



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 8071

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Washington, D.C. 20530

MAR 18 1985

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Gary H. Slavens, et al;
2 U.S.C. §§441a and 441f

Dear Mr. Steele:

Several months ago, Gary H. Slavens, a former campaign worker for Congressman Robin Tallon of South Carolina, informed United States Attorney Henry Dargan McMaster that during the Congressman's 1982 campaign he had been instructed by Tallon to find a way of getting a \$1,000 cash contribution into the campaign. We requested the Federal Bureau of Investigation to conduct a preliminary inquiry of this alleged incident in order to enable us to determine whether this matter had potential prosecutive merit as a criminal violation of the Federal Election Campaign Act, as well as other federal election offenses.

This investigation has now been concluded, and we have declined prosecution of it. This declination was based in part on the comparatively small sum allegedly involved (\$1,000), and on the failure of the investigation to corroborate the admission which Mr. Slavens initially made.

Attached for your information are copies of the interview reports (FD-302's) prepared by the FBI during this preliminary inquiry. As is readily apparent, Mr. Slavens clearly admits that he contributed \$1,000 to Tallon's 1982 campaign in his wife's name; that he did so because he had already reached his personal contribution limit; and that he received the corpus of this contribution in cash from a Mr. Stokes. Stokes has been interviewed, and he denies giving either Tallon or Slavens any money for the Tallon campaign.

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We are referring this matter to the Commission for whatever attention it considers appropriate under 2 U.S.C. §437g(a). If we can be of additional assistance, please let us know.

Sincerely,

Gerald E. McDowell, Chief
Public Integrity Section
Criminal Division

By:



Craig C. Donsanto, Director
Election Crimes Branch
Public Integrity Section
Criminal Division

Attachments

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SENSITIVE

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

RECEIVED
OFFICE OF THE IFEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

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DATE AND TIME OF
TRANSMITTAL BY OGC
TO THE COMMISSION:

PRE-MUR 143
STAFF MEMBER: Laurence Tobey

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

RESPONDENTS' NAMES:

Gary H. Slavens
Congressman Robin M. Tallon, Jr.
G.B. Stokes
Vicki Slavens
Tallon for Congress Committee,
Lamar J. Rabon, as treasurer
Joe W. Pearce, Jr.
Ed Saleeby
David Keller
C. Edward Floyd
Conyers O'Bryan

RELEVANT STATUTES:

2 U.S.C. § 432(b)(1)
2 U.S.C. § 432(b)(3)
2 U.S.C. § 441f
2 U.S.C. § 441g
11 C.F.R. § 110.4(c)(2)

INTERNAL REPORTS
CHECKED:

Reports of the Tallon for Congress
Committee

RELEVANT MURs
CHECKED:

MUR 1353

GENERATION OF MATTER

This matter was referred to this Office by the Department of Justice. The Federal Bureau of Investigation conducted a preliminary inquiry into allegations that illegal cash contributions were received by Representative Robin M. Tallon, Jr. (South Carolina, 6th District) during the 1982 primary and general election campaigns. The allegations were made by Gary H. Slavens. On the basis of its investigation, the

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Department of Justice declined to prosecute this matter because of the comparatively small sums of money allegedly involved and because the investigation failed to corroborate Slavens' allegations.

SUMMARY OF ALLEGATIONS

Gary H. Slavens worked on Representative Tallon's principal campaign committee during the 1982 campaign, and then served as Special Assistant to Tallon from January 1983 until July 1983, when Slavens resigned.

a. Alleged Contribution by G.B. Stokes in the Name of Vicki Slavens

Slavens alleges that, during the 1982 general election campaign, Tallon approached Slavens and advised him that G.B. Stokes (a local businessman) had given Tallon a \$1,000.00 cash contribution for his campaign. Stokes allegedly asked Slavens how to get this money into Tallon's campaign fund. Slavens claims that he told Tallon that Slavens could not make the contribution in his own name, because he had already given \$1,000.00 to Tallon's general election campaign fund. Slavens claims that he deposited the \$1,000.00 in the checking account of his wife, Vicki Slavens, and then had her write a check for \$1,000.00 to the Tallon campaign committee.

b. Alleged Cash Contribution by Joe W. Pearce, Jr.

Slavens alleged that Joe W. Pearce, Jr., the current Mayor of Florence, SC, gave \$700.00 in cash to Jefferson M. Lee, III, who worked for Tallon during the 1982 campaign and currently serves as Tallon's Senior Field Director. Slavens purportedly

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advised Tallon that Pearce had made a cash contribution to the campaign, and Tallon, according to Slavens, replied that he was aware that Pearce had made the cash contribution.

c. Alleged Cash Contribution by Ed Saleeby

Slavens further alleges that a member of Tallon's 1982 campaign committee (whose name Slavens cannot remember) told Slavens that South Carolina State Senator Ed Saleeby made a cash contribution of \$1,300.00 or \$1,400.00 to Tallon's 1982 general election campaign.

d. Alleged Cash Contribution by Others

Slavens claims that Mark Stroman (who worked for Tallon from June 1982 until March 1983, serving as Legislative Assistant from January, 1983 until his resignation) told Slavens that the Tallon campaign received other cash contributions. According to Slavens, Stroman said that such contributions were received when the campaign was out "on the road." However, Stroman never discussed with Slavens the specific amount of the alleged cash contributions.

e. Alleged Cash Contributions by Keller, Floyd and Others

Finally, Slavens alleges that during Tallon's 1982 campaign, Jefferson M. Lee, III advised Slavens that Lee approached David Keller, C. Edward Floyd, and other individuals whose names Slavens could not recall and solicited cash contributions for Tallon's campaign. Slavens did not indicate the amounts of these cash contributions.

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APPLICATION OF THE LAW TO THE FACTS

a. Preface: Relevant Provisions of the Federal Election Campaign Act of 1971 as amended

1.) Limitation on Contribution of Currency

The Act provides that no person shall make cash contributions exceeding \$100.00 to candidates for federal office. 2 U.S.C. § 441g. Further, Commission regulations provide that a candidate or committee receiving a cash contribution greater than \$100.00 shall promptly return the amount over \$100.00 to the contributor. 11 C.F.R. § 110.4(c)(2).

2.) Contributions in the Name of Another Prohibited

The Act provides that no person shall make a contribution in the name of another or knowingly permit his name to be used to effect such a contribution, and that no person shall knowingly accept a contribution by one person in the name of another. 2 U.S.C. § 441f.

3.) Organization of Political Committee - Account of Contributions

The Act provides that every person who receives a contribution for an authorized political committee shall, no later than 10 days after receiving the contribution, forward the contribution to the treasurer; and if the contribution is greater than \$50.00, include the name and address of the person making the contribution and the date of receipt. 2 U.S.C. § 432(b)(1).

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4.) Organization of Political Committees - Segregated Funds

The Act provides that all funds of a political committee shall be segregated from, and may never be commingled with, the personal funds of an individual. 2 U.S.C. § 432(b)(3).

b. Respondent Robin Tallon

1.) Acceptance of excessive cash contributions

Gary Slavens alleges that Representative Tallon accepted a cash contribution of \$1,000.00 from G.B. Stokes and failed to return the balance in excess of \$100.00. If true, then Tallon violated the prohibition against accepting cash contributions in excess of \$100.00 and requiring return of any excess. 11 C.F.R. § 110.4(c)(2).

2.) Failure to Forward Contribution to Treasurer

Gary Slavens alleges that Representative Tallon accepted the \$1,000.00 contribution from G.B. Stokes and failed to forward the contribution and the name and address of the donor to this campaign treasurer within 10 days of receipt. If true, then Tallon violated 2 U.S.C. § 432(b)(1).

3.) Contribution in the Name of Another

Gary Slavens alleges that Representative Tallon gave him \$1,000.00 which Slavens put in the checking account of his wife, Vicki Slavens after which Slavens had his wife write a check for \$1,000 to the Tallon Committee. If true,

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then Representative Tallon caused a contribution to be made in the name of another in violation of 2 U.S.C. § 441f. See MUR 1353.

4.) Commingling of Funds

Gary Slavens alleges that Representative Tallon gave him \$1,000.00 of campaign treasury money and that by agreement with Tallon, Slavens put his money in his wife's checking account. If true, then Representative Tallon caused campaign funds to be commingled with the personal funds of an individual, and failed to segregate the contribution in violation of 2 U.S.C. § 432(b)(3).^{1/}

c. G.B. Stokes

Gary Slavens alleges that G.B. Stokes gave \$1,000.00 in cash to Representative Tallon as a contribution to Tallon's campaign. If true, then Stokes violated the Act by making a cash contribution greater than \$100.00. 2 U.S.C. § 441g.

d. Gary Slavens

Gary Slavens admits that he received \$1,000.00 from Representative Tallon which Slavens deposited in the checking account of his wife, Vicki Slavens. If true, then Gary Slavens commingled the \$1000.00 with the personal funds of an individual in violation of 2 U.S.C. § 432(b)(3).

^{1/} Representative Tallon was not interviewed by the FBI.

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e. Vicki Slavens

1. Commingling of Funds

Gary Slavens alleges that he deposited \$1,000.00 received from Representative Tallon as a campaign contribution into Vicki Slavens checking account. If Vicki Slavens knew of the source of the \$1,000.00, then Vicki Slavens violated the Act by allowing the funds of a political committee to be commingled with her personal funds.

2 U.S.C. § 432(b)(3).

2. Contribution in the Name of Another

Gary Slavens alleges that Vicki Slavens allowed him to deposit \$1,000.00 in her checking account and that she then wrote a check for that amount to the Tallon for Congress Committee. If true, Vicki Slavens is guilty of knowingly permitting her name to be used for a contribution in the name of another in violation of the Act. 2 U.S.C. § 441f.^{2/}

f. Joe W. Pearce, Jr.

Gary Slavens alleges that Joe W. Pearce, Jr., the current Mayor of Florence, S.C. made a cash contribution of \$700.00 to the Tallon campaign. If true, this contribution violated the prohibition against cash contributions greater than \$100.00.

2 U.S.C. § 441g.

2/ Vicki Slavens was not interviewed by the FBI.

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g. Ed Saleeby

Gary Slavens alleges that South Carolina State Senator Ed Saleeby gave a cash contribution of \$1,300.00 or \$1,400.00 to Tallon's general election campaigns. (Saleeby was not interviewed by the FBI.) If true, such contribution violated the prohibition against cash contributions greater than \$100.00. 2 U.S.C. § 441g, and 2 U.S.C. § 441a(a)(1)(A) which prohibits contributions greater than \$1,000.00 by any person.

h. David Keller, C. Edward Floyd, and Conyers O'Bryan

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Gary Slavens alleges that Jefferson M. Lee, III told Slavens that Lee solicited David Keller, C. Edward Floyd and other individuals whose names Slavens does not recall for cash contributions to Tallon's campaign. Slavens did not indicate the amount of the contributions. When Lee was asked by the FBI about that allegation, Lee acknowledged that Keller, Floyd, and Conyers O'Bryan were solicited for contributions. However, according to Lee, these contributions were received in the form of checks, not cash. The Tallon Committee's reports show aggregate contributions of \$300.00 by C. Edward Floyd and \$500.00 by David Keller. Therefore, there does not appear to have been a violation of the Act or regulations by these individuals. See 2 U.S.C. § 441g.

i. Tallon for Congress Committee and Lamar J. Rabon, as Treasurer

1. Contribution in the Name of Another

A review of the Committee's reports indicated that it did, in fact, accept a \$1,000 contribution from Vicki

Slavens. Given that at least two agents of the Committee (Tallon and Gary Slavens) allegedly were aware that Vicki Slavens' contribution was actually a contribution made by another person in the name of Vicki Slavens, the knowledge of those agents can be imputed to the Committee. Therefore, the Committee and Lamar J. Rabon, as treasurer, violated the Act by knowingly accepting a contribution in the name of another. 2 U.S.C. § 441f.

2. Cash Contribution from Pearce

Gary Slavens alleges that Joe W. Pearce, Jr. gave a cash contribution in excess of \$100.00 to the Tallon for Congress Committee which was accepted. If true, the Committee violated 11 C.F.R. § 110.4(c)(2) which requires a committee to return any portion of a cash contribution greater than \$100.00. 11 C.F.R. § 110.4(c)(2).

3. Cash Contributions from Saleeby

Gary Slavens alleges that the Committee accepted a cash contribution of \$1,300.00 or \$1,400.00 from State Senator Ed Saleeby for Tallon's general election campaign. If true, the Committee violated 11 C.F.R. § 110.4(c)(2) which requires a committee to return any portion of a cash contribution greater than \$100.00. 11 C.F.R. § 110.4(c)(2), and also 2 U.S.C. § 441a(f), which prohibits a committee from accepting excessive contributions.

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4. Cash Contributions from Keller, Floyd and O'Bryan

Gary Slavens alleges that Jefferson M. Lee, III admitted soliciting David Keller, C. Edward Floyd and others for cash contributions. In response to questions from the FBI, Lee admitted soliciting contributions but denied that he asked for cash. The Committee's records disclose contributions of \$300.00 by Floyd and \$500.00 by Keller, which appear to be permissible. The Committee does not appear to have violated the Act with respect to these individuals. See 2 U.S.C. § 441g.

RECOMMENDATIONS

1. Open a Matter Under Review.
2. Find reason to believe that G.B. Stokes violated 2 U.S.C. § 441g by making a cash contribution to Congressman Robin M. Tallon, Jr.'s campaign in excess of \$100.00.
3. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 11 C.F.R., § 110.4(c)(2) by receiving a cash contribution in excess of \$100.00 from G.B. Stokes and not promptly returning the amount over \$100.00 to the contributor.
4. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(1) by receiving a contribution for his principal campaign committee from G.B. Stokes and not forwarding it, within 10 days of its receipt, to the treasurer of said committee.
5. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 441f for causing a contribution to his principal campaign committee to be made in the name of another person.
6. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(3) by failing to segregate the funds of a political committee and causing them to be commingled with the personal funds of another individual.

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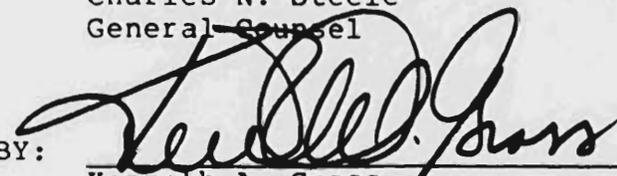
7. Find reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with the personal funds of another individual.
8. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with her personal funds.
9. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 441f by knowingly permitting her name to be used to effect a contribution made in the name of another person.
10. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441f by knowingly accepting a contribution made by one person in the name of another person.
11. Find reason to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g by making cash contributions in excess of \$100.00 to the Tallon for Congress Committee.
12. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution from Joe W. Pearce, Jr., in excess of \$100.00, and not returning the excess over \$100.00 as required.
13. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution greater than \$1,000.00.
14. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100 to the Tallon for Congress Committee.
15. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution from Ed Saleeby in excess of \$100.00 and not returning the excess over \$100.00 as required.
16. Find reason to believe that the Tallon for Congress Committee violated 2 U.S.C. § 441a(f) by knowingly accepting an excessive contribution from Ed Saleeby.
17. Find no reason to believe that David Keller violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.

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- 18. Find no reason to believe that C. Edward Floyd violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.
- 19. Find no reason to believe that Conyers O'Bryan violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.
- 20. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution in excess of \$100.00 from David Keller and not promptly returning the amount over \$100 to the contributor.
- 21. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution in excess of \$100.00 from C. Edward Floyd and not promptly returning the amount over \$100.00 to the contributor.
- 22. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution in excess of \$100.00 from Conyers O'Bryan and not promptly returning the amount over \$100.00 to the contributor.
- 23. Approve the attached General Counsel's Factual and Legal Analyses.
- 24. Approve and send the attached letters.

Charles N. Steele
General Counsel

August 5, 1985
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments

- Referral letter from the Department of Justice
- General Counsel's Factual and Legal Analyses
- Letters to Respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ JODY C. RANSOM *JCR*
DATE: AUGUST 8, 1985
SUBJECT: OBJECTION - Pre-MUR 143 First General
Counsel's Report signed August 5, 1985

The above-named document was circulated to the Commission on Wednesday, August 7, 1985 at 4:00.

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, August 13, 1985.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gary H. Slavens)
Congressman Robin M. Tallon, Jr.)
G.B. Stokes)
Vicki Slavens)
Tallon for Congress Committee,) PRE-MUR 143
Lamar J. Rabon, as treasurer)
Joe W. Pearce, Jr.)
Ed Saleeby)
David Keller)
C. Edward Floyd)
Conyers O'Bryan)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 13, 1985, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in Pre-MUR 143:

1. Open a Matter Under Review.
2. Find reason to believe that G.B. Stokes violated 2 U.S.C. § 441g by making a cash contribution to Congressman Robin M. Tallon, Jr.'s campaign in excess of \$100.00.
3. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 11 C.F.R. § 110.4(c) (2) by receiving a cash contribution in excess of \$100.00 from G.B. Stokes and not promptly returning the amount over \$100.00 to the contributor.

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4. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(1) by receiving a contribution for his principal campaign committee from G.B. Stokes and not forwarding it, within ten days of its receipt, to the treasurer of said committee.
 5. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 441f for causing a contribution to his principal campaign committee to be made in the name of another person.
 6. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(3) by failing to segregate the funds of a political committee and causing them to be commingled with the personal funds of another individual.
 7. Find reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with the personal funds of another individual.
 8. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with her personal funds.
 9. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 441f by knowingly permitting her name to be used to effect a contribution made in the name of another person.
 10. Find reason to believe that Congressman Robin M. Tallon, Jr., the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441f by knowingly accepting a contribution made by one person in the name of another person.

(continued)

11. Find reason to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g by making cash contributions in excess of \$100.00 to the Tallon for Congress Committee.
12. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution from Joe W. Pearce, Jr. in excess of \$100.00, and not returning the excess over \$100.00 as required.
13. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution greater than \$1,000.00.
14. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100 to the Tallon for Congress Committee.
15. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by receiving a cash contribution from Ed Saleeby in excess of \$100.00 and not returning the excess over \$100.00 as required.
16. Find reason to believe that the Tallon for Congress Committee violated 2 U.S.C. § 441a(f) by knowingly accepting an excessive contribution from Ed Saleeby.
17. Find no reason to believe that David Keller violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.
18. Find no reason to believe that C. Edward Floyd violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.

