THE WHITE HOUSE

WASHINGTON

February 10, 1981

MEMORANDUM FOR THE WHITE HOUSE STAFF

FROM: FRED F. FIELDING
COUNSEL TO THE PRESIDENT

SUBJECT: Communications with the Department of Justice

As we are all keenly aware, it is imperative that there be public confidence in the effective and impartial administration of the laws. To that end, after consultation between the President and the Attorney General, the following procedures have been established in regard to communications between the White House Staff and the Department of Justice.

1. All inquiries which concern or may concern particular pending investigations or cases being handled by the Department of Justice shall be directed to the Counsel to the President. If appropriate and necessary, the inquiry will then be transmitted to the Office of the Attorney General or the Deputy Attorney General.

2. All requests for formal legal opinions from the Department of Justice shall be directed to the Counsel to the President, who will direct such requests to the Office of the Attorney General or to the Assistant Attorney General -- Office of Legal Counsel.

3. All comments between the White House Office and the Department of Justice in regard to policy, legislation and budgeting should be handled directly between those parties concerned.

Your cooperation in observing these guidelines is most strongly urged. If you have any questions regarding these procedures, please contact this Office.

THE WHITE HOUSE

WASHINGTON

December 15, 1983

Dear Mr. Schmults:

In response to your letter of November 16, 1983, attached is a list of all individuals in the Executive Office of the President who fall within the purview of 18 U.S.C. §1751. I will provide changes to your office as they may occur. Also, as to the designation of a 24 hours a day contact, I shall be that person and may be reached through the following numbers: 202/456-2632, 202/456-1414 or 202/395-2000.

Sincerely,

Fred F. Fielding
Counsel to the President

The Honorable Edward C. Schmults
Deputy Attorney General
Department of Justice
Room 5111
Washington, D.C. 20530

The President	Ronald W. Reagan
The Vice President	George Bush

EXECUTIVE OFFICE OF THE PRESIDENT

Council of Economic Advisers Chairman	~~Martin S. Feldstein~~
Council on Environmental Quality Chairman	A. Alan Hill
Office of Management and Budget Director	David A. Stockman
Office of the U.S. Trade Representative	William E. Brock
Office of Science and Technology Policy - Director	George A. Keyworth II
Office of the Vice President Chief of Staff	Adm. Daniel J. Murphy

The White House Office

Counsellor to the President	Edwin Meese III
Chief of Staff and Assistant to the President	James A. Baker, III
Deputy Chief of Staff and Assistant to the President	Michael K. Deaver
Assistant to the President and Press Secretary	James Scott Brady
Assistant to the President and Deputy to the Chief of Staff	Richard G. Darman
Counsel to the President	Fred F. Fielding
Assistant to the President for Cabinet Affairs	Craig L. Fuller
Assistant to the President for Communications	~~David R. Gergen~~
Assistant to the President for Presidential Personnel	John S. Herrington

Assistant to the President and Director of Special Support Services	Edward V. Hickey, Jr.
Deputy Counsellor to the President	~~James E. Jenkins~~
Assistant to the President for National Security Affairs	Robert C. McFarlane
Assistant to the President and Deputy to the Deputy Chief of Staff	Michael A. McManus
Assistant to the President for Legislative Affairs	M.B. Oglesby
Assistant to the President for Management and Administration	John F.W. Rogers
Assistant to the President for Political Affairs	vacant
Assistant to the President and Principal Deputy Press Secretary	Larry M. Speakes
Assistant to the President for Policy Development	John A. Svahn
Assistant to the President for Intergovernmental Affairs	Lee L. Verstandig
Assistant to the President for Public Liaison	Faith Ryan Whittlesey

12/83

THE WHITE HOUSE

WASHINGTON

March 27, 1984

MEMORANDUM FOR FRED F. FIELDING

FROM: JOHN G. ROBERTS /s/

SUBJECT: Justice Department

The attached sheet describes the order of succession at the Department of Justice. I have advised Larry Speakes of the first part.

The answer to your second question, concerning the length of time an acting official may serve, is considerably more complicated. Officials appointed pursuant to the Vacancy Act, 5 U.S.C. §§ 3345-3347, may serve for not more than 30 days. 5 U.S.C. § 3348. The provision authorizing the President to "detail" other Executive branch officials confirmed by the Senate to fill vacancies caused by the resignation of the head of an Executive department or other official specifically "does not apply to a vacancy in the office of Attorney General." 5 U.S.C. § 3347. Thus, at first blush, I do not think the President can appoint an Acting Attorney General.

The President could theoretically appoint an Acting Deputy Attorney General, but I know in the past we have objected to putting officials in a "double acting" role, as would be the case with an Acting Deputy Attorney General acting as Attorney General. (Lowell Jensen's case is distinguishable, since he would act as Attorney General by virtue of the succession statute, 28 U.S.C. § 508.)

