



FEDERAL ELECTION COMMISSION

*Routing Slip*

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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 checked="" 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 type="checkbox"/> (5) Internal Documents                                    |   |

Signed *J. M. Spauld*  
date *11/4/83*

83040140174

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 1558  
Paul Tribble for Senate Committee, Inc., )  
B. W. Armstrong, Treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on October 18, 1983, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1558:

1. Find reason to believe the Paul Tribble for Senate Committee, Inc. and B. W. Armstrong, as treasurer, violated 2 U.S.C. §§434(b) (3) (A), 434(b) (3) (C), and 434(b) (3) (E), but take no further action and close the file.
2. Send an appropriate letter and the General Counsel's Factual and Legal Analysis attached to the General Counsel's report dated October 6, 1983.

Commissioners Aikens, Elliott, McGarry, and Reiche voted affirmatively for the decision; Commissioners Harris and McDonald dissented.

Attest:

10-19-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

8304040175



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 24, 1983

Mr. B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, Virginia 23204

Re: MUR 1558

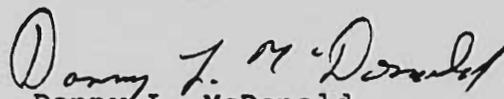
Dear Mr. Armstrong:

On October 18, 1983, the Commission found reason to believe that the Paul Tribble for Senate Committee, Inc. and you, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The General Counsel's Factual and Legal analysis, which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Judith Thedford at (202) 523-4529.

Sincerely,

  
Danny L. McDonald,  
Chairman

33040440176

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Paul Tribble for Senate MUR NO. 1558  
Committee, Inc. STAFF MEMBER & TEL NO.  
B. W. Armstrong, Treasurer Judith Thedford  
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan. The Commission voted to open a MUR in this matter on July 19, 1983.

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible.

\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble.

On August 15, 1983, the Paul Tribble for Senate Committee, Inc. filed amended reports. The amended 1982 July Quarterly Report provided a Schedule A to reflect the transfer of \$29,418.66 from Friends of Paul Tribble - 1982. On the same report, the newly amended 1982 Quarterly Report, the totals for individual contributions and memo entry unitemized contributions were revised. The report appears to account for all contributions received from individuals during this time period. The amended post-general election report disclosed the source of the \$75,000 loan, the due date, the interest rate, that it was unsecured, and that there were no additional guarantors.

The Office of General Counsel recommends finding reason to believe that the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), 434(b)(3)(E), to take no further action, and to close the file.

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RECOMMENDATION

Find reason to believe that the Paul Trible for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434 (b) (3) (A), 434 (b) (3) (C), and 434 (b) (3) (E).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, Virginia 23204

Re: MUR 1558

Dear Mr. Armstrong:

On October 18, 1983, the Commission found reason to believe that the Paul Tribble for Senate Committee, Inc. and you, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The General Counsel's Factual and Legal analysis, which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Judith Thedford at (202) 523-4529.

Sincerely,

*MJG.* 10/21/83

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Paul Tribble for Senate  
Committee, Inc.  
B. W. Armstrong, Treasurer

MUR NO. 1558  
STAFF MEMBER & TEL NO.  
Judith Thedford  
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

33040440132  
This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan. The Commission voted to open a MUR in this matter on July 19, 1983.

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RAFI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RAFI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible.

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\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

33040440132

The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble.

On August 15, 1983, the Paul Tribble for Senate Committee, Inc. filed amended reports. The amended 1982 July Quarterly Report provided a Schedule A to reflect the transfer of \$29,418.66 from Friends of Paul Tribble - 1982. On the same report, the newly amended 1982 Quarterly Report, the totals for individual contributions and memo entry unitemized contributions were revised. The report appears to account for all contributions received from individuals during this time period. The amended post-general election report disclosed the source of the \$75,000 loan, the due date, the interest rate, that it was unsecured, and that there were no additional guarantors.

The Office of General Counsel recommends finding reason to believe that the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), 434(b)(3)(E), to take no further action, and to close the file.

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RECOMMENDATION

Find reason to believe that the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES STEELE,  
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/ JAN SAVAGE *JS*

DATE:

OCTOBER 11, 1983

SUBJECT:

OBJECTION - MUR 1558 First General Counsel's  
Report dated October 6, 1983

The above-named document was circulated to the  
Commission on Thursday, October 6, 1983 at 4:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Harris	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Reiche	_____

This matter will be placed on the Executive Session  
agenda for Tuesday, October 18, 1983.

63040140136



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *CA*  
DATE: October 6, 1983  
SUBJECT: MUR 1558 - First General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

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**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 OCT 6 A 9: 44

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION 10/6/83 - 9:40

MUR NO. 1558  
STAFF MEMBER  
Judith Thedford

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Paul Tribble for Senate Committee, Inc.,  
B.W. Armstrong, Treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C),  
434(b)(3)(E)

INTERNAL REPORTS CHECKED: Paul Tribble for Senate Committee, Inc.

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan. The Commission voted to open a MUR in this matter on July 19, 1983.

SUMMARY OF ALLEGATIONS

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RFAI")

\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. As of the date of the referral, no additional response had been received.

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**FACTUAL AND LEGAL ANALYSIS**

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble.

On August 15, 1983, the Paul Tribble for Senate Committee, Inc. filed amended reports. The amended 1982 July Quarterly Report provided a Schedule A to reflect the transfer of \$29,418.66 from Friends of Paul Tribble - 1982. On the same report, the recently amended 1982 July Quarterly Report, the totals for individual contributions and memo entry unitemized contributions were revised. The report appears to account for

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all contributions received from individuals during this time period. The amended post-general election report disclosed the source of the \$75,000 loan, the due date, the interest rate, that it was unsecured, and that there were no additional guarantors.

The Office of General Counsel recommends finding reason to believe that the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), 434(b)(3)(E), to take no further action, and to close the file.

RECOMMENDATIONS

1. Find reason to believe the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E), take no further action and close the file.
2. Send the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele  
General Counsel

Oct 5, 1983  
Date

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

Attachments

Proposed letter  
General Counsel's Factual and Legal Analysis

83040440191



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, Virginia 23204

Re: MUR 1558

Dear Mr. Armstrong:

On \_\_\_\_\_, 1983, the Commission found reason to believe that you and your committee had violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The General Counsel's Factual and Legal analysis, which formed a basis for the Commission's finding is attached for your information.

If you have any questions, please direct them to Judith Thedford at (202) 523-4529.

Sincerely,

83040440192

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT	<u>Paul Tribble for Senate Committee, Inc.</u> <u>B. W. Armstrong, Treasurer</u>	MUR NO. <u>1558</u> STAFF MEMBER & TEL NO. <u>Judith Thedford</u> <u>(202) 523-4529</u>
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SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan. The Commission voted to open a MUR in this matter on July 19, 1983.

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

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\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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23040440196  
The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. As of the date of the referral, no additional response has been received.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b) (3) (A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b) (3) (C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b) (3) (E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble.

On August 15, 1983, the Paul Tribble for Senate Committee, Inc. filed amended reports. The amended 1982 July Quarterly Report provided a Schedule A to reflect the transfer of \$29,418.66 from Friends of Paul Tribble - 1982. On the same report, the newly amended 1982 Quarterly Report, the totals for individual contributions and memo entry unitemized contributions were revised. The report appears to account for all contributions received from individuals during this time period. The amended post-general election report disclosed the source of the \$75,000 loan, the due date, the interest rate, that it was unsecured, and that there were no additional guarantors.

The Office of General Counsel recommends finding reason to believe that the Paul Tribble for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b) (3) (A), 434(b) (3) (C), 434(b) (3) (E), to take no further action, and to close the file.

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RECOMMENDATION

Find reason to believe that the Paul Tribe for Senate Committee, Inc. and B.W. Armstrong, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).