(continued)

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19. Find no reason to believe that Conyers O'Bryan violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100.00 to the Tallon for Congress Committee and close the file with regard to him.
 20. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4 (c) (2) by receiving a cash contribution in excess of \$100.00 from David Keller and not promptly returning the amount over \$100 to the contributor.
 21. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4 (c) (2) by receiving a cash contribution in excess of \$100.00 from C. Edward Floyd and not promptly returning the amount over \$100.00 to the contributor.
 22. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4 (c) (2) by receiving a cash contribution in excess of \$100 from Conyers O'Bryan and not promptly returning the amount over \$100 to the contributor.
 23. Approve the General Counsel's Factual and Legal Analyses attached to the report dated August 5, 1985.
 24. Approve and send the letters attached to the General Counsel's report dated August 5, 1985.

Commissioners Aikens, Harris, McDonald, McGarry, and Josefiak voted affirmatively for the decision. Commissioner Elliott dissented.

August 14, 1985

Date

Attest:

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

David Keller
1131 Margaret Drive
Florence, South Carolina 29501

RE: MUR 2071

Dear Mr. Keller:

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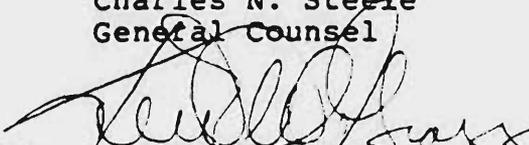
In the course of performing its normal administrative responsibilities, your name was referred to the Federal Election Commission (hereinafter the "Commission") as possibly having violated 2 U.S.C. § 441g, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). However, on August 13, 1985, the Commission determined there is no reason to believe that such a violation occurred. Accordingly, the Commission voted to terminate its inquiry into MUR 2071 as it pertains to you. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission advises you that the investigation now being conducted is confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A). This matter will become part of the public record within 30 days after the entire file is closed. Those confidentiality provisions remain in effect until the entire matter is closed.

If you have any questions, please contact Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Factual and Legal Analysis



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

C. Edward Floyd
427 Woodvale Drive
Florence, South Carolina 29501

RE: MUR 2071

Dear Dr. Floyd:

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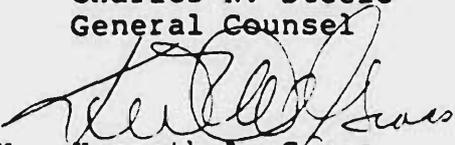
In the course of performing its normal administrative responsibilities, your name was referred to the Federal Election Commission (hereinafter the "Commission") as possibly having violated 2 U.S.C. § 441g, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). However, on August 13, 1985, the Commission determined there is no reason to believe that such a violation occurred. Accordingly, the Commission voted to terminate its inquiry into MUR 2071 as it pertains to you. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission advises you that the investigation now being conducted is confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A). This matter will become part of the public record within 30 days after the entire file is closed. Those confidentiality provisions remain in effect until the entire matter is closed.

If you have any questions, please contact Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Factual and Legal Analysis



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 23, 1985

Conyers O'Bryan
501 South Coit Street
Florence, South Carolina 29501

RE: MUR 2071

Dear Mr. O'Bryan:

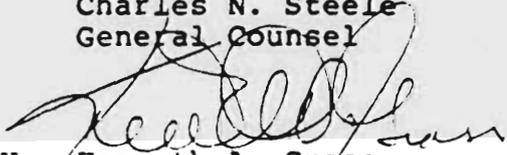
In the course of performing its normal administrative responsibilities, your name was referred to the Federal Election Commission (hereinafter the "Commission") as possibly having violated 2 U.S.C. § 441g, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). However, on August 13, 1985, the Commission determined there is no reason to believe that such a violation occurred. Accordingly, the Commission voted to terminate its inquiry into MUR 2071 as it pertains to you. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission advises you that the investigation now being conducted is confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A). This matter will become part of the public record within 30 days after the entire file is closed. Those confidentiality provisions remain in effect until the entire matter is closed.

If you have any questions, please contact Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
General Counsel's Factual and Legal Analysis

104055010



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 23, 1985

The Honorable Ed Saleeby
The Senate of South Carolina
P.O. Box 519
Hartsville, South Carolina 29550

RE: MUR 2071

Dear Senator Saleeby:

On August 13, 1985, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g, 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. 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. See 11 C.F.R. § 111.18(d).

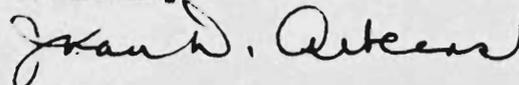
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Joan D. Aikens
Vice-Chairman

Enclosures

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

21040365012

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Ed Saleeby

MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions made to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. Gary H. Slavens, a Tallon campaign worker, alleges that he was told by someone who also worked on Tallon's 1982 campaign, whose name Slavens could not recall, that South Carolina State Senator Ed Saleeby (10th District) made a cash contribution in the amount of \$1,300 or \$1,400 to the Tallon for Congress Committee or agents thereof.

No person is permitted to make contributions:

to any candidate and his authorized political committees with respect to any election for federal office which in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A)

Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Ed Saleeby violated 2 U.S.C. § 441a(a)(1)(A).

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No person is permitted to make cash contributions:

to or for the benefit of any candidate which, in the aggregate, exceed \$100, with respect to any campaign of such candidate for nomination for election or for election, to Federal office.

Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Ed Saleeby violated 2 U.S.C. § 441g.

RECOMMENDATION

1. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe that Ed Saleeby violated 2 U.S.C. § 441g.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

The Honorable Robin M. Tallon, Jr.
432 Cannon House Office Building
Washington, D.C. 20515

RE: MUR 2071

Dear Congressman Tallon:

On August 13, 1985, the Federal Election Commission, (hereinafter "the Commission") determined that there is reason to believe that you violated 2 U.S.C. § 432(b)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On that same date, the Commission also determined that there is reason to believe that you violated 2 U.S.C. § 441f. In addition, on that date, the Commission determined that there is reason to believe that you violated 2 U.S.C. § 432(b)(3). Further, on that same date, the Commission also determined that there is reason to believe that you violated 11 C.F.R. § 110.4(c)(2). The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. 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,

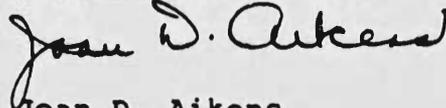
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and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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.

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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Joan D. Aikens
Vice-Chairman

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

21040363016

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Congressman Robin M. Tallon, Jr. MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions and a contribution made in the name of another person to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. During his general election campaign, he allegedly accepted a \$1,000 cash contribution from G.B. Stokes. Stokes purportedly gave the cash contribution directly to Tallon with instructions that he (Stokes) wished to remain anonymous. Whenever a candidate receives a cash contribution in excess of \$100, that candidate is required to promptly return the amount over \$100 to the contributor. 11 C.F.R. § 110.4(c)(2). Tallon allegedly failed to return the excessive amount of Stokes's cash contribution. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Tallon violated 11 C.F.R. § 110.4(c)(2).

Every person who receives a contribution for an authorized political committee is required to forward that contribution to

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the treasurer of said committee within 10 days after receiving such contribution. 2 U.S.C. § 432(b)(1). In the matter at hand, Stokes's alleged contribution was intended for Tallon's campaign. Stokes purportedly gave it directly to Tallon, an agent of his authorized political committee. However, allegedly, Tallon did not forward Stokes's contribution to the treasurer of his (Tallon's) committee. Therefore, this Office recommends that the Commission find there is reason to believe that Tallon violated 2 U.S.C. § 432(b)(1).

Instead of forwarding Stokes's alleged contribution to the treasurer of his authorized political committee, Tallon purportedly approached Gary H. Slavens, one of Tallon's campaign workers, and, after advising Slavens that Stokes had given him (Tallon) a \$1,000 cash contribution for his campaign, allegedly asked Slavens how to get that money into his campaign insofar as Stokes wished to remain anonymous. Slavens claims to have told Tallon that he (Slavens) could not make the contribution in his name because he had already given \$1,000 to Tallon's general election campaign fund. However, Slavens said he advised Tallon that he (Slavens) would take Stokes's \$1,000 cash contribution from Tallon and deposit that money into the checking account of his wife, Vicki Slavens, at the Citizens and Southern National Bank in Florence, SC. Then, Slavens advised Tallon that he (Slavens) would have his wife make a check in the amount of \$1,000 payable to Tallon's general election campaign fund so that

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the contribution would appear to have been made by Vicki Slavens, which he did.

When he allegedly accepted Stokes's contribution to his campaign, Tallon, as an agent of his authorized campaign committee, was accepting what were funds of the committee. By turning those funds over to Slavens with the knowledge of how those funds were going to be utilized, i.e., to make a contribution in the name of another person (in violation of 2 U.S.C. § 441f), Tallon was, thereby, responsible for effecting such a contribution. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Tallon violated 2 U.S.C. § 441f by, effectively, making a contribution in the name of another person.

Further, all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual. 2 U.S.C. § 432(b)(3). In this matter, Tallon allegedly took funds of his political committee and gave them to Gary Slavens with the knowledge that those funds were going to be commingled with the personal funds of Vicki Slavens. As such, this Office recommends that the Commission find there is reason to believe that Tallon violated 2 U.S.C. § 432(b)(3).

RECOMMENDATIONS

1. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 11 C.F.R. § 110.4(c)(2).
2. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(1).
3. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 441f.
4. Find reason to believe that Congressman Robin M. Tallon, Jr., violated 2 U.S.C. § 432(b)(3).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Lamar J. Rabon
Treasurer
Tallon for Congress Committee
P.O. Box 1984
Florence, SC 29530

RE: MUR 2071

Dear Mr. Rabon:

On August 13, 1985, the Federal Election Commission (hereinafter "the Commission") determined that there is reason to believe that the Tallon for Congress Committee and you, as treasurer, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 110.4(c)(2) with regard to certain allegations. On that same date, the Commission also determined that there is no reason to believe that you and the committee violated 11 C.F.R. § 110.4(c)(2) with regard to certain other allegations. The General Counsel's factual and legal analysis, which formed a basis for the Commission's findings, 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. See 11 C.F.R. § 111.18(d).

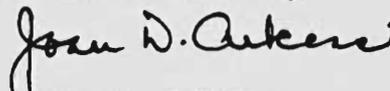
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications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

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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely, . .



Joan D. Aikens
Vice-Chairman

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

21040363021

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Tallon for Congress Committee
Lamar J. Rabon, as treasurer

MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions and a contribution made in the name of another person to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. The Tallon for Congress Committee (hereinafter the "Committee") is Tallon's principal campaign committee. It is alleged that, during the 1982 general election campaign, Tallon approached Gary H. Slavens, one of Tallon's campaign workers, and advised Slavens that he (Tallon) had been given a \$1,000 cash contribution for his campaign by a local businessman. Tallon purportedly asked Gary Slavens how to get this money into his (Tallon's) campaign fund insofar as the actual contributor wished to remain anonymous. Gary Slavens claims to have told Tallon that he (Slavens) could not make the contribution in his name because he had already given \$1,000 to Tallon's general election campaign fund. However, Gary Slavens said he advised Tallon that he (Slavens) would take the \$1,000 cash contribution at issue

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from Tallon and deposit that money into the checking account of his wife, Vicki Slavens, at the Citizens and Southern National Bank in Florence, SC. Then, Gary Slavens advised Tallon that he (Slavens) would have his wife make a check in the amount of \$1,000 payable to Tallon's general election campaign fund, i.e., the Tallon for Congress Committee, so that the contribution would appear to have been made by Vicki Slavens, which he did.

No person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. For purposes of the Federal Election Campaign Act of 1971, as amended (the "Act"), the term "person" includes a committee. 2 U.S.C. § 431(11). Since Robin M. Tallon, Jr., and Gary Slavens were both agents of the Committee and they both purportedly had knowledge of this plan to make a contribution in the name of another person, their knowledge can be imputed to the Committee. Thus, when the Committee accepted Vicki Slavens's \$1,000 contribution, it violated 2 U.S.C. § 441f by knowingly accepting a contribution made by one person in the name of another person. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441f.

Further, a committee which receives a cash contribution in excess of \$100 shall promptly return the amount over \$100 to the contributor. 11 C.F.R. § 110.4(c)(2). The Committee allegedly

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received cash contributions in excess of \$100 from both Joe W. Pearce, Jr., the current Mayor of Florence, SC, and South Carolina State Senator Ed Saleeby (10th District) without returning the amounts over \$100 to the contributors. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) with regard to cash contributions from both Joe W. Pearce, Jr. and Ed Saleeby.

In addition, the Committee, through Jefferson M. Lee, III, an agent thereof, allegedly solicited and received cash contributions from C. Edward Floyd, David Keller and Conyers O'Bryan during the 1982 campaign. However, upon investigation, Lee, while acknowledging that he did solicit contributions from Floyd, Keller and O'Bryan, said the contributions were in the form of checks, not cash. The Committee's reports show aggregate contributions in the amount of \$300, as of May 24, 1982, made by Floyd to Tallon's campaign and a contribution of \$500 on October 22, 1982, made by Keller to Tallon's general election campaign. Therefore, the Office of General Counsel recommends that the Commission find there is no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) with regard to receiving alleged cash contributions in excess of \$100 from C. Edward Floyd, David Keller and Conyers O'Bryan

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without promptly returning the amount over \$100 to each contributor.

RECOMMENDATIONS

1. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441f.
2. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by accepting a cash contribution in excess of \$100 from Joe W. Pearce, Jr. without returning the amount over \$100 to Pearce.
3. Find reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by accepting a cash contribution in excess of \$100 from Ed Saleeby without returning the amount over \$100 to Saleeby.
4. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by accepting a cash contribution in excess of \$100 from C. Edward Floyd without returning the amount over \$100 to Floyd.
5. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by accepting a cash contribution in excess of \$100 from David Keller without returning the amount over \$100 to Keller.
6. Find no reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 11 C.F.R. § 110.4(c)(2) by accepting a cash contribution in excess of \$100 from Conyers O'Bryan without returning the amount over \$100 to O'Bryan.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

The Honorable Joe W. Pearce, Jr.
Mayor of Florence, South Carolina
419 South Coit Street
Florence, South Carolina 29501

RE: MUR 2071

Dear Mayor Pearce:

On August 13, 1985, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441g, a provision 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 findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. See 11 C.F.R. § 111.18(d).

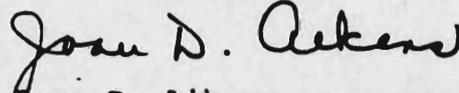
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Joan D. Aikens
Vice-Chairman

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

21040363027

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Joe W. Pearce, Jr.

MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions made to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. Gary H. Slavens, a Tallon campaign worker, alleged that Joe W. Pearce, Jr., the current Mayor of Florence, SC, made cash contributions aggregating either \$700 or \$1,500 to the Tallon for Congress Committee or agents thereof. No person is permitted to make cash contributions:

to or for the benefit of any candidate which, in the aggregate, exceed \$100, with respect to any campaign of such candidate for nomination for election or for election, to Federal office.

2 U.S.C. § 441g. Slavens purportedly advised Tallon that Pearce had made a cash contribution to his campaign and Tallon, according to Slavens, acknowledged said contribution. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g.

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RECOMMENDATION

1. Find reason to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

G.B. Stokes
Howard Johnson's Motel
P.O. Box 905
Florence, SC 29503

RE: MUR 2071

Dear Mr. Stokes:

On August 13, 1985, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441g, a provision 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. 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. Statements should be submitted under oath.

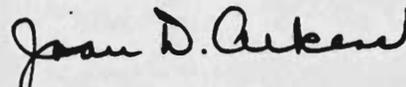
If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. 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.

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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Joan D. Aikens
Vice-Chairman

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

21040366031



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Gary H. Slavens
2924 Palmetto Street
Florence, SC 29501

RE: MUR 2071

Dear Mr. Slavens:

On August 13, 1985, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 432(b)(3), a provision 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. 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. See 11 C.F.R. § 111.18(d).

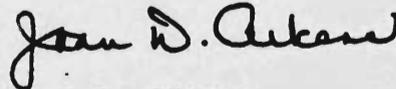
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



Joan D. Aikens
Vice-Chairman

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

91040363034

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Gary H. Slavens

MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions and a contribution made in the name of another person to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. Gary H. Slavens worked on Tallon's 1982 campaign.

Slavens alleges that, during the 1982 general election campaign, Tallon approached Slavens and advised him that G.B. Stokes, a local businessman, had given him (Tallon) a \$1,000 cash contribution for his campaign. Tallon purportedly asked Slavens how to get this money into his (Tallon's) campaign fund insofar as Stokes wished to remain anonymous. Slavens claims to have told Tallon that he (Slavens) could not make the contribution in his name because he had already given \$1,000 to Tallon's general election campaign fund. However, Slavens said he advised Tallon that he (Slavens) would take Stokes's \$1,000 cash contribution from Tallon and deposit that money into the checking account of his wife, Vicki Slavens, at the Citizens and Southern National

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Bank in Florence, SC. Then, Slavens advised Tallon that he (Slavens) would have his wife make a check in the amount of \$1,000 payable to Tallon's general election campaign fund so that the contribution would appear to have been made by Vicki Slavens, which he did.

All funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual. 2 U.S.C. § 432(b)(3). Gary Slavens allegedly received committee funds from Tallon and deposited them in the account of Vicki Slavens. Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3).

RECOMMENDATION

1. Find reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3).

21040363036



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Vicki Slavens
2924 Palmetto Street
Florence, SC 29501

RE: MUR 2071

Dear Mrs. Slavens:

On August 13, 1985, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 432(b)(3) and § 441f, 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 findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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. Statements should be submitted under oath.

If pre-probable cause conciliation is requested, the Commission may decide not to propose a conciliation agreement until it has completed its review and analysis of the submitted materials. 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. You should be advised, however, that the Commission is not required to enter into any negotiations directed towards reaching a conciliation agreement unless and until it makes a finding of probable cause to believe. 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.

71040363037

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 Laurence Tobey, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Joan D. Aikens
Joan D. Aikens
Vice-Chairman

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

210403600338

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Vicki Slavens

MUR
STAFF MEMBER:
Stephen Levin

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

FACTUAL AND LEGAL ANALYSIS

This investigation involves allegations of cash contributions and a contribution made in the name of another person to the campaign of Congressman Robin M. Tallon, Jr., in 1982. The information in this report is based on investigative reports and information received from the Department of Justice.

Robin M. Tallon, Jr., was a candidate for election to the House of Representatives from South Carolina's 6th District in 1982. Vicki Slavens's husband, Gary, worked on Tallon's 1982 campaign.

Gary Slavens alleges that, during the 1982 general election campaign, Tallon approached Slavens and advised him that he (Tallon) had been given a \$1,000 cash contribution for his campaign by a local businessman. Tallon purportedly asked Gary Slavens how to get this money into his (Tallon's) campaign fund insofar as the actual contributor wished to remain anonymous. Gary Slavens claims to have told Tallon that he (Slavens) could not make the contribution in his name because he had already given \$1,000 to Tallon's general election campaign fund. However, Gary Slavens said he advised Tallon that he (Slavens) would take the \$1,000 cash contribution at issue from Tallon and

21040330002

deposit that money into the checking account of his wife, Vicki Slavens, at the Citizens and Southern National Bank in Florence, SC. Then, Gary Slavens advised Tallon that he (Slavens) would have his wife make a check in the amount of \$1,000 payable to Tallon's general election campaign fund so that the contribution would appear to have been made by Vicki Slavens, which he did.