Tex Lezar tells me that the Vacancy Act does not apply to Justice. That is true for officials acting by virtue of the statutory succession in 28 U.S.C. § 508. It is also true for officials delegated responsibilities by the Attorney General pursuant to 28 U.S.C. § 510. In both cases the officials do not hold their offices pursuant to the Vacancy Act, but rather 28 U.S.C. §§ 508 and 510, and accordingly are not subject to the limitations of the Vacancy Act. In all other cases, however, such as a Presidential detail, I believe the Vacancy Act would apply.

THE WHITE HOUSE

WASHINGTON

March 27, 1984

Pursuant to 28 U.S.C. § 508, the order of succession in the Department of Justice is:

Attorney General
Deputy Attorney General
Associate Attorney General.

Pursuant to an order of the Attorney General dated June 1, 1983, and issued pursuant to 28 U.S.C. § 510, the order following the above is:

Solicitor General
Assistant Attorney General, Office of Legal Counsel
Assistant Attorney General, Criminal Division
Assistant Attorney General, Civil Division.

THE WHITE HOUSE

WASHINGTON

May 30, 1984

MEMORANDUM FOR FRED F. FIELDING

FROM: JOHN G. ROBERTS JGR

SUBJECT: Draft Department of Justice Report on H.R. 5452, a Bill to Amend the FTC Act Concerning Acquisitions of Substantial Energy Reserve Holders

The Office of Management and Budget has requested our views by noon today on a draft Department of Justice report on the above-referenced legislation. H.R. 5452 amends the Federal Trade Commission Act to impose new requirements with respect to the acquisition of "substantial energy reserve holders," defined as holders of at least 100 million barrels of oil or natural gas reserves. Specifically, the bill provides that consent decrees or orders requiring divestiture of assets of substantial energy reserve holders, issued by the FTC or a court, may not become final until the required divestiture has been approved by the FTC or a court. This curiously-worded provision would have the effect of extending indefinitely the time available to the FTC or a court to review proposed acquisitions. (Current law specifies time limits within which the FTC must object to mergers submitted for approval.) The bill also provides that, until 60 days after approval of a proposed divestiture, the acquired party must be maintained as a separate business entity and the acquiring party cannot elect more than 20 percent of the directors of the acquired party.

In its draft report, Justice opposes H.R. 5452. The report notes that it is unclear from the legislation whether the new procedures for reviewing the acquisition of substantial energy reserve holders apply to Justice, since H.R. 5452 amends only the FTC Act, not the Tunney Act. Even without these ambiguities, however, Justice opposes the bill because it singles out the acquisitions of energy firms, when "there is no persuasive indication that acquisitions in this industry pose unique competitive problems."

In addition, the draft report points out that the bill is unnecessary, since enforcement agencies and courts are already able to review and raise timely objections to proposed divestitures. Finally, the draft report objects that the bill would eliminate much of the discretion of the FTC and the courts by requiring them to issue "hold separate

orders" in all acquisitions of substantial energy reserve holders, even if a court determined that such an order would be inequitable in a particular case.

Attached for your approval and signature is a memorandum for Branden Blum of OMB indicating that this office has no objections to the draft report.

Attachment

THE WHITE HOUSE

WASHINGTON

May 30, 1984

MEMORANDUM FOR BRANDEN BLUM
LEGISLATIVE ATTORNEY
OFFICE OF MANAGEMENT AND BUDGET

FROM: FRED F. FIELDING Orig. signed by FFF
COUNSEL TO THE PRESIDENT

SUBJECT: Draft Department of Justice Report on H.R. 5452, a Bill to Amend the FTC Act Concerning Acquisitions of Substantial Energy Reserve Holders

Counsel's Office has reviewed the above-referenced draft report, and finds no objection to it from a legal perspective.

FFF:JGR:aea 5/30/84
cc: FFFielding/JGRoberts/Subj/Chron

THE WHITE HOUSE

WASHINGTON

May 30, 1984

MEMORANDUM FOR BRANDEN BLUM
LEGISLATIVE ATTORNEY
OFFICE OF MANAGEMENT AND BUDGET

FROM: FRED F. FIELDING
COUNSEL TO THE PRESIDENT

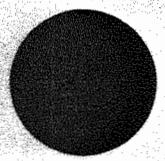
SUBJECT: Draft Department of Justice Report on H.R. 5452, a Bill to Amend the FTC Act Concerning Acquisitions of Substantial Energy Reserve Holders

Counsel's Office has reviewed the above-referenced draft report, and finds no objection to it from a legal perspective.