83040440196



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

W/drawn by  
CNS @ Table  
9-13-83

MEMORANDUM TO: CHARLES STEELE,  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JAN SAVAGE *JS*

DATE: AUGUST 30, 1983

SUBJECT: OBJECTION - MUR 1558 First General  
Counsel's Report dated  
August 26, 1983

The above-named document was circulated to the  
Commission on Monday, August 29, 1983 at 11:00.

Objections have been received from the Commissioners  
as indicated by the name(s) checked:

- Commissioner Aikens \_\_\_\_\_
- Commissioner Elliott \_\_\_\_\_ X \_\_\_\_\_
- Commissioner Harris \_\_\_\_\_
- Commissioner McDonald \_\_\_\_\_
- Commissioner McGarry \_\_\_\_\_
- Commissioner Reiche \_\_\_\_\_

This matter will be placed on the Executive Session  
agenda for Tuesday, September 13, 1983.

33040140177



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *AK*  
DATE: August 26, 1983  
SUBJECT: MUR 1558 - First General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS

DISTRIBUTION

48 Hour Tally Vote	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>	Audit Matters	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Litigation	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>	Closed MUR Letters	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>	Status Sheets	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>	Advisory Opinions	<input type="checkbox"/>
Information	<input type="checkbox"/>	Other (see distribution below)	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>		
Non-Sensitive	<input type="checkbox"/>		
Other	<input type="checkbox"/>		

\_\_\_\_\_  
\_\_\_\_\_  
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83040440178

**SENSITIVE**

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

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY

83 AUG 26 P12: 10

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY  
OGC TO THE COMMISSION 8/26/83-12:10

MUR NO. 1558  
STAFF MEMBER  
Judith Thedford

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Paul Tribble for Senate Committee, Inc.,  
B.W. Armstrong, Treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C),  
434(b)(3)(E)

INTERNAL REPORTS CHECKED: Paul Tribble for Senate Committee, Inc.

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan.

SUMMARY OF ALLEGATIONS

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RAI")

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\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. To date, no additional response has been received.

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**FACTUAL AND LEGAL ANALYSIS**

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, have failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble. The Reports Analysis Division forwarded letters to the Committee and treasurer requesting the required information; however, the Committee and treasurer have failed to file amended reports disclosing this information.

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RECOMMENDATIONS

1. Find reason to believe the Paul Tribble for Senate Committee, Inc. violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).
2. Find reason to believe that B.W. Armstrong, as treasurer of the Paul Tribble for Senate Committee, Inc., violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).
3. Send the attached letters and General Counsel's Factual and Legal Analyses.

Charles N. Steele  
General Counsel

August 29, 1983  
Date

BY:

Kenneth A. Gross  
Kenneth A. Gross  
Associate General Counsel

Attachments

Proposed letters  
General Counsel's Factual and Legal Analyses

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. B. W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, Virginia 23204

RE: MUR 1558

Dear Mr. Armstrong:

On August , 1983, the Federal Election Commission determined that there is reason to believe that the Paul Tribble for Senate Committee, Inc., violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the Committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

If the Committee intends to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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Mr. B. W. Armstrong  
Page 2

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The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judith Thedford at (202) 523-4529.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

83040440204

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Mr. B. W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, Virginia 23204

RE: MUR 1558

Dear Mr. Armstrong:

On August , 1983, the Federal Election Commission determined that there is reason to believe that B.W. Armstrong as treasurer of the Paul Tribble for Senate Committee, Inc., violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended. The General Counsel's Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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Mr. B. W. Armstrong  
Page 2

4

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judith Thedford at (202) 523-4529.

Sincerely,

Enclosures  
General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

(5)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Paul Tribble for Senate  
Committee, Inc.

MUR NO. 1558  
STAFF MEMBER & TEL NO.  
Judith Thedford  
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan.

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

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\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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(6)

The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. To date, no additional response has been received.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

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2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, have failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble. The Reports Analysis Division forwarded letters to the Committee and its treasurer requesting the required information; however, the Committee and its treasurer have failed to file amended reports disclosing this information.

RECOMMENDATION

Find reason to believe the Paul Tribble for Senate Committee, Inc. violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT B.W. Armstrong, Treasurer  
MUR NO. 1558  
STAFF MEMBER & TEL NO.  
Judith Thedford  
(202) 523-4529

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

SUMMARY OF ALLEGATIONS

This matter was referred to the Office of General Counsel by the Reports Analysis Division on May 3, 1983, after a review of the reports filed by the Paul Trible for Senate Committee, Inc. and its treasurer, B.W. Armstrong, revealed that the Committee failed to provide the source of a loan.

The Paul Trible for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66. \*/ A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982, for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

\*/ A transfer to the Committee was reported by the Friends of Paul Trible 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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The Committee's 1982 30 Day Post-General Report failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983, for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. To date, no additional response has been received.

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FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 434(b) (3) (A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b) (3) (C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this matter, the Paul Tribble for Senate Committee, Inc. and its treasurer, B.W. Armstrong, have failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the candidate, Paul Tribble. The Reports Analysis Division forwarded letters to the Committee and its treasurer requesting the required information; however, the Committee and its treasurer have failed to file amended reports disclosing this information.

RECOMMENDATION

Find reason to believe that B.W. Armstrong, as treasurer of the Paul Tribble for Senate Committee, Inc., violated 2 U.S.C. §§ 434(b)(3)(A), 434(b)(3)(C), and 434(b)(3)(E).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The Paul Tribble for )  
Senate Committee )

RAD Referral 83L-18

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 19, 1983, the Commission decided by a vote of 5-0 to open a MUR in the above-captioned matter.

Commissioners Aikens, Elliott, Harris, McDonald and McGarry voted affirmatively in this matter; Commissioner Reiche did not cast a vote.

Attest:

7-19-83

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

83040440213

Received in Office of Commission Secretary:  
Circulated on 48 hour tally basis:

7-14-83, 5:12  
7-15-83, 2:00

RECEIVED  
OFFICE OF THE  
COMMISSION SECRETARY



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

83 JUL 14 P 5: 12

July 14, 1983

**MEMORANDUM**

TO : The Commission

FROM : Charles N. Steele  
General Counsel

BY: Kenneth A. Gross  
Associate General Counsel *KAG*

SUBJECT: RAD Referral 83L-18  
The Paul Tribble for Senate Committee

The Office of General Counsel has prepared for Commission review twenty-seven (27) critiques of referrals from the Reports Analysis Division.

Attached to this referral is a critique prepared by this Office, a copy of the referral from the Reports Analysis Division, and a 48-hour tally vote sheet. The OGC critique summarizes the facts, presents an analysis of the legal issues involved, and makes a recommendation as to the disposition of the referrals. The copy of the RAD referral is attached for informational purposes, and the separate vote sheet provides for a vote on this referral.

Attachments  
Critique and Referral

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RAD REFERRAL NUMBER: 83L-18

SUBJECT: The Paul Tribble For Senate Committee, Inc.

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BACKGROUND

1. Date of referral: May 3, 1983.
2. Financial background:
  - a. Total 1979-1980 receipts: \$ N/A
  - b. Total 1979-1980 disbursements: \$ N/A
  - c. Total 1981-1982 receipts: \$2,228,848.
  - d. Total 1981-1982 disbursements: \$2,170,961.
  - e. Cash on hand (12/31/82): \$57,891.
  - f. Debts owed to the committee (12/31/82): \$ 0
  - g. Debts owed by the committee (12/31/82): \$ 0
3. Status of candidate

Paul Tribble won the 1983 Virginia senatorial race.

SUMMARY OF RAD ACTIONS

A. Failure to Provide Schedules

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1983 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A and failed to provide Schedule A to disclose a transfer from an authorized committee of

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\$29,418.66. \*/ A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules. A Second Notice was sent to the Committee on December 30, 1982 for failure to respond to the RFAI. A staff member of the Reports Analysis Division called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible. To date, no response has been received.

B. Failure to Properly Disclose Loans

The Committee's 1983 30 Day Post-General Report, failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C. The loan was reported as repaid directly to the candidate on October 31, 1982. An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan. A Second Notice was mailed on January 21, 1983 for failure to respond to the RFAI. A response was received on February 10, 1983, which did not provide the necessary information; the assistant treasurer, indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would

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\*/ A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982. This transfer was in the amount of \$29,418.66.