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All funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual. 2 U.S.C. § 432(b)(3). Gary Slavens allegedly recieved committee funds from Tallon and deposited them into the checking account of Vicki Slavens. If Vicki Slavens knew that the alleged source of the funds which her husband deposited into her checking account was Tallon and that the funds were committee funds, as alleged, then she permitted the funds of a political committee to be commingled with her personal funds in violation of 2 U.S.C. § 432(b)(3). Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Vicki Slavens violated 2 U.S.C. § 432(b)(3).

Further, if, in fact, Vicki Slavens did have knowledge of the alleged source of the funds for her contribution as described above and still made the contribution in her name then Vicki Slavens was in violation of 2 U.S.C. § 441f which prohibits any person from knowingly permitting his or her name to be used to effect a contribution made in the name of another person. As such, this Office recommends that the Commission find there is reason to believe that Vicki Slavens violated 2 U.S.C. § 441f.

RECOMMENDATIONS

1. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 432(b)(3).
2. Find reason to believe that Vicki Slavens violated 2 U.S.C. § 441f.

21040360041

RECEIVED AT THE FEC
GCC# 8442

EDWARD E. SALEEBY
SENATOR, DARLINGTON COUNTY
SENATORIAL DISTRICT NO. 10

HOME ADDRESS:
BOX 519
HARTSVILLE, S. C. 29550



COMMITTEES
BANKING AND FINANCE
EDUCATION
FISH, GAME AND FORESTRY
JUDICIARY
TRANSPORTATION

August 28, 1985

SEP 4 9:19

Mr. Laurence Tobey
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Tobey:

I am enclosing Statement of Designation of Counsel naming Benny R. Greer, Esquire, P.O. Drawer 519, Darlington, S.C., 29532, as my attorney in regards to your recent inquiry. Mr. Greer will be corresponding with you immediately in regards to information you may wish us to file with you.

We assume this meets the ten day requirement mentioned in your letter. If by chance this is incorrect, please telephone me at my beach home in Myrtle Beach, 803-238-1037, or Mr. Greer at his office in Darlington, 803-393-4083.

With kind regards, I am

Yours very truly,

Edward E. Saleeby
EES/v
Enclosure
cc: Benny R. Greer, Esquire

21040360042

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: Benny R. Greer

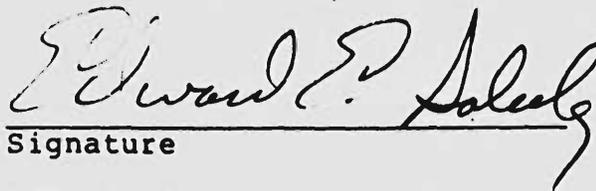
ADDRESS: P.O. Drawer 519

Darlington, S.C., 29532

TELEPHONE: 803-393-4083

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

8/28/85
Date


Signature

RESPONDENT'S NAME: Edward E. Saleeby

ADDRESS: P.O. Box 519

Hartsville, S.C., 29550

HOME PHONE: 803-332-8294

BUSINESS PHONE: 803-332-1531

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Robin Tallon

REFLECTION COMMITTEE

Post Office Box 1984 Florence, South Carolina 29503

August 29, 1985

Received 8429
Askins
Office
9/3/85
9:30
M 2071
OFFICE OF THE
COMMISSION SECRETARY
D
85 AUG 3 A10:24

Ms. Joan D. Askins
Vice-Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Askins,

In regards to your letter to me dated August 23, 1985, I would like to point out that during 1982, I was not treasurer for the Tallon for Congress Committee. I feel sure your records will reflect the same. A separate statement from my attorney will follow this letter on my behalf.

I will answer your letter on behalf of the Tallon for Congress Committee in order by your recommendations.

Recommendation Number 1:

We have researched our records and find that Vicki Slavens did contribute \$1,000 by check. During my conversation with Congressman Robin Tallon, Jr., he denies ever having a conversation with Mr. Slavens concerning the acceptance of \$1,000 of cash to be deposited in his wife's account. The committee has no reason to believe that this was not a contribution from Mrs. Slavens on her own right.

Recommendation Number 2:

After reviewing our records concerning Mr. Pearce, we received a check for \$100 on April 6, 1982, a copy of which is enclosed. On September 10, 1982, we received \$10. Our records indicate this was by check, but I could not locate the copy of the check. We deny receiving any other funds from Mr. Pearce.

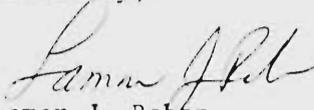
Recommendation Number 3:

Our records indicate that we did not receive any funds from Mr. Saleeby during 1982 either by check or cash.

Should you have any questions concerning Tallon for Congress Committee, please let me know and I will be more than glad to help.

If you have any questions concerning myself, please direct all questions or correspondence to my personal attorney, Mr. Jim Bell, 163 North Coit Street, Florence, South Carolina 29501.

Sincerely,


Lamar J. Rabon
Treasurer

LJR:bmr

2104036044

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: James Bell

ADDRESS: 163 N. Cat St
Florence, SC 29501

TELEPHONE: 669-5221

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8/30/75
Date

Lamar J. Roben
Signature

RESPONDENT'S NAME: Lamar J. Roben

ADDRESS: P.O. Box 12517
Florence, SC

HOME PHONE: 665-1548

BUSINESS PHONE: 667-1000

40363045

R P ENDLESS ENDEAVORS
 P.O. DRAWER 2270 689-9846
 FLORENCE, SC 29503

310

87-120
 632

April 6 1982

Pay to the Order of Tallon for Congress Committee \$ 100.00
One - Hundred and 00/100 D. Mars



BANKERS TRUST
 Florence, South Carolina 29503

For contribution for W. Peasart

⑆053201209⑆00 4616 8267⑆ 0310

91040353046

TALLON FOR CONGRESS

Prior Years Contributions _____

Name Joe W. Peasart Jr. "Check" # 310

Address P.O. Box 2270 (R.P. ENDLESS ENDEAVORS)
Florence, S.C.

Phone 669-5846 Business _____

Name of employer Price & Peasart - Real Estate
Self Employed

Occupation _____

Date	Amount	CK	CA	Period/Date	Year/Date	P or G
4-6-82	100.00	✓			100.00	(P) 100.00
9-16-82	10.00	✓			110.00	(G) 100.00

RECEIVED AT THE FEC
GC# 8434
85 SEP 3 12:07

LAW OFFICES OF
OHANESIAN & OHANESIAN
106 SOUTH MARLBORO STREET - POST OFFICE BOX 1373
BENNETTSVILLE, SOUTH CAROLINA 29612-1373

BARBARA OHANESIAN, J.D.
803-479-7193

GREG OHANESIAN, J.D.
803-479-7194

August 29, 1985

Ms. Joan D. Aikens
Vice Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: My client: Joe W. "Rocky" Pearce, Jr.
MUR 2071

Dear Ms. Aikens:

My client received your letter dated August 23, 1985 regarding the above matter on August 26, 1985.

I have enclosed an Affidavit and a Statement of Designation of Counsel in the above matter. I contacted Mr. Laurence Tobey, the staff member assigned to this case, by telephone on August 28, 1985, and have also mailed copies of the enclosed to his attention.

Based upon the General Counsel's Factual and Legal Analysis of MUR 2071, the information supplied the Federal Election Commission consists of one reported allegation made by a Gary H. Slavens regarding cash contributions made by my client to the Tallon for Congress Committee or its agents in 1982. However, the first paragraph of said Factual and Legal Analysis uses the term "allegations" and refers to information based on "investigative reports and information received from the Department of Justice." If there are any other allegations other than the one made by Gary H. Slavens as stated in paragraph #2 of the Analysis, we respectfully reserve the right to answer said allegations after being specifically apprised of same and ask that an extension beyond the ten-day period from receipt of the August 23rd letter be granted to respond.

Additionally, if the Federal Election Commission has not requested a financial report regarding this matter from Congressman Robin Tallon, please so notify this office at your earliest convenience so that we may obtain an Affidavit from Congressman Tallon's office regarding Mr. Pearce's contributions. This office hereby formally requests an extension of time to obtain said Affidavit if such records have not been requested by the Commission.

5 SEP 4 9:40

40365047

Ms. Aikens
Federal Election Commission
8-29-85
Page Two

My client wishes to cooperate fully with the Commission in its investigation. Please advise this office as to any further documentation or information needed in order to make a decision in this matter.

Sincerely yours,



Barbara Ohanesian, J.D.
Member of the Firm
Ohanesian & Ohanesian

BPO/bp
Encl.
Affidavit
Statement of Designation of Counsel
cc: Mr. Laurence Tobey

2104065048

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

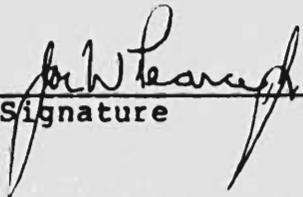
NAME OF COUNSEL: Barbara Ohanesian
Ohanesian & Ohanesian Law Offices

ADDRESS: P. O. Box 1373
Bennettsville, South Carolina
29512

TELEPHONE: 803-479-7193; 7194

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

8-27-85
Date


Signature

RESPONDENT'S NAME: Joe W. "Rocky" Pearce, Jr.

ADDRESS: 419 South Coit Street
Florence, South Carolina 29501

HOME PHONE: 803-665-7443

BUSINESS PHONE: 803-667-1100

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STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE)

AFFIDAVIT

The undersigned, after being duly sworn, deposes and says:

1. That he is Joe W. "Rocky" Pearce, Jr., and he resides in Florence, South Carolina, having as his office address 419 South Coit Street, Florence, South Carolina, 29501;

2. That he respectfully denies making "cash contributions aggregating either \$700.00 or \$1,500.00 to the Tallon for Congress Committee or agents thereof" during Congressman Robin M. Tallon's campaign for Congress in 1982, and further he denies any violation of 2 U.S.C. 5441g;

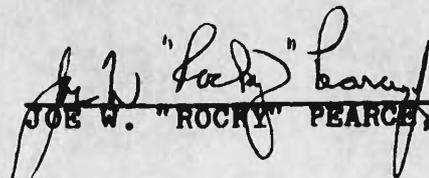
3. That after careful review of his financial records, the deponent states he made the following campaign contributions to the Tallon for Congress Committee in 1982: (a) a check for One Hundred (\$100.00) Dollars dated April 6, 1982 and signed by Joe W. Pearce, Jr., and (b) a Ten (\$10.00) Dollar contribution made on or about the first week of September, 1982;

4. That he is represented in this matter by the law firm of Ohanesian & Ohanesian, P. O. Box 1373, Bennettsville, South Carolina, 29512, and authorizes said firm to receive any notification and other communications from the Federal Election Commission pertaining to MUR 2071;

21040363050

AFFIDAVIT
JOE W. "ROCKY" PEARCE, JR.
PAGE TWO

5. That he desires to cooperate fully and in good faith with the Federal Election Commission in its investigation of MUR 2071.



JOE W. "ROCKY" PEARCE, JR.

SUBSCRIBED AND SWORN TO before
me this 29th day of August, 1985.



(L.S.)
Notary Public for South Carolina
My Commission expires: 8-10-91

21040360051

HAIGH PORTER
ATTORNEY AT LAW

152 S. McQUEEN STREET
P. O. BOX 4337

FLORENCE, S. C. 29502

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

AREA CODE 803
685-7090

25 SEP 9 P3:16

*CC# 8486 Received
Aikens office
9/19/85
3:00 p.m.*

2071

September 3, 1985

25 SEP 9 P3:33

GENERAL COUNSEL

Ms. Joan D. Aikens
Vice-Chairman
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

CERTIFIED MAIL -RETURN
RECEIPT REQUESTED

Dear Ms. Aikens:

I am writing to you on behalf of my client, Mr. G. B. Stokes, Jr., and in response to your letter to Mr. Stokes of August 23, 1985. Enclosed you will find the statement of designation of counsel which has been executed by Mr. Stokes.

In your letter, you stated that Mr. Stokes may submit any legal or factual materials which he believes are relevant to the Commission's consideration of this matter. In accordance with that instruction, you will also find enclosed an affidavit by Mr. Stokes.

In reviewing your General Counsel's factual and legal analysis, it is our understanding that Mr. Stokes is specifically charged with making a direct contribution of \$1,000.00 in cash to Robin M. Tallon, Jr., during Rep. Tallon's 1982 general election campaign for election to the House of Representatives from South Carolina's 6th District. As you can see from the affidavit, Mr. Stokes has no recollection of making such a direct contribution to Rep. Tallon in cash. We will be happy to cooperate with your Commission in any way that we can. We do feel, however, that the allegations against Mr. Stokes are totally unfounded and we would like to see this matter brought to an expeditious conclusion.

Please let us know if you need any further information from us.

Yours very truly,

David Stanton
David Stanton
Attorney to G. B. Stokes, Jr.

DS:ljc
Enclosures
cc: Dwight Drake, Esq.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: DAVID STANTON

ADDRESS: P. O. Box 4337

152 S. McQueen Street

Florence, S. C. 29502

TELEPHONE: (803) 665-7090

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

September 3, 1985
Date


Signature

RESPONDENT'S NAME: G. B. Stokes, Jr.

ADDRESS: P. O. Box 905

Florence, S. C. 29503

HOME PHONE: (803) 662-0740

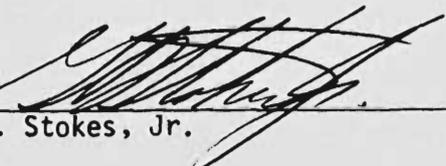
BUSINESS PHONE: (803) 662-3291

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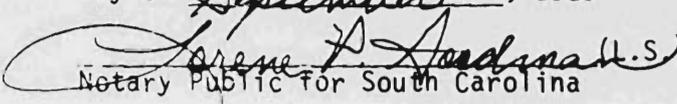
STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

AFFIDAVIT

PERSONALLY appeared before me G. B. Stokes, Jr., who, being duly sworn, deposes and says that to the best of his recollection, he did not make a direct contribution of One Thousand and NO/100 (\$1,000.00) Dollars in cash to Robin M. Tallon, Jr., during Representative Tallon's 1982 general election campaign for election to the House of Representatives from South Carolina's 6th District.


G. B. Stokes, Jr.

Sworn to before me this 4th
day of September, 1985


Notary Public for South Carolina

My Commission expires: 3-3-88

21040363054

GCC# 8476 Received
RECEIVED
9/6/85

NELSON, MULLINS, GRIER & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR KEENAN BUILDING 1310 LADY STREET

POST OFFICE BOX 11070

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE 799-2000

AREA CODE 803

TELECOPY 286-7800

5 SEP 6

MYRTLE BEACH OFFICES:

1700 NORTH BAK STREET PLAZA

1700 NORTH BAK STREET

POST OFFICE BOX 3939

MYRTLE BEACH, S.C. 29578-3939

TELEPHONE 448-1002

AREA CODE 803

DWIGHT F. DRAKE
DIRECT DIAL
(803) 733-9420

September 3, 1985

85 SEP 6 P 1: 56
OFFICE OF THE
COMMISSIONER
SECRETARY
ED

Ms. Joan D. Aikens
Vice Chairman
Federal Election Commission
Washington, DC 20463

RE: MUR 2071

Dear Ms. Aikens:

I am representing Congressman Robin Tallon of South Carolina's Sixth Congressional District in connection with the above referenced matter.

I understand from your letter of August 23, 1985, that the Federal Election Commission has determined that there is reason to believe that there have been violations of 2 U.S.C. §432(b)(1); 2 U.S.C. §441f; 2 U.S.C. §432(b)(3); and 11 C.F.R. §110.4(c)(2). As I understand it from your letter and the factual and legal analysis of your General Counsel which was enclosed with that letter, the basis for the finding of the Federal Election Commission is that a \$1,000.00 cash campaign contribution was deposited in a bank account of Mrs. Vicki Slavens and Mrs. Slavens in turn donated to the campaign of Congressman Tallon a check in the amount of \$1,000.00. Purportedly, the \$1,000.00 in cash was given to Congressman Tallon by Mr. G.B. Stokes. Congressman Tallon then supposedly delivered the cash to Mr. Gary Slavens who supposedly had the cash deposited in Mrs. Vicki Slavens' account.

The purpose of this letter is to inform you that such did not occur. The records of the campaign indicate that Mrs. Slavens did, in fact, contribute \$1,000.00 to the campaign but there was no factual basis to believe then, or now, that this contribution was not made in her own right.

Therefore, we respectfully request that the Commission determine that there is no reason to believe that a violation of the Federal Election Campaign Act occurred and that the matter under review be terminated.

Should you have any questions concerning this matter, please do not hesitate to contact me at the address indicated on the enclosed Statement of Designation of Counsel.

Sincerely,

Dwight F. Drake
Dwight F. Drake

DFD/dlc
Enclosure

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: DWIGHT F. DRAKE

ADDRESS: P.O. Box 11070
Columbia S.C. 29211

TELEPHONE: (803) 799-2000

35 SEP 6 1 P 3: 02

GENERAL COUNSEL

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

8/30/85
Date

Robin Tallow
Signature

RESPONDENT'S NAME: CON. ROBIN TALLOW

ADDRESS: 432 Cannon Building
WASHINGTON, D.C.
20515

HOME PHONE: ~~20~~

BUSINESS PHONE: (202) 225-3315

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RECEIVED AT THE FEC
GCC# 8532
SEP 13 P 3: 31

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1200

1015 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE (202) 789-8640

DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

JAMES F. SCHOENER
(202) 789-8643

September 12, 1985

SEP 13 P 3: 59

Laurence Tobey, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 2071

Dear Mr. Tobey:

Enclosed please find a Designation of Counsel form on behalf of Mr. Gary H. Slavens in the above-designated matter under review.

Mr. Slavens has informed me that you wish to take his deposition in this matter and he desires to cooperate. We suggest that his deposition be a condition of a pre-probable cause concilation agreement, which I would be pleased to discuss with you at your earliest convenience.

