



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1986

Date Filmed 2/8/86 Camera No. --- 2

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MAR 1986

FEDERAL ELECTION COMMISSION

internal memos, routing slips, duplicate copies, conciliation proposals and negotiations
and related correspondence, 12 Day reports and comments, pre-brief and comments,
FAD referral cover memo -

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

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

Signed Francen B. Hojin
date 1-27-86

[Handwritten initials]
1/31/86

DEMETRIOS FOR CONGRESS

P.O. BOX 888
FLORENCE, SC 29503

269

January 6 1986

975
832

PAY TO THE ORDER OF FEDERAL ELECTION COMMISSION

\$ 500.00

Five Hundred and no/100-----DOLLARS

 **First National Bank**
First National Bank of South Carolina
Darlington, South Carolina 29532

Paula D. Lawson

⑆000269⑆ ⑆053200051⑆ 2500 4184 5⑆

000#9478

MEMORANDUM

TO: RETHA DIXON

TO: JOAN HARRIS

FROM: JOAN HARRIS

FROM: RETHA DIXON

CHECK NO. 269 (a copy of which is attached) RELATING

TO MUR 1986 AND NAME Demetrios for Congress Committee Paula Lawson

WAS RECEIVED ON January 17, 1986 PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16)

* / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER _____

SIGNATURE Robyn M Bishop DATE 1-17-86

7
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RECEIVED
JAN 21 1986

FILED IN THE FEC
CC 4478
36 JAN 16 49:06

36 JAN 17 94:01

January 12, 1985

Ms. Frances B. Hagan
Office of General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: Demetrious for Congress Committee
MUR 1986

Dear Ms. Hagan:

Enclosed herewith please find the clarification of the source of candidate loans, continuous itemization of loans and check in the amount of \$500.00 pursuant to the terms of the Conciliation Agreement. It is my understanding that you will see that these documents are properly filed.

With kind regards, I am,

Yours truly,
Paula Lawson
Paula Lawson

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Demetrious for Congress Committee

Attachment to FEC Report - October 15 Quarterly

LOANS

<u>Source of Loan</u>	<u>Date Incurred</u>	<u>Amount</u>
Mary Demetrious	May 23, 1984	\$ 5,000.00
Mary Demetrious	April 19, 1984	\$ 4,500.00
Mary Demetrious	May 23, 1984	\$15,000.00
Mary Demetrious	May 23, 1984	\$ 5,000.00
Mary Demetrious	June 8, 1984	\$ 5,000.00
Mary Demetrious	June 11, 1984	\$ 2,200.00
Mary Demetrious	June 11, 1984	\$ 2,000.00
Mary Demetrious	June 12, 1984	\$ 2,200.00
Mary Demetrious	June 12, 1984	\$ 5,000.00
Mary Demetrious	June 15, 1984	\$ 1,600.00
Mary Demetrious (C & S Bank)	September 4, 1984	\$ 2,000.00
Mary Demetrious	July 31, 1984	\$ 500.00
Mary Demetrious	October 6, 1984	\$ 275.00

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Demetrious for Congress Committee
Attachment to FEC Report - July 15 Quarterly

LOANS

Velouchi Association - Paid in Full

<u>Source of Loan</u>	<u>Date Incurred</u>	<u>Amount</u>
Mary Demetrious	May 23, 1984	\$ 5,000.00
Mary Demetrious	April 19, 1984	\$ 4,500.00
Mary Demetrious	May 23, 1984	\$15,000.00
Mary Demetrious	May 23, 1984	\$ 5,000.00
Mary Demetrious	June 8, 1984	\$ 5,000.00
Mary Demetrious	June 11, 1984	\$ 2,200.00
Mary Demetrious	June 11, 1984	\$ 2,000.00
Mary Demetrious	June 12, 1984	\$ 2,200.00
Mary Demetrious	June 12, 1984	\$ 5,000.00
Mary Demetrious	June 15, 1984	\$ 1,600.00

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STATEMENT AS TO SOURCE OF CANDIDATE LOANS

All loans to the Demetrious for Congress Campaign have been from the candidate's personal funds, with the exception of loan shown on the October 15 Quarterly Report in the amount of \$2,000.00. This loan was from the Citizens and Southern National Bank and was secured by the candidate.

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8 6 0 4 0 5 6 4 9 8 3

1878 Partridge Circle
Florence, South Carolina 29501



Ms. Frances B. Hagan
Office of General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

06 JAN 19 09:00

RECEIVED AT THE FEC

GC# 9259

85 DEC 23 10: 54

December 19, 1985

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

85 DEC 23 11: 27

Mr. Kenneth A. Gross
General Counsel
Federal Elections Committee
Washington, D.C. 20463

RE: MUR - 1986
Demetrious For Congress Committee

Dear Mr. Gross:

I have received your letter dated December 13, 1985, in which you advised that a copy of the Conciliation Agreement was enclosed. However, the copy was not enclosed, and I would appreciate your forwarding same to me as soon as possible.

Thank you for your help in this matter.

Very truly yours,

Paula Lawson

PAULA LAWSON

jp

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Demetrious for Congress Committee)
Paula Lawson, as treasurer)

MUR 1986

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 9, 1985, the Commission decided by a vote of 4-0 to take the following actions in MUR 1986:

1. Accept the conciliation agreement attached to the General Counsel's Report signed December 2, 1985.
2. Close the file.