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file the necessary amendments shortly. On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again. To date, no additional response has been received.

There are no other matters pending with RAD.

OGC ANALYSIS

2 U.S.C. § 434(b)(3)(A) requires a reporting committee to identify each person who makes a contribution to the reporting committee during the reporting period, whose contributions aggregate in excess of \$200 within the calendar year, together with the date and amount of any such contributions.

2 U.S.C. § 434(b)(3)(C) requires a reporting committee to identify each authorized committee which makes a transfer to the reporting committee.

2 U.S.C. § 434(b)(3)(E) requires a reporting committee to identify a person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

In this referral, the Paul Tribble For Senate Committee, Inc. ("the Committee") has failed to report contributions from individuals totalling \$634.94 on Schedule A; a \$29,418.66 transfer from Friends of Paul Tribble 1980, an authorized committee; and the source and terms of a \$75,000 loan from the

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candidate, Paul Tribble. The Reports Analysis Division forwarded letters to the Committee requesting the required information; however, the Committee has failed to file amended reports disclosing this information.

RECOMMENDATION:

Open a MUR.

Attachment:

RAD Referral

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

3 May 1983

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *ABC*  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JG*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF THE PAUL TRIBLE FOR SENATE COMMITTEE, INC.

This is a referral of the Paul Tribble for Senate Committee, Inc. (the "Committee"). The Committee has failed to provide Schedule A to disclose receipts and has failed to provide the source of a loan. According to the Review and Referral Procedures (Charts 7 and 11), these matters require further examination by your office.

Please note that this committee was referred to the Commission for possible audit under 2 U.S.C. 438(b), and was not approved for audit on March 24, 1983.

If you have any questions, please contact Susan Kaltenbaugh at 523-4172.

Attachments

cc: Commissioners

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**REPORTS ANALYSIS REFERRAL**  
**TO**  
**OFFICE OF GENERAL COUNSEL**

DATE: 3 May 1983

ANALYST: Susan Kaltenbaugh

- I. COMMITTEE: Paul Tribble for Senate Committee, Inc.  
(C00149310)  
B. W. Armstrong, Treasurer  
P.O. Box 506  
Richmond, VA 23204
- II. RELEVANT STATUTE: 2 U.S.C. 434(b)(3)(A) and (C)  
2 U.S.C. 434(b)(3)(E)
- III. BACKGROUND:
- A. Failure to Provide Schedules  
2 U.S.C.434(b)(3)(A) and (C)

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A. Additionally, the Committee failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66 (Attachment 3).<sup>1/</sup> A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules (Attachment 4). A Second Notice was sent to the Committee on December 30, 1982 for failure to respond to the RFAI (Attachment 5). A staff member of the Reports Analysis Division (RAD) called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible (Attachment 6). To date, no response has been received.

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<sup>1/</sup> A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982 (Attachment 2). This transfer was in the amount of \$29,418.66.

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B. Failure to Properly Disclose Loans  
2 U.S.C. 434(b)(3)(E)

The Committee's 1982 30 Day Post-General Report, failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C (Attachment 7). The loan was reported as repaid directly to the candidate on October 31, 1982 (Attachment 8). An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan (Attachment 9). A Second Notice was mailed on January 21, 1983 for failure to respond to the RFAI (Attachment 10). A response was received on February 10, 1983, which did not provide the necessary information (Attachment 11). The assistant treasurer, indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly (Attachment 6). On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again (Attachment 12). To date, no additional response has been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

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8 3 0 4 0 1-4824 0 2 2 2  
 FEDERAL ELECTION COMMISSION  
 CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 4APR83

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	# OF MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
TRIBBLE, PAUL S JR	SENATE	REPUBLICAN PARTY					1988 ELECTION	ID# 82VA00035	
1. STATEMENT OF CANDIDATE									
1982 STATEMENT OF CANDIDATE							19JAN82	2 82SEN/001/0220 ✓	
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
PAUL TRIBBLE FOR SENATE COMMITTEE								ID# C00149310 SENATE	
1982 STATEMENT OF ORGANIZATION							25JAN82	3 82SEN/001/0522 ✓	
STATEMENT OF ORGANIZATION - AMENDMENT							27APR82	3 82SEN/006/2604 ✓	
48 HOUR CONTRIBUTION NOTICE							14OCT82	2 82SEN/012/373 ✓	
48 HOUR CONTRIBUTION NOTICE							15OCT82	2 82SEN/013/331 ✓	
48 HOUR CONTRIBUTION NOTICE							19OCT82	4 82SEN/015/0053 ✓	
48 HOUR CONTRIBUTION NOTICE							20OCT82	2 82SEN/016/0520 ✓	
48 HOUR CONTRIBUTION NOTICE							20OCT82	2 82SEN/016/1575 ✓	
48 HOUR CONTRIBUTION NOTICE							22OCT82	2 82SEN/016/1261 ✓	
48 HOUR CONTRIBUTION NOTICE							27OCT82	4 82SEN/017/0712 ✓	
48 HOUR CONTRIBUTION NOTICE							1NOV82	3 82SEN/017/1166 ✓	
48 HOUR CONTRIBUTION NOTICE							1NOV82	1 82SEN/017/1165 ✓	
48 HOUR CONTRIBUTION NOTICE							1NOV82	1 82SEN/017/1293 ✓	
48 HOUR CONTRIBUTION NOTICE							2NOV82	2 82SEN/017/1512 ✓	
48 HOUR CONTRIBUTION NOTICE							2NOV82	2 82SEN/017/1510 ✓	
APRIL QUARTERLY			127,927		59,166		15JAN82 -31MAR82	32 82SEN/005/3116 ✓	
REQUEST FOR ADDITIONAL INFORMATION							15JAN82 -31MAR82	1 82FEC/231/0627 ✓	
PRE-PRIMARY			138,878		117,929		1APR82 -16MAY82	46 82SEN/007/0566 ✓	
JULY QUARTERLY				254,177		162,137	15MAY82 -30JUN82	63 82SEN/010/2566 ✓	
REQUEST FOR ADDITIONAL INFORMATION							15MAY82 -30JUN82	5 82FEC/259/1598 ✓	
REQUEST FOR ADDITIONAL INFORMATION 2ND							15MAY82 -30JUN82	6 82FEC/260/2834 ✓	
OCTOBER QUARTERLY				898,108		721,617	1JUL82 -30SEP82	230 82SEN/014/0711 ✓	
OCTOBER QUARTERLY - AMENDMENT				887,540		711,049	1JUL82 -30SEP82	88 82SEN/002/3240 ✓	
REQUEST FOR ADDITIONAL INFORMATION							1JUL82 -30SEP82	9 82FEC/254/0327 ✓	
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JUL82 -30SEP82	12 82FEC/259/275 ✓	
PRE-GENERAL				148,496		334,678	1OCT82 -13OCT82	49 82SEN/015/38 ✓	
PRE-GENERAL - AMENDMENT				148,496		334,678	1OCT82 -13OCT82	24 82SEN/002/3216 ✓	
REQUEST FOR ADDITIONAL INFORMATION							1OCT82 -13OCT82	2 82FEC/254/0337 ✓	
REQUEST FOR ADDITIONAL INFORMATION 2ND							1OCT82 -13OCT82	1 82FEC/259/3427 ✓	
POST-GENERAL				632,942		703,998	14OCT82 -22NOV82	176 82SEN/018/2691 ✓	
POST-GENERAL - AMENDMENT				632,942		703,998	14OCT82 -22NOV82	6 82SEN/002/3210 ✓	
REQUEST FOR ADDITIONAL INFORMATION							14OCT82 -22NOV82	2 82FEC/260/1879 ✓	
REQUEST FOR ADDITIONAL INFORMATION 2ND							14OCT82 -22NOV82	3 82FEC/262/3420 ✓	
YEAR-END				41,324		81,980	22NOV82 -31DEC82	29 82SEN/002/0636 ✓	
COMP ADJUST AMEND			2,436-				15JAN82 -31MAR82	2 82SEN/007/0564 ✓	
TOTAL			264,369	1,964,479	177,119	1,993,842		819 TOTAL PAGES	
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

reports with check (✓) have had basic review completed.  
 debts owed by committee as of 12/31/82 = 0  
 ending cash on hand as of 12/31/82 = 257891

Attachment 1

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 2

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committees.