Sincerely,

James F. Schoener
James F. Schoener

JFS/cb

Enclosure

cc w/e: Mr. Gary H. Slavens

1104060001

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071
NAME OF COUNSEL: Hon. James Schoener
ADDRESS: 1015 15th St.
Suite 1200
Washington S.C. 20005
TELEPHONE: 202/789-8640

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

9-5-85
Date

Gary H. Slavens
Signature

RESPONDENT'S NAME: GARY H. SLAVENS
ADDRESS: P.O. Box 3203
Florence SC 29501
HOME PHONE: 667-9794
BUSINESS PHONE: _____

8
5
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THE FEC
GCC# 8566
05 SEP 18 A7:53

LAW OFFICES
GREER & MILLING
100 ST JOHN STREET
DARLINGTON, SOUTH CAROLINA 29532

BENNY R GREER
JOHN M MILLING

TELEPHONE 393-4083
P O DRAWER 519

September 16, 1985.

Federal Election Commission
Washington, D. C. 20463

Attention: Mr. Laurence Tobey

Re: MUR 2071

Dear Mr. Tobey:

Edward E. Saleeby has previously advised you that I am his personal attorney, and that he has consulted me concerning the above matter.

Please be so kind as to advise us of the approximate date upon which the alleged actions are supposed to have occurred. It may well be that, upon ascertaining this date, we might well be able to give definitive proof that would tend to get this matter concluded.

Thank you for your attention to this matter.

Yours very truly,

Benny Greer
BENNY R. GREER

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SEP 16 1985
A 9:08

BRG/sbb

GCC 917
RECEIVED AT THE FEC

**LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE**

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1866-1928)
LEWIS H. PADDOCK (1866-1935)
FERRIS D. STONE (1882-1945)

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1200

1015 FIFTEENTH STREET, N. W.
WASHINGTON, D. C. 20005

TELEPHONE (202) 789-8640

85 DEC 3 1985
DETROIT, MICHIGAN
ANN ARBOR, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
KALAMAZOO, MICHIGAN
LANSING, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN

JAMES F. SCHOENER
(202) 789-8643

December 3, 1985

Laurence Tobey, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

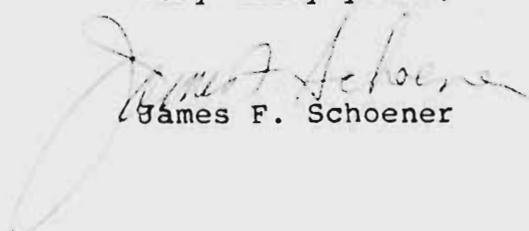
Re: MUR 2071

Dear Mr. Tobey:

I am sorry to be so slow in answering the request for the enclosed affidavit. I sent it to my client in September and only received it back in late November, (when I was out of the city). Regardless, here it is and if you have questions concerning it please contact me.

On the basis of this cooperation and the unintentional nature of the violation I would request a conciliation based upon a recognition of the error, an agreement to comply in all respects hereafter, and a waiver of a fine or penalty.

Very truly yours,


James F. Schoener

71-405050

Before the
FEDERAL ELECTION COMMISSION

AFFIDAVIT OF GARY H. SLAVENS

Re: MUR 2071

GARY H. SLAVENS being duly sworn deposes and says as follows:

1. That he resides at 2924 Palmetto Street, Florence, South Carolina and so resided at all times relevant to the matters in the affidavit.

2. That approximately 3 or 4 weeks prior to the 1982 general election he had a discussion with candidate for Congress, Robin M. Tallon, Jr. (6th District S.C.) concerning a cash contribution to his campaign.

3. Tallon advised Slavens that he had \$1,000 cash received from our G. B. Stokes, a local businessman, who desired to contribute to Tallon but desired to remain anonymous.

4. Slavens discussed this question with one Glen Odum, treasurer of the Tallon campaign committee who advised Slavens that since he (Slavens) had already donated \$1,000 to the Tallon primary campaign and had loaned \$1,000 to the general election campaign, that he (Slavens) could not make a further contribution to the campaign. He did, however, state that Slaven's wife Vicki could make a contribution out of their joint funds.

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5. Accordingly the \$1,000 cash was taken by Slavens and deposited in the joint account with his wife and asked his wife to make a \$1,000 contribution by check to the Tallon campaign.

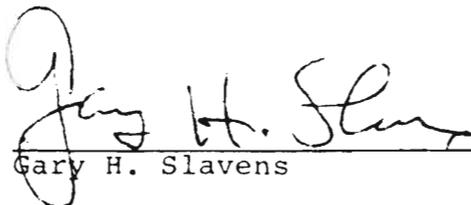
6. That his wife did not know the source of the cash deposit, and believed that the donation was solely from joint account funds.

7. That he believed this method of handling these funds was not a violation of the law and that he believes that Robin Tallon and Glen Odum believed that this procedure was permitted under the law.

8. That violations of the law, if any, were purely unintentional; that they were most concerned that the funds were not used to "buy votes" or violate the other election laws.

9. That this affidavit is made in connection with a conciliation agreement in this MUR and shall be a part of such agreement when completed.

10. Further your deponent sayeth not:



Gary H. Slavens

Sworn to and subscribed before me a notary public in and for the State of South Carolina this 22nd day of November 1985.



Notary Public

My Commission Expires: 2-24-87

2104065062

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of
Gary H. Slavens, et al.

)
)
)
)

MUR 2071 MAR 7 11:36

GENERAL COUNSEL'S REPORT

BACKGROUND

This matter was brought to the Commission's attention by a referral from the Department of Justice. On August 13, 1985, the Commission found reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with his personal funds. The Commission also found reason to believe that Vicki Slavens, Gary Slavens' wife, violated 2 U.S.C. §§ 432(b)(3) and 441f by commingling the funds of a political committee with her personal funds and by knowingly permitting her name to be used to effect a contribution in the name of another. On the same date, the Commission found reason to believe that G. B. Stokes violated 2 U.S.C. § 441g by making a cash contribution in excess of \$100 to a candidate for federal office. On the same date, the Commission found reason to believe that Representative Robin Tallon violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). On the same date, the Commission found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon,^{1/} as treasurer violated 2 U.S.C. § 441f.

^{1/} Lamar J. Rabon is the current treasurer of the Tallon Committee. He was not the treasurer of the Committee in 1982. The treasurer at the time the alleged violations occurred was Glenn Odom.

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On September 9, 1985, G.B. Stokes filed an affidavit with the Commission in which he stated under oath that he never made the alleged contribution to Representative Tallon's campaign. On the same date, Representative Tallon submitted a letter through counsel in which he denied that he accepted a contribution in the name of another or any funds as alleged. Counsel for Representative Tallon stated that campaign records showed that Vicki Slavens donated \$1,000 to the Tallon Committee, but counsel stated that there is no factual basis to believe that this contribution was not made in Mrs. Slavens' own right.

Vicki Slavens has not replied to the Commission's finding of reason to believe.

Lamar J. Rabon, the treasurer of the Tallon for Congress Committee filed a letter with the Commission on August 29, 1985, in which he stated that he was not the treasurer of the Committee at the time the alleged violations occurred, and pledged full cooperation with the Commission's investigation.

On December 6, 1985, Gary H. Slavens filed an affidavit through counsel in which he stated that 3 or 4 weeks prior to the 1982 general election, Slavens had a conversation with Representative Tallon regarding a cash contribution to Tallon's campaign. Slavens stated that Tallon advised Slavens that Tallon had received a \$1,000 cash contribution from G.B. Stokes, who desired to contribute but desired to remain anonymous. Slavens

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further stated that he then discussed this contribution with Glenn Odom, the treasurer of the Tallon campaign.^{2/} Slavens further stated that Slavens and Odom agreed that Slavens would take the \$1,000 cash and deposit it in a joint account held by Slavens and his wife Vicki Slavens. Slavens further stated that he then had his wife make a \$1,000 contribution by check to the Tallon campaign.

In light of the fact that Slavens has asserted under oath in his affidavit that the described transaction occurred, that G.B. Stokes has denied under oath in his affidavit that the described transaction occurred, that Vicki Slavens has failed to respond to the Commission's reason to believe finding, and that Representative Tallon has denied that the transaction took place, this Office believes that the only effective means to resolve these factual matters is to take the depositions of Gary Slavens, Vicki Slavens, G.B. Stokes, Representative Robin Tallon, and Glenn Odom, and to subpoena the relevant records of the Tallon For Congress Committee. Therefore, this Office recommends that the Commission authorize the appropriate subpoenas and orders.

^{2/} The Commission has not yet found reason to believe against Glenn Odom. The Department of Justice referral mentioned Mr. Odom, but did not implicate him in this matter. Mr. Odom was not interviewed by the Department of Justice. This Office will seek a reason to believe finding against Mr. Odom if the investigation produces evidence of his participation in this matter.

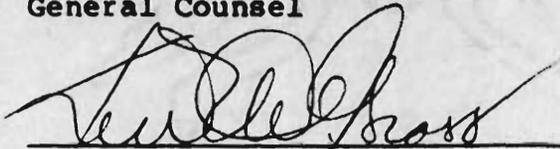
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RECOMMENDATIONS:

1. Authorize the attached subpoenas and orders to:
 Gary H. Slavens, Vicki Slavens, G.B. Stokes,
 Representative Robin Tallon and Glenn Odom.
2. Authorize the attached subpoena to: The Tallon for Congress
 Committee, and Lamar Rabon, as treasurer.
3. Approve and send the attached letters.

Charles N. Steele
General Counsel

March 6, 1986
Date

BY: 
Kenneth A. Gross
Associate General Counsel

Attachments:

1. Affidavit of Gary H. Slavens
2. Subpoenas (6)
3. Letters to Respondents (6)

21040363066



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*
DATE: MARCH 12, 1986
SUBJECT: OBJECTION - MUR 2071 - General Counsel's Report
Signed March 6, 1986

The above-named document was circulated to the Commission on Monday, March 10, 1986 at 11:00 A.M.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, March 18, 1986.

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Tolley

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gary H. Slavens, et al.) MUR 2071

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 18, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2071:

1. Authorize the subpoenas and orders to Gary H. Slavens, Vicki Slavens, G.B. Stokes, and Representative Robin Tallon and Glenn Odom, as recommended in the General Counsel's report dated March 6, 1986.
2. Authorize the subpoena to The Tallon for Congress Committee and Lamar Rabon, as treasurer, as recommended in the General Counsel's report dated March 6, 1986.
3. Deny the request to enter into pre-probable cause conciliation at this time.
4. Direct the Office of General Counsel to send appropriate letters pursuant to the above decisions.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decisions.

Attest:

3-19-86
Date

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

2104005038



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 2, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tallon for Congress Committee,
and Lamar J. Rabon, as treasurer
P.O. Box 1984
Florence, SC 29503

RE: MUR 2071
Tallon for Congress Committee

Dear Mr. Rabon:

On August 13, 1985, the Commission determined that there is reason to believe that the Tallon for Congress Committee violated 2 U.S.C. §§ 441a(f) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.4(c)(2). An investigation of this matter is being conducted and it has been determined that additional information from the Tallon for Congress Committee is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires the Tallon for Congress Committee to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena. You are required to produce the information requested at the Office of the United States Attorney (conference room) at 1100 Laurel Street, Columbia, South Carolina, 29201, at 10:00 a.m. on May 21, 1986.

Pursuant to 11 C.F.R. 114.14, a witness summoned by the Commission shall be paid for mileage at the rate of 20.5 cents per mile. You will be given a check for the mileage at the time appointed for the production of documents.

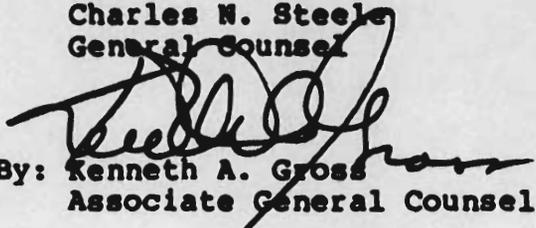
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Tallon for Congress Committee,
and Lamar J. Rabon, as treasurer
Page Two

If you have any questions, please direct them to Laurence E.
Tobey, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

21040363070

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS

TO: The Tallon for Congress Committee
and Lamar J. Rabon, as treasurer

RE: MUR 2071

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, are hereby ordered to produce for inspection and copying all documents and materials listed below that are in their possession or control. Production is to be made at the Office of the United States Attorney (conference room) at 1100 Laurel Street, Columbia, South Carolina 29201 at 10:00 a.m. on May 21, 1986.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks

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and other negotiable paper, credit card slips, records and compilations in the possession or control of the Tallon for Congress Committee. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to Lamar J. Rabon, as treasurer in his capacity as agent, express or implied, of the Tallon for Congress Committee.

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

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;
- (d) the name and title of the person to whom the document is addressed;

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- (e) the name and title of the person to whom the document was actually sent;
- (f) the identity of any other person who read a part of the document;
- (g) the number of pages;
- (h) the paragraph of this subpoena to which the document is otherwise responsive; and
- (i) the nature of the claimed privilege or objection.

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans received by the Tallon for Congress Committee from the following individuals: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby, including, but not limited to, letters, memoranda, bank records of contributions and loans received, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions and/or loans by the Tallon for Congress Committee on behalf of Robin Tallon as a candidate for the United States House of Representatives from the following persons: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby.

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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set her hand at the office of the Commission at
999 E Street, N.W., Washington, D.C., this ^{1st} day of
May, 1986.

Joan D. Aikens

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

11040360074



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Stanton, Esquire
P.O. Box 4337
152 S. McQueen Street
Florence, SC 29502

RE: MUR 2071
Stokes, G.B.

Dear Mr. Stanton:

On August 23, 1985, your client was notified that the Commission found reason to believe that your client violated 2 U.S.C. § 441g, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to appear and give sworn testimony on May 23, 1986, and provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

Pursuant to 11 CFR 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. Your client will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Laurence E. Tobey within two days of your receipt of this notification.

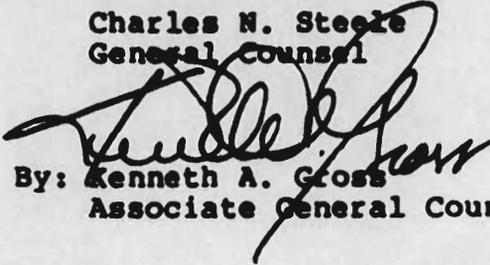
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David Stanton, Esquire
Page Two

If you have any questions, please direct them to Laurence E. Tobey, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena & Order

21040363076

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
Gary H. Slavens, et al.)
)
)
)

DEPOSITION OF MICHAEL GLENN ODOM

Deposition of Michael Glenn Odom, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 2:35 p.m., on Thursday, May 22, 1986, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Subpoena.

APPEARANCES:

Thomas J. Whitehead, Esquire,
Assistant General Counsel,
Federal Election Commission.

No appearance for Deponent.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO, S.C. 29063

(803) 781-1400

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GENERAL COUNSEL

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STIPULATIONS

It is stipulated by and between counsel for the respective parties that all objections are reserved until the time of trial, except as to the form of the question. The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

INDEX

	Page
Direct Examination by Mr. Whitehead-----	3
Certificate of Notary Public-----	51

EXHIBITS

(There are no exhibits to the deposition.)

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1
2 WHEREUPON,
3 MICHAEL GLENN ODOM, HAVING BEEN DULY
4 SWORN AND CAUTIONED TO SPEAK THE TRUTH,
5 THE WHOLE TRUTH, AND NOTHING BUT THE
6 TRUTH, TESTIFIED AND DEPOSED AS FOLLOWS:

7 DIRECT EXAMINATION BY

8 MR. WHITEHEAD:

9 Q Could you give us your full name and address, Mr. Odom?

10 A Michael Glenn Odom; 1457 Wisteria Drive, Florence,
11 South Carolina.

12 Q What's your home phone?

13 A Area Code 803-669-0645.

14 Q 803-669---

15 A ---0239, excuse me, is the home.

16 Q ---0239.

17 A Correct.

18 Q And that's the home phone.

19 A Yes, sir.

20 Q What is your place of business, Mr. Odom?

21 A I'm a partner in the firm of Fallon and Odom,
22 Attorneys, in Florence.

23 Q Spell that Fallon.

24 A F a-l-l-o-n.

25 Q Is that a Professional Corporation?

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2 A No, sir, just a partnership.

3 Q And that's located where?

4 A 1224 West Evans, Florence, S.C.

5 Q And what's the telephone number there, please?

6 A Area Code 803-669-0645.

7 Q Are you represented by counsel?

8 A No, sir.

9 Q You are your own counsel as counsel?

10 A I'm here.

11 Q Could you give us your educational background, please?

12 A Graduated from high school in '67.

13 Q What high school is that?

14 A McClenaghan High School in Florence. Graduated from
15 the University of South Carolina at Florence in 1969
16 with an Associate Degree. Went to the main campus
17 of Carolina for about two and a half months, then
18 left on extended leave with the service; finished
19 Francis Marion College in 1975, with a B.A. Degree
20 in Political Science; finished the University of
21 South Carolina School of Law in 1977 with a Juris
22 Doctor Degree.

23 Q And you've been practicing law since that time?

24 A Yes, sir.

25 Q Are you a member of the South Carolina Bar?

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A I was sworn into the South Carolina Bar in May of 1978.

Q Well, I take it you have all kinds of experience with depositions, and so I won't have to---

A Not tremendous, but---

Q Well, in any event, if there's any question that you don't understand, please ask me to rephrase it. If you don't ask me rephrase it, I'll assume that you understand it and that your answer is to that question as it's posed.

A That's fine.

Q Okay. No problem on that then. Were you always connected with Mr. Fallon since law school?

A No, sir. When I first got out I was with the firm of Reeves and Fallon, same Fallon, and then in February of 1979 I began my own practice at 1224 West Evans, and then in November of 1983 Mr. Fallon and I formed a partnership.

Q Is there just the two of you or do you have associates?

A Just the two of us.

Q Plus a secretary, I take it.

A Right.

Q Any paralegals?

A Two.

1

2 Q You are familiar with Representative Robin Tallon?

3 A Yes, sir.

4 Q And you were at one time his treasurer---

5 A That's correct.

6 Q ---for the Tallon for Congress Committee. Could you
7 tell us exactly when you began as treasurer?

8 A Without having a document in front of me, I'm pretty
9 sure it was in February when we filed his notice of
10 candidacy.

11 Q His statement of candidacy?

12 A His statement, yes, sir. I was named as treasurer
13 then, and I believe that was in February of '82.

14 Q That was a statement of candidacy filed with the
15 Federal Election Commission?

16 A That's correct.

17 Q How did you happen to come upon the treasurer's
18 position with Mr. Tallon's Committee?

19 A As I recall it, in January when he was again re-
20 entering the race, a friend of mine or a person that
21 became a good friend of mine, Jimmy Brown, and Jeff
22 Lee, who I had known before--- I had approached
23 Jeff and at least said, "If I can be of assistance,
24 let me know," and then apparently at some weekend
25 meeting my name came up as treasurer, and it was

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ratified, and I became treasurer.

2

3

Q So it was somebody else who---

4

A Yes, sir. I never specifically asked to be treasurer of the campaign.