FFF:JGR:aea 5/30/84
cc: FFFielding/JGRoberts/Subj/Chron

ID # _____ CU

WHITE HOUSE
CORRESPONDENCE TRACKING WORKSHEET



☐ O - OUTGOING
☐ H - INTERNAL
☐ I - INCOMING
Date Correspondence Received (YY/MM/DD) 84 / 05 / 25

Name of Correspondent: James Muir

☐ **MI Mail Report** **User Codes: (A)** _____ **(B)** _____ **(C)** _____

Subject: Draft Department of Justice report H.R. 5452, a bill to amend the FTC Act concerning acquisitions of Substantial Energy Reserve Holders.

ROUTE TO:		ACTION			DISPOSITION		
Office/Agency	(Staff Name)	Action Code	Tracking Date YY/MM/DD		Type of Response	Code	Completion Date YY/MM/DD
CU	HOLL	ORIGINATOR	84 05 25				/ /
		Referral Note:					
CU	RT 18	D	84 05 25			S	84 05 30
		Referral Note:					MOOH
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ACTION CODES:
A - Appropriate Action
C - Comment/Recommendation
D - Draft Response
F - Furnish Fact Sheet to be used as Enclosure
I - Info Copy Only/No Action Necessary
R - Direct Reply w/Copy
S - For Signature
X - Interim Reply

DISPOSITION CODES:
A - Answered
B - Non-Special Referral
C - Completed
S - Suspended

FOR OUTGOING CORRESPONDENCE:
Type of Response = Initials of Signer
Code = "A"
Completion Date = Date of Outgoing

Comments: _____

Keep this worksheet attached to the original incoming letter.
Send all routing updates to Central Reference (Room 75, OEOB).
Always return completed correspondence record to Central Files.
Refer questions about the correspondence tracking system to Central Reference, ext. 2590.

5/81

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

May 25, 1984

LEGISLATIVE REFERRAL MEMORANDUM

TO: LEGISLATIVE LIAISON OFFICER

Federal Trade Commission
Department of Commerce
Department of Energy

SUBJECT: Draft Department of Justice report on H.R. 5452, a bill to amend the FTC Act concerning acquistions of substantial energy reserve holders.

The Office of Management and Budget requests the views of your agency on the above subject before advising on its relationship to the program of the President, in accordance with OMB Circular A-19.

Please provide us with your views no later than -- NOON --

Wednesday, May 30, 1984

Direct your questions to Branden Blum (395-3802), the legislative attorney in this office.

James C. Murr for
Assistant Director for
Legislative Reference

Enclosure

cc: Lehmann Li Fred Fielding Karen Wilson Ken Glozer
Mike Uhlmann John Cooney Joe Hezir Kate Newman

United States Department of Justice

ASSISTANT ATTORNEY GENERAL
LEGISLATIVE AFFAIRS

WASHINGTON, D.C. 20530

Honorable James J. Florio
Chairman, Subcommittee on Commerce,
Transportation and Tourism
Committee on Energy and Commerce
House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

This is in response to your request for the views of the Department of Justice on H.R. 5452, a bill to amend the Federal Trade Commission Act with respect to acquisitions of substantial energy reserve holders, and to amend the Clayton Act with respect to acquisitions of companies with net sales or total assets greater than $2 billion. The Department of Justice recommends against enactment of this legislation.

The proposed amendments to the Federal Trade Commission Act concern proceedings challenging acquisitions of substantial energy reserve holders. The amendments would provide that a consent decree or agreement, or an order issued by the FTC or a court, which provided for divestiture could not become final until the required divestiture is approved by the FTC or the court. The amendments would also require that under certain circumstances, substantial energy reserve holders be maintained as separate entities until sixty days after final approval of their acquisition. The proposed amendments to the Clayton Act would permit the FTC or the Department of Justice to delay large acquisitions for a period of not more than sixty days beyond the delays already contemplated by existing law.

Existing Law and Practice Concerning Mergers and Acquisitions

In order to understand the full impact of these proposals on the enforcement of the antitrust laws, a detailed understanding of current law and practice is required. Section 7 of the Clayton Act, 15 U.S.C. § 18, prohibits mergers and acquisitions whose effect "may be substantially to lessen competition, or to tend to create a monopoly." Jurisdiction to enforce Section 7 is vested in both the Department of Justice

and the FTC. In order to avoid duplication of efforts, particular acquisitions are assigned for evaluation to either the Department or the FTC, through a long-established liaison procedure between the two agencies.

Before the enactment in 1976 of the premerger notification requirements in Section 7A of the Clayton Act, the antitrust enforcement agencies sometimes did not learn of acquisitions until shortly before, or even after, they had been consummated. As a result, the anticompetitive effects of illegal acquisitions could be cured, if at all, only through divestiture. Divestiture was not always an adequate remedy, however. If the acquired assets had already been integrated with the operations of the acquiring company, efforts to "unscramble the eggs" were sometimes futile. Even if the assets had been held separate, acceptable purchasers could be hard to find. When divestiture was ultimately accomplished, the divested business was sometimes a less effective competitor than it had been prior to the acquisition, due to months or years of atrophy between the original acquisition and the ultimate divestiture.