Name of Committee (in Full)

Friends of Paul Trible 1980 (House Committee)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Paul Trible 1982 - Tower Box 67 2101 Executive Drive Hampton, VA 23666	FEC-ID# C00142208 VA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1/12/82	500.00
Friends of Paul Trible Senate Committee Doug Lewis, Treasurer P.O. Box 728, Arlington, VA	C00149310 FEC-ID# C00142208 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	1/12/82	19,000.00
Friends of Paul Trible 1982	FEC-ID# C00142208 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	2/19/82	200.00
Friends of Paul Trible for Senate Committee W. Armstrong, Treasurer P.O. Box 26234, Richmond, VA	C00149310 FEC-ID# C00142208 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	6/18/82	20,418.66
Friends of Paul Trible 1982	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Paul Trible 1982	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Paul Trible 1982	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Paul Trible 1982	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Friends of Paul Trible 1982	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional) .....	49,118.66
TOTAL This Period (last page this line number only) .....	.....

1982 July Quarterly

Attachment 3

Name of Committee (in Full)  
Paul Tribble for Senate Committee

Report Covering the Period: 7/1/82  
From: May 15th To: June 30, 1982

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
<b>I. RECEIPTS</b>		
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>		
(a) Individuals/Persons Other Than Political Committees	\$131,071.94	\$295,284.95
(Info Entry Underlined \$ 69,767.06 )		
(b) Political Party Committees	30,330.00	30,530.00
(c) Other Political Committees	60,535.09	143,210.00
(d) The Candidate	0	0
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b, 11c and 11d)	221,937.03	469,025.04
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	29,418.66	SIC 48,418.66
<b>13. LOANS:</b>		
(a) Made or Guaranteed by the Candidate	0	0
(b) All Other Loans	0	0
(c) TOTAL LOANS (add 13a and 13b)	0	0
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Returns, etc.)	2,099.66	2,245.02
15. OTHER RECEIPTS (Dividends, Interest, etc.)	722.17	1,294.74
16. TOTAL RECEIPTS (Add 11a, 12, 13c, 14 and 15)	254,177.52	520,983.46
<b>II. DISBURSEMENTS</b>		
17. OPERATING EXPENDITURES	159,242.41	336,338.10
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0
<b>19. LOAN REPAYMENTS:</b>		
(a) Of Loans Made or Guaranteed by the Candidate	0	0
(b) Of All Other Loans	0	0
(c) TOTAL LOAN REPAYMENTS (add 19a and 19b)	0	0
<b>20. REFUNDS OF CONTRIBUTIONS TO:</b>		
(a) Individuals/Persons Other Than Political Committees	2,895.00	2,895.00
(b) Political Party Committees	0	0
(c) Other Political Committees	0	0
(d) TOTAL CONTRIBUTION REFUNDS (add 20a, 20b and 20c)	2,895.00	2,895.00
21. OTHER DISBURSEMENTS	0	0
22. TOTAL DISBURSEMENTS (Add 17, 18, 19c, 20d and 21)	\$162,137.41	\$339,233.10

**III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF THE REPORTING PERIOD	\$	\$ 87,254.14
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$	254,177.52
25. SUBTOTAL (Add Line 23 and Line 24)	\$	341,431.66
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$	162,137.41
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$	\$179,294.25

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**SCHEDULE A**

**ITEMIZED RECEIPTS**

Attachment to Form 1040  
 This schedule should be filed with  
 Form 1040 of the preceding  
 calendar year.

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

**PAUL TRIBLE FOR SENATE COMMITTEE** (in kind contributions)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Frank Easterly 401 Mutual Building Richmond, Virginia 23219	Self employed Investments	6/01/82	\$263.24
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Self Employed	Aggregate Year-to-Date—\$	\$26.48
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. T. T. Penrose III 12382 Warwick Boulevard Newport News, Va. 23606	Photo Reflections	5/17/82	40.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Photographer	Aggregate Year-to-Date—\$	\$40.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Charles J. Weir 809 Villa Ridge Road Falls Church, Va. 22046	Retired Military	5/15/82	\$30.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	5/28/82	131.70
Aggregate Year-to-Date—\$		\$161.70	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Charles Hale 4747 Shore Drive Virginia Beach, Va. 23455	Bayside Motors Virginia Beach, Va.	6/04/82	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Owner	Aggregate Year-to-Date—\$	\$1,200.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date—\$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			\$60,639.94

82020102584

total itemized



FEDERAL ELECTION COMMISSION  
 WASHINGTON, D.C. 20463

Attachment 4

7 December 1982

B.W. Armstrong, Treasurer  
 Paul Tribble for Senate Committee  
 210 East Main Street  
 Richmond, VA 23219

Identification Number: C00149310

Reference: July Quarterly Report (5/15/82-6/30/82)

Dear Mr. Armstrong:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees may not make a contribution to a candidate for the office of Senator in excess of \$17,500 in an election year. If you have received an excessive contribution(s), the Commission recommends that you refund the amount in excess to the donor(s). The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(b) of the Detailed Summary Page of your next report. (2 U.S.C. 441a (f) and (h))

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, prompt action by you to refund the excessive amount will be taken into consideration by the Commission.

-On the Detailed Summary Page, Line 11(a) Column A minus the unitemized receipts should equal \$61,304. The total of all entries itemized on Schedule A for Line 11(a) equals \$60,639. These totals should be the same. Please explain the discrepancy and amend your report(s) accordingly. (11 CFR 104.3(a))

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JK

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless it is made from a separate segregated fund established by the corporation. (2 U.S.C. 441b(a))

The Commission notes the refund of the prohibited contribution. Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, the prompt action by your committee in refunding the contribution will be taken into consideration.

-Please clarify the outstanding balance for the debt owed to the Covington Company. This correction may affect the totals on Schedule D and Line 10 of the Summary Page.

-Please clarify the discrepancy in the payments to The Covington Company and Commercial Union Insurance Company. Debt payments for this period (Schedule D) do not equal the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, or public or private organization, other than an agency of the United States Government. (11 CFR 104.3(b)(4)(i)(A) and 100.10)

-Please amend your report to include a supporting Schedule A for the activity reported on Line 12 of the Detailed Summary Page. All transfers to your committee from authorized committees must be itemized on Schedule A; regardless of the amount transferred. (11 CFR 104.3(a)(4)(iii))

-For future reports, please be advised that contributions from individuals which, in the aggregate, do not exceed \$200 need not be itemized on Schedule A. The total amount of the unitemized contributions should be included on the memo entry line and in the total of contributions received on Line 11(a) of the Detailed Summary Page.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 119 D

83040440227

SK

Street, N.E., Room 623, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst  
Reports Analysis Division

83040440228



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RO-3

December 30, 1982

B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee  
210 East Main Street  
Richmond, VA 23219

Identification Number: C00149310

Reference: July Quarterly Report (5/15/82-6/30/82) Q2

Dear Mr. Armstrong:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated December 7, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Susan Kaltenbaugh on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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1-4 JL

MEMORANDUM FOR FILES

Attachment

6

RE: TELECON

DATE: 3/31/1983

FROM: Sue Kaltenbaugh

TO: Dot Meldrum 804-272-2001

NAME OF COMMITTEE: Paul Tribble for Senate Virginia

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I called Ms. Meldrum to remind her that there were several outstanding RFAI's. She stated that she was out of town until recently, and would begin to file the necessary amendments as soon as possible. I urged her to do so immediately.

