	9.4-	3.8	6.4	1,200.00	1.1-	1.8	2.9-
12.00	192.3-	78.3	132.0	16,187.60	14.9-	24.1	39.0-
26.46	15.3-	6.2	10.5	1,192.13	1.1-	1.8	2.9-
13.57	.6-	.3	.4	2,461.34	2.3-	3.7	5.9-
.00	.0	.0	.0	38,531.53 ✓	35.5-	57.4	92.9-
52.51	245.7-	100.0	168.6	66,505.58	61.2-	99.0	160.3-
14.51	145.7-	59.3	100.0	41,488.91-	38.2	61.8-	100.0

RUN-DATE 02/28/77

LEGISLATIVE ...

BALANCE SHEET
AS OF 12/31/76

----- LIABILITIES AND EQUITIES -----

LIABILITIES

INCOME TAXES WITHHELD	\$	2,283.00
FEDERAL INCOME TAX WITHHELD		337.50
STATE INCOME TAX WITHHELD		947.01
FICA TAX WITHHELD		

TOTAL LIABILITIES

EQUITIES

RETAINED EARNINGS	
YTD NET INCOME * GAIN *	

TOTAL EQUITIES

TOTAL LIABILITIES AND EQUITIES

79040113465

FINANCE SHEET
AS OF 12/31/76

ASSETS AND LIABILITIES AND EQUITIES

\$	2,283.00-
	337.50-
	947.01-
<hr/>	

\$	3,567.51-
<hr/>	

\$	3,567.51-
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	.00
	41,488.91-
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	41,488.91-
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\$	45,055.42-
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79040113455

NET ASSETS

STATE OF TEXAS
 DEPARTMENT OF REVENUE
 1000 WEST 11TH AVENUE
 AUSTIN, TEXAS 78701
 (512) 463-1000

RUN-DATE 02/28/77

LEGISLATIVE ACTION FUND

BALANCE SHEET
AS OF 12/31/76

----- ASSETS -----

ASSETS

CASH-LEGISLATIVE ACTION FUND
MISCELLANEOUS
ADVANCES
L.A.F. POSTAGE ADVANCE

\$ 600.00
500.00

TOTAL ASSETS

79040113467

LAF #13

GUN OWNERS OF AMERICA (GOA)
 RELATIONSHIP TO
 LEGISLATIVE ACTION FUND (LAF)

	ACTUAL PAYMENTS BY LAF TO GOA	GOA PD OR ASSUMED LAF PAYROLL TAXES	AMOUNT DUE PER ALLOCATION SCH (LAF OHS GOA)	DUE TO LAF
1976				
June			2,872.08	(2,872.08)
July			2,053.77	(4,925.85)
August	20,133.50		3,052.48	12,155.17
September			2,158.04	9,997.13
October 1-18	9,105.99		1,430.48	17,672.64
October 18-31		1,854.53		15,818.11
November	9,292.04		5,153.28	19,956.87
December			1,912.98	18,243.89
	<u>38,531.53</u>	• 3,567.51	16,720.13	
TOTAL	<u>38,531.53</u>		<u>20,287.64</u>	<u>18,243.89</u>

7-9040113469
 77 DIAL 30542

GOC # A

COMPARATIVE INCOME STATEMENT AS OF 12/31/76

-----CURRENT MONTH-----
 DOLLAR AMOUNT PERCENT AS
 REVENUE EXPENSE

INCOME			
CONTRIBUTIONS-CASH	48,976.67-	100.0	40.4-
OTHER INCOME	.00	.0	.0

TOTAL INCOME	48,976.67-	100.0	40.4-
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Vilaine

FUND RAISING EXPENSES			
POSTAGE-MASS MAILING	.00	.0	.0
DIRECT MAILING SUPPLIES	31,926.50	65.2-	26.3
DIRECT MAILING EXPENSES	86,439.77	176.5-	71.3
OTHER EXPENS ASSOC/DIR MAILING	.00	.0	.0

TOTAL FUND RAISING EXPENSES	118,366.27	241.7-	97.6
-----------------------------	------------	--------	------

INCOME BEFORE OPERATING EXPENSES	69,389.60	141.7-	57.2
----------------------------------	-----------	--------	------

OPERATING EXPENSES			
ADVERTISING-NEWSPAPER	.00	.0	.0
ADVERTISING-RADIO	.00	.0	.0
ANALYSES&SURVEYS	.00	.0	.0
AUTO EXPENSE	.00	.0	.0
CONSULTING FEES(OTHER THAN LEGAL	1,600.00	3.3-	1.3
CONSULTING FEES(TRAVEL)	.00	.0	.0
CONTRIBS MADE TO COMMITTEES	.00	.0	.0
DATA PROCESSING CHARGES	.00	.0	.0
DUES&SUBSCRIPTIONS	.00	.0	.0
FREIGHT&SHIPPING COSTS	.00	.0	.0
IN-KIND CONTRIBUTIONS	.00	.0	.0
MISCELLANEOUS	153.61	.3-	.1
OFFICE SUPPLIES&EXPENSE	383.74	.8-	.3
OUTSIDE LABOR	42.00	.1-	.0
PROPERTY TAXES-TAX&LICENSE	.00	.0	.0
POSTAGE-OTHER	.00	.0	.0
PRINTING	265.53	.5-	.2
PROFESSIONAL SERVICES-LEGAL	54.94	.1-	.0
HOUSE MAILING SUPPLIES	.00	.0	.0
HOUSE MAILING EXPENSES	.00	.0	.0

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RUN-DATE 02/28/77

GUN OWNERS OF CALIFORNIA CAMPAIGN

COMPARATIVE INCOME STATEMENT
AS OF 12/31/76

	-----CURRENT MONTH-----		
	DOLLAR AMOUNT	PERCENT AS REVENUE EXPENSE	
OTHER HOUSE MAILING EXP	.00	.0	.0
RETURNED CONTRIBUTIONS	.00	.0	.0
TELEPHONE	.00	.0	.0
TRAVEL & ENTERTAINMENT	450.42	.9-	.4
ALLOCATED ADMINISTRATIVE EXPENSES	.00	.0	.0
<hr/>			
TOTAL OPERATING EXPENSES	2,950.21	6.0-	2.4
<hr/>			
NET INCOME * GAIN OR LOSS *	72,339.81	147.7-	59.6

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COMPARATIVE INCOME STATEMENT
 THROUGH 12/31/76

CURRENT MONTH	PERCENT AS OF			DOLLAR AMOUNT	PERCENT AS OF		
	REVENUE	EXPENSE	INCOME		REVENUE	EXPENSE	INCOME
0	.0	.0	.0	213.74	.0	.0	.1-
0	.0	.0	.0	71.00	.0	.0	.0
0	.0	.0	.0	171.25	.0	.0	.1-
2	.9-	.4	.6	3,794.42	.3-	.4	1.4-
0	.0	.0	.0	18,315.19	1.4-	1.8	6.6-
<hr/>							
21	6.0-	2.4	4.1	257,624.30	19.8-	25.1	92.2-
<hr/>							
11	147.7-	59.6	100.0	279,419.72-	21.4	27.3-	100.0
<hr/>							

7901011473

BALANCE SHEET
AS OF 12/31/76

----- ASSETS -----

\$ 955.51 /
6,402.61 /
49,208.82

\$ 56,566.94

4,800.00
27.06
600.00

5,427.06

237,160.89-
449,899.11-
687,060.00

.00
304,050.00 ----- to GOA + Leg. Fin

\$ 366,044.00

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JN-DATE 02/28/77

GU... OWNERS OF CALIFORNIA CAMPAIGN

BALANCE SHEET
AS OF 12/31/76

----- LIABILITIES AND EQUITIES

LIABILITIES

SUSPENSE
LOANS PAYABLE
ACCRUED ACCOUNTS PAYABLE

TOTAL LIABILITIES

EQUITIES

RETAINED EARNINGS
YTD NET INCOME * GAIN *

TOTAL EQUITIES

TOTAL LIABILITIES AND EQUITIES

79040113475

BALANCE SHEET
AS OF 12/31/76

--- LIABILITIES AND EQUITIES ---

\$ 4,800.00-
500.00-
56,504.90-

LIABILITIES

\$ 61,804.90-

24,819.38-
335,924.62-

EQUITIES

304,239.10-

LIABILITIES AND EQUITIES

\$ 366,044.00-

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GOC B c16

951 ARDEN WAY • SACRAMENTO, CALIFORNIA 95815

Gun Owners
of California
CAMPAIGN COMMITTEE



Dear Member:

It is difficult to write this letter because as a friend and generous supporter of Gun Owners of California you have more than done your share to help elect pro-gun candidates this past November 2nd.

We won ten new seats in the State Assembly and State Senate...ten new votes to help stop gun confiscation legislation...but the price of this success has been high...and unless I receive your immediate help Gun Owners of California will be forced to shut down its operations.

Please, stay with me and let me explain:

During the closing days of the campaign, friends I thought I could count on wrote me and told me they couldn't help with last-minute campaign contributions.

I knew that if our pro-gun candidates were to be successful they would need money to pay for last-minute advertising, so in belief of our cause, Gun Owners of California postponed payment on its own expenses in order to provide the candidates with the money they needed.

Quite frankly, this money could not have come at a more crucial time.

In fact, without these last-minute funds pro-gun candidates like Bob Nimmo, Bill Campbell, Jim Ellis and Stan Statham could not have been elected...and would not be going to Sacramento to fight for our side.

And believe me, this money was well-spent, because the ten extra pro-gun votes we added to the California Legislature are going to be more crucial then ever.

But now, this overdue debt is weighing heavily on my shoulders.

Unless I can raise \$55,000 to pay off this debt I don't know what the future of our Campaign Committee will be. GOC depends upon contributions from concerned citizens like yourselves for its operating funds.. and this debt could ruin GOC financially.