The Congress concluded, in 1976, that many of these problems could be avoided if the antitrust enforcement agencies had an opportunity to intervene before, rather than after, illegal acquisitions had been consummated. Accordingly, Congress enacted Section 7A of the Clayton Act, 15 U.S.C. § 18a, which requires notification to antitrust enforcement agencies prior to consummation of mergers or acquisitions. This notification process begins when the parties to the proposed transaction provide the agencies with certain preliminary information about the transaction and about the business activities of the parties. For most types of transactions, the reviewing agency has thirty days, from the date both parties' filings are received, in which to conduct a preliminary review of the acquisition. If the proposed transaction is a cash tender offer, this preliminary review period extends for fifteen days from the date of the acquiring party's filing.

If the proposed transaction raises competitive concerns, the reviewing agency may issue requests for additional information from the parties. After this information is provided, the parties must wait an additional 20 days, or ten days in the case of cash tender offers, before consummating the acquisition. The length of time between issuance of the requests for additional information and the parties' submission of the requested information depends upon the scope of the requests and the efforts made by the parties to respond quickly. In many cases, that time period is substantial.

The firm policy and practice of the Department is to devote whatever resources are necessary to be prepared, before the waiting period has expired, to file suit and seek a temporary restraining order or preliminary injunction to block consummation of anticompetitive transactions. That policy has developed precisely because of the difficulties of securing effective relief, through divestiture or otherwise, after an anticompetitive acquisition has been consummated. For the same reasons, the Department ordinarily will insist that any divestiture that is required must be accomplished before, rather than after, consummation. The Department will generally seek to prohibit an acquisition if such divestiture has not been accomplished, even if the parties are willing to enter into a binding consent agreement requiring post-consummation divestiture. 1/

When the parties are unable or unwilling to divest the offending assets prior to consummation, the Department generally will file suit and seek a court order to prevent the transaction from going forward. If the court denies the Department's request for a temporary restraining order or preliminary injunction, thereby allowing consummation of the acquisition, the Department generally seeks prompt and effective divestiture. In almost all cases in which the court permits a challenged acquisition to proceed, the court issues a "hold separate" order to prevent all or part of the acquired assets from being integrated and commingled with the business operations of the acquiring party.

The government and the parties to a challenged transaction may at any time enter into a consent agreement which requires divestiture or other relief. All such consent agreements are subject to the requirements of the Tunney Act, 15 U.S.C. § 16(b)-(h). Pursuant to that Act, notice of the consent agreement is published in the Federal Register and general circulation newspapers. The Department also publishes a

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1/ In some cases, pre-consummation divestiture may be impossible. For example, the offending assets may belong to a company which is the target of a hostile takeover attempt, and which is unwilling to dispose of the assets. In that situation, the Department will allow the acquisition to proceed if the acquiring party is willing to enter into a consent decree requiring prompt and effective divestiture of the assets. This exception to the Department's usual policy precludes target companies from blocking acquisitions by refusing to cure competitive problems. Other circumstances occasionally warrant exceptions to the Department's "fix-it-first" policy.

Competitive Impact Statement which explains the decree and its anticipated effects on competition. Interested persons are invited to submit comments to the Department and the court, and after a sixty day waiting period the Department publishes and responds to those comments. In all consent decrees, the Department reserves the right to withdraw its consent at any time during this public comment period. No consent decree may be entered by the court until this public comment period has expired and the court has independently found that the proposed decree is in the public interest.

In all consent decrees requiring divestiture, the Department requires advance notification of any proposed divestiture, and reserves the right to object to any such proposal. All consent decrees vest continuing jurisdiction in the court to hear and rule upon such objections, and to set aside or modify the original consent decree if appropriate.

Effects of the Proposed Bill on Existing Law

H.R. 5452 would add to the Federal Trade Commission Act new provisions concerning acquisitions of substantial energy reserve holders. With respect to such acquisitions, proposed Section 25(a) provides that consent decrees or agreements, or orders issued by the Commission or a court, requiring divestiture of assets may not become final until the required divestiture has been approved by the Commission or the court. If the divestiture is not approved, the order may be set aside, and proceedings may be initiated to obtain other relief, including the divestiture of all the assets of the acquired party as a single entity.