Commissioners Elliott, Harris, Josefiak and McGarry voted affirmatively for this decision; Commissioners Aikens, and McDonald did not cast a vote.

Attest:

12-10-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Wed.,	12-4-85,	2:21
Circulated on 48 hour tally basis:	Thurs.,	12-5-85,	11:00
Deadline for vote:	Mon.,	12-9-85,	11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

ED

SENSITIVE

In the Matter of

Demetrious for Congress Committee
Paula Lawson, as treasurer

95 03 04 P2:21
NOV 1985

GENERAL COUNSEL'S REPORT

Background

Attached is a conciliation agreement which has been signed by the treasurer of the Demetrious for Congress Committee.

Recommendation

The Office of General Counsel recommends accepting this agreement and closing the file.

Charles N. Steele
General Counsel

December 2, 1985
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachment
Conciliation Agreement

86040564988

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Demetrious for Congress Committee) MUR 1986
Paula Lawson, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer ("Respondent") violated 2 U.S.C. § 434(b)(8) by failing continuously to itemize loans and 2 U.S.C. § 434(b)(3)(E) by failing to clarify the source of candidate loans.

NOW, THEREFORE, the Commission and Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Demetrious for Congress Committee, Respondent, is the principal campaign committee for 1984 House of Representatives candidate Mary Demetrious from the sixth district of South Carolina.

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2. Paula Lawson became treasurer of the committee on October 29, 1985.

A.1. On the 1984 Amended 12 Day Pre-Primary Report, Respondents reported receipt of four loans from the candidate totaling \$29,500. These loans were not reported on the Respondents' next report, a Quarterly Report covering May 24, 1984, through July 15, 1984.

2. 2 U.S.C. § 434(b)(8) states that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to a political committee and where such debts and obligations are settled for less than their reported amount, a statement of circumstances under which such debts and obligations were extinguished.

B.1 On the 1984 Amended 12 Day Pre-Primary Report, the Respondents failed to clarify the source of four candidate loans totaling \$29,500. On its 1984 Quarterly Report covering May 24, 1984, through July 15, 1984, Respondents failed to clarify the source of six loans from the candidate totaling \$18,000.

V. Respondents failed to continuously itemize loans in violation of 2 U.S.C. § 434(b)(8).

VI. Respondents failed to clarify the source of candidate loans in violation of 2 U.S.C. § 434(b)(3)(E).

VII. Respondents will amend disclosure reports to itemize the loans outstanding and to clarify the source of candidate loans.

VIII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Five Hundred Dollars (\$500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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IX. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

XI. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XII. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XIII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

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

December 12, 1985
Date

FOR THE RESPONDENTS:

Paula Lawson

11/15/85
Date





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 13, 1985

Mrs. Paula Lawson, Treasurer
Demetrious for Congress Committee
1878 Partridge Circle
Florence, South Carolina 29501

RE: MUR 1986
Demetrious for Congress
Committee
Paula Lawson, as treasurer

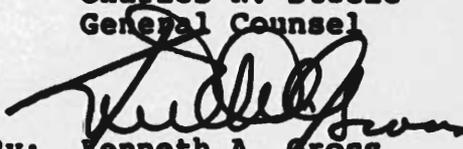
Dear Mrs. Lawson:

On December 9, 1985, the Commission accepted the conciliation agreement you signed in settlement of a violation of 2 U.S.C. §§ 434(b)(8) and 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Demetrious for Congress Committee) MUR 1986
Francis Eugene Willis, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 4, 1985, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1986:

1. Find probable cause to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer, violated 2 U.S.C. §§ 434(b) (8) and 434(b) (3) (E).
2. Send the letter and conciliation agreement attached to the General Counsel's report dated August 19, 1985.

Commissioners Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Aikens was not present at the time of the vote.

Attest:

9-6-85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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the Committee's 1984 Amended 12 Day Pre-Primary Report. No loan repayments were reported on the 1984 July Quarterly Report nor were the loans included on the summary page in the debt total for the period.^{1/}

On October 30, 1984, RAD sent a Request for Additional Information ("RFAI") to the Committee. The RFAI noted Commission Regulations requiring the continuous reporting of all outstanding loans and requested the current status of the loans in question. On November 21, 1984, RAD sent a second letter for failure to respond to the RFAI. The RAD analyst attempted to reach the treasurer and assistant treasurer by telephone, without success.

Because the Committee failed to continuously itemize four loans from the candidate totaling \$29,500, the Office of General Counsel is recommending a finding of probable cause to believe that the Committee violated 2 U.S.C. § 434(b)(8).

B. Source of Candidate Loans

2 U.S.C. § 434(b)(3)(E) states that reports shall disclose each 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 such loan.

The Committee failed to clarify the source of four candidate loans totaling \$29,500 (discussed in A above) which were itemized on its 1984 Amended 12 Day Pre-Primary Report. The Committee also failed to clarify the source of six candidate loans totaling \$18,000 itemized on its 1984 July Quarterly Report.

^{1/} The Committee did disclose another debt total for the calendar year to date which appeared to include these loans.