5

6

Q You offered your services.

7

A I offered services in general.

8

Q Did you have any previous political experience?

9

A Not as an adult. My father was a politician, being

10

Clerk of Court of Florence County for some fourteen

11

years, and, of course, I was involved in politics

12

in that respect. I would say that when I became

13

involved with Robin Tallon's campaign was probably

14

the first time since after law school that I'd gotten

15

involved in anything.

16

Q Was your father's position an elected position?

17

A Yes, sir.

18

Q So he had to run for that particular office each time

19

it was up?

20

A Yes, sir.

21

Q Are you currently involved in any political activities?

22

A Yes, sir. At this point in time I'm treasurer of

23

Hugh Leatherman's Governor's campaign.

24

Q Is he the Democrat nominee?

25

A There are four Democrats running. There will be a

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operated within the requirements of the FEC regulations. It was my responsibility to make sure all contributions and expenditures were maintained so that when it became time to make our reports we could do so without running around with our heads cut off and basically just to monitor and make sure we were following what the FEC said concerning contributions and distributions.

Q Did you have copies of the Act and the regulations?

A Yes, sir.

Q Had you taken any courses or studied anything in connection with election campaigns?

A No, sir. Basically what I did was I took the information that the FEC provides in the orange pamphlet is what I can call it that is for a guideline for a campaign, as well as some other FEC documents. I studied those one weekend and just got a general idea of what it was a treasurer was supposed to do. Jimmy Brown had been the treasurer of the John Jenrette campaign after he was no longer a candidate. So Jimmy was able to help me a little bit in saying what needed to be done and this kind of thing.

Q Was Jimmy Brown in a volunteer capacity like yourself?

A When?

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2 Q With the Tallon Committee.

3 A Yes, sir.

4 Q In advising. In effect, he was advising you in a
5 voluntary way.

6 A I would say if I had a real problem with something,
7 I would ask him a question because he had the exper-
8 ience with the FEC reports, but he wasn't someone
9 that I actually would, quote, call "an advisor."
10 If I had problems, I'd ask him questions, but it
11 wasn't anything that was daily. It was just on an
12 occurrence.

13 Q Was he there often at the campaign headquarters?

14 A Yes, sir.

15 Q How often would you say?

16 A Jimmy was very active in getting Robin Tallon to
17 reconsider and in fact to make an announcement in
18 February that he would run. I'd say that Jimmy spent
19 as much time, if not more, down there as I did.

20 Q You say that he was instrumental in getting Robin
21 Tallon to decide to run. Can you explain that a little
22 more?

23 A I think it was in November of 1981 that Robin pretty
24 much said he was not going to be a candidate in the
25 race in '82, and that was because of the fact that

SF 404
CALIFORNIA ARCHIVE IN 47102
21 J 40 3 8 3 0 3 5

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Hicks Harwell at that point in time was going to be a candidate -- was a candidate and was doing well. Then I think it was in November or that period of time that he got in somewhat of some hot water in the State House.

Q "He" meaning?

A Hicks Harwell.

Q What was that particular---

A I really don't know what it was exactly. I, of course, knew at the time, but it was something like a political slip on Hicks' part, and---

Q What was his position? What was he doing with the State? Do you recall?

A Hicks, I think, was just a practicing attorney at that point in time because Robin had taken over Hicks' seat. I believe that's correct.

Q Robin had taken over what?

A Hicks' House seat -- State House seat. So I think that Hicks was just practicing law. He had run against Jenrette in the '80 primary and lost.

Q That is Hicks?

A Hicks lost to Jenrette in the '80 primary, and Napier, of course, beat Jenrette.

Q He worked in the Jenrette campaign?

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A You're asking me if I did?

Q No, no. He, meaning Hicks Harwell.

A He didn't work. He ran against Jenrette in 1980 in the primary.

Q Oh, I'm sorry. I misunderstood. So he, Hicks, had run against Jenrette.

A Yes.

Q It was Brown that worked with him.

A Brown worked with---

Q And he lost. Right?

A Right. Hicks lost in the primary, yes, sir.

Q Jenrette then ran against---

A Napier.

Q ---Napier and lost to Napier.

A In the general election, that's correct.

Q And that was in 1980, and, of course, in 1982 Robin Tallon won that election.

A That's correct.

Q Let's get back to November of 1981. You mentioned that Tallon had taken Hicks' House seat. That is the House of Representatives of the State of South Carolina?

A House of Representatives, yes, sir. That's correct.

Q Was that the Florence District?

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2 A I think it's--- It's either Seat--- I think it's
3 Seat 63, I believe is the one.

4 Q Had he given any indication that he was going to
5 run for Congress against Mr. Harwell?

6 A I think there was talk of it.

7 Q You say talk. What do you mean?

8 A Well, of course, I wasn't really that involved in it
9 in the Fall of '81, but as we told war stories at
10 night or whatever during the campaign for Robin,
11 I had just heard that Robin had decided in November
12 not to run for Congress.

13 Q And you said Jimmy Brown was involved in---

14 A Jimmy was involved in getting him to run, and I said
15 that worked out in January and early February of '82.

16 Q When did Robin Tallon tell you that he was going to
17 run for Congress?

18 A I'd have to say it was in February of '82.

19 Q Were you friendly with Robin Tallon after this point?
20 Where was your acquaintanceship with him?

21 A I really didn't know him prior to that except in
22 the Fall of '81 I handled a real estate transaction
23 for him down in Conway, Horry County, and that was
24 really the first time I'd ever had any contact with
25 him other than knowing that he was a member of the

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House and ran Robin's Men Store. So I had a contact with him then. I guess that was the first time I really ever saw him personally.

Q Was he representing a client in this transaction or what?

A I was pretty much representing him.

Q Was he involved as a principle? He was not as an attorney at that time? He's not an attorney, is he?

A He's not an attorney.

Q That's right. I'm getting him confused with---

A No, he's not an attorney.

Q ---someone else. Okay, fine. So you represented Robin Tallon in a real estate transaction. Was that for the business?

A He had a side business that he was in with Jeff Lee and I believe it was Carl Grant.

Q What kind of business was that?

A I think it was something to do with clothes, screen-printing or something like that.

Q I'm sorry, I don't understand.

A Screenprinting is taking tee shirts and putting logos or what-not on them.

Q Do you remember what that business was called?

A Carolina Textiles, Incorporated.

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2 Q What is the principle name of his men's stores?
3 What does he call them?

4 A I don't really know. I don't know what the corporate
5 name of it is. I know that there is pretty much---
6 I'm guessing when I say there's a holding company and
7 then there's Robin's of Florence, Inc. Some of them
8 are separately incorporated, and some of them aren't.
9 So I don't know which one is really the one that holds
10 them all.

11 Q Does he have just one set of stores or does he have
12 different quality type stores?

13 A He's got two different kinds. He's got the Robin's,
14 and I think he's got one called Le Master. I think
15 the only one he's got that's called Le Master is the
16 one that's at the Magnolia Mall. Le Master's is a
17 much higher quality.

18 Q Le Master is spelled L-e M-a-s-t-e-r?

19 A L-e M-a-s-t-e-r.

20 Q And this is different as far as quality is concerned?

21 A Yes, sir.

22 Q And the other one is called Robin's---

23 A Men's Stores, Ladies' Stores or whatever.

24 Q Does he deal in ladies' clothing also?

25 A Yes, sir.

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2 Q Who was the campaign manager at the time that you
3 were connected with the campaign?

4 A The campaign manager--- If I recall it correctly,
5 the first one he had was Cam Chesson, and then
6 Russ Rosen came in during the primary runoff period,
7 and then after the runoff Cam went back to Virginia
8 and Russ was the manager from there on.

9 Q Cam, you say, was from Virginia. Whereabouts?

10 A I'm pretty sure he's from Virginia, but where I don't
11 know. I'm pretty sure he's from Virginia.

12 Q And Rosen? What was his first name again?

13 A Russ Rosen, R-o-s-e-n.

14 Q Is he local?

15 A No. He's from Virginia also.

16 Q Is he currently involved in the---

17 A Leatherman campaign.

18 Q Is he campaign manager for the Leatherman campaign?

19 A Yes, sir.

20 Q And you're the treasurer for that.

21 A That's correct.

22 Q Sue Bass, what was her position?

23 A Sue Bass, I believe we filed that she was the
24 assistant treasurer, and Sue--- Because I didn't
25 have the time and I wasn't independently wealthy just

1
2 to quit what I was doing and just spend down there
3 all the time, Sue was the person that daily handled all
4 the contributions and distributions, and I came in and
5 reviewed what she did. So that's what Sue was.

6 Q What period of time did she serve in this capacity,
7 if you recall?

8 A I'm pretty sure she served throughout until about
9 the middle of the summer, and then---

10 Q Summer of 1982?

11 A And then Crista Collins came in from there. I think
12 we dropped Sue and then made Crista assistant treasurer.

13 Q The present treasurer in response to subpoena produced
14 these receipt books and produced the receipt books
15 which are--- They run from March 12 of '82 through
16 October the 22nd of -- or 23rd, I'm sorry, of '82.
17 Are you familiar with these particular books?

18 A I've seen them on occasion, yes.

19 Q Was it you that began the practice of using these
20 receipt books?

21 A I'm not sure whether it was me or not. We had
22 several different things that we used. We used the
23 receipt book, and we also used the control cards and
24 the individual cards on contributors. I'm thinking
25 the receipt book was more of an aid in helping them

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2 write thank-you letters and for the individual con-
3 tributor to have, in fact, a receipt because I think
4 when they wrote him a thank-you letter they enclosed
5 the receipt with it. So I think that's pretty much
6 what that was for. But what I made sure that we did
7 and what I insisted on going into was the actual
8 card system as put forth in that pamphlet or program
9 by the FEC. So we had individual contributor cards
10 on everybody who gave money. That's pretty much
11 what I was more concerned with than those.

12 Q Did you ever go to computers?

13 A Not while I was there, no, sir. I think they've gone
14 now, but we didn't.

15 Q In response to the subpoena you produced certain
16 documents today which are pretty much the reports
17 filed with the FEC---

18 A That's correct.

19 Q ---during the period of time that you were treasurer.
20 Is that right?

21 A Yes, sir.

22 Q What are the beginning dates and the ending dates?

23 A Well, of course, the ones I brought began with our
24 twelve-day pre-primary, which was from April the 5th
25 through May the 19th of 1982, and they end up with---

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Q Let me have those dates again.

A The first one is a period of April 5, '82, through May 19, 1982, and that's what we call the twelve-day pre-primary, and it ends up with the July 31 report.

Q 1982?

A Right. I brought too much. I've got through '83 with me today.

Q When did you discontinue acting as treasurer for the Robin Tallon for Congress Campaign Committee?

A It was in the Fall of '83.

Q Who was your successor?

A Lamar J. Rabun.

Q How did he happen to become the successor?

A Lamar is an accountant, and the Congressional Office, it's my understanding, rents space in his building, and so apparently it was just very convenient for him to just be treasurer.

Q Are you acquainted with Gary Slavens?

A Yes, sir.

Q Can you tell me the basis for that acquaintanceship?

When did it begin and what is it like?

A The first time I ever recall meeting Gary Slavens was at a Robin Tallon get-together or meeting or something like that. That's the first time I've ever

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met him to my knowledge.

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Q Can you tell me approximately the date and where?

4

A No, sir, I really can't.

5

Q Was it early in the campaign?

6

A I'd say that I met him early in the campaign, yes.

7

I didn't see a lot of Gary from that February

8

period through the runoff. I think at that point

9

in time, in fact, he was working out of Atlanta

10

with the Government. So I would see him, but I

11

didn't really get to know much about him until after

12

the general election started.

13

Q When was the runoff date?

14

A The runoff date---

15

Q The primary was when? It's coming up soon, isn't it?

16

A It's always two weeks after the--- The primary was

17

on the 8th of June. So the 22nd of June was the

18

runoff.

19

Q So you met Mr. Slavens -- or you had more dealings

20

with Mr. Slavens after the runoff and going into the

21

general election period?

22

A I saw him more, yes.

23

Q Did you know him under conditions other than the

24

campaign; that is, socially or in a business sense?

25

A He's a member of my church. In fact, he's a member

1
2 of my Sunday School class, but I didn't really know
3 that then.

4 Q What church is that?

5 A First Baptist in Florence. I'd say in this period
6 of time though I did not see him much more than in a
7 political sense. If I was at the headquarters, he
8 might walk in or he might be there and that kind of
9 thing.

10 Q Do you have any idea how often that might have
11 occurred during the general election campaign?

12 A I would say it would be infrequent. No more than
13 once a week or twice a week.

14 Q Did you ever discuss cash contributions with Gary
15 Slavens?

16 A I can't recall I've ever discussed cash contributions
17 with him. I know that I discussed it with the staff.

18 Q Did you discuss it with the Congressman, Representa-
19 tive Tallon?

20 A Yes, sir.

21 Q Tell us what was said between you and Congressman
22 Tallon and between you and the staff.

23 A I told them that---

24 Q You're talking about the staff now?

25 A Right. Okay, well, I told them both the same thing,

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2 but, in fact, I prepared a document based on the FEC
3 material as to what the FEC says about cash, and I
4 told them that a person -- as I recall, that a person
5 could give no more than A Hundred Dollars in cash,
6 that as far as anonymous cash you could not anonymously
7 accept more than Fifty Dollars in cash, and that's
8 about it; that there were limitations on obtaining
9 cash.

10 Q Are you familiar with the name G.B. Stokes?

11 A Yes, sir, Junior. Is that Junior?

12 Q G.B. Stokes, Junior, I guess is the---

13 A Yes, sir.

14 Q Tell us what the basis of your acquaintanceship is.

15 A G.B. Stokes---- I think his nickname is "Good Boy."

16 I knew him--- I knew that he had been a State
17 President of the Jaycees. I knew of him. I don't
18 even know if he knew me during this period of time.
19 He was just somebody that I knew of.

20 Q What does Mr. Stokes do to your knowledge?

21 A To my knowledge, he is the manager of the Howard
22 Johnson's Motor Lodge in Florence.

23 Q Have you ever had any business dealings with him?

24 A No, sir.

25 Q Have you ever represented him as a client?

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2 A No, sir.

3 Q Are you familiar with the fact that Gary Slavens
4 gave contributions to the Tallon for Congress Committee
5 in 1982?

6 A Yes, sir.

7 Q Could you explain to us for the record what you know
8 about those particular contributions?

9 A On June 21, 1982, he gave A Thousand Dollars for the
10 runoff.

11 Q This is June 21. Go ahead.

12 A On August the 2nd, 1982, he gave A Thousand Dollars
13 for the general election. And then on October 15,
14 1982, he made a loan to the campaign of One Thousand
15 Dollars for the primary election.

16 Q Did the campaign have primary debts at that time?

17 A Yes, sir.

18 Q What were the extent of those debts?

19 A The debt was owed to the candidate for money that he
20 had spent in the campaign. In other words, we
21 transferred -- the loan that he made was used to
22 pay off the debt owed to Robin Tallon.

23 Q So we have dates of June 21, 1982, and that was
24 for the runoff.

25 A Yes, sir.

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Q We have another one on July 30th. Right?

A I've got an August 2.

Q Well, it's probably written down on the report.

A All right.

Q And that was for the general.

A Right. Yes, sir.

Q And then on October 15th or thereabouts. Right?

A Yes, sir. It was a loan.

Q For the primary.

A Right, yes, sir.

Q Did you explain to him that he could legitimately give Three Thousand Dollars under the circumstances, and tell me what you used as your rationale?

A Yes, sir, I did, and the rationale that I used was that limitations were based on One Thousand Dollars per election event. We had primary, runoff, and general, and then to the extent -- after each election cycle, to the extent that we did have debt, that we could accept contributions even after that period of time if it was going to repay debt. So that's why he could make, in my understanding--- and I think I did advise him that when he made a contribution in October that we could revert that back to the primary as long as we used it to pay off

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primary debt.

Q Did you designate it for the primary on your reports, the October---

A Yes, sir.

Q And it was on the basis of primary debt.

A Yes, sir.

Q Had you called the FEC on this for any kind of special information? We do have a telephone line. Are you familiar with that?

A Yes, sir. I think the only thing I called them about concerning this was when Napier was receiving contributions and he was marking it primary. We got upset because we knew he had no primary opposition. I think I did call the FEC on that, and I'm not really sure whether I asked that specific question in that conversation or not, but that's really what got my interest and what got me to realize that each election period was a different event. But I don't believe I called to specifically ask that question, no, sir.

Q Did the booklet or the regs--- Did you refer to the regs in connection with the allowance of primary debt being covered at a later time?

A I'm not sure which document I looked in, but I did

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2 look into it and find out to the point, as far as I
3 understand it right now, that you could use it as
4 long as you had existing debt.

5 Q That is correct.

6 A I forget where I saw it, but I did look in there to
7 find that out.

8 Q It actually is 11 C.F.R. Section 110.1 (a)(II)(1).
9 That's where the information is found. I take it
10 this is where you---

11 A I don't think it's contained in the orange book. So
12 I had to find it in there.

13 Q It's not in the Act.

14 A Right. I found it in the regs then.

15 Q And that particular section does refer to debts
16 outstanding at the end of a cycle. You characterized
17 Slavens' October contribution as a loan. Is that---
18 Was that your understanding of it at the time?

19 A Yes, sir.

20 Q Did you give him a note of any kind or any kind of
21 written instrument to indicate that this was a loan?

22 A I have no recollection whether I did or didn't, and
23 I've got nothing with me here that shows that I did.

24 Q Was this loan repaid?

25 A To my knowledge, it was.

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Q Was either of the other two characterized as loans or were they straight contributions?

A They were straight contributions.

Q Slavens testified this morning that he believes he got paid on two of these, that two of them happened to be loans. It's not that monumental. It's just that---

A All I can say is--- And I'm going to look again since you've raised that, but I'm positive the report called them both--- Yes, there were two contributions and one loan because they were filed on different schedules. The two contributions came on 11A, and the loan came on 13A.

Q He was not certain. See, he didn't have any papers with him. Did you ever discuss a contribution of One Thousand Dollars in cash from Mr. G.B. Stokes to the campaign with Gary Slavens?

A No, sir. Let me rephrase that. Up until the last ten days, no, sir.

Q Why do you say that?

A Mr. Slavens called me Tuesday or Monday of this week and was talking to me about a cash contribution that Mr. Stokes had made, and, to my knowledge, that was the first I'd ever heard of that.