Proposed Section 25(b) requires the acquired party to be maintained as a separate business entity, forbids the commingling of assets between the acquiring party and the acquired party, and forbids the acquiring party from electing more than 20 percent of the directors of the acquired party. These provisions remain in effect until 60 days after approval of any proposed divestiture; if no divestiture is required, the provisions remain in effect until the final entry of a decree or order. If it appears that legal proceedings challenging an acquisition may be protracted, the Commission or the court may modify or terminate those requirements if it finds that it is in the public interest to do so.

Discussion

H.R. 5452 is ambiguous in a number of important respects. We assume from its wording that the bill is intended to establish procedures to be followed in the event of a challenge to the acquisition of a substantial energy reserve holder by

either the FTC administratively or the Department of Justice in court. Although the FTC has reviewed most such acquisitions that have occurred recently, the Department has examined a number of such mergers in the past and is likely to do so again in the future. However, the insertion of these new procedures into the FTC Act, and the lack of any correlation between them and the provisions of the Tunney Act, which is part of the Clayton Act, raise some ambiguities in this regard. The bill's references to "approval", and to a decree, agreement, or order becoming "final", raise questions as to precisely what is meant by these terms and how they relate to approval under the Tunney Act or the general legal doctrine of finality. For example, "approval" might refer to approval of a divestiture plan, approval of a particular purchaser, approval of a consummated transaction, or approval of the turning over of assets to a trustee for divestiture purposes. The precise effect of H.R. 5452, given these ambiguities, is difficult to discern, and the bill should not be enacted for this reason alone.

In addition, H.R. 5452 singles out acquisitions of energy firms, even though there is no persuasive indication that acquisitions in this industry pose unique competitive problems, or that existing enforcement procedures are not fully adequate to deal with any anticompetitive merger that might be proposed. The Department has seen no evidence that divestiture of energy assets is more problematic than divestiture of assets in other industries. Accordingly, the Department opposes efforts to undermine the general applicability of the antitrust laws by creating different rules for a particular industry.

More importantly, the proposed legislation is unnecessary and unwise regardless of its scope. Section 25(a) would not add to the powers already exercised by the courts in ordering and overseeing injunctive relief. Under existing law, the enforcement agencies and the courts are able to review proposed divestitures and to raise objections to them if appropriate. Under the provisions of the Tunney Act, the settlement process is open to public scrutiny and comment, and the courts are explicitly directed to make their own findings as to the public interest. The broad equitable powers of the courts are fully sufficient to secure, in appropriate cases, the specific forms of relief contemplated by this proposed legislation. 2/ Even

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2/ We defer to the FTC for a full evaluation of its powers and the administrative procedures it follows in challenging acquisitions of substantial energy reserve holders. 16 C.F.R. §§ 2.31 et. seq. outlines procedures followed by the Commission for the review of proposed consent agreements that in major respects are comparable to procedures under the Tunney Act.

assuming that its ambiguities could be resolved, it is highly likely that section 25(a) would constrain the exercise of necessary discretion by the enforcement agencies and the courts, adversely affecting the interests of merging parties, other potential participants in divestiture transactions, and the consuming public at large.

Section 25(b) would change existing law by eliminating much of the discretion now exercised by the FTC and the courts in issuing and enforcing hold separate orders. What we understand to be the basic goals of section 25(b) are fully protected by existing law and procedures. The policies of the enforcement agencies and the powers of the courts and the Commission are adequate to assure that necessary divestiture takes place. If a hold separate order is required pending any given divestiture, it can be obtained either through consent or litigation. Interested parties have more than adequate opportunity under the Tunney Act and the FTC's procedures to become fully aware of proposed mergers and divestitures and take whatever action they feel is appropriate. The Department believes that the flexibility with which existing equitable powers are exercised is more appropriate and effective than the rigid requirements of the bill. The bill would require hold separate provisions in all acquisitions of substantial energy reserve holders even though a court might otherwise decide that, in a particular case, a hold separate order was inequitable. The bill would also require that <u>all</u> assets be held separate, including assets which might be wholly unrelated to the competitive problem.

The latter effect may itself be anticompetitive in some situations. A business subject to a hold separate order may be hampered in planning for the future, raising capital, or attracting and retaining the most qualified personnel. If it remains in limbo for a substantial period of time, its competitive vitality may be sapped. It was for precisely this reason, among others, that Congress enacted Section 7A of the Clayton Act, and that the Department has insisted on pre-consummation divestiture, rather than allowing offending assets to be held separate and divested at some future time. The bill would permit some modification of its hold separate requirements it if appeared that litigation would be "protracted." However, the bill does not define "protracted" and the Department sees no reason to risk these anticompetitive effects for even a short period of time.

Section 2 of the proposed bill would amend Section 7A of the Clayton Act dealing with the pre-merger notification process. The bill would allow the FTC or the Department to extend by up to 60 days the preliminary waiting period before which acquisitions could be consummated. The sixty-day

extension would be permitted only if the net sales or total assets of the acquired person were greater than $2 billion dollars.