83040440230

1982 30 Day Post  
General Report

DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
Page 2, FEC FORM 2

Attachment 7 p. 1 of 2

Name of Candidate or Office		Period for Which the Report is Made		
Paul Trible for Senate Committee		October 14, 1981, November 12, 1982		
L. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
11.	CONTRIBUTIONS (other than loans) FROM:			
(a)	Individuals/Persons Other Than Political Committees (Items Entry Unitemized \$ <u>\$217,785.62</u> )	\$384,914.72	\$1,392,335.54	11 (a)
(b)	Political Party Committees	2,719.62	33,787.52	11 (b)
(c)	Other Political Committees	168,423.77	640,719.34	11 (c)
(d)	The Candidate			11 (d)
(e)	TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d))	556,058.11	2,066,842.46	11 (e)
12.	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		48,418.66	12
13.	LOANS:			
(a)	Made or Guaranteed by the Candidate	\$75,000.00	\$75,000.00	13 (a)
(b)	All Other Loans	0	0	13 (b)
(c)	TOTAL LOANS (add 13 (a) and 13 (b))	75,000.00	\$75,000.00	13 (c)
14.	OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	2,245.02	14
15.	OTHER RECEIPTS (Dividends, Interest, etc.)	1,884.32	8,024.83	15
16.	TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	\$632,942.43	\$2,200,530.97	16
H. DISBURSEMENTS				
17.	OPERATING EXPENDITURES	\$626,016.41	\$2,015,966.16	17
18.	TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0		18
19.	LOAN REPAYMENTS:			
(a)	Of Loans Made or Guaranteed by the Candidate	\$75,000.00	\$75,000.00	19 (a)
(b)	Of All Other Loans	0	0	19 (b)
(c)	TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	\$75,000.00	\$75,000.00	19 (c)
20.	REFUNDS OF CONTRIBUTIONS TO:			
(a)	Individuals/Persons Other Than Political Committees	\$2,757.00	\$7,987.00	20 (a)
(b)	Political Party Committees	0	0	20 (b)
(c)	Other Political Committees	225.00	575.00	20 (c)
(d)	TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	\$2,982.00	\$8,562.00	20 (d)
21.	OTHER DISBURSEMENTS			21
22.	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	\$703,998.47	\$2,099,528.16	22
III. CASH SUMMARY				
23.	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 169,602.68		23
24.	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 632,942.43		24
25.	SUBTOTAL (Add Line 23 and Line 24)	\$ 802,545.11		25
26.	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 703,998.41		26
27.	CASH ON HAND AT END OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 98,546.70		27

**SCHEDULE C**  
(Revised 3-82)

**LOANS**

Attachment / pg 2 of 2

Form 1041  
LINE 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, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

Name of Lender (in Full)			
<b>PAUL TRIBLE FOR SENATE COMMITTEE, INC.</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date
Paul S. Tribble, Jr. 2007 Mason Hill Drive Alexandria, Va. 22307 (Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		\$75,000.00	\$75,000.00
Balance Outstanding at Close of This Period		0	
Terms: Date Incurred <u>10/15/82</u> Date Due <u>11/02/82</u>		Interest Rate <u>7 1/2%</u>	<input type="checkbox"/> Secured
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date
Balance Outstanding at Close of This Period			
Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (per)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (Last page in this line only) .....			0
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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1982 30 Day Post General

Page 31 of 67  
LINE NUMBER 11  
This amount should be included in the category of the General Summary Page

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Attachment 8

Any information copied from these Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
**Paul Tribble for Senate Committee**

8304044033036

A. Full Name, Mailing Address and ZIP Code Station WERT Warsaw, VA 22572	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/82	Amount of Each Disbursement This Period \$ 56.70
B. Full Name, Mailing Address and ZIP Code Station WKWI Kilmarnock, VA 22482	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/82	Amount of Each Disbursement This Period \$ 66.00
C. Full Name, Mailing Address and ZIP Code Station WESR P.O. Box 458 Olney, VA 23418	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/82	Amount of Each Disbursement This Period \$ 175.00
D. Full Name, Mailing Address and ZIP Code Station WEXM P.O. Box 2189 Exmore, VA 23350	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/29/82	Amount of Each Disbursement This Period \$ 99.90
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code Station WKEZ Yorktown, VA	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/82	Amount of Each Disbursement This Period \$ 36.00
G. Full Name, Mailing Address and ZIP Code Station WBCI Williamsburg, VA	Purpose of Disbursement radio advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/29/82	Amount of Each Disbursement This Period \$ 102.00
H. Full Name, Mailing Address and ZIP Code Paul S. Tribble, Jr. 2007 Mason Hill Drive Alexandria, VA 22307	Purpose of Disbursement repayment of loan. Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 10/31/82	Amount of Each Disbursement This Period \$75,000.00
I. Full Name, Mailing Address and ZIP Code Balmar, Inc. 821 N. Stuart Street Arlington, VA 22203	Purpose of Disbursement NVA poll signs Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 11/01/82	Amount of Each Disbursement This Period \$ 590.72

**SUBTOTAL** of Disbursements This Page (optional) .....

**TOTAL** This Period (last page this line number only) .....



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

Attachment

RQ-2

9 79192

December 28, 1982

B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, VA 23204

Identification Number: C00149310

306

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Armstrong:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule A of this report, you have not adequately identified the occupation titles of your contributors. Please note that you should state the actual job title (chairman, president, etc.) rather than "executive" or "businessman". Also, "information requested but not received" is not sufficient.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

-In-kind contributions should be included in both receipt and disbursement totals for individuals and political committees. Please amend your report, as necessary.

-On Schedule B of this report, you have reported disbursements for which you have failed to include either the date, amount, address, or purpose. Please amend your report to include the missing information for each of these entries. Please note that purposes such as "expense reimbursement, expenses for September, etc." are not adequate. (11 CFR 104.3(b)(4))

-Commission Regulations require the continuous reporting of all outstanding debts/loans. Review of this report indicates an omission of debts itemized on your previous

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report(s). (11 CFR 104.3(d) and 104.11) Please amend your report to indicate the current status of these omitted debts:

North American Marketing totalling \$22,678 (payment of \$19,232 disclosed)

-Debt payments for this period (Schedule D) do not equal the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, or public or private organization, other than an agency of the United States Government. Please clarify the discrepancy in the payment to Expert Graphic (payment of \$2,946 disclosed) and Piedmont Airlines (payment of \$911 disclosed). (11 CFR 104.3(b)(4)(i)(A) and 100.10)

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 CFR 110.10. (11 CFR 100.7(a)(1) and 104.3(d))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 119 D Street, N.E., Room 623, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst -  
Reports Analysis Division

823034254068239

Attachment

10

3412



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

January 21, 1983

B. W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, VA 23204

Identification Number: C00149310

306

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Armstrong:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated December 28, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Susan Kaltenbaugh on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

83032623137  
83040440231

MLF  
1/26  
K  
1/26  
LAD  
1/27

RECEIVED.  
SECRETARY OF THE SENATE

1983 FEB 11 AM 10:45

HAND DELIVERED

**TRIBLE**  
**U.S. SENATE**

83 FEB 10 AM 10:09

*Attachment*

*11*

*Amended 1982 30 Day  
Post General Report.*

January 31, 1983

Ms. Susan Kaltenbaugh  
Senior Report Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC

Dear Ms. Kaltenbaugh:

With reference to your letter 30 day post general report,  
I am enclosing amended summary sheets for this period. Since  
it will take some time to follow up on the rest of your requests,  
I will file a further amended report as soon as possible.

The reason I am filing the summary pages now is for continuity  
from the amended September 30 report.

Sincerely,  
*Dorothy B. Meldrum,*  
Dorothy B. Meldrum,  
Assistant to the Treasurer *by SAT*

enclosure

8304044023210  
830404402337

*12*

MEMORANDUM FOR FILES

RE: TELECON

DATE: April 26, 1983

FROM: Susan Kaltenbaugh

TO: Dorothy Meldrum

NAME OF COMMITTEE: Paul Trible for Senate Committee Inc.

I again attempted to reach Ms. Meldrum. There was no answer.