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Q In addition to deposition testimony -- I have deposed Mr. Slavens -- he submitted an affidavit in which he said that he discussed specifically the G.B. Stokes One Thousand Dollars cash contribution which Tallon advised him, Slavens, that he had received, and he discussed it with you, Glenn Odom, and you advised him, in effect--- I'll quote from his affidavit. It might make it easier. This is Paragraph 4 of his affidavit of November 22nd, 1985. Paragraph 4 reads, quote, "Slavens discussed this question with one Glenn Odom, treasurer of the Tallon Campaign Committee, who advised Slavens that since he (Slavens) had already donated One Thousand to the Tallon primary campaign and had loaned One Thousand to the general election campaign that he (Slavens) could not make a further contribution to the campaign. He did, however, state that Slavens' wife, Vicki, could make a contribution out of their joint funds." Do you recall discussing that with him?

A Yes, sir.

Q Can you tell me what that discussion was all about?

A Well, I think it was pretty much about what he's saying there. I think what I told him was that Vicki could give A Thousand Dollars, and, in fact,

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2 she did give A Thousand Dollars to the campaign.
3 There was nothing that said that she couldn't.

4 Q But was this in connection with A Thousand Dollars
5 cash received from G.B. Stokes?

6 A No, sir.

7 Q What is your recollection of the conversation between
8 yourself and Mr. Slavens about Vicki's contribution?

9 A As I recall it, Gary was trying to put more money into
10 the campaign, and I don't know whether he thought of
11 it or whether I thought of it, but somehow it got
12 around that Vicki could give A Thousand Dollars, and
13 I agreed that Vicki could give A Thousand Dollars.

14 Q Did Gary Slavens indicate why he would be interested
15 in giving more money to the campaign?

16 A It's my understanding that Gary wanted to do everything
17 he could to make sure Robin Tallon was elected.
18 Campaigns cost money.

19 Q But can you state unequivocally that there was no
20 One Thousand Dollar cash contribution from G.B.
21 Stokes to the campaign?

22 A Not to my knowledge, no, sir.

23 Q To your knowledge, there was no One Thousand Dollar
24 cash contribution from G.B. Stokes.

25 A That's correct.

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Q Would you have been in a position to know of any cash contributions from Mr. Stokes?

A No, sir. I think it could have gotten in without me knowing about it.

Q So it is possible that it could have come into the campaign.

A Certainly. We handled--- I don't think we handled an astronomical amount of cash, but we handled at least A Thousand Dollars in cash.

Q Your receipt books reflect a lot of cash -- pass-the-hat cash donations. Can you explain what that means, pass-the-hat cash donations?

A Pass-the-hat, in my estimation, is about the only way that, quote, "an anonymous contribution" can actually be received because if somebody walks up to me and I see his face and he gives me Fifty Dollars, I know who it was. So in a pass-the-hat, which is the exception to the cash contribution, it envisions a receptacle being passed around or a receptacle available that people drop cash into or whatever contribution, so that when the night is over with you pick up the money and count it.

Q Where were these held normally?

A On the back of our cash contribution card we normally

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn Odom
1224 W. Evans Street
Florence, SC 29501

RE: MUR 2071

Dear Mr. Odom:

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The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 22, 1986, and order which requires you provide certain information have been issued. The Commission does not consider you a respondent in this matter; but rather a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. That section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Laurence E. Tobey within two days of your receipt of this notification.

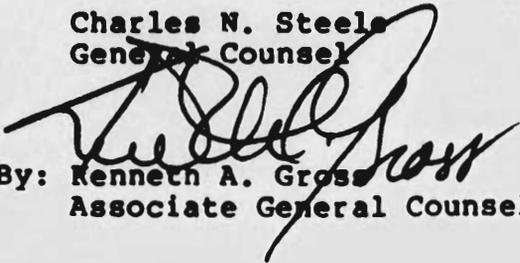
Glenn Odom
Page Two

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena.

If you have any questions, please direct them to Laurence E. Tobey, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena & Order

21040363107

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO APPEAR FOR DEPOSITION

TO: Glenn Odom

RE: MUR 2071

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At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), Glenn Odom is hereby ordered to produce for inspection and copying all documents and materials listed below that are in his possession or control. Production is to be made at the Office of the United States Attorney (conference room) at 1100 Laurel Street, Columbia, South Carolina 29201, at 10:00 a.m. on May 21, 1986.

In addition, Glenn Odom is hereby ordered to appear for deposition by representatives of the Commission the same location on May 22, 1986, at 3:00 p.m.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids,

printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Glenn Odom. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to Glenn Odom, in his capacity as agent, express or implied, of the Tallon for Congress Committee, as well as in his individual capacity.

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

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans received by the Tallon for Congress Committee from the following individuals: Gary H. Slavens, Vicki Slavens, G. B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby, including, but not but not limited to, letters, memoranda, or other documents; bank records of contributions and loans received, including deposit slips, copies of checks, stop payments on checks and credit card slips.

2. All documents and materials relating to contributions and/or loans solicited or accepted by you, directly or indirectly, on behalf of Robin Tallon as a candidate for the United States House of Representatives from the following individuals: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby.

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3. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions and/or loans by you on behalf of Robin Tallon as a candidate for the United States House of Representatives from the following individuals: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at the office of the Commission at 999 E. Street, N.W., Washington, D.C., this 1st day of May, 1986.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

91040363111



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vicki Slavens
2924 Palmetto Street
Florence, SC 29501

RE: MUR 2071
Slavens, Vicki

Dear Ms. Slavens:

On August 23, 1985, you were notified that the Commission found reason to believe that you violated 2 U.S.C. §§ 432(b)(3) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to appear and give sworn testimony on May 22, 1986, and provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 CFR 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Laurence E. Tobey within two days of your receipt of this notification.

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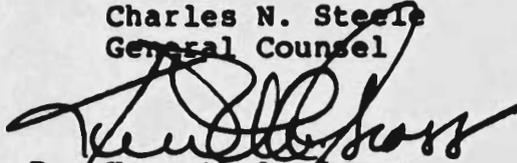
Vicki Slavens
Page Two

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order.

If you have any questions, please direct them to Laurence E. Tobey, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel



By: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena & Order

21040363113

**UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION**

**SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO APPEAR FOR DEPOSITION**

TO: Vicki Slavens

RE: MUR 2071

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), Vicki Slavens is hereby ordered to produce for inspection and copying all documents and materials listed below that are in her possession or control. Production is to be made at the Office of the United States Attorney (conference room) at 1100 Laurel Street, Columbia, South Carolina 29201, at 10:00 a.m. on May 21, 1986.

In addition, Vicki Slavens is hereby ordered to appear for deposition by representatives of the Commission at 11:00 a.m. on May 22, 1986 at the same location.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks

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and other negotiable paper, credit card slips, records and compilations in the possession or control of Vicki Slavens. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;
- (d) the name and title of the person to whom the document is addressed;
- (e) the name and title of the person to whom the document was actually sent;
- (f) the identity of any other person who read a part of the document;
- (g) the number of pages;

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(h) the paragraph of this subpoena to which the document is otherwise responsive; and

(i) the nature of the claimed privilege or objection.

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making of contributions and/or loans by you to the Tallon for Congress Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand at the office of the Commission at 999 E. Street, N.W., Washington, D.C., this 1st day of

May, 1986.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James F. Schoener, Esquire
Miller, Canfield, Paddock & Stone
1015 Fifteenth Street, N.W., #1200
Washington, D.C. 20005

RE: MUR 2071
Slavens, Gary H.

Dear Mr. Schoener:

On August 23, 1985, your client was notified that the Commission found reason to believe that your client violated 2 U.S.C. § 432(b)(3), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

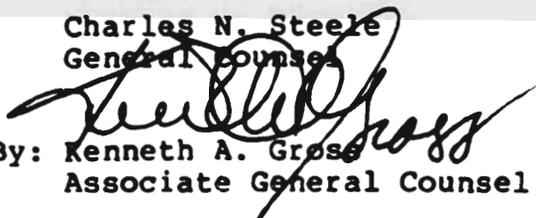
Consequently, the Federal Election Commission has issued the attached subpoena which requires your client to appear and give sworn testimony on May 22, 1986, and provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended. Because further information is required from your client, the Commission voted on March 18, 1986 to deny your request for pre-probable cause conciliation at this time.

Pursuant to 11 CFR 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. Your client will be given a check for the witness fee and mileage at the time of the deposition.

If you have any questions, please direct them to Laurence E. Tobey, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Grosse
Associate General Counsel

Enclosure
Subpoena & Order

71040363117

**UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION**

**SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO APPEAR FOR DEPOSITION**

TO: Gary H. Slavens

RE: MUR 2071

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a) (1) and (3), Gary H. Slavens is hereby ordered to produce for inspection and copying all documents and materials listed below that are in his possession or control. Production is to be made at the Office of the United States Attorney (conference room) at 1100 Laurel Street, Columbia, South Carolina 29201, at 10:00 a.m. on May 21, 1986.

In addition, Gary H. Slavens is hereby ordered to appear for deposition by representatives of the Commission at 9:30 am on May 22, 1986 at the same location.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks

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and other negotiable paper, credit card slips, records and compilations in the possession or control of Gary H. Slavens. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to Gary H. Slavens, in his capacity as agent, express or implied, of the Tallon for Congress Committee, as well as in his individual capacity.

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

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;
- (d) the name and title of the person to whom the document is addressed;

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- (e) the name and title of the person to whom the document was actually sent;
- (f) the identity of any other person who read a part of the document;
- (g) the number of pages;
- (h) the paragraph of this subpoena to which the document is otherwise responsive; and
- (i) the nature of the claimed privilege or objection.

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents, letters, memoranda, materials, and copies of checks or other financial instruments relating to contributions and/or loans given by you, or solicited by you, or accepted by you, directly or indirectly, on behalf of Robin Tallon as a candidate for the United States House of Representatives.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation or acceptance of contributions and/or loans by you on behalf of Robin Tallon as a candidate for the United States House of Representatives.

71040365120

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
COMM. FILE NO. 110
SENSITIVE

In the Matter of
Gary H. Slavens, et al.

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MUR 207100 MAY 23 All : 18

COMPREHENSIVE INVESTIGATIVE REPORT #1

On March 18, 1986, the Commission authorized subpoenas for depositions and production of documents to four Respondents in this matter: Gary H. Slavens, Vicki Slavens, G.B. Stokes, and Representative Robin Tallon. On the same date, the Commission authorized a subpoena for deposition and the production of documents to Glenn Odom as a witness. On the same date, the Commission authorized a subpoena for the production of documents to the Tallon for Congress Committee, and Lamar J. Rabon as treasurer.

Subpoenas have been received by counsel for Gary H. Slavens and G.B. Stokes. Subpoenas have also been received by Glenn Odom and Lamar J. Rabon as treasurer of the Tallon Committee. A subpoena was sent by certified mail to Vicki Slavens at her home address. No response has been received, nor has the receipt been returned. An inquiry has been filed with the U.S. Postal Service. Negotiations are taking place between this Office and counsel for Representative Tallon to schedule his deposition and production of documents at a mutually convenient time and place.

Pursuant to the subpoenas issued and served, production of documents and/or depositions of Gary Slavens, Glenn Odom, G.B. Stokes, and the Tallon for Congress Committee will take place in Columbia, South Carolina during May 21-23, 1986. This Office

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will make a further report to the Commission after this stage of the investigation is completed.

Charles N. Steele
General Counsel

May 22, 1986
Date

BY: 
Kenneth A. Gross
Associate General Counsel

71040363143



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/CHERYL A. FLEMING *MMW*

DATE: MAY 28, 1986

SUBJECT: MUR 2071 - COMPREHENSIVE INVESTIGATIVE REPORT #1
SIGNED MAY 22, 1986

The above-captioned matter was circulated by the Commission Secretary's Office to the Commissioners on Tuesday, May 27, 1986 at 11:00 A.M.

There were no objections received in the Office of the Secretary of the Commission to the Comprehensive Investigative Report at the time of the deadline.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 30, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Tallon for Congress Committee
Attn: Lamar J. Rabon, Treasurer
P.O. Box 1984
Florence, SC 29503

RE: MUR 2071

Dear Mr. Rabon:

Enclosed please find a check for \$33.62,
representing payment for your mileage expenses
pursuant to 11 C.F.R. 114.14, for your production
of documents on May 21, 1986.

Thank you for your cooperation in this matter.

Sincerely,

Charles N. Steele
General Counsel

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

Enclosure:
check

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would -- or at least I would instruct whoever was helping me to write down the amount of cash that was brought in by anyone and to note what the function was, and I even asked how many people were there because it's obvious if you only have two people and somebody walks in and says, "I've got A Thousand in pass-the-hat money," that that's not possible. So normally we would write the function, how much cash was brought in, about how many people were there. So the cash contribution card would probably tell us that.

Q You would note it pretty much in these receipts book, too, I see.

A Well, I don't know if she actually receipted an anonymous cash receipt or not. I don't know.

Q I think she did receipt them.

A Okay.

Q Because that's how I ran across them was through the pass-the-hat---

A Right.

Q You are acquainted with Jeff Lee. You mentioned earlier in your testimony that you were involved in some venture with Mr. Lee and Mr. Tallon at one point.

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A Yes, sir.

Q What is Jeff Lee doing these days? Is he connected with the Congressman?

A He's with the Congressman. He's the top position in Florence. I don't know what that's actually called, but he has the top position now in the Florence office.

Q Is he a contemporary of the Congressman?

A Contemporary meaning the same age?

Q Same age, yes.

A Yes, sir. I think he's probably younger.

Q Are you all pretty much close to each other's age?

A The Congressman is older than I am.

Q How old are you?

A Thirty-six.

Q The Congressman is in his forties, I take it.

A I think that's about right.

Q Did you ever discuss--- How long have you known Jeff Lee?

A When I got back to Florence from law school, I became involved in the Florence Chapter of the Jaycees, and I would say it was probably within months after being sworn into the Bar, and at that point in time I believe Jeff Lee was president of the local chapter,

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2 and so I knew him then. Well, I had to because
3 also when I bought my first car in May of '78 he
4 financed it. So I knew him by that.

5 Q What business is he in?

6 A He was, I guess, a loan officer or a commercial loan
7 officer at People's Bank, later bought by Bankers
8 Trust.

9 Q That's in Florence?

10 A Yes, sir.

11 Q Is he working fulltime with the Congressman now or
12 is he still connected with the banking business?

13 A No, sir. He's been fulltime with the Congressman
14 since '82.

15 Q Did you ever discuss cash contributions with Jeff Lee?

16 A Yes, sir.

17 Q Was he part of the campaign?

18 A Yes, sir.

19 Q What was his title, if any?

20 A I don't really know what his title was, but he was
21 definitely connected.

22 Q Was he volunteer?

23 A No, sir.

24 Q He was paid?

25 A Yes, sir.

2025 RELEASE UNDER E.O. 14176
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2 Q What duties did he have?

3 A When we had a campaign manager, I'd say his duties
4 were to do whatever the campaign manager told him to
5 do. He was an advance type person, thought about
6 issues, responses, helping raise money, a little bit
7 of everything.

8 Q What were some of the key issues of the campaign?

9 A Economic development was one of them. That was a
10 real famous one.

11 Q Local economic development?

12 A Yes, sir, mostly local. I'd say, connected with
13 that, jobs, getting back into the Democratic fold,
14 things like that.

15 Q You did discuss cash contributions with Jeff Lee.

16 A Yes, sir.

17 Q Would you explain?

18 A It was pretty much the same as when I did it with the
19 staff. Jeff was the one that usually brought in---
20 I'd say if we ever had that much cash being brought
21 in, it was probably through Jeff, but, at the same
22 point in time, that would be natural because Jeff was
23 the one that was following the Congressman more, and,
24 with Jeff, I especially remember saying, "If you're
25 turning in anonymous, it's got to really be anonymous,

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2 and we can't get out from under this Fifty Dollar per
3 person rule," I said. "So don't bring me cash if
4 you can't justify people."

5 Q Did he ever bring you cash?

6 A Yes, sir.

7 Q Did he justify the cash contributions?

8 A Yes, sir.

9 Q Were they in amounts over Fifty Dollars?

10 A No, sir.

11 Q Did he give the name and address of the individual
12 from whom he got the cash?

13 A No, sir. Usually--- If I was there when it was
14 brought in, I would ask him where was it at, about
15 how many people were there, and then we would take it.

16 Q It's your testimony, I take it, that he didn't bring
17 you any cash contributions over Fifty Dollars.

18 A I don't understand the question.

19 Q That's the way I understood your testimony. He would
20 bring you money in in cash form, but it was always
21 less than Fifty Dollars.

22 A No, sir.

23 Q Okay. Then tell me where I misinterpreted.

24 A Let's say if he brought in Five Hundred--- He might
25 have brought in Five Hundred Dollars on occasion,

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2 Just as an example. At that point in time I would
3 say, "Jeff, where did it come from?" He would say,
4 "Well, it's pass-the-hat, the bucket there or milk
5 bottle or Mason jar or whatever." I'd say, "Jeff,
6 how many people were there?," and he'd always say,
7 "There were twenty or thirty people there." I'd
8 say, "Okay."

9 Q Did he ever bring in any cash in large amounts and
10 say, "This is from one or two people?"

11 A No, sir. No, sir, he did not.

12 Q Are you acquainted with Rocky Pearce?

13 A Yes, sir.

14 Q He's the Mayor of Florence. Right?

15 A Yes, sir.

16 Q How long have you been acquainted with him?

17 A Because my practice is in real estate and Rocky is
18 a realtor, I knew of Rocky, I'd say, as early as
19 1980 perhaps in a real estate transaction. I knew
20 his family because they grew up in Florence and I
21 grew up in Florence.

22 Q Did the Committee accept any contributions from
23 Rocky Pearce in 1982?

24 A These records reflect no contributions from Rocky
25 Pearce. In reviewing some records that Jeff Lee had

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2 Tuesday, there was a Hundred Dollar contribution from
3 him, I think, on a partnership account that we put
4 him down for, and then there was a Ten Dollar
5 contribution that Jeff showed me, but other than
6 those two, if there were more than that, they would
7 be reflected on his contribution card. I'm aware of
8 those two. There could be more.

9 Q Yes, that seems to be all I see. Are you acquainted
10 with Ed Saleeby?

11 A Yes, sir.

12 Q Could you give us the--- Let me go back to Mr.
13 Pearce. Did you accept any cash contributions from
14 Mr. Pearce?

15 A Not to my knowledge. No, sir, we did not accept
16 any cash contributions from him to my knowledge.

17 Q Are you acquainted with Ed Saleeby?

18 A Yes, sir.

19 Q What is the basis of that acquaintance?

20 A Mr. Saleeby is the Senator from a Darlington district.
21 He lives in Hartsville. I knew of him because he is
22 a lawyer, a very prominent and respected lawyer over
23 in Darlington. As far as knowing him personally, I
24 do not know him personally. We do not socialize.
25 I know who he is. I can usually recognize him when

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I see him, but I don't see him that often.

Q Did you accept any contributions--- Did the campaign accept any contributions from Ed Saleeby?