8 6 0 4 0 5 6 4 9 9 3

On October 30, 1984, an RFAI was sent for the 12 Day Pre-Primary and July Quarterly Reports requesting that the Committee clarify whether or not the source of the loans was the candidate's personal funds, a lending institution, or some other source. The RFAI noted that if the candidate borrowed the funds from a lending institution, the name of the institution and the complete terms of the loans were required. The letter also advised that if the loans were from the candidate's personal funds, the Committee must acknowledge that fact in an amendment to its report. RAD sent the Committee a second notice on November 21, 1984, for failure to respond to the RFAI. The RAD analyst attempted several times to contact the Committee by telephone, without success.

Because the Committee failed to comply with the requirement to identify the source of the loans from the candidate, this Office is recommending findings of probable cause to believe that violations of 2 U.S.C. §§ 434(b)(8) and 434(b)(3)(E) occurred in this matter.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

Attached is a conciliation agreement which this Office is prepared to offer in settlement of these issues. The proposal

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IV. RECOMMENDATIONS

1. Find probable cause to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer, violated the following:

- a) 2 U.S.C. § 434(b) (8).
- b) 2 U.S.C. § 434(b) (3) (E).

19 August 1985
Date



Charles N. Steele
General Counsel

Attachments
Proposed Conciliation Agreement
Letter to Respondents

86040564995



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1985

Francis Eugene Willis, Treasurer
Demetrious for Congress Committee
P.O. Box 888
Florence, South Carolina 29503

RE: MUR 1986
Demetrious for Congress
Francis Eugene Willis, a:

Dear Mr. Willis:

On Sept 6, 1985, the Commission determined that probable cause to believe that the Demetrious for Congress Committee and you, as treasurer, committed a violation of 2 U.S.C. §§ 434(b)(8) and 434(b)(3)(E), provisions of the Election Campaign Act of 1971, as amended, in connection with the Committee's failure to itemize loans continuously and to clarify the source of candidate loans.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by its methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court for the payment of a civil penalty.

We enclose a conciliation agreement that this office has prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it along with the civil penalty to the Commission within ten days. I will then recommend to the Commission approve the agreement. Please make your payment of the civil penalty payable to the U.S. Treasurer.

If you have any questions or suggestions for changing the enclosed conciliation agreement, please contact France, the staff member assigned to this matter, at (202) 523-

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

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RE:

That Francis Eugene Willis is no longer
of the Democrats for Congress.
Forward all correspondence to Mrs. Paula
Marbridge Circle, Florence, South Carolina, or
Post Office Box 22, Darlington, South

Also, please send an updated copy of the FEC regulations
to Mrs. [Name] so that the necessary information which
you have requested may be submitted as soon as possible.
Thank you for your cooperation.

Sincerely,

Mary [Name]

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

85 JUN 10 4 31 20

June 10, 1985

MEMORANDUM

CONFIDENTIAL

TO: The Commission

FROM: Charles H. Steele *CHS/lan*
General Counsel

SUBJECT: MUR #1986

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on June 10, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Demetrious for Congress Committee) MUR 1985
Francis Eugene Willis, Treasurer)

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

On April 23, 1985, the Commission found reason to believe that the Demetrious for Congress Committee and as treasurer, Francis Eugene Willis, violated 2 U.S.C. § 434(b)(8) for failure to continuously itemize loans and 2 U.S.C. § 434(b)(3)(E) for failure to clarify the source of candidate loans.

On April 25, 1985, the Office of General Counsel notified the respondent of the Commission's findings. The Committee did not respond to the notice.

II. Legal Analysis

A. Reporting of Candidate Loans

2 U.S.C. § 434(b)(8) states that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to a political committee and where such debts and obligations are settled for less than their reported amount, a statement of circumstances under which such debts and obligations were extinguished.

According to a Reports Analysis Division referral to the Office of General Counsel, the Demetrious for Congress Committee ("the Committee") failed to itemize on its 1984 July Quarterly Report (covering May 24, 1984, through July 15, 1984) four candidate loans totaling \$29,500. The loans previously had been disclosed on the Committee's 1984 Amended 12 Day Pre-Primary Report. No loan repayments were reported on the 1984 July

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Quarterly Report nor were the loans included on the summary page in the debt total for the period.^{1/}

On October 30, 1984, RAD sent a Request for Additional Information ("RFAI") to the Committee. The RFAI noted Commission Regulations requiring the continuous reporting of all outstanding loans and requested the current status of the loans in question. On November 21, 1984, RAD sent a second letter for failure to respond to the RFAI. The RAD analyst attempted to reach the treasurer and assistant treasurer by telephone, without success.

Because the Committee failed to continuously itemize four loans from the candidate totaling \$29,500, the Office of General Counsel is prepared to recommend a finding of probable cause to believe that the Committee violated 2 U.S.C. § 434(b)(8).

B. Source of Candidate Loans

2 U.S.C. § 434(b)(3)(E) states that reports shall disclose each 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 such loan.

The Committee failed to clarify the source of four candidate loans totaling \$29,500 (discussed in A above) which were itemized on its 1984 Amended 12 Day Pre-Primary Report. The Committee also failed to clarify the source of six candidate loans totaling \$18,000 itemized on its 1984 July Quarterly Report.

^{1/} The Committee did disclose another debt total for the calendar year to date which appeared to include these loans.