I don't know where else to turn to help pay this crushing debt. So I decided to write to you because as a good friend, I thought you would understand and help at this time of our greatest need.

The money situation is absolutely desperate. There is little money

7004511473

in the bank and the creditors are asking when they can expect payment.

Printers, stationery suppliers, utilities--they have all bent over backwards to wait as long as possible. And most of our suppliers are small, independent businessmen who desperately need their money now just to make ends meet and pay their workers.

That's why I must have the help of every member of GOC to raise the \$55,000 to pay these overdue expenses.

I have been able to arrange for the bills to be paid in two installments. The down payment of \$35,000 is due on January 14, 1977 and the final payment of \$20,000 is due on February 14, 1977.

Believe me, I know how loyal and generous you have been in the past. I can only thank God that there are people like you, who are helping to preserve our right to own and use firearms.

But the sad fact is that I will be forced to shut down Gun Owners of California unless I receive funds to pay this heavy debt.

Please let me hear from you today. Let me know if you can help. I must have your answer right away.

Here's how I would like you to help:

Enclosed with my letter are two special envelopes. Each is especially marked for our important deadlines...January 14th and February 14th.

If you could send a contribution of \$20.00 or more to help meet the \$35,000 down payment by January 14th it would be a tremendous help.

Then I hope you can make an extra effort to send another contribution of \$20.00 or more to help me meet the final payment of \$20,000 by February 14th.

Either way I must have your answer right away. The deadline for making the down payment on the \$55,000 overdue debt is fast approaching.

If you can't help me make the final payment on February 14th I will understand. But please help me by sending \$20.00 or more with the envelope marked "Deadline - January 14th" for the down payment today.

sincerely,



H.L. "Bill" Richardson
Founder and Chairman
Gun Owners of California

P.S. I sincerely hope you will carefully consider this matter and help me meet these important deadlines. Personally I think it would be tragic if GOC had to close its doors because of this heavy debt.

P.P.S. I have enclosed some copies of the overdue campaign bills now sitting on my desk. As you can see, in a State with such a large population as California it costs an awful lot to run a campaign committee.

COMPARATIVE INCOME STATEMENT
AS OF 12/31/76

ACCOUNT	CURRENT MONTH			YEAR-TO-DATE			
	PERCENT AS OF REVENUE	PERCENT AS OF EXPENSE	PERCENT AS OF INCOME	DOLLAR AMOUNT	PERCENT AS OF REVENUE	PERCENT AS OF EXPENSE	PERCENT AS OF INCOME
.44-	100.0	74.1-	286.2-	1,741,117.16-	100.0	87.9-	723.6-
.44-	100.0	74.1-	286.2-	1,741,117.16-	100.0	87.9-	723.6-
.38	8.5-	6.3	24.4	468,226.51	26.9-	23.6	194.6
.48	22.2-	16.4	63.5	222,195.20	12.8-	11.2	92.3
.02	54.2-	40.1	155.0	511,649.25	29.4-	25.8	212.7
.71	3.4-	2.6	9.9	16,616.06	1.0-	.8	6.9
.59	88.3-	65.4	252.7	1,218,687.02.	70.0-	61.5	506.5
.85	11.7	8.7-	33.5-	522,430.14-	30.0	26.4-	217.1-
.92	.3	.2-	.9-	6,003.97	.3-	.3	2.5
.00	.0	.0	.0	76.18	.0	.0	.0
.00	.5-	.4	1.4	3,776.86-	.2-	.2	1.6
.00	2.0-	1.5	5.6	17,858.72	1.0-	.9	7.4
.00	.0	.0	.0	93.87	.0	.0	.0
.00	.5	.3-	1.3-	144,870.00	8.3-	7.3	60.2
.00	.0	.0	.0	2,000.00	.1-	.1	.8
.42	7.9-	5.8	22.5	58,665.33	3.4-	3.0	24.4
.00	.0	.0	.0	450.75	.0	.0	.2
.77	.1-	.1	1.4	418.53	.0	.0	.2
.20	.0	.0	.1	464.06	.0	.0	.2
.11	4.7-	3.5	13.6	17,875.91	1.0-	.9	7.4
.33	1.1-	.8	3.3	4,158.17	.2-	.2	1.7
.67	2.0-	1.5	5.7	9,564.30	.5-	.5	4.0
.10	.8-	.6	2.4	1,935.54	.1-	.1	.8
.87	1.1-	.8	3.2	17,866.68	1.0-	.9	7.4
.00	.0	.0	.0	150,777.05	8.7-	7.6	62.7
.92	.0	.0	.0	29,455.43	1.7-	1.5	12.2
.16	.2-	.2	.6	22,447.63	1.3-	1.1	9.3
.00	.0	.0	.0	930.00	.1-	.0	.4
.57	.6-	.4	1.6	3,552.02	.2-	.2	1.5

BALANCE SHEET
AS OF 12/31/76

----- ASSETS -----

ASSETS

CASH

PETTY CASH	\$ 75.
CASH-FEDERAL ADMIN	3,708.
CASH-FEDERAL RAVCO	57,501.
CASH-L.A.F. HOLDING ACCOUNT	67,163.

*Virginia
Doubtful
TRANSFER to
LEG ACTED AND*



ADVANCES

DRAWING ACCOUNTS

DRAWING-FEDERAL ADMIN	582,000.
DRAWING-FEDERAL RAVCO	582,000.

LOANS RECEIVABLE

TOTAL ASSETS

7904011481

BALANCE SHEET
AS OF 12/31/76

----- ASSETS -----

\$	75.00
	3,708.63
	57,501.84
	67,163.83

COUNT

\$	128,449.30
	1,169.86

582,000.00-
582,000.00

.00
2,000.00-

\$	127,619.16

7 9 0 4 0 1 1 3 4 8 5

LIABILITIES AND EQUITIES

LIABILITIES

INCOME TAXES WITHHELD
FEDERAL INCOME TAX WITHHELD
STATE INCOME TAX WITHHELD
FICA TAX WITHHELD
SDI TAX WITHHELD

LOANS PAYABLE *TRANSFERRED FROM GOC support fund*
ACCRUED ACCOUNTS PAYABLE

TOTAL LIABILITIES

EQUITIES

RETAINED EARNINGS
YTD NET INCOME * LOSS *

TOTAL EQUITIES

TOTAL LIABILITIES AND EQUITIES

*accruals
for 1976 payment
FEC other*

*\$275,000 for deferral
after support fund
Registered as fed units (1 time)
(Regating)*

ALANCE SHEET
S OF 12/31/76

ILITIES AND EQUITIES -----

D	\$	677.70-
		393.75-
		37.98-
		100.84-

GOC *Support funds* →

\$	1,210.27-
•	278,000.00-
	78,056.57-

Part low rate \$ 2,000 on loan to federal government

\$ 357,265.84-

10,956.31-
162,547.42

229,647.68

\$ 127,619.16-

S AND EQUITIES

7 9 0 4 0 1 1 3 4 8 7

Schedule C

July 1976
Federal Election Commission
1325 N. Street, N.W.
Washington, D.C. 20543

Debits and Obligations for
Line Numbers 26 and/or 27 of FEC Form 3

GOA filing FEC fr 12/76
(See instructions on back)

Page 5 of 5 for

LINE NUMBER 27

(Use separate schedules for each numbered line)

GOA# B

7 9 9 4 3 1 6 6 6 2

Name of Contributor or Committee in full	Date (month, day, year)	Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
GUN OWNERS OF AMERICA CAMPAIGN COMM. 176 Full name, mailing address and ZIP code, and nature of obligation (Phone Service) Pacific Telephone P.O. Box T Sacramento, CA 95814	12-4-76	1,034.82		1,034.82
(Legal Services) Hobbs, Doyle & Nielsen Suite 2500, The Alcoa Bldg. San Francisco, CA 94111	12-1-76	383.94		383.94
(Insurance) McGee & Thielen 888 Capitol Mall Sacramento, CA 95814	10-6 to 11-17-76	529.00		529.00
(Telex Rental) Western Union 10101 & Pacific Streets Sacramento, CA 95814	12-1-76	220.65		220.65
(Mastercharge) Wells Fargo Bank 10101 Pacific Street Sacramento, CA 95814	12-1-76	2,746.00		2,746.00
(Typewriter Rental) T.M.M. P.O. Box 5845 San Mateo, CA 94402	11-23 to	95.40		95.40
Gun Owners of California 951 Arden Way Sacramento, Calif 95815	12-31-76	283,000.00	125,752.33	*157,247.67
*Balance owing represents over projected Allocation of Administrative Services Burden Allocated to Gun Owners of California.				
Subtotal this period this page (optional)		\$ 288,059.39	\$ 125,752.33	\$ 162,307.06
Total this period (last page this line number only)		\$ 346,558.55	\$ 125,752.33	\$ 220,806.22
Carry over outstanding balance only to appropriate line of summary				

GOA # C

AMENDMENT TO RECEIPTS

	REPORTED	ACTUAL	OVER REPORTED
Total Transfers In (from line 18c)	374,846.72	338,846.72	36,000.00

Note: Transfers from Gun Owners of California totaled
 300,315.19, transfers from the Gun Owners of America/
 Legislative Action Fund totaled 38,531.53

GOA ammendment
 filed w/ FEC
 6/13/77

exhibit # 4

79040113487
 7703054244;

GOA #1

Form 3
1977
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

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

RECEIVED
FEDERAL ELECTION
COMMISSION

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

1(a) Name of Candidate or Committee (in full) Check if name or address is changed
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

2 Identification Number
C00030999

1(b) Address (number and street)
455 CAPITOL MALL, STE. 315

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

1(c) City, State and ZIP code
SACRAMENTO, CA 95814

4 Type of Report (Check appropriate box and name of election, if applicable)

(a) Amendment For _____ (which report) July 10 Quarterly Report

(b) April 10 Quarterly Report October 10 Quarterly Report

(c) Tenth day report preceding _____ election on _____ in the State of _____ (primary, general or convention) (date)