A Not to my knowledge. I looked in these papers. I haven't found any, and so if we did, it would have been under Two Hundred -- Two Hundred Dollars or less, and it would be on the contribution cards. Those cards might reflect something, but I don't know.

Q Turning your attention to early April of 1982, you were connected with the campaign in early April of 1982?

A Yes, sir.

Q We have information that there was Thousand Dollar bonuses paid to some of the higher echelon employees in Tallon's men's stores which in turn found their way into the Committee, and, indeed, many of these are found in the receipt books. Are you familiar with this?

A I am familiar with contributions from some of the people in Mr. Tallon's business. I have no knowledge of any bonuses that may have been declared in his business.

Q You have not heard that being said or bandied about within the office?

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2 A No, sir. Not in that office, no, sir.

3 Q Anywhere?

4 A I'd say that maybe two years ago I had heard that,
5 but at that time I was involved in it, I did not know
6 that.

7 Q You said two years ago. Sometime in 1984?

8 A '84, yes, sir.

9 Q Under what circumstances did you hear this?

10 A Jack Lawson, who is an attorney in Florence who was---
11 He and I were sharing some office space. He had a
12 brother named Mark. Mark worked for Robin Tallon,
13 Mark Lawson, and I think it was in '84 that Jack
14 told me that Mark had been, quote, "declared a
15 bonus" and then told to give it to the Tallon
16 campaign.

17 Q And Lawson was employed by the men's stores?

18 A Yes, sir.

19 Q What was his job with the men's stores?

20 A I really don't know. I know that he used to carry
21 clothes around for them, but I think at one time he
22 might have been the manager somewhere. But
23 specifically, I don't know.

24 Q To your knowledge, was Robert Welch or Bobby Welch
25 connected with the Tallon stores?

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2 A Yes, sir.

3 Q To your knowledge, was Robert Hartnett connected
4 with the Tallon men's stores?

5 A Yes, sir.

6 Q Is his wife Lynn Hartnett?

7 A That's correct.

8 Q Was Jerry Harris connected with the men's stores?

9 A Yes, sir.

10 Q How about Ronald Menschu?

11 A Yes, sir. Wait a minute. Ronald Menschu? Robert
12 Menschu?

13 Q Robert or Ronald, I'm not sure.

14 A If that's Robert Menschu, yes, sir.

15 Q He's connected with the men's stores. Is he not
16 the husband of Cameron Menschu?

17 A (Nods in the affirmative.)

18 Q You're shaking your head yes?

19 A Yes, sir. Yes, sir. I'm sorry. Excuse me. Yes,
20 sir.

21 Q And is she not the sister, Cameron Tallon Menschu,
22 of the Congressman?

23 A That's correct.

24 Q It's our information that the bonuses were openly
25 discussed at campaign headquarters where Sue Bass

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2 and Cameron Menschu worked. Cameron Menschu was in
3 the office at the time, was she not?

4 A Which office? The campaign office?

5 Q The campaign office.

6 A I don't know if that's true or false.

7 Q Did you see her at campaign headquarters quite often?

8 A Yes, sir.

9 Q Did she take an active role in the campaign at the
10 time?

11 A That's difficult to say because I really think she
12 was more spending time helping run Robin's because
13 Robin wasn't there than actively being involved
14 in the campaign.

15 Q Is she an officer of the Robin's Stores?

16 A I do not know.

17 Q How do you know that she was active in running the
18 business of Robin's Men's Stores?

19 A Robin pretty much had his, quote, "corporate head-
20 quarters" on the back end of the Robin's Stores
21 in Florence, separate entrance on the outside, and
22 whenever I went to talk with Robin in the early
23 days or sometimes even in the later days, because
24 he was down there trying to stay away from people,
25 that's where Cameron was, and that's where Sue Bass

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2 came from. Sue moved -- took a leave of absence,
3 terminated or whatever from Robin's, and came to
4 work on the campaign staff.

5 Q Where was that headquarters located? He had two
6 or three stores in Florence.

7 A Well, it was behind the Robin's Men's Store in Florence.

8 Q And where is that located?

9 A That's in the Five Points Area. It's on what's
10 called East Evans Extension.

11 Q Would you spell that for the reporter?

12 A E-a-s-t E-v-a-n-s Extension.

13 Q That's a pretty commonly known address in Florence?

14 A Yes, sir.

15 Q So it wasn't until 1984 that you heard from Mr.
16 Lawson's brother -- that is, Joe Lawson---

17 A Jack.

18 Q ---Jack Lawson, that Mark Lawson, his brother, had
19 been given a bonus and directed to turn that bonus
20 over to the campaign.

21 A Yes, sir.

22 Q That's your testimony.

23 A That's my testimony.

24 Q Are you familiar with the fact that that is a viola-
25 tion of the Act?

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2 A Yes, sir. If the--- As I understood it, if the -- if
3 it is used as a conduit to put money in the campaign,
4 yes, sir, it is a violation of the Act. Now, because
5 I was no longer involved in the campaign, I didn't
6 worry about it. I didn't do anything else with it,
7 but it's improper to use that as a conduit where
8 the employee has no choice. Now, I'd have to look
9 to see exactly what amount Mark Lawson gave to the
10 campaign and exactly how much perhaps he was given
11 as a bonus, but that does seem to be improper, yes,
12 sir.

13 Q In the receipt book, beginning at Number 93732 and
14 dated April 14, there are -- and running through, I
15 might add, 93738--- I'll read off the various
16 receipts, and then you can tell me whether or not
17 these people were connected with Robin's Stores.
18 The first one is an April 14 contribution from
19 Ronald B. Menschu for A Thousand Dollars, signed
20 by Sue Bass.

21 A Does it show his address?

22 Q 120 Lakewood Drive, Florence.

23 A Yes, sir. That's who I would call Robert.

24 Q So he goes under the name Ronald or---

25 A That's how I know him, yes, sir.

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- 1
- 2 Q There is a 93733, April 14, a donation of A Thousand
3 Dollars from a Jane Harris.
- 4 A Jane Harris?
- 5 Q Right. Is her husband the---
- 6 A Her husband could well be Jerry Harris. I don't know
7 that to be true.
- 8 Q 93734, there's A Thousand Dollar contribution on
9 April 14, '82, from Robert Welch. Mr. Welch is
10 connected with Robin's Stores, I believe you told me.
- 11 A I think I did tell you that he was connected, but I
12 think I'm getting him confused with Robert Menschu.
13 So I really don't know about Mr. Welch.
- 14 Q 93734, there's A Thousand Dollar contribution from a
15 Ronald M. Teter or Teten.
- 16 A That name does not ring a bell.
- 17 Q 3964 American Avenue, West Columbia, South Carolina.
- 18 A I do not know him.
- 19 Q On April 14th, at 93736, there's a Five Hundred
20 Dollar contribution from Jerry Harris.
- 21 A Jerry was connected with the store at the beach area.
- 22 Q And that would be the husband of Jane Harris?
- 23 A That's what I would guess. The same address.
- 24 Q Same address in the book.
- 25 A Right.

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2 Q 93737, there's A Thousand Dollar contribution from
3 Mark Lawson, no address given.

4 A He was---

5 Q This is the Mark Lawson of whom you speak?

6 A Yes, sir. Let me say if I could I really didn't know
7 that Mark and really to a point didn't know that
8 any of those people were connected with Robin's
9 until after these contributions were made because I
10 didn't individually meet them until other social
11 occasions.

12 Q I understand that. I understand that.

13 A Thank you.

14 Q I just want to pin down to the closest extent that
15 I can what actually happened in this transaction.

16 A Right.

17 Q On April 15, 93738, there's a Five Hundred Dollar
18 contribution from a Stu, S-t-u, Britton, B-r-i-t-t-o-n.
19 Are you familiar with that name?

20 A No, sir.

21 Q Are you familiar with that name being connected
22 with the Robin's Stores?

23 A No, sir, I'm not.

24 Q On April 15, 1982, at 93742, there's a Five Hundred
25 Dollar contribution from a Jim Russell. Was Russell

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2 connected with Robin's Stores to your knowledge?

3 A Not to my knowledge.

4 Q We're pretty close to the end. I don't have too much
5 more here. In his testimony Slavens has indicated
6 that you advised him and so he indeed advised others
7 that they could give up to Three Thousand Dollars as
8 late as October.

9 A Yes, sir.

10 Q Is that the case? Is that what happened?

11 A As I recall, it is. I said that as long as we have
12 debt from each election period, then we can accept
13 the contribution as long as that contribution is
14 used to retire that debt.

15 Q According to Mr. Slavens, these were in the form
16 of loans and that he and I believe the Congressman
17 were instrumental in getting these people to con-
18 tribute. I refer to contributions by a Charles
19 Godwin in October of 1982 in the amount of Three
20 Thousand Dollars. He was a State Senator from
21 Lake City, I believe.

22 A That's correct. I recall a loan by him. Yes, sir,
23 I've got a record of a loan of Three Thousand Dollars
24 that was incurred on September 17, 1982.

25 Q September 17, 1982.

31 J 40 3 3 1 4 1

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2 A Yes, sir.

3 Q And that's Charles Godwin's loan of Three Thousand
4 Dollars.

5 A Yes, sir.

6 Q Was that repaid? Do you recall? And that's reported
7 on what report?8 A This is in the January 31 year-end report through
9 12/31/82.10 Q He also mentioned a Tom Smith, a State Senator, who
11 did the same thing. In fact, that particular one is
12 reflected in the receipt books.13 A Yes. Tom Smith was October 18 of '82. As far as the
14 repayment on the Godwin loan, when I left as treasurer
15 it was still outstanding and no payments had been made
16 from these records.17 Q First of all, let me back up to Tom Smith. What was
18 the date of the loan from him? October what?

19 A October 18, 1982.

20 Q Was there any repayment of that?

21 A None reflected in these records.

22 Q And what date do we go up to on these records?

23 A June 30, 1983.

24 Q Do you know offhand whether these loans have been
25 paid off?

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2 A No, sir.

3 Q Who came up with the idea of obtaining these Three
4 Thousand Dollar loans and how many were there?

5 A I don't know who came up with the idea. I was asked
6 was it possible, and I said in my opinion that it was.

7 Q Because of the outstanding primary debt?

8 A Yes, sir.

9 Q Who was the debt owed to? Mostly to the Congressman?

10 A The debt that was existing, I'd say, without really
11 looking in here, was--- Well, it would have to have
12 been him because I think we were pretty much current
13 on everything else. I'm almost positive any loan
14 we got in we used to retire the loan that he had
15 made as much as possible.

16 Q Did you run other fundraisers after he was elected?

17 A Yes, sir.

18 Q To retire these debts?

19 A Yes, sir.

20 Q Were they successful?

21 A Total money received or total contributions which
22 would count--- Total contributions in the period
23 of November 23, 1982, to 12/31, 1982, was Sixteen
24 Thousand, Seven Hundred and Fifty-Five Dollars. So
25 I'd say we were not too successful, although we did

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2 Q You had no conversations with him about this Stokes
3 One Thousand Dollar cash contribution?

4 A No, sir.

5 Q You can state unequivocally that you had no conver-
6 sations with the Congressman about this Stokes One
7 Thousand Dollar cash contribution?

8 A No, sir.

9 Q You can state unequivocally that you had no conver-
10 sations with Mr. Stokes about the One Thousand Dollar
11 cash contribution alleged by Mr. Slavens?

12 A No, sir, no conversation with him.

13 Q So in effect, you have had no conversation with Mr.
14 Slavens, Congressman Tallon, or Stokes in connection
15 with a Thousand Dollar cash contribution from Stokes.

16 A No, sir.

17 Q Do you have any knowledge of any Thousand Dollar cash
18 contribution?

19 A No, sir, not from G.B. Stokes. No, sir.

20 Q Do you have any knowledge of any Thousand Dollar cash
21 contribution from anybody?

22 A No, sir.

23 Q Okay. I think we can close the record.

24 FURTHER DEPONENT SAYETH NOT.

25 (Signing waived.)

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2 STATE OF SOUTH CAROLINA)
3 COUNTY OF RICHLAND) CERTIFICATE

4 This is to certify that the foregoing is the deposition
5 of Michael Glenn Odom, taken before me, Eric B. Gore, a Notary
6 Public in and for the State of South Carolina, duly commi-
7 ssioned and qualified as such, commencing at the hour of
8 2:35 p.m., on Thursday, May 22, 1986, at the U.S. Attorney's
9 Office, 1100 Laurel Street, Columbia, South Carolina, pur-
10 suant to Subpoena.

11 I do further certify that the said witness was first
12 duly sworn by me and cautioned to speak the whole truth; that
13 he was examined as per the foregoing; that notes were taken
14 by me of the questions propounded and the answers given; and
15 that the foregoing fifty (50) typewritten pages represent a
16 true, accurate, and complete transcription of said testimony
17 to the best of my skill and ability.

18 I do further certify that counsel for the respective
19 parties reserved all objections until the time of trial,
20 except as to the form of the question. The reading and
21 signing of the deposition by the deponent was waived by the
22 deponent and counsel for the respective parties.

23 I do further certify that I have sealed up and de-
24 livered the original of said deposition to Thomas J. White-
25 head, Esquire, Assistant General Counsel, Federal Election

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Commission, 999 "E" Street Northwest, Washington, D.C.,
20463, who shall retain the said deposition in his possession
and become custodian thereof until such time as it shall be
needed at trial.

I do further certify that I am not of counsel or
attorney for any of the parties to the said action nor in
any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and
official seal this 29th day of May, 1986.

Eric B. Gore
Eric B. Gore

Notary Public for South Carolina

My Commission expires: 4/23/87.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
Gary H. Slavens, et al.)
_____)

DEPOSITION OF GARY H. SLAVENS

Deposition of Gary H. Slavens, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 9:25 a.m., on Thursday, May 22, 1986, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Subpoena.

APPEARANCES:

Thomas J. Whitehead, Esquire,
Assistant General Counsel,
Federal Election Commission.

No appearance for Deponent.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO. S. C. 29063

(803) 781-1400

36 JUN 10 10:35
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

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STIPULATIONS

It is stipulated by and between counsel for the respective parties that all objections are reserved until the time of trial, except as to the form of the question. The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

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WHEREUPON,

GARY HAMILTON SLAVENS, HAVING BEEN DULY
SWORN AND CAUTIONED TO SPEAK THE TRUTH,
THE WHOLE TRUTH, AND NOTHING BUT THE
TRUTH, TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Would you state your name for the record, please?

A Gary Hamilton Slavens.

Q Will you spell that last name, please?

A S-l-a-v-e-n-s.

Q Could you give us both your business address and
phone number and your home address and phone
number?

A My business address and phone number and home
address and phone number are the same thing. I'm
a farmer. It's 2924 West Palmetto Street, Florence,
South Carolina, 29501. My number is 667-9794,
Area 803.

Q Mr. Slavens, have you ever been involved in a deposi-
tion prior to today?

A Yes, sir.

Q You have. Then you understand what a deposition is
all about.

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2 A Yes, sir, in a civil suit.

3 Q This is civil also. It's not criminal. This is
4 strictly a civil proceeding. I'm going to ask a
5 series of questions, and I want you to give me the
6 answers. I want you to thoroughly understand the
7 question before you give the answer. If I ask you
8 a question and you don't understand it, please stop
9 me, ask me to rephrase it or to give it to you again.
10 If you do not stop me and ask for the question to
11 be repeated, I will assume you know what the question
12 is and that your answer is to that question. Is
13 that understood?

14 A Yes, sir.

15 Q Mr. Slavens, are you represented by counsel?

16 A Well, I just got Judge Schoener to--- Is his name
17 Schoener?

18 Q Schoener.

19 A Schoener.

20 Q Schoener, S-c-h-o-e--n-e-r, I believe is the spelling.

21 A I just went to--- I went to Mr. Napier, who is a
22 friend of mine who used to be a Congressman.

23 Q To whom?

24 A Mr. John Napier. He used to be a Congressman.

25 Q Napier, N-a-p-i-e-r?

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2 A We call it Napier.

3 Q I know. We're going to have a problem with accents
4 here because I've got a Northern one and you've got
5 a Southern one.

6 A My son has got a Northern one. He goes to school
7 up there.

8 Q I see.

9 A But he told me that the Judge--- He calls him Judge.
10 His name is Jim, I think.

11 Q Mr. Schoener was a judge in one of the courts in
12 Michigan.

13 A He just told me to get him and get a deposition
14 because I told him what had happened, and he said,
15 "You haven't done anything really that wrong," and
16 he said, "All you need to do is do a deposition
17 probably and just give it to them."

18 Q When you say deposition, I take it you mean the
19 affidavit that---

20 A I mean affidavit, yes. Right.

21 Q ---that you have submitted previously in this case.

22 A Whatever the legal term is, right.

23 Q It's an affidavit. Are you represented by local
24 counsel?

25 A No, sir.

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2 Q Are you here under subpoena from the Federal Election
3 Commission?

4 A Yes, sir.

5 Q Did you bring any records with you?

6 A No, sir.

7 Q Do you have any records?

8 A I can't find the checks. I mean, if I could get a---
9 I could go to the bank and get them.

10 Q I have some copies of checks. So we won't worry about
11 that. What records did you refer to, if any, prior
12 to this deposition?

13 A You mean when? I don't understand the question.

14 Q Prior to coming here today and since you received
15 the subpoena from us, did you have any records to
16 consult, and, if so, which ones were they?

17 A No, sir.

18 Q You had none. Did you discuss this case with anyone
19 besides Mr. Schoener, your counsel?

20 A I don't understand the question. You mean did I
21 discuss it with a friend?

22 Q Have you discussed this case with anyone except
23 Mr. Schoener, your counsel? I don't care who it
24 is. Just tell me if you did or not.

25 A Yes, sir, I did.

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2 Q Who did you discuss the case with?

3 A I didn't discuss the case. I just discussed the part
4 where I told "Bo" Stokes this boy that supposedly
5 given the Thousand Dollars, you know---

6 Q "Bo" Stokes, his boy, or---

7 A "Bo" Stokes himself. I said, "'Bo," I said--- He
8 claims he didn't give it. He said, "I told my
9 son-in-law to give it." I said, "'Bo,' you ought to
10 tell the truth," and I said, "It's just a fine,"
11 and I said, "If you start going over there lying,
12 you can get yourself in some bad situation when
13 you're under oath and everything."

14 Q Tell me when you had this conversation with Mr.
15 Stokes.

16 A Yesterday morning.

17 Q Yesterday morning. By telephone or in person?

18 A No, sir. I saw him at a restaurant.

19 Q What restaurant was that?

20 A The Eat More Restaurant in Florence.

21 Q What was the name of it again?

22 A Eat More.

23 Q E-a-t M-o-r-e?

24 A Yes, sir.

25 Q And that's in Florence?

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2 A Yes, sir.