The purpose of this provision apparently is to ensure that enforcement authorities have sufficient time to evaluate proposed acquisitions. In the Department's experience, however, the waiting periods provided by existing law are fully adequate to permit a thorough and careful investigation of proposed acquisitions, including acquisitions of very large companies. In many instances, the Department is able to determine with minimal investigation that substantial portions of even very large acquisitions pose no conceivable competitive problems.

The Department has also observed throughout the long history of enforcement of the Clayton Act that the vast majority of corporate mergers do not threaten competition, but, on the contrary, do contribute to the vitality and productivity of our free market economy. For that reason, governmental action to restrict mergers should be undertaken with great care. Section 2 of the proposed bill would introduce more uncertainty, and the possibility of substantial delay, for firms contemplating acquisitions. This uncertainty and delay can only add to the costs and difficulties of financing acquisitions.

Conclusion

In sum H.R. 5452 is unnecessary and unwise. Existing law is fully adequate to permit a careful review of the competitive effects of proposed acquisitions and proposed divestitures. Antitrust enforcement agencies and the courts already have sufficient power to remedy the effects of illegal acquisitions. Therefore, the Department of Justice recommends against enactment of this legislation.

The Office of Management and Budget has advised that there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

Robert A. McConnell
Assistant Attorney General

98TH CONGRESS
2D SESSION

H. R. 5452

To amend the Federal Trade Commission Act to impose certain requirements with respect to the acquisition of substantial energy reserves holders, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

APRIL 12, 1984

Mr. FLORIO introduced the following bill; which was referred jointly to the Committees on Energy and Commerce and the Judiciary

---

A BILL

To amend the Federal Trade Commission Act to impose certain requirements with respect to the acquisition of substantial energy reserves holders, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That (a) the Federal Trade Commission Act is amended by redesignating section 25 as section 26 and inserting after section 24 the following new section:

"SEC. 25. (a) A consent agreement proposed by the Commission, a consent decree proposed for submission to a court of competent jurisdiction, or an order issued by the Commission or a court with respect to an acquisition of a

substantial energy reserve holder which provides for the divestiture of any part of the assets of the substantial energy reserve holder or of the person acquiring such holder may not become final before the required divestiture has been approved by the Commission or the court. If the divestiture required by a decree, agreement, or order is not approved, such decree, agreement, or order may be rescinded by the Commission or court and an action or proceeding may be initiated to obtain appropriate relief, including requiring the person making the acquisition to sell the substantial energy reserve holder as a single entity to an approved person or persons if there is a finding that such acquisition was in violation of law.

"(b) If a substantial energy reserve holder is acquired in an acquisition to which subsection (a) applies or if such a holder is acquired and an action or proceeding has been commenced on or after January 1, 1984, by other than a private party to declare the acquisition a violation of this Act or an Antitrust Act, the substantial energy reserve holder shall be maintained as a separate viable business entity, its assets shall not be commingled with the person making the acquisition, and the person making the acquisition may not elect more than 20 percent of the board of directors of such holder until (1) 60 days after the date the consent agreement, consent decree, or order relating to the acqusition becomes final,

or (2) if the final agreement, decree, or order does not require divestiture, the date the agreement, decree, or order becomes final. If an action or proceeding to declare the acqusition unlawful has been commenced and if it appears that such action or proceeding may be protracted, the Commission or the court may, upon request of any party to the acquisition with respect to which such action or proceeding is initiated, modify or terminate the application of the requirements of this subsection if it finds that such modification or termination is in the public interest.

"(c) For purposes of this section—

"(1) the term 'substantial energy reserve holder' means any person who, individually or together with his affiliates, owns or has an interest in, 100 million barrels or more of proved reserves of crude oil, natural gas liquids equivalents, or natural gas equivalents worldwide, as reported in such person's most recent report to the Securities and Exchange Commission pursuant to the requirements of the Financial Accounting Standards Board Statement Number 69; and

"(2) the term 'acquisition' includes the acquisition of control of a substantial energy reserve holder through the purchase of voting securities or assets, or both.

"(d) The requirements of subsections (a) and (b) do not apply to consent agreements, consent decrees or orders of a court which are proposed or issued in connection with an action brought by a private party.".

(b) Section 25 of the Federal Trade Commission Act, as added by the amendment made by subsection (a), shall apply with respect to consent agreements proposed on or after January 1, 1984, by the Federal Trade Commission, consent decrees proposed on or after January 1, 1984, for submission to a court, and orders issued by a court or the Federal Trade Commission on or after January 1, 1984, respecting the acquisition of substantial energy reserve holders, except that the requirement of subsection (b) of such section respecting the electing of board of directors shall only apply with respect to agreements or decrees proposed after the date of the enactment of this Act or orders issued after such date.