(d) Tenth day report following _____ election on _____ in the State of _____ (primary, general or convention) (date)

5 (a) January 31 Year End Report
(b) Monthly Report **NOVEMBER** (Month)
(c) Termination Report

6 Report covers the period from **11/1/77** through **11/30/77**

Section A - Cash Balance Summary		Column A This Period	Column B Calendar Year Total
6	Cash on hand January 1, 1977		\$ 128,374.00
7	Cash on hand at beginning of reporting period	\$ 34,831.90	
8	Total receipts (from line 19)	\$ 122,757.21	\$ 739,523.05
9	Total expenditures (From line 25)	\$ 77,470.63	\$ 797,704.67
10	Cash on hand at close of reporting period (Subtract line 9 from line 8)	\$ 30,118.48	\$ 80,118.48
11	Cash on hand at close of reporting period (attach itemized list)	\$ 0	

Section B - Presidential Campaign Expenditures Subject to Limitation - Summary (To Be Used Only By Presidential Candidates Receiving Federal Funds)		Column A This Period	Column B Calendar Year Total
12	Cooperating expenditures (from line 20)	\$ n/a	\$
13	Refunds and Rebates (from line 17)	\$	\$
14 (a)	Expenditures subject to limitation (Subtract line 13 from line 12)	\$	\$
(b)	Expenditures from prior years subject to limitation		\$
(c)	Total expenditures subject to limitation (Add lines 14(a) and 14(b))		\$

I certify that I have examined this Report, and to the best of my knowledge and belief it is true, correct and complete.
JOHN H. HODGSON II Signature of Treasurer or Cashier **12/2/77** (Date)

Note: Submission of this report, or failure to file, may subject the person signing this Report to the penalties of 2 U.S.C. 11012 (a).
Further information: Federal Election Commission, 1225 K Street, N.W., Washington, D.C. 20543. Any information reported herein may not be copied for sale or use by any person for the purpose of soliciting contributions or for any commercial purpose.

79040113490

Detailed Summary Schedule of Receipts and Expenditures
(Page 2)

Form 3
OMB No. 1545-0047
March 1977
REV. 11-17-76

CONTRIBUTOR OR COMMITTEE		REPORT COVERING THE PERIOD	
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76		FROM 11/1/77 TO 11/30/77	
		Column A	Column B
		This Period	Calendar year-to-date
PART I - RECEIPTS			
15	Contributions and Other Income:		
(a)	Itemized (Use Schedule A)	\$	
(b)	Unitemized	\$	
(c)	Sales and Collections Included Above: List by event on memo Schedule D (B _____)		
(d)	Subtotal of contributions and other income	\$106,285.70	\$ 662,071.39
16	Loans and Loan Repayments Received:		
(a)	Itemized (Use Schedule A)	\$ 2,000.00	
(b)	Unitemized	\$	
(c)	Subtotal of loans and loan repayments received	\$ 2,000.00	\$17,000.00
17	Refunds, Rebates, Returns Received:		
(a)	Itemized (Use Schedule A)	\$4,471.51	
(b)	Unitemized	\$	
(c)	Subtotal of refunds, rebates, returns	\$4,471.51	\$22,055.67
18	Transfers In:		
(a)	From Affiliated Committees (Itemize on Schedule A Regardless of Amount)	\$	
(b)	From Other Committees (Itemize on Schedule A Regardless of Amount)	\$	
(c)	Subtotal of transfers in	\$ 0	\$38,401.79
19	Total Receipts	\$122,757.21	\$739,528.85
PART II - EXPENDITURES			
20	Operating Expenditures (Committees Not Receiving Federal Funds Include Fund Accounting Expenditures):		
(a)	Itemized (Use Schedule B)	\$54,453.04	
(b)	Unitemized	\$ 15.75	
(c)	Subtotal of operating expenditures	\$54,468.79	\$15,768.83
21	Independent Expenditures (Use Schedule E)	\$ 0	\$ 0
22	Loans, Loan Repayments, and Contribution Refunds Made:		
(a)	Itemized (Use Schedule B)	\$	
(b)	Unitemized	\$	
(c)	Subtotal of loans and loan repayments made and contribution refunds	\$ 0	\$14,000.00
For Use Only by Presidential Campaigns Receiving Federal Funds: Exempt Fundraising, Legal and Accounting Expenditures:			
(a)	Itemized (Use Schedule B)	\$	
(b)	Unitemized	\$	
(c)	Subtotal of fundraising expenditures	\$ 0	\$ 0
24	Transfers Out:		
(a)	To Affiliated Committees (Itemize on Schedule B Regardless of Amount)	\$ 23,001.84	
(b)	To Other Committees (Itemize on Schedule B Regardless of Amount)	\$	
(c)	Subtotal of transfers out	\$ 23,001.84	\$158,015.84
25	Total Expenditures	\$77,470.63	\$787,784.67
PART III - DEBTS AND OBLIGATIONS			
26	Debts and obligations owed to the Committee (Itemize all on Schedule C)	\$ 2,000.00	
27	Debts and obligations owed by the Committee (Itemize all on Schedule C)	\$1,058.24	
PART IV - RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
28	Total Receipts (from line 19)	\$122,757.21	
29	Transfers In (from line 18(a))	\$ 0	
30	Net Receipts (Subtract line 29 from line 28)	\$122,757.21	
31	Total Expenditures (from line 25)	\$77,470.63	
32	Transfers out (from line 24(a))	\$ 23,001.84	
33	Net Expenditures (Subtract line 32 from line 31)	\$54,468.79	

13491
72040



GOA #E

951 ARDEN WAY • SACRAMENTO, CALIFORNIA 95815

Gun
Owners
of America
CAMPAIGN COMMITTEE



Dear Member:

It is difficult to write this letter because as a friend and generous supporter of Gun Owners of America you have more than done your share to help elect pro-gun candidates this past November 2nd.

With your help we won 13 new seats in Congress...13 new votes to help stop gun confiscation legislation...but the price of this success has been high...and unless I receive your immediate help Gun Owners of America will be forced to shut down its operations.

Please, stay with me and let me explain:

During the closing days of the campaign, friends I thought I could count on wrote me and told me they couldn't help with last-minute campaign contributions.

I knew that money to pay for last-minute advertising was critical to the success of our pro-gun candidates, so in belief of our cause, Gun Owners of America borrowed \$122,000 in order to provide the candidates with the money they needed.

Quite frankly, this money could not have come at a more crucial time.

In fact, without these last-minute funds pro-gun candidates like Dan Marriott from Utah, Bob Dornan from California, Mickey Edwards of Oklahoma and Paul Trible of Virginia may very well not have been elected United States Congressmen.

Our contributions were well-spent. The 13 extra pro-gun votes we added to the U.S. Congress are going to be more crucial than ever, especially with a President-Elect who has called for the banning of handguns.

But now, this loan is weighing heavily on my shoulders.

Unless I can raise...\$122,000 to pay off this loan I don't know what the Campaign Committee can do. GOA depends upon contributions from concerned citizens like yourselves for its operating funds...and this debt could ruin GOA financially.

I don't know where else to turn to help pay this crushing debt. So I decided to write to you because as a good friend, I thought you would understand and perhaps help at this time of our greatest need.

The money situation is absolutely desperate. There is little money in the bank and the deadline for paying the loan is fast approaching.

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

7904011349

I must have the help of every member of GOA to raise the \$122,000 to pay this loan.

The loan is to be paid back in two installments. The first payment of \$61,000 should be made on January 14th, 1977 and the final payment of \$61,000 really should be paid no later than February 14, 1977.

Believe me, I know how loyal and generous you have been in the past. I can only thank God that there are people like you, who are helping to preserve our right to own and use firearms.

But the sad fact is that I will be forced to shut down Gun Owners of America unless I receive funds to pay this heavy debt.

Please let me hear from you today. Let me know if you can help. I must have your answer right away.

Here's how I would like you to help:

Enclosed with my letter are two special envelopes. Each is especially marked for our important deadlines...January 14th and February 14th.

If you could send a contribution of \$20.00 or more to help meet the \$61,000 down payment by January 14th it would be a tremendous help.

Then I hope you can make an extra effort to send another contribution of \$20.00 or more to help me meet the final payment of \$61,000 by February 14th.

Either way I must have your answer right away. The deadline for making the down payment on the \$122,000 loan is fast approaching.

If you can't help me make the final payment on February 14th I will understand. But please help me by sending \$20.00 or more with the envelope marked "Deadline-January 14th" for the down payment today.

Sincerely,



H.L. "Bill" Richardson
Founder and Chairman
Gun Owners of America

P.S. I sincerely hope you will carefully consider this matter, and help me meet these important deadlines. Personally, I think it would be tragic if Gun Owners of America had to close its doors because of this heavy debt.