83040440238



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

3 May 1983

MEMORANDUM

TO: CHARLES N. STEELE  
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER *ABC*  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JG*  
ASSISTANT STAFF DIRECTOR, RAD

SUBJECT: REFERRAL OF THE PAUL TRIBLE FOR SENATE COMMITTEE, INC.

This is a referral of the Paul Tribble for Senate Committee, Inc. (the "Committee"). The Committee has failed to provide Schedule A to disclose receipts and has failed to provide the source of a loan. According to the Review and Referral Procedures (Charts 7 and 11), these matters require further examination by your office.

Please note that this committee was referred to the Commission for possible audit under 2 U.S.C. 438(b), and was not approved for audit on March 24, 1983.

If you have any questions, please contact Susan Kaltenbaugh at 523-4172.

Attachments

cc: Commissioners

83040440239

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 3 May 1983ANALYST: Susan Kaltenbaugh

I. COMMITTEE: Paul Tribble for Senate Committee, Inc.  
(C00149310)  
B. W. Armstrong, Treasurer  
P.O. Box 506  
Richmond, VA 23204

II. RELEVANT STATUTE: 2 U.S.C. 434(b)(3)(A) and (C)  
2 U.S.C. 434(b)(3)(E)

## III. BACKGROUND:

A. Failure to Provide Schedules  
2 U.S.C.434(b)(3)(A) and (C)

The Paul Tribble for Senate Committee Inc.'s ("Committee") 1982 July Quarterly Report failed to disclose contributions from individuals totalling \$634.94 on Schedule A. Additionally, the Committee failed to provide Schedule A to disclose a transfer from an authorized committee of \$29,418.66 (Attachment 3).<sup>1/</sup> A Request for Additional Information ("RFAI") was sent to the Committee on December 7, 1982, requesting the required schedules (Attachment 4). A Second Notice was sent to the Committee on December 30, 1982 for failure to respond to the RFAI (Attachment 5). A staff member of the Reports Analysis Division (RAD) called the Assistant Treasurer, Dorothy Meldrum, on March 31, 1983. She stated that she had been out of town and would file the required amendments as soon as possible (Attachment 6). To date, no response has been received.

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<sup>1/</sup> A transfer to the Committee was reported by the Friends of Paul Tribble 1980 (House Committee) on June 18, 1982 (Attachment 2). This transfer was in the amount of \$29,418.66.

83040440240

**B. Failure to Properly Disclose Loans**  
2 U.S.C. 434(b)(3)(E)

The Committee's 1982 30 Day Post-General Report, failed to disclose the source and terms of a \$75,000 loan. The loan was reported on the Detailed Summary Page, as received October 15, 1982 from the candidate, without the terms of the loan disclosed on Schedule C (Attachment 7). The loan was reported as repaid directly to the candidate on October 31, 1982 (Attachment 8). An RFAI was sent on December 28, 1982, requesting the source and the terms of the loan (Attachment 9). A Second Notice was mailed on January 21, 1983 for failure to respond to the RFAI (Attachment 10). A response was received on February 10, 1983, which did not provide the necessary information (Attachment 11). The assistant treasurer, indicated that she would file additional amended reports as soon as possible. A RAD staff member spoke to Ms. Meldrum on March 31, 1983, and she indicated that she would file the necessary amendments shortly (Attachment 6). On April 26, 1983, the analyst unsuccessfully attempted to contact Ms. Meldrum again (Attachment 12). To date, no additional response has been received.

**IV. OTHER PENDING MATTERS INITIATED BY RAD:**

None

83040440241

0 3 0 4 1 9 8 1 - 1 9 8 2 4 0 2 4 2  
 FEDERAL ELECTION COMMISSION  
 1981-1982  
 CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 4APR83

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL			
TRIBBLE, PAUL S JR	SENATE	REPUBLICAN PARTY			VIRGINIA	1988 ELECTION	ID# 82VA00035
1. STATEMENT OF CANDIDATE							
1982 STATEMENT OF CANDIDATE					19JAN82		2 82SEN/001/0220 ✓
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES							
3. PRINCIPAL CAMPAIGN COMMITTEE							
PAUL TRIBBLE FOR SENATE COMMITTEE							
1982 STATEMENT OF ORGANIZATION					ID# C00149310	SENATE	
STATEMENT OF ORGANIZATION - AMENDMENT					25JAN82		3 82SEN/001/0522 ✓
48 HOUR CONTRIBUTION NOTICE					27APR82		3 82SEN/006/2604 ✓
48 HOUR CONTRIBUTION NOTICE					14OCT82		2 82SEN/012/3734 ✓
48 HOUR CONTRIBUTION NOTICE					15OCT82		2 82SEN/013/3314 ✓
48 HOUR CONTRIBUTION NOTICE					19OCT82		4 82SEN/015/0053 ✓
48 HOUR CONTRIBUTION NOTICE					20OCT82		2 82SEN/016/0520 ✓
48 HOUR CONTRIBUTION NOTICE					20OCT82		2 82SEN/016/1575 ✓
48 HOUR CONTRIBUTION NOTICE					22OCT82		2 82SEN/016/1261 ✓
48 HOUR CONTRIBUTION NOTICE					27OCT82		4 82SEN/017/0712 ✓
48 HOUR CONTRIBUTION NOTICE					1NOV82		3 82SEN/017/1166 ✓
48 HOUR CONTRIBUTION NOTICE					1NOV82		1 82SEN/017/1165 ✓
48 HOUR CONTRIBUTION NOTICE					1NOV82		1 82SEN/017/1293 ✓
48 HOUR CONTRIBUTION NOTICE					2NOV82		2 82SEN/017/1512 ✓
48 HOUR CONTRIBUTION NOTICE					2NOV82		2 82SEN/017/1510 ✓
APRIL QUARTERLY		127,927		59,166	15JAN82 -31MAR82		32 82SEN/005/3116 ✓
REQUEST FOR ADDITIONAL INFORMATION					15JAN82 -31MAR82		1 82FEC/231/0627 ✓
PRE-PRIMARY		138,878		117,929	1APR82 -16MAY82		46 82SEN/007/0566 ✓
JULY QUARTERLY			254,177		15MAY82 -30JUN82	162,137	63 82SEN/010/2566 ✓
REQUEST FOR ADDITIONAL INFORMATION					15MAY82 -30JUN82		5 82FEC/259/1598 ✓
REQUEST FOR ADDITIONAL INFORMATION 2ND					15MAY82 -30JUN82		6 83FEC/260/2834 ✓
OCTOBER QUARTERLY			898,108		1JUL82 -30SEP82	721,617	230 82SEN/014/0711 ✓
OCTOBER QUARTERLY - AMENDMENT			887,540		1JUL82 -30SEP82	711,049	88 83SEN/002/3240 ✓
REQUEST FOR ADDITIONAL INFORMATION					1JUL82 -30SEP82		9 82FEC/254/0327 ✓
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL82 -30SEP82		12 82FEC/259/2750 ✓
PRE-GENERAL			148,496		1OCT82 -13OCT82	334,678	49 82SEN/015/3817 ✓
PRE-GENERAL - AMENDMENT			148,496		1OCT82 -13OCT82	334,678	24 83SEN/002/3216 ✓
REQUEST FOR ADDITIONAL INFORMATION					1OCT82 -13OCT82		2 82FEC/254/0337 ✓
REQUEST FOR ADDITIONAL INFORMATION 2ND					1OCT82 -13OCT82		1 82FEC/259/3427 ✓
POST-GENERAL			632,942		14OCT82 -22NOV82	703,998	176 82SEN/018/2691 ✓
POST-GENERAL - AMENDMENT			632,942		14OCT82 -22NOV82	703,998	6 83SEN/002/3210 ✓
REQUEST FOR ADDITIONAL INFORMATION					14OCT82 -22NOV82		2 82FEC/260/1879 ✓
REQUEST FOR ADDITIONAL INFORMATION 2ND					14OCT82 -22NOV82		3 83FEC/262/3420 ✓
YEAR-END			41,324		22NOV82 -31DEC82	81,980	29 83SEN/002/0636 ✓
COMP ADJUST AHEND		2,436-			15JAN82 -31MAR82	24	2 82SEN/007/0564 ✓
TOTAL		264,369	1,964,479		177,119	1,993,842	819 TOTAL PAGES
4. AUTHORIZED COMMITTEES							
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES							

reports with check (✓) have had basic review completed.  
 debts owed by committee as of 12/31/82 = \$0  
 ending cash on hand as of 12/31/82 = \$87,891