SEC. 2. Subsection (e) of section 7A of the Act of October 15, 1914 (15 U.S.C. 18(a)) is amended by adding at the end the following:

"(3) The Federal Trade Commission or the Assistant Attorney General, in its or his discretion may extend the 30-day waiting period (or in the case of a cash tender offer, the 15-day waiting period) specified in subsection (b)(1) of this section or extended under paragraph (2) of this subsection for an additional period of not more than 60 days if the net sales

or total assets of the person proposed to be acquired exceed $2,000,000,000.".

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THE WHITE HOUSE

WASHINGTON

June 25, 1984

MEMORANDUM FOR RICHARD A. HAUSER

FROM: JOHN G. ROBERTS

SUBJECT: Proposed Letter Regarding Juvenile Justice Act of 1974 -- Prepared by the Office of Planning and Evaluation for M.C. Droll's Signature

Richard Darman has asked for comments by close of business today on the above-referenced draft letter. The letter, to be sent over the signature of a member of Bruce Chapman's staff to various newspaper editors, places partial blame for the plight of missing and exploited children on the Juvenile Justice Act of 1974. The theory is that the Act, by generally prohibiting institutionalization of juvenile status offenders (runaways), left those juveniles at the mercy of the street. I have no quarrel with the basic point, although at several points the article falls into the fallacy of attacking a straw man, blaming the Act for things it does not in fact do.

In particular, the last paragraph on page 2 criticizes the Act for "giv[ing] children all of the legal rights of adults" and "abrogat[ing] parental rights once children leave home." The Act does not, of course, do so in so many words. I telephoned the author of the article, M.C. Droll, who explained that she viewed the foregoing as consequences of the deinstitutionalization approach of the Act. In other words, since runaways cannot be held against their will, as status offenders, they cannot be forcibly returned to their parents. This, according to Droll, is giving them all the legal rights of adults and abrogating parental rights. I recommend objecting to this paragraph as written, because it is not clear that the granting of adult rights to children and the abrogation of parental rights are criticized as consequences of deinstitutionalization rather than as specific provisions in the Act itself. The draft memorandum for Darman contains other technical objections. The last item in particular should impress Darman with how carefully we review these things.

Attachment

THE WHITE HOUSE

WASHINGTON

June 25, 1984

MEMORANDUM FOR RICHARD G. DARMAN
ASSISTANT TO THE PRESIDENT

FROM: RICHARD A. HAUSER
DEPUTY COUNSEL TO THE PRESIDENT

SUBJECT: Proposed Letter Regarding Juvenile Justice Act of 1974 -- Prepared by the Office of Planning and Evaluation for M.C. Droll's Signature

Counsel's Office has reviewed the above-referenced proposed article. At page 1, line 2, and page 2, line 15, the draft refers to the "Juvenile Justice Act." The proper name of the statute is the "Juvenile Justice and Delinquency Prevention Act."

The last paragraph on page 2 criticizes the Act for "aligning itself with the movement to give children all of the legal rights of adults" and for "abrogat[ing] parental rights once children leave home." The Act does not, by its terms, do these things. It may be argued that deinstitutionalization -- which the Act does implement -- has the effect of abrogating parental rights and giving children adult legal rights. If this is the point the author wishes to make, the paragraph should be rewritten so it is clear that the Act is being criticized because the Act mandates deinstitutionalization, and deinstitutionalization has these consequences. As written it seems that the Act is being criticized for specific provisions granting adult legal rights to children and abrogating parental rights. As noted, such provisions do not exist.

I would also note that there are several errors in the print-out of possible recipients of the article. One never knows, of course, but I suspect that neither Ruth Lehman nor B. Rollis Hood nor Flora Ogan actually prefer to be addressed as "Mr."

RAH:JGR:aea 6/25/84
cc: FFFielding/RAHauser/JGRoberts/Subj/Chron

THE WHITE HOUSE

WASHINGTON

June 25, 1984

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ASSISTANT TO THE PRESIDENT

FROM: RICHARD A. HAUSER
DEPUTY COUNSEL TO THE PRESIDENT

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ID # 216267 CU

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Subject: Proposed letter Re: Juvenile Justice Act of 1974 — prepared by the Office of Planning and Evaluation for M. C. Droll's signature

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ACTION CODES:
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C - Comment/Recommendation
D - Draft Response
F - Furnish Fact Sheet to be used as Enclosure
I - Info Copy Only/No Action Necessary
R - Direct Reply w/Copy
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WHITE HOUSE STAFFING MEMORANDUM

DATE: 6/21/84 ACTION/CONCURRENCE/COMMENT DUE BY: 6/25 c.o.b.