GOA #F

Schedule B

1977
1-20-77
1-20-77
1-20-77

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(See Instructions on back)

Page 1 of 12 for

LINE NUMBER 20A

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

Name of Candidate or Committee in full

GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

1st qtr 1977 GOA rpt

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
MELINDA LANEY 6220 WILHOFF LANE ROSEVILLE, CA 95678	SALARY /3	1-8 to 1-31-77	455.00
BARBARA LOUISE MOORE 3329 TEMBROOK DRIVE SACRAMENTO, CA 95825	SALARY /1	1-15-77	35.68
JULIETA VISITACION 4458 JANRICK AVE. SACRAMENTO, CA 95832	SALARY /1	1-22-77	32.70
LADINE AREMAN 8393 LA RIVIERA DRIVE SACRAMENTO, CA 95826	SALARY /1	1-8 to 1-31-77	36.79
PAISY DRUMHELLER 2224 PLYMOUTH DRIVE NORTH HIGHLANDS, CA 95660	SALARY /1	1-22 to 1-31-77	159.02
MARY K. COOD 800 DEYLANNE AVE. SACRAMENTO, CA 95815	SALARY /2	1-15 to 1-18-77	300.03
RUTH BIGGS 2009 AVALON DRIVE SACRAMENTO, CA 95821	SALARY /2	1-15 to 1-31-77	503.56
SHAFON ELLIS 2036 CEDRS WAY SACRAMENTO, CA 95821	SALARY /2	1-15 to 1-31-77	470.61

79010113491

Expenditures for... > 1265.1
Expenditures for... > 3

GOA Purchases

70

Sept 1976

7001011405

1975 p. 3

p. 2

p. 5

4/76

p. 1

5/76

p. 5

6

7

6/76

7

9

11

15

7/76

8

10

8/76

8

11/76

6

12/76

4

p. mtr	414.22
Cam equip	1,683.71
chair	150
tables & chrs	109.50
calculator	168.54
bar	204 -
add. mchns.	100 -
Kodak equipment	475.45
microfilm	2,904.16
check profrtr	103.35
Zip codes	33.30
counter	19.64
tables	173.84
mail equip	4,588.76
add. mchns.	734.30
misc	12.32
rotte prt	30 -
misc	36.14
card racks	30.61
o. chairs	1,314.40
M. Ficke Film	300.74
mail mchu.	5,081.11

mail	✓
Cam	✓
0	✓
0	✓
ad	✓
0	✓
ad	✓
Cam	✓
Cam	✓
MSC	✓
MSC	✓
0	✓
0	✓
Mail	✓
ced	✓
MSC	✓
MSC	✓
↓	
0	✓
MSC	✓
mail	✓

add 1,087 included w)

rent (cf # 70)

0 ✓

Mail =	10,498.31
0 =	3,058.38
Cam =	5,063.32
ad =	1,002.84
MSC =	479.71
<hr/>	
	20,102.56

PAYEE - NAME & ADDRESS DATE OF PAYMENT	PURPOSE OF EXPENDITURE	PRIMARY ELECTION	AMOUNT OF EXPENDITURE
Pacific Telephone Co. 414 -K-St. Sacramento, CA. 12/8	Monthly Charges	X	330.35*
American Mailing Equipment Box 4613 Sacramento, CA. 11/21, 11/26	<u>Postage meter</u>	X	414.22*
The Baumgarten Co. 225 11th St. NW Washington, D.C. 11/17, 12/18	Rubber Stamps	X	190.05
Eastman Kodak Co. 100 Alcosta Blvd. San Ramon, CA. 11/5, 11/12, 11/17	<u>Camera Equipment</u>	X	1,683.71
DAC, Inc. 26 -J- St. Sacramento, CA. 12/12	<u>Desk Chair</u>	X	150.00*
Metropolitan Army Navy Store 20 -J- St. Sacramento, CA. 11/8, 11/14, 11/18, 11/19	<u>Tables & Chairs</u>	X	109.50
TARGET '76 Petty Cash Acct. 51 Arden Way Sacramento, CA. 11/18, 11/20, 12/16, 12/22	Transfer of Funds	X	127.75
Quality Business Machines 320 Auburn Blvd. Sacramento, CA. 2/3	<u>Calculator</u>	X	168.54*
Simplex Time Recorder 816 19th St. Sacramento, CA. 1/24, 12/2	Labor Charge	X	389.86*

1975

Schedule B
 May 1976
 Federal Election Commission
 11 K Street, N.W.
 Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (See instructions on back)

Page 7 of 13 for

LINE NUMBER 20a

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

Name of Candidate or Committee in full			
Gun Owners of America Campaign Committee '76 5/76			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
California Research 1024 - 10th Street Sacramento, Calif 95814 49	Subscription	5-19-76	300.00 X
M Space 3219 Folsom Blvd Sacramento, Calif 95816 50	Printing Services	5-19-76	33.50
Norm Moore P. O. Box D Chicago Park, Calif 95712 51	Front Office Counter Replacement	5-20-76	19.64 X
Doug Hanson 1961 Howe Ave. Sacramento, Calif 95825 52	Art Supplies	5-21-76	14.79 X
Coopers & Lybrand 555 Capitol Mall Sacramento, Calif 95814 53	Accounting Services	5-27-76	495.00 X
Metropolitan Dept. Stores 820 J Street Sacramento, Calif 95814 54	Office Tables	5-28-76	173.84 X
S. M. U. D P. O. Box 15830 Sacramento, Calif 95813 55	Install Night Light	5-24-76	100.00 X
Sharon S Anderson P. O. Box 1331 Placerville, Calif 95667 56	Salary	5-1 to 5-31-76	119.14 X
Subtotal of expenditures this page (optional)			\$ 1,255.91
Total this period (last page this line number only)			\$

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

576

Name of Candidate or Committee in full			
Gun Owners of America Campaign Committee # 76			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Western Office Equipment 3015 J Street Sacramento, Calif 95816 41	Purchase of Paymaster Check Protector	5-26-76	103.35
Comstock Security 2268 Glen Ellen Circle Sacramento, Calif 95822 42	Pre-Employment Testing	5-27-76	97.86
Director of Internal Revenue Fresno, Calif 43	Payroll Taxes	5-6-76	4,726.32
U. S. Postmaster Sacramento, Calif 95815 44	Postage	5-6 to 5-31-76	25,862.46
Supt. of Documents U. S. Printing Office Washington, D.C. 20402 45	Zip Code Directories	5-10-76	33.30
W. E. Laney Jr. 6220 Wilhoff Lane Roseville, Calif 95678 46	Travel Advance	5-11-76	200.00
Department of Benefit Payments P. O. Box 2069 Sacramento, Calif 95810 47	State Payroll Taxes	5-11-76	530.93
United Parcel Service 1380 Shore Sacramento, Calif 95655 48	Parcel Delivery Charges	5-12-76	9.67
Subtotal of expenditures this page (optional)			\$ 31,563.89
Total this period (last page this line number only)			\$

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See Instructions on back)

Name of Candidate or Committee in full			
Gun Owners of America Campaign Committee '76 5/76			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Docutronic #8 Palms Plaza Homestead, Pa. 33030 33	Equipment Rental	4-26-76	227.89 X
Engle Flying Service 8995 Sunset Ave. Fair Oaks, Calif 95628 34	Airfare	5-26-76	139.50
Eastman Kodak 343 State Street Rochester, New York 14650 35	Microfilmer	5-26-76	2,904.16 X
Hal Hammond P. O. Box 19352 Sacramento, Calif 95819 36	Printing Service	5-26-76	27.00
I Mark Company 2550 Fair Oaks Blvd Sacramento, Calif 95825 37	Equipment Repairs	5-26-76	213.45 X
Image Printing & Publication Co. 1200 S Street Sacramento, Calif 95814 38	Printing Service	5-26-76	37.10
Safeguard Business Systems 6117 Malt Ave. Los Angeles, Calif 90040 39	Office Forms	5-26-76	132.77 X
Xerox Corp 555 Capitol Mall Sacramento, Calif 95814 40	Equipment Rental	5-26-76	190.80 X
Subtotal of expenditures this page (optional)			\$ 3,872.67
Total this period (last page this line number only)			\$

7904011350

Schedule B
January 1976
Federal Election Commission
1275 N Street, N.W.
Washington, D.C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See instructions on back)

Page 1 of 1
LINE NUMBER 20
Total Expenditures for this
Reporting Period

Name of Candidate or Committee in full			
Gun Owners of America Campaign Committee '76			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount (see instructions)
U. S. Postmaster Sacramento, Calif	Postage	4-1 to 4-30-76	18,297.25 ✓
Wells Fargo Bank 10th & J Street Sacramento, Calif	Payroll Taxes	4-19-76	3,752.02 ✓
Townsend & Townsend One Kearney Street San Francisco, Calif 94108	Legal Assistance	4-12-76	553.70 ✓
Globe Chemical 1811 Del Paso Blvd Sacramento, Calif 95815	Cleaning Supplies	4-5-76	72.78 ✓
Michael Doury P. O. Box 12809 Baton Rouge, La. 70805	Research Svc.	4-7-76	300.00 *
Frank Erickson 5700 Arden Way Carmichael, Calif 95608	Rent	4-13-76	1,400.00 ✓
Eastman Kodak 9100 Alameda Blvd San Ramon, Calif 94583	Equipment	4-12-76	475.00 ✓
Mahan Proctor & Associates 2624 J. Street Sacramento, Calif 95810	Labels	4-28-76	2,491.50 ✓
Subtotal of expenditures for this reporting period			\$27,542.25
Total reported expenditures for this reporting period			\$27,542.25

adm
adm
adm
adm
adm
adm

X

X

X

X

4/76

475.00

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

1st qtr '76

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Xerox Corp P. O. Box 37201 San Francisco, Calif 94137 X	Telecopier Expense	2-3-76 1-9-76	\$232.14
U. S. Postmaster Sacramento, Calif	Postage Due Account ?	1-1 to 3-31-76	9,56,300 * \$67,850.00
Wells Fargo Bank 10th & J Street Sacramento, Calif X	Payroll Taxes	1-1 to 3-31-76	7,011.27 a. \$1,689.56
Abbey Carpet Corp 5800 Frankiin Street Sacramento, Calif 95820 X	Adding Machines	3-6-76	\$100.00
Wells Fargo Bank 10th & J Street Sacramento, Calif	Postage Account	1-1 to 3-31-76	A. 92,600 - \$86,100.00
Bank of So. Maryland 304 Charles St. La Plata, Maryland	Postage Escrow Account	3-3-76	\$2,200.00
Diversified Mail Service 7777 Leesburg Pike Falls Church, Virginia 22043	Mailing Form Letters & Postage	1-1 to 3-31-76	\$17,061.53
U. S. Postmaster Sacramento, Calif 95815 J	Postage Due Acct.	1-1 to 3-15-76	74,267.92 \$15,000.00