Attachment 1

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page \_\_\_\_\_  
 (Use separate schedule for each category of the Detailed Summary Page)

Attachment 2

Any information copied from cash Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full)			
Friends of Paul Trible 1980 (House Committee)			
A. Full Name, Mailing Address and ZIP Code Friends of Paul Trible 1982 - Tower Box 67 2101 Executive Drive Hampton, VA 23666	Purpose of Disbursement FEC-ID# C00142268 VA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 1/12/82	Amount of Each Disbursement This Period 500.00
B. Full Name, Mailing Address and ZIP Code Friends of Paul Trible Senate Committee Doug Lewis, Treasurer P.O. Box 728, Arlington, VA 22216	Purpose of Disbursement C00149310 FEC-ID# C00142208 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 1/12/82	Amount of Each Disbursement This Period 19,000.00
C. Full Name, Mailing Address and ZIP Code Friends of Paul Trible 1982 C00142208	Purpose of Disbursement FEC-ID# C00142208 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 2/19/82	Amount of Each Disbursement This Period 200.00
D. Full Name, Mailing Address and ZIP Code Friends of Paul Trible For Senate Committee B. W. Armstrong, Treasurer P.O. Box 26234, Richmond, VA 23260	Purpose of Disbursement C00149310 FEC-ID# C00142208 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 6/18/82	Amount of Each Disbursement This Period 29,418.66
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			49,118.66
TOTAL This Period (last page this line number only)			

820122305246

58



**SCHEDULE A**

**ITEMIZED RECEIPTS**

Attachment 3 to 2012

*Use this form to report contributions to the campaign committee for each primary year.*

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such sources.

Name of Committee (in Full)			
<b>PAUL TRIBLE FOR SENATE COMMITTEE (in kind contributions)</b>			
<b>A. Full Name, Mailing Address and ZIP Code</b> Mr. Frank Easterly 401 Mutual Building Richmond, Virginia 23219	<b>Name of Employer</b> Self employed Investments	<b>Date (month, day, year)</b> 6/01/82	<b>Amount of Each Receipt This Period</b> \$263.24
	<b>Occupation</b> Self Employed	<b>Aggregate Year-to-Date—\$</b> \$26.48	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>B. Full Name, Mailing Address and ZIP Code</b> Mr. T. T. Pearose III 12382 Warwick Boulevard Newport News, Va. 23606	<b>Name of Employer</b> Photo Reflections	<b>Date (month, day, year)</b> 5/17/82	<b>Amount of Each Receipt This Period</b> 40.00
	<b>Occupation</b> Photographer	<b>Aggregate Year-to-Date—\$</b> \$40.00	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>C. Full Name, Mailing Address and ZIP Code</b> Charles J. Weir 809 Villa Ridge Road Falls Church, Va. 22046	<b>Name of Employer</b> Retired Military	<b>Date (month, day, year)</b> 5/15/82	<b>Amount of Each Receipt This Period</b> \$30.00
	<b>Occupation</b> Retired	<b>Aggregate Year-to-Date—\$</b> \$161.70	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>D. Full Name, Mailing Address and ZIP Code</b> Mr. Charles Hale 4747 Shore Drive Virginia Beach, Va. 23455	<b>Name of Employer</b> Bayside Motors Virginia Beach, Va.	<b>Date (month, day, year)</b> 6/04/82	<b>Amount of Each Receipt This Period</b> 200.00
	<b>Occupation</b> Owner	<b>Aggregate Year-to-Date—\$</b> \$1,200.00	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt This Period</b>
	<b>Occupation</b>	<b>Aggregate Year-to-Date—\$</b>	
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>SUBTOTAL of Receipts This Page (optional)</b>			
<b>TOTAL This Period (last page this has number only)</b>			<b>\$60,639.94</b>

4  
 5  
 3  
 0  
 1  
 0  
 2  
 0  
 8  
 8

total itemized



FEDERAL ELECTION COMMISSION  
 WASHINGTON, D.C. 20463

Attachment 4

7 December 1982

B.W. Armstrong, Treasurer  
 Paul Tribble for Senate Committee  
 210 East Main Street  
 Richmond, VA 23219

Identification Number: C00149310

Reference: July Quarterly Report (5/15/82-6/30/82)

Dear Mr. Armstrong:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Republican or Democratic Senatorial Campaign Committee, or the national committee of a political party, or any combination of such committees may not make a contribution to a candidate for the office of Senator in excess of \$17,500 in an election year. If you have received an excessive contribution(s), the Commission recommends that you refund the amount in excess to the donor(s). The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20(b) of the Detailed Summary Page of your next report. (2 U.S.C. 441a (f) and (h))

If you find the contribution(s) in question was disclosed incompletely or incorrectly, please amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution, prompt action by you to refund the excessive amount will be taken into consideration by the Commission.

-On the Detailed Summary Page, Line 11(a) Column A minus the unitemized receipts should equal \$61,304. The total of all entries itemized on Schedule A for Line 11(a) equals \$60,639. These totals should be the same. Please explain the discrepancy and amend your report(s) accordingly. (11 CFR 104.3(a))

83040440241

*JK*

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless it is made from a separate segregated fund established by the corporation. (2 U.S.C. 441b(a))

The Commission notes the refund of the prohibited contribution. Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, the prompt action by your committee in refunding the contribution will be taken into consideration.

-Please clarify the outstanding balance for the debt owed to the Covington Company. This correction may affect the totals on Schedule D and Line 10 of the Summary Page.

-Please clarify the discrepancy in the payments to The Covington Company and Commercial Union Insurance Company. Debt payments for this period (Schedule D) do not equal the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, or public or private organization, other than an agency of the United States Government. (11 CFR 104.3(b)(4)(i)(A) and 100.10)

-Please amend your report to include a supporting Schedule A for the activity reported on Line 12 of the Detailed Summary Page. All transfers to your committee from authorized committees must be itemized on Schedule A, regardless of the amount transferred. (11 CFR 104.3(a)(4)(iii))

-For future reports, please be advised that contributions from individuals which, in the aggregate, do not exceed \$200 need not be itemized on Schedule A. The total amount of the unitemized contributions should be included on the memo entry line and in the total of contributions received on Line 11(a) of the Detailed Summary Page.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 119 D

83040440247

SK

Street, N.E., Room 623, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst  
Reports Analysis Division

83040440248

Attachment 5



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

December 30, 1982

B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee  
210 East Main Street  
Richmond, VA 23219

Identification Number: C00149310

Reference: July Quarterly Report (5/15/82-6/30/82) Q2

Dear Mr. Armstrong:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated December 7, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Susan Kaltenbaugh on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

03032502834  
83040440249

1-4 JL  
1/6

MEMORANDUM FOR FILES

Attachment

6

RE: TELECON

DATE: 3/31/1983

FROM: Sue Kaltenbaugh

TO: Dot Meldrum 804-272-2001

NAME OF COMMITTEE: Paul Triple for Senate Virginia

---

I called Ms. Meldrum to remind her that there were several outstanding RFAI's. She stated that she was out of town until recently, and would begin to file the necessary amendments as soon as possible. I urged her to do so immediately.