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On October 30, 1984 an RFAI was sent for the 12 Day Pre-Primary and July Quarterly Reports requesting that the Committee clarify whether or not the source of the loans was the candidate's personal funds, a lending institution or some other source. The RFAI noted that if the candidate borrowed the funds from a lending institution, the name of the institution and the complete terms of the loans were required. The letter also advised that if the loans were from the candidate's personal funds, the Committee must acknowledge that fact in an amendment to its report. RAD sent the Committee a second notice on November 21, 1984, for failure to respond to the RFAI. The RAD analyst attempted several times to contact the Committee by telephone, without success.

Because the Committee failed to comply with the requirement to identify the source of the loans from the candidate, this Office is prepared to recommend a finding of probable cause to believe that a violation of 2 U.S.C. § 434(b)(3)(E) occurred in this matter.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer, violated the following:
 - a) 2 U.S.C. § 434(b)(8).
 - b) 2 U.S.C. § 434(b)(3)(E).

June 6, 1985
Date

Charles N. Steele
Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 10, 1985

Mr. Francis Eugene Willis, Treasurer
Demetrious for Congress Committee
P.O. Box 888
Florence, South Carolina 29503

RE: MUR 1986
Demetrious for Congress
Francis Eugene Willis,
Treasurer

Dear Mr. Willis:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on April 23, 1985, found reason to believe that the Demetrious for Congress Committee and you, as treasurer, had violated 2 U.S.C. §§ 434(b)(8) and 434(b)(3)(E), instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

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Francis Eugene Willis, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Frances B. Hagan, the staff member assigned to handle this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

86040565003

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Demetrious for Congress Committee) RAD Referral 85L-6
Francis Eugene Willis, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 23, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85L-6:

1. Open a MUR.
2. Find reason to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer, violated the following:
 - a) 2 U.S.C. § 434(b)(8)
 - b) 2 U.S.C. § 434(b)(3)(E).
3. Approve the letter and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed April 18, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

4-23-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

4-18-85, 3:55
4-19-85, 2:00

86040565004

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

RECEIVED
OFFICE OF THE FEDERAL
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT APR 18 1985 3:55

DATE AND TIME OF
TRANSMITTAL BY OGC
TO THE COMMISSION

4/18/85-3:55

RAD: 85L-6

STAFF MEMBER: Frances Hagan

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:

Demetrious for Congress Committee
Francis Eugene Willis, Treasurer
2 U.S.C. § 434(b)(8);
11 C.F.R. § 104.3(d)
11 C.F.R. § 104.11
2 U.S.C. § 434(b)(3)(E)
11 C.F.R. § 104.3(a)(4)(iv)

SENSITIVE

INTERNAL REPORTS CHECKED:

None

FEDERAL AGENCIES CHECKED:

None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division.

SUMMARY OF ALLEGATIONS

The Demetrious for Congress Committee and as treasurer, Francis Eugene Willis, violated 2 U.S.C. § 434(b)(8) for failure to continuously itemize loans and 2 U.S.C. § 434(b)(3)(E) for failure to clarify the source of candidate loans.

FACTUAL AND LEGAL ANALYSIS

A. Reporting of Candidate Loans

2 U.S.C. § 434(b)(8) states that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to a political committee and where such debts and obligations are settled for less than their reported amount, a

86040565005

statement of circumstances under which such debts and obligations were extinguished.

According to RAD, the Demetrious for Congress Committee ("the Committee") failed to itemize on its 1984 July Quarterly Report four candidate loans totaling \$29,500. The loans previously had been disclosed on the Committee's 1984 Amended 12 Day Pre-Primary Report. No loan repayments were reported on the 1984 July Quarterly Report nor were the loans included on the summary page in the debt total for the period. 1/

On October 30, 1984, RAD sent a Request for Additional Information ("RFAI") to the Committee. The RFAI noted Commission Regulations requiring the continuous reporting of all outstanding loans and requested the current status of the loans in question. On November 21, 1984, RAD sent a second letter for failure to respond to the RFAI. The RAD analyst attempted to reach the treasurer and assistant treasurer by telephone, without success.

Because the Committee failed to continuously itemize four loans from the candidate totaling \$29,500, the Office of General Counsel recommends finding reason to believe that the Committee violated 2 U.S.C. § 434(b)(8).

1/ The Committee did disclose another debt total for the calendar year to date which appeared to include these loans.

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B. Source of Candidate Loans

2 U.S.C. § 434(b)(3)(E) states that reports shall disclose each 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 such loan.

The Committee failed to clarify the source of four candidate loans totaling \$29,500 (discussed in A above) which were itemized on its 1984 Amended 12 Day Pre-Primary Report. The Committee also failed to clarify the source of six candidate loans totaling \$18,000 itemized on its 1984 July Quarterly Report.

On October 30, 1984, an RFAI was sent for the 12 Day Pre-Primary and July Quarterly Reports requesting that the Committee clarify whether or not the source of the loans was the candidate's personal funds, a lending institution or some other source. The RFAI noted that if the candidate borrowed the funds from a lending institution, the name of the institution and the complete terms of the loans were required. The letter also advised that if the loans were from the candidate's personal funds, the Committee must acknowledge that fact in an amendment to its report. RAD sent the Committee a second notice on November 21, 1984, for failure to respond to the RFAI. The RAD analyst attempted several times to contact the Committee by telephone, without success.

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Because the Committee failed to comply with the requirement to identify the source of the loans from the candidate, this Office recommends a finding of reason to believe for a violation of 2 U.S.C. § 434(b)(3)(E).