Subtotal of expenditures this page (optional) ▶ \$

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

Form 278e
 U.S. Election Commission
 214 Street, N.W.
 Washington, D.C. 20543

Unreimbursed Expenditures
 Campaign Fundraising, Loans, and Transfers
 for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (See Instructions on back)

Page 10 of 11
 LINE NUMBER 20B
 (Use separate schedule for each numbered line)

7994041056206

Name of Candidate or Committee in full			
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76			
Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
ASSOCIATED FREIGHT LINES 841 FOLGER AVE. BERKELEY, CA. 94710	DELIVERY, PRINTING	7-8-76	48.21
FISHER PRINTING & LITHOGRAPHY 220 RIVERSIDE AVE. ROSEVILLE, CA. 95678	PRINTING	7-12-76	2,810.06
SAWDCO P.O. BOX 1434 SACRAMENTO, CA. 95807	WASTE DISPOSAL	7-12-76	29.00
ELLIS & ELLIS 2209 TESLA WAY SACRAMENTO, CA. 95825	PASTE-UPS	7-12-76	25.44
PLEXIM TIME RECORDER CO. 26 SOUTH GARDNER STREET GARDNER, MASS. 01440	CARD PAGES	7-12-76	30.61
VALERELITE COMPANY INC. P.O. BOX 8126 SACRAMENTO, CA. 95818	LIGHTING FIXTURES	7-13 to 7-27-76	46.28
ELIANS LOCK & SAFE 10487D FOLESON BLVD. RANCHO CORDOVA, CA. 95670	REPAIR	7-15-76	36.00
SMUD 6101 S ST. SACRAMENTO, CA. 95813	STREET LIGHT	7-21-76	10.71
			\$ 3,008.31
			\$

7/76

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See Instructions on back)

Page 8 of 11 for
 LINE NUMBER 208

(Use separate schedules for each numbered line)

Name of Candidate or Committee in full
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76 **7/76**

Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SPERRY UNIVAC P.O. BOX 44265 SAN FRANCISCO, CA. 94144	EQUIP. RENTAL <input checked="" type="checkbox"/>	7-12 to 7-27-76	1,708.53
TOWNSEND & TOWNSEND ONE MARKET PLAZA SAN FRANCISCO, CA. 94105	LEGAL EXPENSE	7-27-76	159.43
IMBERJACK 936 ARDEN WAY SACRAMENTO, CA. 95815	TAPE, KEYS, HOOKS <input checked="" type="checkbox"/>	7-12-76	36.14
U.S. POSTMASTER SACRAMENTO, CA. 95815	POSTAGE DUE, METER	7-7 to 7-22-76	7,000.00
U.S. POSTMASTER SACRAMENTO, CA. 95815	PERMIT	7-1 to 7-29-76	1,005.00
DEPARTMENT OF BENEFIT PAYMENTS P.O. BOX 2009 SACRAMENTO, CA. 95810	PAYROLL TAXES- STATE <input checked="" type="checkbox"/>	7-15-76	2,767.33
M. SPACE 3219 FOLSOM BLVD. SACRAMENTO, CA. 95816	PRINTING	7-13-76	6.00
WELLS FARGO BANK 104 N AND J STREETS SACRAMENTO, CA. 95814	POSTAGE TRANSFERS	7-2 to 7-26-76	73,260.00

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50

Total for all expenditures on this page (do not include any other schedules) **\$85,792.35**

Total for all expenditures on this form (numbered 1-5) **\$85,792.35**

Schedule B

John's 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 15 of 15 for

LINE NUMBER 20a

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

70040113503
76030230311

Name of Candidate or Committee in full			
Gun Owners of America Campaign Committee '76 6/76			
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Ron Biron 2430 Fair Oaks Blvd Sacramento, Calif 95825	Coffee Pot X	6-28-76	30.00
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Mahan Proctor & Associates 2024 J Street Sacramento, Calif 95814	Data Processing Service S	6-29-76	4,969.04
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Subtotal of expenditures this page (total all)			▷ \$ 4,999.04
Total this period (all pages that line number only)			▷ \$191,705.57

Schedule B

February 1976
Federal Election Commission
1200 M Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Page 11 of 15 for
LINE NUMBER 20a

(Use separate schedules for each numbered line)

6/76

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Studio Four 7777 Leesburg Pike Falls Church, Va. 22043	Art Design	6-10-76	75.00
Townsend & Townsend One Market Street San Francisco, Calif 94105	Legal Expense	6-9-76	2.80
Richard Viguerie Co. 7777 Leesburg Pike Falls Church, Va. 22043	Direct Mailing Expense	6-7-76	9,173.67
Tom E. Brady 3967 D Street Sacramento, Calif 95819	Rubber Stamp	6-15-76	5.25
Lumberjack 936 Arden Way Sacramento, Calif 95815	Office Equipment	6-17-76	12.32
Smith Lithograph Corp 1029 E. Gude Dr. Rockville, Md. 20850	Printing Brochures	6-17-76	2,325.00
U. S. Postmaster Sacramento Main Sacramento, Calif 95815	Postage	6-7 to 6-30-76	11,604.00
Willis Lancy Jr. 6220 Wilhoff Lane Roseville, Calif 95678	Travel & Entertainment	6-25-76	54.94

790001150307
7630230307

Total of expenditures this page (total all pages)

\$ 23,252.55

(Indicate page number if more than one page)

\$

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

6/76

79040113500
75030230305

Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Office Industrial Furnishers P. O. Box 1552 Sacramento, Calif 95807	Office Furniture	6-22-76	334.43
Pacific Telephone P. O. Box T Sacramento, Calif 95813	Phone Service	6-22-76	2,486.28
Patterson Travel Agency 1501 Arden Way Sacramento, Calif 95815	Airfare	6-21-76	58.50
Pip Instant Postal Press 2367 Arden Way Sacramento, Calif 95825	Photo Copies	6-17-76	27.45
Prep Inc. 1121 Arlington Blvd Arlington, Va. 22209	Forms	6-17-76	495.00
Quality Data Services 2322 Auburn Blvd Sacramento, Calif 95821	Adding Machines & Repairs	6-22-76	734.30
Red Lion Motor Inn 2001 Pt. West Way Sacramento, Calif 95815	Meetings	6-2-76	20.07
Rem of Sacramento 1926 - 28th Street Sacramento, Calif 95822	Univac Supplies	6-2-76	23.75

Subtotal of expenditures this page (from all) ▷ \$ 4,179.78

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

Module B
 February 1976
 Federal Election Commission
 320 K Street, N.W.
 Washington, D.C. 20543

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (See Instructions on back)

Page 8 of 12 for
 LINE NUMBER 20a
 (Use separate schedule for each numbered line)

707699127510
 1066000

Name of Candidate or Committee in full			
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76			
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
CAPITAL OFFICE EQUIP. CO 3119 ARDEN WAY SACRAMENTO, CA. 95815	<u>OFFICE CHAIRS</u> X	8-13-76	1,314.40
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
GREYHOUND PACKAGE EXPRESS 715 L STREET SACRAMENTO, CA. 95814	SHIPPING	8-9-76	19.10
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
IBM P.O. BOX 5845 SAN MATEO, CA. 94402	EQUIP. RENTAL X	8-3-76	143.10
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
IBM 1660 WILSON BLVD. ARLINGTON, VA. 22209	DATA PROCESSING CARDS	8-26-76	47.84
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
PACIFIC TELEPHONE P.O. BOX 7 SACRAMENTO, CA. 95813	PHONE SERVICE X	8-3-76	847.25
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
DON HAPPER 481 PARKFAIR DRIVE, #8 SACRAMENTO, CA. 95825	EXPENSES	8-12-76	250.00 ?
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
M.L. RICHARDSON 951 ARDEN WAY SACRAMENTO, CA. 95815	EXPENSES	8-9-76	150.00 ?
Full name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure for this period
LOU RITCHIE HEATING & AIR COND. 6350 MADISON AVE., # 6 SACRAMENTO, CA. 95208	ELECTRICAL MAINT. X	8-17-76	68.26
			\$ 2,500.00
			\$

8/76

150.00 ?

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Name of Candidate or Committee in full

GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

11/76

77030149581190

Full Name, mailing address and ZIP code

Kelley Services, Inc.
 G.P.O. Box 1179
 Detroit, MICH 48232

Purpose of Expenditure

Temp. Employee

X

Date (month, day, year)

11-1 to
 11-19-76

Amount of each expenditure this period

490.88 X

Full Name, mailing address and ZIP code

Calico West
 9621 F Oates Drive
 Sacramento, CA 95827

Purpose of Expenditure

Layout/Paste-up

Date (month, day, year)

11-1-76

Amount of each expenditure this period

16.75

Full Name, mailing address and ZIP code

Eastman Kodak Company
 19000 Alcosta Blvd.
 San Ramon, CA 94583

Purpose of Expenditure

Microfiche Film

X

Date (month, day, year)

11-1-76

Amount of each expenditure this period

300.74

Full Name, mailing address and ZIP code

Cipriano Espinor
 997 Arden Way
 Sacramento, CA 95815

Purpose of Expenditure

Office Rent

X

Date (month, day, year)

11-1-76

Amount of each expenditure this period

1,900.00

Full Name, mailing address and ZIP code

Red Carpet Licquors
 1050 Howe Ave.
 Sacramento, CA 95825

Purpose of Expenditure

Party Supplies

X

Date (month, day, year)

11-3-76

Amount of each expenditure this period

28.47

Full Name, mailing address and ZIP code

I Mark
 1610 Executive Court
 Sacramento, CA 95825

Purpose of Expenditure

Machine Maintenance

X

Date (month, day, year)

11-9-76

Amount of each expenditure this period

69.95

Full Name, mailing address and ZIP code

Pitney Bowes
 Walnut & Pacific Streets
 Stamford, CONN 06904

Purpose of Expenditure

Copier Rental

X

Date (month, day, year)