SUBJECT: PROPOSED LETTER RE JUVENILE JUSTICE ACT OF 1974 -- prepared by the Office of Planning and Evaluation for M.C. Droll's signatur

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McFARLANE	☐	☐	_____	☐	☐

REMARKS:

May we have your comments by close of business Monday, June 25. Thank you.

RESPONSE:

Richard G. Darman
Assistant to the President
Ext. 2702

1984 JUN 21 PM 2:47

WHEN GOOD INTENTIONS REAP BAD RESULTS

Hundreds of thousands of American Children are at risk. In passing the Juvenile Justice Act of 1974, Congress helped create this nightmare. And by refusing to revoke that legislation, it is turning its back on scores of defenseless children.

Every year, some 5,000 children in this country are criminally abducted, often to be molested or murdered. Another 150,000 children are kidnapped by non-custodial parents to live their lives alternately in hiding and on the run, gathering emotional, if not physical, scars.

But those outrages are multiplied in the growing community of children who run away from--or are thrown out of--their homes. Every year, nearly a quarter-million of these youngsters are relegated to a desperate struggle for survival on the streets, where they are prime prospects for recruitment as thieves, drug dealers, kiddie-porn models and child prostitutes.

If the extent of this problem is mind-boggling, the end results are soul-searing. Father Bruce Ritter, who runs rescue missions in several center cities for runaways and homeless youths, tells of a teenage alcolholic with syphilis, intestinal parasites and lice who existed for three years "by selling himself into a thousand beds and a thousand cars." He remembers a frightened 10-year-old furtively calling for help after being forced to make pornographic films--and, then, the sudden thud as the phone was hung up at the other end of the line. But a survey of those buried in John and Jane Doe graves every year recounts an even grimmer tale. Hundreds of these unidentified bodies belong to children.

The Reagan Administration has taken the lead in efforts to recover young kidnap victims--and to recover them quickly and unharmed. This month, for example, the President opened a national Center for Missing and Exploited Children.

Among other things, the new Center will handle inquiries and accept information on sightings and other types of leads to such children's whereabouts and provide technical assistance to parents and state and local law enforcement agencies searching for missing children.

Moreover, the Justice Department and the FBI are working together to establish a National Center for the Analysis of Violent Crime (VICAP) that should lead to the apprehension of repeat, or "serial," killers, rapists and molesters who travel from jurisdiction to jurisdiction.

But if more is being done to save young kidnap victims, little is being done to ease the plight of runaway and throwaway children.

Although the number of teenagers in America is declining, the percentage of teenagers who run away or are forced from their homes is rising. Certainly, an increase in family violence contributes to this--more than half of the children who leave home do it to escape abuse--but so do the dictates set forth in the Juvenile Justice Act.

When Congress passed that legislation 10 years ago, it made several flawed judgement calls, not the least of which was aligning itself with the movement to give children all of the legal rights of adults. In rushing, willy-nilly, to accept what is a rigidly ideological and highly abstract theory, it created more problems than it solved. It abrogated parental rights once children leave home, even if the children are fleeing decent, caring families. It transferred the resources and authority of juvenile courts and law enforcement agencies to social service agencies. It accomplished much of this by deinstitutionalizing status offenders, juveniles who have committed offenses which would not be considered offenses if committed by adults, like truancy and running away. And if states want federal funding for their juvenile programs, they must toe the line.

Now this is not to say that the main goal of deinstitutionalization was not a worthy one. It was. Clearly, children who are running from abuse or neglect, or simply adolescent misunderstanding, do not belong either in jails or in old-style juvenile halls, which is where they used to be held. But neither do they belong on the streets.

Most of these children are confused or disturbed or both. More often than not, they are incapable of making rational, informed decisions on their own behalf. Even normal youngsters--those without untoward pressures on them--need adult guidance, the kind good parents provide. But the 1974 Act, and its subsequent amendments, made it virtually impossible to give such guidance to the children who need it most.

In an effort to comply with the Act's edicts, most states will not allow status offenders to be detained against their will for more than a few days or, in many cases, hours. And those kinds of prohibitions are far too stringent. They erode the authority of state and local agencies whose staffs are best equipped to make decisions in the best interests of the children. They also ignore the fact that it takes time to convince youngsters who have been traveling the road of hard knocks that they have better options.

Moreover, making all shelters voluntary makes it easy to lure children, who either have been picked up or have decided themselves to seek refuge, back to the streets. Pimps, drug dealers and other hoodlums give them pie-in-the-sky promises, and then lead them into unspeakable underworld lives.

In forcing the total deinstitutionalization of status offenders, Congress replaced one evil with another. Common sense and compassion now demand another change in the rules. The Administration has called for one, but only Congress can effect it.

Marian Clarke Droll
Special Assistant
Office of Planning and Evaluation

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