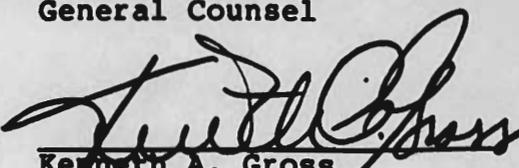
RECOMMENDATION

1. Open a MUR
2. Find reason to believe that the Demetrious for Congress Committee and Francis Eugene Willis, as treasurer, violated the following:
 - a) 2 U.S.C. § 434(b)(8),
 - b) 2 U.S.C. § 434(b)(3)(E).
3. Approve attached letter and General Counsel's Factual and Legal Analysis.

April 18, 1985
Date

Charles N. Steele
General Counsel

BY:


Kenneth A. Gross
Associate General Counsel

Attachments

Proposed Letter and General Counsel's Factual and Legal Analysis
RAD Referral

86040565008



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Francis Eugene Willis, Treasurer
Demetrious for Congress Committee
P.O. Box 888
Florence, South Carolina 29503

RE: MUR
Demetrious for Congress
Francis Eugene Willis, Treasurer

Dear Mr. Willis:

On _____, 1985, the Federal Election Commission determined that there is reason to believe that the Demetrious for Congress Committee and you, as treasurer, violated 2 U.S.C. § 434(b)(8) and § 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act.") 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 and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 finding of probable cause to believe if so desired. 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.

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.

Attachment A (1)

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Francis Eugene Willis, Treasurer
Page 2

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 Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

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

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A (2)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Demetrious for Congress Committee
Francis Eugene Willis, Treasurer

MUR NO. ___

SUMMARY OF ALLEGATIONS

The Demetrious for Congress Committee and as treasurer, Francis Eugene Willis, violated 2 U.S.C. § 434(b) (8) for failure to continuously itemize loans and 2 U.S.C. § 434(b) (3) (E) for failure to clarify the source of candidate loans.

FACTUAL AND LEGAL ANALYSIS

A. Reporting of Candidate Loans

2 U.S.C. § 434(b) (8) states that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to a political committee and where such debts and obligations are settled for less than their reported amount, a statement of circumstances under which such debts and obligations were extinguished.

According to RAD, the Demetrious for Congress Committee ("the Committee") failed to itemize on its 1984 July Quarterly Report four candidate loans totaling \$29,500. The loans previously had been disclosed on the Committee's 1984 Amended 12 Day Pre-Primary Report. No loan repayments were reported on the 1984 July Quarterly Report nor were the loans included on the summary pages in the debt total for the period. 1/

1/ The Committee did disclose another debt total for the calendar year to date which appeared to include these loans.

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On October 30, 1984, RAD sent a Request for Additional Information ("RFAI") to the Committee. The RFAI noted Commission Regulations requiring the continuous reporting of all outstanding loans and requested the current status of the loans in question. On November 21, 1984, RAD sent a second letter for failure to respond to the RFAI. The RAD analyst attempted to reach the treasurer and assistant treasurer by telephone, without success.

Because the Committee failed to continuously itemize four loans from the candidate totaling \$29,500, the Office of General Counsel recommended finding reason to believe that the Committee violated 2 U.S.C. § 434(b)(8).

B. Source of Candidate Loans

2 U.S.C. § 434(b)(3)(E) states that reports shall disclose each 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 such loan.

The Committee failed to clarify the source of four candidate loans totaling \$29,500 (discussed in A above) which were itemized on its 1984 Amended 12 Day Pre-Primary Report. The Committee also failed to clarify the source of six candidate loans totaling \$18,000 itemized on its 1984 July Quarterly Report.

On October 30, 1984, an RFAI was sent for the 12 Day Pre-Primary and July Quarterly Reports requesting that the Committee

A (4)

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clarify whether or not the source of the loans was the candidate's personal funds, a lending institution or some other source. The RFAI noted that if the candidate borrowed the funds from a lending institution, the name of the institution and the complete terms of the loans were required. The letter also advised that if the loans were from the candidate's personal funds, the Committee must acknowledge that fact in an amendment to its report. RAD sent the Committee a second notice on November 21, 1984, for failure to respond to the RFAI. The RAD analyst attempted several times to contact the Committee by telephone, without success.

Because the Committee failed to comply with the requirement to identify the source of the loans from the candidate, this Office recommended a finding of reason to believe for a violation of 2 U.S.C. § 434(b)(3)(E).

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 6 March 1985

ANALYST: Gregory Swanson

I. COMMITTEE: Demetrious for Congress Committee
(C00179564)
Francis Eugene Willis, Treasurer
P.O. Box 888
Florence, SC 29503

II. RELEVANT STATUTE: A. 2 U.S.C. §434(b)(8)
11 CFR 104.3(d)
11 CFR 104.11
B. 2 U.S.C. §434(b)(3)(E)
11 CFR 104.3(a)(4)(iv)

III. BACKGROUND:

A. Failure to Itemize Loans Previously Reported - 2 U.S.C. §434(b)(8), 11 CFR 104.3(d), 11 CFR 104.11

The Demetrious for Congress Committee ("the Committee") failed to itemize on Schedule C of its 1984 July Quarterly Report four (4) candidate loans totalling \$29,500. The loans had been disclosed on the Committee's previous report, the 1984 Amended 12 Day Pre-Primary (Attachment 2). No loan repayments were reported on the 1984 July Quarterly Report nor were the loans included in the total on Line 10 of the Summary Page (Attachment 3).^{1/}

A Request for Additional Information ("RFAI") was sent to the Committee on October 30, 1984 for the 1984 July Quarterly Report. The RFAI noted Commission Regulations requiring the continuous reporting of all outstanding loans and requested the current status of those loans not included (Attachment 4). A Second Letter was sent November 21, 1984, for failure to respond to the RFAI (Attachment 5).