11-9-76

Amount of each expenditure this period

206.70

Full Name, mailing address and ZIP code

Media Pacific
 1225 Eighth Street
 Sacramento, CA 95814

Purpose of Expenditure

Advertising

Date (month, day, year)

11-9-76

Amount of each expenditure this period

516.29

Subtotal of expenditures this page (optional) \$ 3,529.78

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

Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

LINE NUMBER 20a

File separate schedules for each numbered label

(See Instructions on back)

Name of Candidate or Committee in full

GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

12/76

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Western Union Telegraph Company
7916 Westpark Drive
McLean, VA 22101

Telegraphs

12-6-76

48.20

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Deira, Loyle & Nielsen
Suite 2500, The Alcoa Building
One Maritime Plaza
San Francisco, CA 94111

Legal Services

12-6-76

232.63

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Sacramento Office Furniture Service
1015 J Street
Sacramento, CA 95814

Furniture Rental

12-9 to
12-8-76

62.40

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Computer Rental
1000 10th Street
San Francisco, CA 94144

Computer Rental

12-6-76

1,800.00

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Computer Rental
1000 10th Street
Sacramento, CA 95814

Computer Rental

12-6-76

173.00

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Machine Rental
1000 10th Street
Sacramento, CA

Machine Rental

12-6-76

300.00

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

American Mailing Equipment
1150 Fulton Ave, Suite C
Sacramento, CA 95825

Machine Purchase

12-6-76

5,781.11

Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Belly Services, Inc.
P.O. Box 1179
Detroit, MICH 48232

Temp. Employee

12-6-76

571.20

Subtotal of expenditures this page (optional)

\$ 8,293.44

Total this period (last page this line number only)

5

100103635517

aw

?

X

X

X

X

X

X

X

FOA # H

SCHEDULE C
Page 4 of 4

Amendment to
end .75
report
B-O

NAME - NAME AND ADDRESS OF PAYMENT	PURPOSE OF EXPENDITURE	PRIMARY ELECTION	AMOUNT OF EXPENDITURES
------------------------------------	------------------------	------------------	------------------------

Payroll Taxes /15, 12/1, 12/15, 12/31	Payroll taxes	X ✓	1,609.50
A Payroll Taxes /15, 12/1, 12/15, 12/31	Payroll taxes	X L	768.14*
Payroll Taxes /15, 12/1, 12/15, 12/31	Payroll taxes	X L	231.80*
llis E. Laney, Jr. 10 Wilhoff Lane Seville, CA 95678 /13, 11/17, 11/26, /8, 12/17	Reimb. for mileage & supplies	X -	217.15
M Corporation 10 Capitol Mall Sacramento, CA 95814	Typewriter rental	X -	101.76*
Lee & Thielen 57 - 10th St. Sacramento, CA 95806 3/21, 12/30	Insurance Coverage	X ✓	432.00*
Employer's Taxes	Payroll taxes	X ✓	355.96*
	Sub-Total		\$112,720.98

INDIVIDUAL CONTRIBUTION EXPENSES

llis E. Laney, Jr. 10 Wilhoff Lane Seville, CA 95678	Rental of drafting table, work chairs, art supplies	X	672.00*
L. Richardson 1 Arden Way Sacramento, CA 95815	Rental of Dura-Mach 10 Typewriter	X	350.00*
Target '76 Calif. Campaign Committee 1 Arden Way Sacramento, CA 95815	175,000 Mailing list names ✓	X	165.00
	Total		\$113,907.98

GOA # I

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

Page 1 of 1 for
LINE NUMBER 17a
(Use separate schedule(s) for each
numbered line)

Name of Contributor or Committee in full
GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

1st qtr 1977 GOA rpt

Full name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
U.S. POSTMASTER (PERMIT REFUND) SACRAMENTO, CA 95813	n/a <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-18	29.38
Principal place of business SAME AS ABOVE			
U.S. POSTMASTER (MAILING REFUND) LOS ANGELES, CA 90052	n/a <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-22	413.40
Principal place of business SAME AS ABOVE			
TAM & ORDER CAMPAIGN COMMITTEE (PHONE SERVICES) 1107-NINTH STREET, STE 317 SACRAMENTO, CA 95814	CAMPAIGN COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-2	4.42
Principal place of business SAME AS ABOVE			
LEGISLATIVE ACTION FUND (PHONE SERVICE) 455 CAPITOL MALL, STE 315 SACRAMENTO, CA 95814	CAMPAIGN COMMITTEE <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-2	9.16
Principal place of business SAME AS ABOVE			
COMPUTER CAGING CORPORATION (PURCHASE OF PROGRAMMING) 6060 SUNRISE VISTA DRIVE, STE 100 CITRUS HEIGHTS, CA 95610	COMPUTER SERVICES <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-23	8,017.50
Principal place of business SAME AS ABOVE			
COMPUTER CAGING CORPORATION (REFUND OVERPAYMENT OF 6060 SUNRISE VISTA DRIVE, STE 100 PROCESSING CHARGES) CITRUS HEIGHTS, CA 95610	COMPUTER SERVICES <input type="checkbox"/> Check if Contributor is self-employed n/a Aggregate Year-to-date >\$ n/a	11-23	5,997.65
Principal place of business SAME AS ABOVE			
Total of receipts (see page four chart)		\$	\$
Total of refund (last page this line number only)		\$	\$14,471.51

7004013514

Schedule A

January 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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

Page 1 of 1 for
LINE NUMBER 18a
(Use separate schedules for each
numbered line).

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

May 1976

Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Gun Owners of California-Federal Support Fund 951 Arden Way Sacramento, Calif 95815		5-13-76	10,000.00
		5-17-76	35,000.00
		5-19-76	5,000.00
Principal place of business		Occupation	
Same		N/A	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-Date ▶ \$05,000.00	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business		Occupation	
		<input type="checkbox"/> Check if Contributor is self-employed	
		Aggregate Year-to-date ▶ \$	
Subtotal of receipts this page (optional)			▶ \$
Total this period (last page this line number only)			▶ \$ 50,000.00

790401083386

Schedule A

January 1976
Federal Election Commission
1300 M Street, N.W.
Washington, D.C. 20543

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

Page 1 of 1 for
LINE NUMBER 18a

(This space is for the filer's use -
do not include)

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

June 176

Full Name, mailing address and ZIP code

Gun Owners of California-Federal Support Fund
951 Arden Way
Sacramento, Calif 95815

Date (month,
day, year)

Amount of cash
receipt this period

6-15-76

35,000.00

6-21-76

15,000.00

6-18-76

7,000.00

6-22-76

4,000.00

6-23-76

10,000.00

6-25-76

5,000.00

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$ 702,000.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this period

6-28-76

7,000.00

6-29-76

5,000.00

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of cash
receipt this period

Principal place of business

Occupation

Check if Contributor is self-employed

Aggregate Year-to-Date > \$

Subtotal of receipts this page (optional) > \$

Total this period (last page this line number only) > \$ 88,000.00

79040113515
76030230294

GCC #A

SECTION 3301, CORPORATIONS CODE)

STATE OF CALIFORNIA, MAKES

95815
 95815
 95815
 95815
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 95815

77-032839

Spencer

77-032839

15

STATEMENT BY DOMESTIC CORPORATION

THIS STATEMENT MUST BE FILED WITH CALIFORNIA SECRETARY OF STATE (SECT. 3301, CORPORATIONS CODE). PLEASE READ THE INSTRUCTIONS ON THE BACK OF THE FORM BEFORE COMPLETING.

THE CORPORATION NAMED HEREIN ORGANIZED UNDER THE LAWS OF THE STATE OF CALIFORNIA, MAKES THE FOLLOWING STATEMENT:

1 ADDRESS & LOCATION OF THE PRINCIPAL OFFICE	2 CITY OR TOWN	3 STATE	4 ZIP CODE
2248 Erickson Street	Sacramento,	CALIF.	95815
* NUMBER AND STREET ADDRESS OF POST OFFICE			
(SAME)			
* CITY ADDRESS & STATEMENT NUMBER			
* CITY & STATE			
* ZIP CODE			

THE NAMES OF THE FOLLOWING OFFICERS ARE:

PRESIDENT:			
NAME: DAN LOEFFLER			
2248 Erickson St.	Sacramento, CA	95815	
* NUMBER AND STREET ADDRESS OF POST OFFICE			
* CITY ADDRESS & STATEMENT NUMBER			
* CITY & STATE			
* ZIP CODE			

VICE-PRESIDENT:			
NAME: (NONE)			
* NUMBER AND STREET ADDRESS OF POST OFFICE			
* CITY ADDRESS & STATEMENT NUMBER			
* CITY & STATE			
* ZIP CODE			

SECRETARY:			
NAME: Barbara A. RICHARDSON			
2248 Erickson St.	Sacramento, CA	95815	
* NUMBER AND STREET ADDRESS OF POST OFFICE			
* CITY ADDRESS & STATEMENT NUMBER			
* CITY & STATE			
* ZIP CODE			

TREASURER:			
NAME: BARBARA A. RICHARDSON			
2248 Erickson St.	Sacramento, CA	95815	
* NUMBER AND STREET ADDRESS OF POST OFFICE			
* CITY ADDRESS & STATEMENT NUMBER			
* CITY & STATE			
* ZIP CODE			

DO NOT WRITE IN THIS SPACE

FILED
 SACRAMENTO, CALIF.
 FEB 16 1977
Wendy Fox
 REGISTERED CLERK
 SECRETARY OF STATE

[Signature]
 President

2-12-77
 2:10 PM 03/16 67-7
 COUNTY CLERK'S OFFICE
 1000 P. AVENUE
 SACRAMENTO, CALIF. 95814

77-032840

15

CC # B

RESOLUTION AUTHORIZING SIGNING AND ENDORSING CHECKS AND OTHER INSTRUMENTS

RESOLVED, that WELLS FARGO BANK, N.A. be, and it is hereby selected as a Depository of the funds of this Organization, and that Pres. and Asst. Sec/Treas. Organization be and they are authorized to establish such accounts, and that checks or drafts withdrawing said funds may be signed by any 2 of the following:

	NAME	TITLE
1.	T. E. HALL	Accountant
PLEASE	H. L. RICHARDSON	Chairman of Board
2.		
OR	DAN LOEFFLER	President
PRINT		
3.		
NAMES	BARBARA A. RICHARDSON	Sec/Treas
AND	TIM MACY	Asst. Sec/Treas
TITLES		
4.		