83040440250



**SCHEDULE C**  
(Required 2022)

**LOANS**

Attachment 7 pg 2 of 2

Form 1041  
LHA 10-2021  
OMB No. 1545-0047  
See instructions for Form 1041-ES

Name of Guarantor (to Part B)			
<b>PAUL TRIBLE FOR SENATE COMMITTEE, INC.</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Paul S. Tribble, Jr. 2007 Mason Hill Drive Alexandria, Va. 22307 (Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		\$75,000.00	0
Terms: Date Incurred <u>10/15/82</u> Date Due <u>11/02/82</u> Interest Rate _____ % (per) <u>JK</u> <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Section: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (per) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional) .....			
TOTALS This Period (next page in this book only) .....			0
Carry outstanding balance only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

R 040440256

Page 37 of 57  
LINE NUMBER 11  
This amount should be used  
together with the amount of the Budget  
Summary Page

SCHEDULE B

ITEMIZED DISBURSEMENTS

Attachment 8

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)  
Paul Tribble for Senate Committee

8 3 9 4 '0 24 4 10 92 25 8 3 6

Name of Committee (in Full)		Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Station WMTT Warsaw, VA 22572		radio advertising	10/31/82	\$ 56.70
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
B. Full Name, Mailing Address and ZIP Code Station WKWI Kilmarnock, VA 22482		radio advertising	10/31/82	\$ 66.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code Station WESR P.O. Box 458 Olney, VA 23418		radio advertising	10/31/82	\$ 175.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code Station WEXH P.O. Box 2189 Exmore, VA 23350		radio advertising	10/29/82	\$ 99.90
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code		Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code Station WKEZ Yorktown, VA		radio advertising	10/31/82	\$ 36.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code Station WBCI Williamsburg, VA		radio advertising	10/29/82	\$ 102.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code Paul S. Tribble, Jr. 2007 Mason Hill Drive Alexandria, VA 22307		repayment of loan	10/31/82	\$75,000.00
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code Balmar, Inc. 821 N. Stuart Street Arlington, VA 22203		NVA poll signs	11/01/82	\$ 590.72
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....				
TOTAL This Period (last page this line number only) .....				



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

Attachment

9 791/2

RO-2

December 28, 1982

B.W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, VA 23204

Identification Number: C00149310

306

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Armstrong:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule A of this report, you have not adequately identified the occupation titles of your contributors. Please note that you should state the actual job title (chairman, president, etc.) rather than "executive" or "businessman". Also, "information requested but not received" is not sufficient.

If your committee has made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain this information from the contributors, your committee may have "exercised best efforts" and need only confirm this effort, in writing. See 11 CFR 104.3(a)(4)(i) and 11 CFR 104.7.

-In-kind contributions should be included in both receipt and disbursement totals for individuals and political committees. Please amend your report, as necessary.

-On Schedule B of this report, you have reported disbursements for which you have failed to include either the date, amount, address, or purpose. Please amend your report to include the missing information for each of these entries. Please note that purposes such as "expense reimbursement, expenses for September, etc." are not adequate. (11 CFR 104.3(b)(4))

-Commission Regulations require the continuous reporting of all outstanding debts/loans. Review of this report indicates an omission of debts itemized on your previous

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report(s). (11 CFR 104.3(d) and 104.11) Please amend your report to indicate the current status of these omitted debts:

North American Marketing totalling \$22,678  
(payment of \$19,232 disclosed)

-Debt payments for this period (Schedule D) do not equal the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, or public or private organization, other than an agency of the United States Government. Please clarify the discrepancy in the payment to Expert Graphic (payment of \$2,946 disclosed) and Piedmont Airlines (payment of \$911 disclosed). (11 CFR 104.3(b)(4)(i)(A) and 100.10)

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or other source. If the candidate borrowed funds from a lending institution or any other source, the amount of the loan, the date incurred, the date due, the interest rate, whether or not the loan was secured, and all endorsers' or guarantors' names, addresses, occupations, employers and the amount guaranteed by each, if applicable, should be itemized. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. Further, it is important to note that "personal funds" is strictly defined by Commission regulations and may be found in 11 CFR 110.10. (11 CFR 100.7(a)(1) and 104.3(d))

An amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 119 D Street, N.E., Room 623, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4172.

Sincerely,

*Susan Kaltenbaugh*

Susan Kaltenbaugh  
Senior Reports Analyst  
Reports Analysis Division

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Attachment

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RO-3

January 21, 1983

B. W. Armstrong, Treasurer  
Paul Tribble for Senate Committee, Inc.  
P.O. Box 506  
Richmond, VA 23204

Identification Number: C00149310

306

Reference: 30 Day Post-General Report (10/14/82-11/22/82)

Dear Mr. Armstrong:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated December 28, 1982. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Susan Kaltenbaugh on our toll-free number (800) 424-9530 or our local number (202) 523-4172.

Sincerely,

*John D. Gibson*  
John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

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RECEIVED.  
SECRETARY OF THE SENATE

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**U.S. SENATE**

January 31, 1983

RECEIVED BY THE FEC

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*Attachment*

*11*

*Amended 1982 30 Day  
Post General Report.*

Ms. Susan Kaltenbaugh  
Senior Report Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC

Dear Ms. Kaltenbaugh:

With reference to your letter 30 day post general report,  
I am enclosing amended summary sheets for this period. Since  
it will take some time to follow up on the rest of your requests,  
I will file a further amended report as soon as possible.

The reason I am filing the summary pages now is for continuity  
from the amended September 30 report.

Sincerely,  
*Dorothy B. Meldrum,*  
Dorothy B. Meldrum,  
Assistant to the Treasurer *By SAA*

enclosure

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*12.*

*K S. 3107 HA REP C1452*

MEMORANDUM FOR FILES

RE: TELECON  
DATE: April 26, 1983  
FROM: Susan Kaltenbaugh  
TO: Dorothy Meldrum  
NAME OF COMMITTEE: Paul Tribble for Senate Committee Inc.

---

I again attempted to reach Ms. Meldrum. There was no answer.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1558

Date Filmed 11/17/83 Camera No. --- 3

Cameraman IRL



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1558

Date Filmed 12/2/83 Camera No. --- 3

Cameraman JRL

CCA 1171

**MLB CORPORATION**

P. O. Box 31440  
RICHMOND, VIRGINIA 23294-1440  
(804) 747-9740

REP JT  
NY

**BEVERLEY W. ARMSTRONG**  
PRESIDENT

83 NOV 21 P 2: 29

November 17, 1983

Mr. Danny Lee McDonald  
Chairman, Federal Elections Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

11/15/83

Dear Chairman McDonald:

This is in reply to your letter of October 24, 1983 addressed to me as Treasurer of the Paul Tribble for Senate Committee. There you indicated that some technical problems had arisen in connection with certain of the Committee's filings, that these problems had been resolved, and that the matter was now closed. I wanted to take this opportunity to explain how these problems arose.

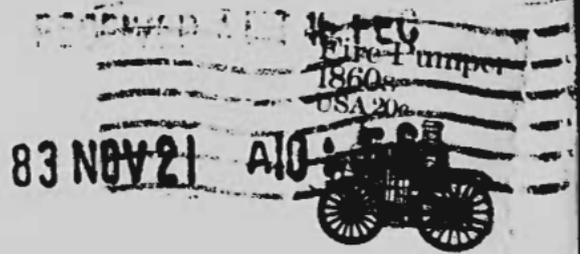
After the election, I turned over day-to-day responsibility to our Assistant Treasurer. This responsibility included any follow-up needed on our FEC reports and the handling of correspondence addressed to me as Treasurer. As you can imagine, our Assistant Treasurer had worked very hard during the closing weeks of the campaign. Unbeknownst to me, she took time off after the election to recover. Unfortunately, as a consequence, the Treasurer's duties were left wanting.

When it came to the attention of the Tribble Committee staff members that there were problems with the Committee's FEC filings, we took immediate steps, as your letter indicates, to resolve them. I also note that your letter shows they were quite technical: an error in addition, the failure to indicate the terms of a loan, and the fact that an inter-committee transfer was disclosed only once rather than twice as required. In any event, these errors did not result in anything less than complete disclosure of all campaign contributions received by the Committee.

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MLB CORPORATION  
P. O. BOX 31440  
RICHMOND, VIRGINIA 23294-1440



Mr. Danny Lee McDonald  
Chairman, Federal Elections Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1558

Date Filmed 12/2/83 Camera No. --- 3

Cameraman JRL