^{1/} The Committee, however, disclosed another debt total in Column B for Line 10 which appeared to include these loans.

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DEMETRIOS FOR CONGRESS COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Because of the Committee's failure to respond to the Second Notice, the Reports Analysis Division ("RAD") analyst attempted to contact the Committee officials by telephone (Attachment 6). The RAD analyst was unable to obtain telephone numbers for the Committee's treasurer (Francis Eugene Willis) and assistant treasurer (Paula Lawson). The RAD analyst left messages on December 26 and 27, 1984; January 2 and 15, 1985; and February 7, 1985 with the candidate's answering service requesting that she contact the Commission. As of this date, the candidate has not returned the calls nor has the Committee responded to the RAD notices.

B. Failure to Clarify the Source of Candidate Loans - 2
U.S.C. §434(b) (3) (E), 11 CFR 104.3(a) (4) (iv)

The Committee failed to clarify the source of four (4) candidate loans totalling \$29,500 itemized on Schedule C for Line 13(a) of the Detailed Summary Page on its 1984 Amended 12 Day Pre-Primary Report (Attachment 2). The Committee also failed to clarify the source of six (6) candidate loans totalling \$18,000 itemized on Schedule C for Line 13(a) of the Detailed Summary Page on its 1984 July Quarterly Report (Attachment 3).

An RFAI was sent for the 12 Day Pre-Primary and July Quarterly Reports on October 30, 1984, requesting that the Committee clarify whether or not the source of the loans was the candidate's personal funds, a lending institution or other source. The RFAI noted that if the candidate borrowed the funds from a lending institution, the name of the institution and the complete terms of the loans were required. If the loans were from the candidate's personal funds, the Committee must acknowledge that fact in an amendment to its report (Attachment 4). A Second Notice was sent November 21, 1984, for failure to respond to the RFAI (Attachment 5).

Because of the Committee's failure to respond to the Second Notice, the RAD analyst attempted to contact the Committee officials on numerous occasions (Attachment 6). As of this date, no response has been received.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1983-1984

DATE 6MAR85

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
DEMETRIOS, MARY	HOUSE 06	DEMOCRATIC PARTY					SOUTH CAROLINA 1984 ELECTION	ID# H4SC06023	
1. STATEMENT OF CANDIDATE							19MAR84	1 84HSE/256/0250	
1984 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPTS & EXPENDITURES									
3. PRINCIPAL CAMPAIGN COMMITTEE									
DEMETRIOS FOR CONGRESS COMMITTEE								ID# C00179564 HOUSE	
1984 STATEMENT OF ORGANIZATION							19MAR84	1 84HSE/256/0250	
APRIL QUARTERLY			25,310		20,045		17APR84 - 15APR84	17 84HSE/258/5...	
PRE-PRIMARY			35,715		20,747		15APR84 - 23MAY84	13 84HSE/261/2620	
PRE-PRIMARY - AMENDMENT			37,215		20,747		15APR84 - 23MAY84	6 84HSE/266/3809	
REQUEST FOR ADDITIONAL INFORMATION							13APR84 - 23MAY84	2 84FEC/347/3987	
REQUEST FOR ADDITIONAL INFORMATION 2ND							15APR84 - 23MAY84	2 84FEC/348/2300	
JULY QUARTERLY			24,136		45,023		24MAY84 - 15JUL84	20 84HSE/266/4771	
REQUEST FOR ADDITIONAL INFORMATION							24MAY84 - 30JUN84	1 84FEC/347/5100	
REQUEST FOR ADDITIONAL INFORMATION 2ND							24MAY84 - 30JUN84	1 84FEC/349/3130	
OCTOBER QUARTERLY			3,009		3,153		16JUL84 - 15NOV84	8 84HSE/281/5430	
NOTICE OF FAILURE TO FILE							1JUL84 - 30SEP84	1 84FEC/348/4360	
REQUEST FOR ADDITIONAL INFORMATION							16JUL84 - 15NOV84	2 85FEC/366/3310	
TOTAL			89,670	0	88,968	0		74 TOTAL PAGES	
4. AUTHORIZED COMMITTEES									
4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES									

All reports have been reviewed.

Cash-on-hand as of November 15, 1984: \$700

Debts and obligations owed to the committee as of November 15, 1984: \$0

Debts and obligations owed by the committee as of November 15, 1984: \$57,164*

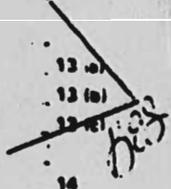
*This figure was calculated by the RAD analyst; the Committee reported outstanding debts and obligations totalling \$9,664.