FURTHER RESOLVED, that WELLS FARGO BANK, N.A. is authorized to honor and pay any and all checks and drafts of this Organization signed as provided herein, whether or not payable to the person or persons signing them; and that checks, drafts, bills of exchange, and other evidence of indebtedness may be endorsed for deposit to the account of this Organization by any of the foregoing or by any other employee or agent of this Organization, and may be endorsed in writing or by stamp and with or without the designation of the person so endorsing.

FURTHER RESOLVED, that the authority hereby conferred shall remain in force until written notice of the revocation thereof by the Board of this Organization shall have been received by said depository at the office at which the account is kept; and that the cancellation of the secretary or an assistant secretary as in the continuing authority of this resolution and the persons authorized to sign and their signatures, shall be binding upon this Organization.

I HEREBY certify that the foregoing is a true and correct copy of the resolution adopted by the Board of this organization at a meeting of said Board regularly held on the 12 day of February, 1977 and that said resolution is still in full force and effect.

I FURTHER certify that the signatures appearing on the reverse side of this card are the signatures of the persons authorized to sign for and on behalf of this organization.

WITNESS my hand and the seal of this organization this 12 day of February, 1977

Barbara A. Richardson
SECRETARY

SEAL

COMPUTER CAGING CORPORATION

NAME OF ORGANIZATION

WE CERTIFY TO THE CORRECTNESS OF THE FOREGOING INFORMATION.

BY SIGN OFFICER TITLE BY SIGN OFFICER TITLE

79040113518

CCC #C

Frank P. Adams
235 Montgomery Street, Suite 1922
San Francisco, California 94104
Telephone: 415-391-7717

605118
FILED
in the Office of the Secretary of State
of the State of California
DEC 20 1976
WACH FONG III, Secretary of State
By John R. ...
Deputy

4

ARTICLES OF INCORPORATION
OF
COMPUTER CAGING CORPORATION

FIRST: The name of this corporation is:

COMPUTER CAGING CORPORATION

SECOND: The purposes for which the corporation is formed, including the specific business in which the corporation is primarily to engage, are;

(a) The specific business in which the corporation is primarily to engage is to account for and record the receipt of information, drafts and checks by means of photography and computer science, with related filing, recording and classification;

(b) To engage, generally, in any business related or unrelated to those described in Clause (a) of this Article SECOND, from time to time authorized or approved by the Board of Directors of this corporation, or to carry on any other trade or business which can, in the opinion of the Board of Directors of this corporation, be advantageously carried on in connection with or auxiliary to those described in Clause (a) of this Article SECOND; and to do all such things which are incidental or conducive to the attainment of the above objectives, or any of them;

(c) To become a member of any partnership or joint venture, and to enter into any lawful arrangements for sharing profits and/or losses in any transaction or transactions, and to promote and organize other corporations;

(d) To guarantee the contracts of customers and others;

(e) To do business anywhere in the world;

(f) To have and exercise all rights and powers from time to time granted to a corporation by law.

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Registration of ...

Page 2

The foregoing shall be construed as objects, purposes and powers, and the enumeration thereof shall not be held to limit or restrict in any manner the powers now or hereafter conferred on this corporation by the laws of the State of California.

The objects, purposes and powers specified herein shall, except as otherwise expressed, be in no way limited or restricted by reference to or inference from the terms of any other clause or paragraph of these articles. The objects, purposes and powers specified in each of the clauses or paragraphs of these Articles of Incorporation shall be regarded as independent objects, purposes or powers.

The corporation may in its By-Laws confer powers, not in conflict with law, upon its Directors in addition to the foregoing, and in addition to the powers and authorities expressly conferred upon them by statute.

THIRD: The county in the State of California where the principal office for the transaction of the business of the corporation is located is the County of SACRAMENTO.

FOURTH: (a) The number of Directors of this corporation is three (3).

(b) The names and addresses of the persons who are appointed as first Directors are:

H.L. Richardson, Jr.	951 Arden Way Sacramento, California 95815
Norman H. Moore	Box D Chicago Park, California 95712
H.L. Richardson, Sr.	2844 Wright St. Sacramento, California, 95821

79040113520

Norman H. Moore
Norman H. Moore

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

On this 16th day of December, before me,
Judy S. Guin, a Notary Public for the State of California,
personally appeared NORMAN H. MOORE, known to me to be the person
whose name is subscribed to the within Articles of Incorporation,
and acknowledged to me that he executed the same.



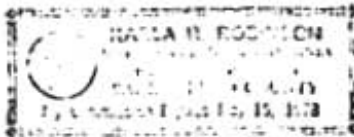
(Notarial Seal)

Judy S. Guin
Notary Public

H. L. Richardson, Sr.
H. L. Richardson, Sr.

STATE OF CALIFORNIA)
) ss.
COUNTY OF SACRAMENTO)

On this 16th day of December, before me,
Karla E. Robinson, a Notary Public for the State of California,
personally appeared H. L. RICHARDSON, SR., known to me to be the
person whose name is subscribed to the within Articles of Incorporation,
and acknowledged to me that he executed the same.



(Notarial Seal)

Karla E. Robinson
Notary Public

79010113521

Hall # A

7904011352

**Gun
Owners
of California**
CAMPAIGN COMMITTEE



951 ARDEN WAY
SACRAMENTO CALIFORNIA 95815

Thomas E. Hall
CONTROLLER
(916) 927-2444

Hall # B

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(see instructions on back)

(Use separate schedules for each numbered line).

*FEC report, 1st qtr. 11/97
Filed 4/9/76*

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

alar

79040113521

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Beth M Ficco 721 Lampasas Ave. #0 Sacramento, Calif 95815	Salary	2-6 to 3-31-76	\$1,060.88 <i>a. 854.70</i>
Thomas E. Hall 3481 Kimberly Road Shingle Springs, Calif 95682	Salary	3-1 to 3-31-76	9708.48 \$836.80
Douglas E. Hanson 1961 Howe Ave. Apt 166 Sacramento, Calif 94825	Salary	2-13 to 3-31-76	2,320.20 \$3,033.32
Willis Earl Laney Jr. 6220 Wilhoff Lane Roseville, Calif 95678	Salary	1-1 to 3-31-76	4,327.50 \$5,250.00
Timothy P. Macy 281 Sharp Circle Roseville, Calif 95678	Salary	1-1 to 3-31-76	2,703.50 \$3,000.00
Lynda M Nehr 4552 Wawona Circle Fair Oaks, Calif 95628	Salary	1-1 to 3-31-76	198.14 \$2,590.00
Donna L Reddick 2430 Fair Oaks Sacramento, Calif 95825	Salary	1-1 to 3-31-76	1,904.54 \$2,550.00
Nadine J. Areman 8393 La Riviera Dr. Sacramento, Calif 95815	Salary	1-16 to 3-31-76	167.27 \$117.65

Subtotal of expenditures this page (optional) ▶ \$
Total this period (last page this line number only) ▶ \$

THE ADVOCATE

1730 South Amphlett, Ste. 225 • San Mateo, California 94402 • Telephone (415) 573-7100

Hall #C

To Whom in May Concern:

Thomas E. Hall, former controller for two gun-owner committees chaired by state Sen. H.L. Richardson has expressed to me his desire to cooperate with any and all representatives of public agencies in regard to the allegations he has made in my article "Sen. Richardson's 'Lemonade Machine.'" He may be reached by telephone at these numbers: work -- (916) 673-8330; home -- (916) 743-1049. His current address is: 1925 Pinewood Way, Marysville, CA 95901.

Sasha Gregory-Lewis

Sasha Gregory-Lewis
2/15/78

7 9 0 4 0 1 1 5 2 ;

Misc A

79040113525

	T. conts. GOA	T. conts. GOA	GOA → GOA	GOA cont. est.
1/76 → 3/31/76	411025-	269053	20000	18315
4/76	133760	57015	35000	22911
5/76	274696	146995	50000	24669
6/76	87016		88000	22072
7/76	137845			15778
8/76	109780	486544		25180
9/76	137044	195711	5000	16600
10/76	194962	107541		38000
11/76	110831			24268
12/76	138878	157065		17610
	1735837	1409924	198000	223745

T 142 = 3145761
 2 = 2 7142 = 44.8 %
 11 = 9 10 = 40 %
 12 = 2 10 = 45 %
 3-11 = 46803
 5-12 = 79719
 3-4 = (25943)
 5-6 = 17143
 11 = 9 3 = 43.2 %
 12 = 2 5 = 68 %
 3 = 2 10 = 52 %
 5 = 2 10 = 66 %
 T 102 / 377993 = 12 %

approx. allocation
 original, allo
 amended, al
 excess of adv
 excess of adv
 dif. between
 dif. between
 advances from
 advances from
 12A/8/100
 average advance
 note, amended

1st. quarter	Conts. GOA	C. Casing	
4/77 →	159660	12544	
5/77	31630	13286	
6/77	70408	7506	
8/77	57386	6227	
9/77	54302	5473	
7/77	44606	7151	
9/77	86975	6437	
10/77	535		
11/77	106285	(5997)	1989
	612387		59616

424/8
 104/4

exhibit #1

5578
 Jan May
 49 8 June

GOC → GOA am.	GOC → GOA adm.	LAF → GOA	LAF → GOA am.	est. adm.	act. adm.	act. GOC burden/am.	act GOC burden am.	4-11
38315	35193			45787	45755	18302	16426	
28900	18437			57277	27042	10816	9708	
23000	22285			62172	36442	14576	13082	
83864	27063	8284.		55232	43322	17328	21227	
48630	19352	5924.		39495	29816	11926	14609	
	28763	8805.		58701	42002	16800	20580	
(10000)	20335	6225.		41500	33555	13422	16991	
38000	13479	9105.		85647	26155	10462	12815	
		9100.		60670	52242	20896	25589	
	48559	6603.		44026	41661	16664	20413	
250609 -	233466	54046 -	38531	550507	377992	151197	170890	

tallies w/ computer output

to charge to GOA for GOC admin.
 charges for GOC admin.
 location for GOC admin.
 bills from GOC to GOA over actual GOC burden
 bills from GOC to GOA over actual GOC burden, amended
 and estimated charges (GOC owes to GOA) end of Yr.
 bills and estimated charges, amended (GOA owes to GOC), end of Yr.