B
(4)

DETAILED SUMMARY PAGE of Receipts and Disbursements (Page 2, FEC FORM 3)

Name of Candidate		Report Covering the Period	
Demirious for Congress Committee		April 15	May 23
		COLUMN A	COLUMN B
		Total This Period	Calendar Year to Date
I RECEIPTS			
11	CONTRIBUTIONS FROM		
	(a) Individuals Other Than Political Committees		11 (a)
	(b) Political Committees		11 (b)
	(c) Total	1,500.00	11 (c)
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		12
13	LOANS		
	(a) Made or Guaranteed by the Candidate	29,500.00	13 (a)
	(b) Other Loans		13 (b)
	(c) TOTAL LOANS (add 13 (a) and 13 (b))		13 (c)
14	TRANSFERS TO OPERATING EXPENDITURES (Refunds, Reimburse, etc.)		14
15	OTHER RECEIPTS (Dividends, Interest, etc.)		15
16	TOTAL RECEIPTS (add 11 (c), 12 (c), 14 and 15)	37,215.00	16
II DISBURSEMENTS			
17	OPERATING EXPENDITURES	18,747.51	17
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		18
19	LOAN REPAYMENTS		
	(a) Of Loans Made or Guaranteed by the Candidate	2,000	19 (a)
	(b) Of Other Loans		19 (b)
	(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	2,000	19 (c)
20	REFUNDS OF CONTRIBUTIONS TO		
	(a) Individuals Other Than Political Committees		20 (a)
	(b) Political Committees		20 (b)
	(c) Other Political Committees		20 (c)
	(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b) and 20 (c))		20 (d)
21	OTHER DISBURSEMENTS		21
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	20,747.51	22
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 5,265.02	23
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 37,215.00	24
25	SUBTOTAL (Add Line 23 and Line 24)	\$ 42,480.02	25
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 20,747.51	26
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 21,732.51	27

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SCHEDULE C
(Required Form)

LOANS

Page 2 of 3
This schedule should be filed separately

Name of Contributor (or Full Name of Contributor for Congress Committee)			
Name, Address and ZIP Code of Loan Source			
	Original Amount of Loan	Complete Payments To Date	Balance Outstanding at Close of This Period
Mary Demetrious P. O. Box 22 Darlington, S. C. 29532	\$5,000.00	0	\$5,000.00
Date of Disbursement: 5-23-84 Interest Rate: _____ Secured: _____ Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____ Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____			
Name, Address and ZIP Code of Loan Source			
	Original Amount of Loan	Complete Payments To Date	Balance Outstanding at Close of This Period
Mary Demetrious P. O. Box 22 Darlington, S. C. 29532	\$4,500.00	0	\$4,500.00
Date of Disbursement: 4-19-84 Interest Rate: _____ Secured: _____ Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____ Name of Employer: _____ Occupation: _____ Amount Guaranteed Outstanding: \$ _____			
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page of this form only)			
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

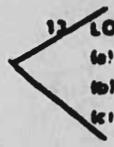
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B (6)

RETAINED EMBROIDERY MADE OF TISSUE AND DISBURSEMENTS PAGE 2, PFC FORM 2

Name of Committee (in Full)		Report Covering the Period	
Demetrious for Congress Committee		From: May 24	To: J-17 15
		COLUMN A	COLUMN B
		Total This Period	Calendar Year to Date
I. RECEIPTS			
11	CONTRIBUTIONS (other than loans) FROM:		
(a)	Individuals/Persons Other Than Political Committees	53,800.00	
	(Name Entry L-statement \$ 500.00)		
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	The Candidate	2,336.12	
(e)	TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)))	56,136.12	
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
13	LOANS		
(a)	Made or Guaranteed by the Candidate	18,000.00	
(b)	All Other Loans		
(c)	TOTAL LOANS (add 13 (a) and 13 (b))	18,000.00	47,500.00
14	OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
15	OTHER RECEIPTS (Dividends, Interest, etc.)		
16	TOTAL RECEIPTS (add 11 (a), 12, 13 (c), 14 and 15)	24,136.12	86,661.83
II. DISBURSEMENTS			
17	OPERATING EXPENDITURES	45,023.64	
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES		
19	LOAN REPAYMENTS:		
(a)	Of Loans Made or Guaranteed by the Candidate		
(b)	Of All Other Loans		
(c)	TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))		8,000.00
20	REFUNDS OF CONTRIBUTIONS TO:		
(a)	Individuals/Persons Other Than Political Committees		
(b)	Political Party Committees		
(c)	Other Political Committees		
(d)	TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		
21	OTHER DISBURSEMENTS		
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	45,023.64	
III. CASH SUMMARY			
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 21,732.51	
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 24,136.12	
25	SUBTOTAL (Add Line 23 and Line 24)	\$ 45,868.63	
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 45,023.64	
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	\$ 844.99	

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B(9)

EXAMPLES
 Schedule B-2

LOANS

Name of Committee (if Full) Demetriou for Congress Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Payments Made To Date	Balance Outstanding at Close of This Period
Mary Demetriou P. O. Box 22 Darlington, S. C. 29532	\$5,000.00	-0-	\$5,000.00
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Terms: Date Incurred 8-8-84 Date Due Open Interest Rate None (Year) <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	Payments Made To Date	Balance Outstanding at Close of This Period
Mary Demetriou P. O. Box 22 Darlington, S. C. 29532	\$2,200.00	-0-	\$2,200.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): Terms: Date Incurred 8-11-84 Date Due Open Interest Rate None (Year) <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)			\$7,200.00
TOTALS This Period (last page in this line only)			