GOC → GOA pd. % total burden
 GOC → GOA pd. % total burden, amended
 account for it.

to GOA by GOC, by month: \$42,133 over actual admin. charges, amended
 \$33,000 reported owed by GOA to GOC on 11/10/77, 11/10/77.
 it says GOC → GOA = \$500315 - conflicts w/ line 5
 this report - 151,197 = 149,118 excess pd. to GOA excess over adm.
 - 170,890 = 129,425 amend. to GOA excess over adm.

2001 88 - repair GOC on 11/25
 \$10,000 unaccounted for

Schedule B
 January 1976
 Federal Election Commission
 125 K Street, N.W.
 Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
 (See instructions on back)

MSC # B

Page 3 of 13 for
 LINE NUMBER 20a
 (Use separate schedule(s) for each numbered line.)

Name of Candidate or Committee in Full

Gun Owners of America Campaign Committee #76

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
17 Creative Printing 5170 Lawrence Plaza Hyattsville, Md. 20781	Printing Service	5-20-76	3,384.23
18 Metro Printing Service Inc. 8446 Lee Highway Fairfax, Va. 22030	Printing Service	5-20-76	479.00
19 Duplex Products P. O. Box 92062 Chicago, Illinois 60675	Green Stock Cards	5-20-76	204.00 X
20 Henricks Miller Typographics Co. 2363 Champlain St N.W. Washington, D.C. 20009	Typesetting	5-26-76	16.20
21 Frank Erickson 5700 Arden Way Carmichael, Calif 95608	Office Rent & Office Furniture	5-21-76	1,943.50 X
22 Michael H Dowty P. O. Box 52889 Baton Rouge, La. 70805	Research Service	5-4-76 5-15-76	450.00
23 Prep Inc. 1121 Arlington Blvd. Arlington, Va. 22209	Printing Service	5-20-76	2,228.00
24 Red Lion Motor Inn 2001 Pt. West Way Sacramento, Calif 95815	Business Meetings	5-26-76	173.48 X
Subtotal of expenditures this page (optional)			\$ 8,880.41
Total this period (Use page this line number only)			\$

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GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE
EXCEPTIONS TO EXPENDITURE
1/1/76 - 3/31/76

PAYEE/PURPOSE	AMOUNT REPORTED	AMOUNT OF CHECK (S)	UNDER REPORTAGE	OVER REPORTAGE
1. Dept of Benefit Payments (Calif) State P/R Taxes	-0-	851.55 ✓	851.55	-0-
2. Dept of Benefit Payments (Calif) State P/R Taxes	-0-	248.27 ✓	248.27	-0-
3. Michael H. Dowty Res and anal fee	-0-	150.00 ✓	150.00	-0-
4. Dept of Benefit Payments (Calif) State P/R Taxes	-0-	322.24 ✓	322.24	-0-
5. Michael H. Dowty Res and anal fee	-0-	150.00 ✓	150.00	-0-
6. American Mailing Lists Corp.	14,508.17	12,792.61 ✓	-0-	1,715.56
7. Conest Office Supply	368.55	622.81 ✓	254.26	-0-
8. Diversified Printing Serv	24,453.10	27,548.10 ✓	3,095.00	-0-
9. Frank Erikson -- rent	2,800.00	4,200.00 ✓	1,400.00	-0-
10. Bob Hanson -- Consultant Fees and expenses	2,060.00	2,080.37 ✓	20.37	-0-
11. IBM Corp -- Typewriter Rental	169.90	203.52 ✓	33.62	-0-
12. Sen. H.L. Richardson Expenses	310.53	410.53 ✓	100.00	-0-
13. Richard A. Viguerie Co. Mass mailings	79,116.72	82,350.71 ✓	3,233.99	-0-
14. U.S. Postmaster Sacramento, CA	67,850.00	56,300.00 ✓	-0-	11,550.00
15. Wells Fargo Bank Fed P/R Taxes	1,689.56	7,011.27 ✓	5,321.71	-0-
16. Wells Fargo Bank Postage Account	86,100.00	92,600.00 ✓	6,500.00	-0-
17. U.S. Postmaster Sacramento, CA	15,000.00	14,267.62	-0-	732.38

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Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See instructions on back)

Name of Candidate or Committee in full

Gun Owners of America Campaign Committee '76

June 1976 60A rpt

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of contribution this period
Department of Benefit Payments P. O. Box 2069 Sacramento, Calif 95810	State Payroll Taxes	6-4-76	591.15
United Parcel Service 1380 Shore Ave. Sacramento, Calif 95655	Delivery Charge	6-3-76	4.08
M Space 3219 Folsom Blvd Sacramento, Calif 95816	Printing Charges	6-25-76	8.00
Wells Fargo Bank 10th & J Street Sacramento, Calif 95814	Postage	6-7 to 6-30-76	22,640.00
Creative Printing 5170 Lawrence Plaza Hyattsville, Md. 20781	Printing Service	6-25-76	18.50
Duplex Products P. O. Box 92062 Chicago, Illinois 60675	Green Stock Cards	6-25-76	100.40
Frank Erickson 5700 Arden Way Carmichael, Calif 95608	Rent & Purchase of Office Furniture	6-28-76	1,943.50
Michael Dowdy P. O. Box 52889 Baton Rouge, La. 70805	Research Services	6-30-76	450.00

Subtotal Expenditures this page (optional) \$ 25,202.

Total Expenditures this page (line number only) \$

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7300230300

643.50 =
o. furniture

?

1,943.50

Schedule B

For 1976
Federal Election Commission
225 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions or back)

Misc. #c
Page 7 of 12 for

LINE NUMBER 20a

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

Name of Candidate or Committee in full

GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

11/76

77977043005173531

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Globe Chemical Company 1811 Del Paso Blvd. Sacramento, CA 95815	Cleaning Supplies X	11-9-76	25.97
Comet Office Supply Company 2114 K Street Sacramento, CA 95814	Office Supplies X	11-9-76	277.07
Lumberjack Stores, Inc. 936 Arden Way Sacramento, CA 95815	Building Supplies X	11-9-76	92.84
Data Mediums 2110 K Street Sacramento, CA 95816	Office Supplies X	11-11-76	652.57
Doug Hanson 1961 Howe Ave. Sacramento, CA 95825	Mileage Expense	11-11-76	24.80
Ruth Maddrey Federal-States Reports, Inc. P.O. Box 986 Court House Station Arlington, VA 22216	State Report Guide	11-18-76	550.00
H.L. Richardson 951 Arden Way Sacramento, CA 95815	Travel Expense	11-18-76	40.00
Andy Archer 2831 Clark Ave. Carmichael, CA 95608	Salary X	10-16 to 11-13-76	550.42

Subtotal of expenditures this page (optional) > \$ 2,213.67

Total of expenditures this line number only > \$

Schedule D

January 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

Required Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 21, 22, and/or 23 of FEC Form 3
(See instructions on back)

Page 23 of 23 for

LINE NUMBER 20a

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

Name of Candidate or Committee in full

GUN OWNERS OF AMERICA CAMPAIGN COMMITTEE '76

9/76

7001913530
7693033300

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
DOBBS, DOYLE & NIELSEN SUITE 2500, THE ALCOA BUILDING ONE MARITIME PLAZA SAN FRANCISCO, CA. 94111	LEGAL SERVICES	9-15-76	134.73
PATTERSON TRAVEL AGENCY 1501 ARDEN WAY SACRAMENTO, CA. 95815	AIRLINE TICKETS	9-15-76	312.00
LYNDA NEHR 4552 WAMONA CIRCLE FAIR OAKS, CA. 95628	MILEAGE REIMB.	9-20-76	3.72
U.S. POSTMASTER TERMINAL ANNEX LOS ANGELES, CA.	BULK MAILING	9-22-76	9,837.26
TYSON TRUCK LINES, INC. 165 5th AVE, S.W. NEW BRIDGEON, MINN. 55112	RET'D CONTRIBUTION	9-23-76	20.00
McCOLLUM PRESS 11730 PARKLAWN DRIVE ROCKVILLE, MD. 20852	PRINTING	9-8-76	2,950.00
H.L. RICHARDSON 851 ARDEN WAY SACRAMENTO, CA. 95815	TRAVEL ADVANCE	9-30-76	50.00

> \$ 13,307.31

> \$ 13,306.52

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THE **ADVOCATE**

One Peninsula Place, Bldg. 1730, Suite 225, San Mateo, CA 94402

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

30463

RETURN RECEIPT
REQUESTED

CERTIFIED

No. 114984

MAIL

78 FEB 22 AM 11:27

FEDERAL ELECTIONS
COMMISSION



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 538

Date Filmed 4/18/79 Camera No. --- 2

Cameraman SPC

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