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Name of Borrower (in Full)			
Demetrious for Congress Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Mary Demetrious P. O. Box 22 Darlington, S. C. 29532		Original Amount of Loan \$2,000.00	Commissions Payment To Date -0-
Balance Outstanding at Close of This Period \$2,000.00			
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <u>8-11-84</u> Date Due <u>Open</u> Interest Rate <u>NONE</u> % (per) <input type="checkbox"/> Secured			
Let 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 Mary Demetrious P. O. Box 22 Darlington, S.C. 29532		Original Amount of Loan \$2,200.00	Commissions Payment To Date -0-
Balance Outstanding at Close of This Period \$2,200.00			
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Terms: Date Incurred <u>8-12-84</u> Date Due <u>Open</u> Interest Rate <u>NONE</u> % (per) <input type="checkbox"/> Secured			
Let 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)			\$4,200.00
TOTALS This Period (last page in this line only)			
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Form 990.			

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Name of Debtor (to Full)			
Demetrious for Congress Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Mary Demetrious P. O. Box 22 Darlington, S. C. 29532		\$5,000.00	\$5,000.00
Station: <input type="checkbox"/> General <input type="checkbox"/> Other (Specify):			
Terms: Date Incurred <u>5-12-84</u> Date Due <u>Open</u> Interest Rate <u>None</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
Mary Demetrious P. O. Box 22 Darlington, S. C. 29532		\$1,600.00	\$1,600.00
Station: <input type="checkbox"/> Gen. <input type="checkbox"/> Other (Specify):			
Terms: Date Incurred <u>6-15-84</u> Date Due <u>Open</u> Interest Rate <u>None</u> <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)			\$6,600.00
TOTALS This Period (from page to this line only)			\$18,000.00

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

OCT 30 1984 NO-1

Francis E. Willis, Treasurer
Demetrius for Congress Committee
P.O. Box 888
Florence, SC 29503

Identification Number: C00179564

Reference: 12 Day Pre-Primary (4/15/84-5/23/84) and July
Quarterly (5/24/84-6/30/84) Reports

Dear Mr. Willis:

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:

-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 any other source. If the candidate borrowed funds from a lending institution or any other source, please provide the name of the lending institution and the complete terms of the loan. 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))

Part III, B
DES

-Column B figures for the Summary and Detailed Summary pages should equal the sum of the Column B figures of your previous report and the Column A figures of this report. Please amend your report to disclose the Column B Totals. Note that Column B should reflect the year-to-date totals for calendar year 1984.

-Commission Regulations require the continuous reporting of all outstanding loans/debts. This report omits the loan(s) itemized on your previous report(s). Please amend your report(s) to indicate the current status of the following loan(s): Mary Demetrius. (11 CFR 104.3(d) and 104.11)

Part III, A
DES

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An amendment to your original report(s) correcting the above
errata should be filed with the Clerk of the House of
Representatives, 1036 Longworth House Office Building,
Washington, DC 20515 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) 523-4040.

Sincerely,

Stuart N. Herschfeld

Stuart N. Herschfeld
Reports Analyst
Reports Analysis Division

86P4P56502673

B(14)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RG-3

November 21, 1984

Francis E. Willis, Treasurer
Demetrious for Congress Committee
P.O. Box 888
Florence, SC 29503

Identification Number: C00179564

Reference: 12 Day Pre-Primary (4/15/84-5/23/84) and July
Quarterly (5/24/84-6/30/84) Reports

Dear Mr. Willis:

This letter is to inform you that as of November 20, 1984, the Commission has not received your response to our request for additional information, dated October 30, 1984. 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 Stuart Herschfeld on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

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

Enclosure

8 P P A P S P Y, 0 3 2 7 9

B (15)

MEMORANDUM FOR THE FILES: TELECON

SUBJECT: Committee's failure to respond to RFAI's

DATE: December 26, 1984

FROM: Greg Swanson (Analyst)

TO: Mary Demetrious (candidate)

NAME OF COMMITTEE: Demetrious for Congress Committee - C00179564/SC

I attempted to phone the committee in order to gain an explanation as to the committee's failure to respond to a Request for Additional Information concerning the source of candidate loans totalling \$47,500 and dropped loans totalling \$29,500.

Due to my inability to obtain phone numbers for the committee's treasurer, Francis Eugene Willis, and assistant treasurer, Paula Lawson, I left a message with the candidate's answering service for her to contact the Commission.

No response was received and numerous other attempts were made on the dates shown below with no response.

- December 27, 1984
- January 2, 1985
- January 15, 1985
- February 7, 1985

86040565028



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 25, 1985

Mr. Francis Eugene Willis, Treasurer
Demetrious for Congress Committee
P.O. Box 888
Florence, South Carolina 29503

RE: MUR 1986
Demetrious for Congress
Francis Eugene Willis, Treasurer

Dear Mr. Willis:

On April 23, 1985, the Federal Election Commission determined that there is reason to believe that the Demetrious for Congress Committee and you, as treasurer, violated 2 U.S.C. § 434(b)(8) and § 434(b)(3)(E), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act.") 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 and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, 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 finding of probable cause to believe if so desired. 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.

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.

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Francis Eugene Willis, Treasurer
Page 2

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 Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,


John Warren McGarry
Chairman

Enclosures

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

86040565030

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1986

Date Filmed 2/8/86 Camera No. --- 2

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