3 Q And this was Mr. G.B. Stokes.

4 A Right.

5 Q You had a discussion with him yesterday morning.

6 A Yes, sir.

7 Q May the 21st, today being the 22nd.

8 A Yes, sir. And I told him, I said---

9 Q Tell me what you said to him and then tell me what
10 he said to you.

11 A I said, "'Bo,'" I said, "you know, I called you up
12 and asked you to help Robin, and," I said, "later you
13 said that you had helped Robin," and I said, "I
14 assumed the Thousand Dollars that Robin gave me
15 to try to get back in the campaign, to pay the
16 phone bills or whatever they had to do, was your
17 money," and I said, "If it was your money, you ought
18 to tell them the truth about it." I said, "They're
19 not going to do anything but fine you." I said,
20 "They were trying to get it in the campaign. They
21 were trying to do the right thing in my opinion at
22 the time." And he said, "Well..."--- He's a funny
23 fellow. You can't hardly talk to him, you know.
24 You're going to take his deposition, and so you'll
25 know. He thinks he's real smart, and he thinks

1
2 he can outsmart you, and here you are with a law
3 degree and you've done this thing a thousand times,
4 and there's no way to outsmart you, you know. I
5 mean, you've got to tell the truth.

6 Q What did he say to you in reply to what you had just
7 related to me?

8 A He said he never gave him any money. He said, "I
9 gave him..."--- He said--- What he said was, he
10 said, "That was in the primary. I didn't want
11 Hicks Harwell..." this candidate that was running
12 in the primary--- This was the primary election.

13 Q I understand.

14 A ---"...to know about it." I said, "'Bo,' you're
15 wrong."

16 Q Did he say that to you yesterday?

17 A Yes, sir. He said it happened in the primary.

18 Q So what you're telling me -- I want to clarify your
19 testimony, and you tell me where I'm wrong -- is that
20 Mr. Stokes yesterday said to you that he did give
21 A Thousand Dollars in the primary.

22 A No, sir. He said he don't know how much he gave.
23 He said his son-in-law gave it. He said, "I told
24 my son-in-law to give it." His son-in-law is now
25 not his son-in-law as he and his wife are divorced.

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2 Q What is the son-in-law's name?

3 A I don't know. I never met the boy.

4 Q He did not mention his name at that time?

5 A His last name is Lynch. I don't know---

6 Q Lynch, L-y-n-c-h?

7 A L-y-n-c-h, I believe. I believe that's correct.

8 Now, don't hold me to that.

9 Q You don't recall what his first name was?

10 A No, sir.

11 Q What is his wife's first name, if you know what that
12 is?

13 A No, sir.

14 Q You do not. Again going back to the conversation
15 that you had with him yesterday morning, tell me
16 what he stated. That he gave it to his son-in-law
17 to get into the campaign?

18 A He claims he don't know what happened. He said,
19 "I told my son-in-law to give him some money, and
20 I assume he gave it to him. I don't know." Now,
21 I know--- I know he gave it to him because I asked
22 him a week or two later. I said, "I appreciate
23 what you're trying to do for Robin."

24 Q A week or two later from what?

25 A From the time that Robin gave me the Thousand Dollars.

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2 Q Let's get to that conversation a little bit later
3 in this deposition. Let's first of all clear up
4 what was said between you and Mr. Stokes yesterday
5 morning.

6 A He said he didn't give any money.

7 Q He said he personally did not give any money?

8 A That's what he said. That's what he said.

9 Q Did he make any mention of his son-in-law, Mr. Lynch,
10 yesterday morning?

11 A Yes, sir.

12 Q What did he say yesterday morning?

13 A He said, "I told my son-in-law to give Robin some
14 money."

15 Q Did he say anything further than that?

16 A No, sir. I told him this. I said, "'Bo,' just tell
17 the truth." I said, "These people are not head-
18 hunting. They just want to know the truth. They
19 want to find out if they're running straight
20 elections, if they're buying votes, or whatever
21 they're doing." I said, "These people are nice
22 people." I said, "I've talked to them on the phone."
23 I said, "They've never mistreated me or tried to
24 help me." I said, "You ought to tell them the truth
25 if you gave him money."

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2 Q Let's go more back into the deposition and try to
3 take it in some logical sequence aside from your
4 conversation with Mr. Stokes yesterday. Are you
5 married, Mr. Slavens?

6 A Yes, sir.

7 Q And your wife's name is?

8 A Vickie.

9 Q Vickie. Do you live with your wife at the present
10 time?

11 A No, sir.

12 Q Is her address different from the one you gave us?

13 A Yes, sir.

14 Q What is her address?

15 A 864 Indian Drive.

16 Q Florence?

17 A Yes, sir.

18 Q Do you have a phone number for her?

19 A Yes, sir. 662--- I mean--- Yes, 662-9058.

20 Q And the Area Code on that is what?

21 A 803. You can get her after six-thirty. She
22 teaches school in the mornings. She teaches private
23 art lessons.

24 Q Were you and your wife living together in 1982?

25 A Yes, sir.

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Q You lived in Atlanta, Georgia?

2

A When all this went on until--- I was in Atlanta, Georgia, from December of '81 until August--- And don't hold me to these dates. I think I left there in August of 1982.

3

4

5

6

Q Was that an appointed job?

7

A Yes, sir.

8

Q Who appointed you? Mr. Reagan?

9

A Yes, sir.

10

Q Who was instrumental in your getting that appointment?

11

12

A Mr. Napier. You say Napier. I say Napier.

13

Q He's a Republican, is he not?

14

A Yes, sir.

15

Q What were the duties involved in that job?

16

A Well, we were going under a block grant system. I had technicians from each agency, and we would go around to the different states and explain how we were getting around these different grants and that they were changing -- I mean that the Reagan Administration was changing things. I worked for the Office of Management and Budget.

17

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23

Q So you were with OMB, and what was your title again?

24

A Executive Director of the Southeastern Federal

25

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Regional Council.

2

3 Q Executive Director, Federal---

3

4 A Southeastern. See, they operate on regions.

4

5 Q Southeastern Regional Council?

5

6 A Federal Regional Council.

6

7 Q Federal Regional Council.

7

8 A Mr. Clifton Brown was the Chairman.

8

9 Q Was he located in Atlanta?

9

10 A Well, he's just retired.

10

11 Q But he was located in Atlanta at the time?

11

12 A Yes, sir.

12

13 Q After leaving OMB in 1932, in or around August,
14 did you go back to farming?

13

15 A Yes, sir. Well, I always farmed. See, I always
16 had people farming. I always sharecropped every-
17 thing.

14

18 Q How about outside employment besides farming?

15

19 A No, sir.

16

20 Q Is this the only experience that you've had with
21 outside employment?

17

22 A No. I worked for Robin Tallon for seven months.

18

23 Q Okay, fine. Let's get into that. When did you
24 first become acquainted with Representative Tallon?

19

25 A Probably in '78, I guess.

20

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2 Q Under what circumstances?

3 A We were probably having a drink together or something.

4 Q Were you introduced to him through someone else?

5 A I don't remember. We became good friends, and I used
6 to go down on Sunday nights. He had a little office
7 down the street from my house where he owned a
8 clothes store, and we'd go down and talk for a
9 couple of hours.

10 Q So was yours more a social relationship rather than
11 a business relationship?

12 A Oh, yes. Oh, yes. I had no business relationship
13 with him whatsoever.

14 Q Tell me about his store. Does he have one or
15 several or what?

16 A Well, he had several. They closed--- I think they
17 closed their store in Columbia, and I think they
18 closed the one in Greenville. I think he's losing
19 some money. I really don't know what's going on.

20 Q Do you have any idea of the number of his stores,
21 how many there were?

22 A At one time he had five or six. Now, he's closed
23 three in -- two in Columbia and one in Greenville.
24 I think he's closed the one in Greenville. I'm not
25 positive. I heard that. I know he's closed the two

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2 in Columbia. So that would put him down to one,
3 two in Florence, and, three, you've got one in
4 Myrtle Beach. Three.

5 Q There are three stores. What name do they go by?

6 A Well, he's got Robin's, which is a discount thing
7 like Joseph A. Banks, but it's a little lower class
8 clothes, and then he's got what they call Le
9 Masters, which sells things like Polo, that sort
10 of thing.

11 Q What is the name of that one again?

12 A Le Masters. And that one is in Florence.

13 Q When did you first become knowledgeable that
14 Congressman Tallon was interested in running for
15 the House seat of Mr. Napier?

16 A In 1981, sometime in September or October.

17 Q Under what circumstances?

18 A Well, he came to me and he said he didn't see how
19 he could win because of the numbers. He asked me
20 about the numbers.

21 Q Let me back that up. Was he formerly a Representative
22 in the South Carolina House of Representatives?

23 A He was at that time.

24 Q We're talking about 1981?

25 A Yes, sir. And he asked me about the numbers, and I

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2 said, "Listen," I said, "it's forty-four percent
3 black vote in this district." I said, "It's hard
4 for a Republican to win." I said, "John got in
5 because John Jenrette was in trouble and John
6 Napier is a fine fellow." I want to say this on
7 the record.

8 Q Well, I've got to put it on the record.

9 A I want to say this. John Napier is a fine person
10 and one of the closest friends I have, and at that
11 time Robin and I were close friends and John and I
12 were political allies.

13 Q Are you a Republican or a Democrat?

14 A I'm an Independent.

15 Q I just say that because Mr. Napier is a Republican.

16 A I probably vote Republican on the national level
17 and Democratic on the local level.

18 Q What do you mean by a political ally of Mr. Napier?
19 I don't understand the answer to that.

20 A Well, I mean he came to me and asked me would I
21 help him in the Congressional race, and I told him
22 I would.

23 Q This is Napier or Tallon?

24 A John Napier, the first time he ran.

25 Q That was in what year?

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2 A 1980. See, I knew him through Senator Thurmond.
3 He used to work for Senator Thurmond. That's how
4 I knew John.

5 Q Napier.

6 A And so--- And in '81 Robin approached me, and I
7 said, "Robin," I said, "seven percent of the
8 incumbent Congressmen get defeated." I said, "These
9 are the numbers. These are the figures. These
10 are true facts." I said, "Don't run." And he
11 made an announcement that he was not going to run.
12 I said, "John and those told me I could have this
13 appointment, but I'm not..."---

14 Q You're moving too fast for me now. You just said
15 that Robin came to you first.

16 A Right.

17 Q And you said that seven percent of incumbent
18 Congressmen don't get re-elected. Explain your
19 answer to me a little fully. I'm not sure---

20 A I read some figures where ninety-three percent
21 of incumbents in the United States Congress get
22 re-elected. So seven percent don't get re-elected.

23 Q I understand.

24 A And I was telling him that, see.

25 Q Telling Robin Tallon this.

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2 A Right. I was telling Robin Tallon, "These are the
3 numbers, and the numbers just don't look good," and
4 I said, "If you're not going to run, go ahead and
5 make the announcement now because you've got me in
6 one hell of a position," I said, "because John has
7 told me I could have this appointment if I wanted
8 it, and I would like to have it."

9 Q This is the appointment that you ultimately got?

10 A Right. And I said, "I'm not going to take the
11 appointment if you're going to run." I said, "It
12 wouldn't be right." And I took it, and then Harwell
13 was going to run, Hicks Harwell, and he got in some
14 trouble down here, you know, about some money and
15 all this kind of---

16 Q Let's get back into Mr. Harwell in a minute, but
17 let's go back to Mr. Tallon if I may. Did he make
18 a public announcement that he was not going to run
19 for Congress?

20 A A public announcement.

21 Q When was this?

22 A At the Quality Inn or--- It was the Holday Inn, I
23 believe, or it might have been a Quality Inn in
24 Florence sometime in the fall of that year. I think
25 it was in November of 1931. It was in October or

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2 November.

3 Q To your knowledge, when did he change his mind?

4 A To my knowledge, he changed his mind when Hicks
5 Harwell got in some problems up here. They claimed
6 that he gave some lady some money to vote for a
7 candidate -- Hicks Harwell was a House member -- to
8 vote for a candidate for the Board of the University
9 of South Carolina Representatives or something like
10 that. I don't know what it was about.

11 Q He was a House member, meaning the House of Representa-
12 tives for the State of South Carolina.

13 A Right.

14 Q Not the House of Representatives for the United States.

15 A Right. And that's when Robin decided he was going to
16 run. He said, "Hicks can't win," and he said, "John
17 can't get re-elected because of the numbers."

18 Q Now, we're talking about approximately what period
19 of time?

20 A Probably in March, I guess.

21 Q 1982?

22 A (Nods in the affirmative.)

23 Q If you nod, he can't get that on the record.

24 A Okay. Yes, I think it was approximately that. I
25 don't remember.

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2 Q Answer the question either yes or no. If you nod,
3 the reporter is in trouble. He can't record it.

4 A Right. I'm sorry. I'm sorry. I'm not familiar---
5 I've only done one of these things in a civil suit
6 that was---

7 Q I understand. It's human nature. So we're talking
8 now about March of '82. Did he come to you? That
9 is, did Mr. Tallon come to you?

10 A He called me up on the phone.

11 Q Tell me about that conversation.

12 A He telephoned me, and he said he thought he was going
13 to run, and Hicks was in this trouble, and he said,
14 "Do you think I can beat Hicks?" I said, "Yes, I
15 think you can beat Hicks." I said, "I think Hicks
16 has ruined himself politically." He said---

17 Q This incident with Mr. Harwell, did it make the
18 papers?

19 A Front page.

20 Q Front page in the Florence papers?

21 A Front page in Florence, The State, Greenville, every-
22 where.

23 Q And at that time Mr. Harwell was an announced candi-
24 date for the United States House of Representatives?

25 A He hadn't announced yet.

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2 Q He had not announced.

3 A He had not announced, but everybody assumed that he
4 was going to run, and when this hit the papers it
5 just killed him. He's a big, heavysset fellow, and
6 it just killed him, and Robin said, "He can't win,
7 and I think I'm going to run."

8 Q Did Mr. Harwell ever announce? Did he ever run?

9 A Yes, he did.

10 Q So he did become a primary opponent of Mr. Tallon.

11 A Yes, sir, that's right.

12 Q Now let's go back to Mr. Tallon's conversation with
13 you.

14 A I told Robin, I said, "Robin, Hicks can't win, and,"
15 I said, "I'm not so sure that John Napier can win,"
16 I said, "because of the numbers makeup. The numbers
17 just don't jive." I said, "You know, all you've
18 got to do is get twenty percent of the white vote
19 and you're in." You understand politics. I said,
20 "If you want to run, you go ahead and run," I said,
21 "but I'm not leaving from down here until after the
22 primary," I said, "because I don't know who's going
23 to be in the primary," and I said, "I'm going to stay
24 down here for a while."

25 Q "Down here." You mean---

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- 2 A In Atlanta.
- 3 Q So this was a telephone conversation you were having
4 with him from Atlanta to Florence.
- 5 A Right.
- 6 Q Were you living in Atlanta with your wife at that
7 time?
- 8 A No. I was coming home every weekend -- or three
9 weekends a month probably. Mr. Brown was from
10 Sumter, South Carolina. He used to be the Mayor of
11 Sumter in 1968. He was Regional Administrator for
12 HUD, and he's a kind of elderly man, and he and I
13 would ride back. See, I would just drive my car
14 like on a Friday afternoon and just drop him off,
15 and on Sunday afternoon I'd pick him up and we'd
16 go back. Sometimes we tried to work it where we
17 could be in Raleigh if we had business in Raleigh.
18 See, he was Chairman of the Federal Regional Council.
19 We'd go to Raleigh like on a Friday and then drive
20 back here and get to Florence at five or six o'clock,
21 which would work out fine.
- 22 Q When did Robin Tallon announce for the campaign in
23 1982 to your knowledge?
- 24 A I don't know that.
- 25 Q Would it be late March or early April?

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2 A It would have to be. He announced--- When is the
3 filing date? Is the filing date in April?

4 Q I don't know.

5 A I assume it would be March. I think he was the first
6 one to announce, and so I assume it would be March.

7 Q Did Harwell announce after him?

8 A Harwell announced--- He was the last one to announce.

9 Q Who else was in the primary?

10 A John Brasington.

11 Q Spell that for the reporter.

12 A I don't know how to spell it. B-r-a-s-i-n-g-t-o-n.
13 It seems to me that somebody else was in the primary.
14 I didn't know--- I didn't know who else was in the
15 primary. Yes, there was. It was Charles McGill.
16 He was in the primary. There was four people in the
17 primary.

18 Q Did you work for the Tallon for Congress Committee
19 in 1982?

20 A I never worked for the Tallon for Congress Committee
21 anytime during '82, anytime -- not anytime during
22 the year.

23 Q Did you volunteer any services to the---

24 A I made some calls for him.

25 Q You made some calls. Could you explain? Did you make

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those calls from Atlanta and to whom?

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A I made them to Senator McGill probably. He was probably one person.

4

5

Q Senator McGill?

6

A He's a State Senator. And I told him, I said, "Frank, I don't believe that John can win." They liked John Napier, see. I said, "I don't believe he can win." I said, "You don't want Brasington." I said, "You know you don't want Harwell." Is this a confidential deposition?

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Q Yes. Eventually it will go on the public record, but this is after the case closes.

13

14

A Well, I ain't getting sued for slander here, you know.

15

16

Q This is a---

17

A I said, "You know you don't want those people. They're questionable," but at that time I thought Robin said straight up, see, and I really thought he was my friend. And so Frank said--- I said, "Would y'all go with him?," and he said, "Well, what are you going to do? Is he going to give you a job in Washington?" He said, "Let me check him out."

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Q This is Mr. McGill.

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2 A Yes. He said, "I'll get B.J. Gordon, the black
3 Representative from the same county, Williamsburg
4 County, to check him out." So they went over there,
5 and they talked to him, and he said, yes, he'd give
6 me an administrative assistant's job in Washington
7 if he won.

8 Q Is Mr. Tallon telling this to McCoy?

9 A Mr. McGill.

10 Q McGill, rather.

11 A Right.

12 Q That you would have the administrative assistant's
13 job in Washington?

14 A And he told Representative Gordon that.

15 Q This is the black Representative from---

16 A Yes. And so this was after--- This was--- Let me
17 see. I'm getting my times mixed up now.

18 Q Do you want to take a break?

19 A And I said, "I'll resign the position and take my
20 chances because I've got enough farm income that I
21 could live on," and so Frank told me, he said, "Go
22 ahead. I think he'll do what he says he's going to
23 do." He said, "Go ahead and put in your letter of
24 resignation."

25 Q So you did that.

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2 A I did that.

3 Q What time of the year?

4 A July.

5 Q Of '82?

6 A Right. This was after the primary, now.

7 Q This was after the primary. But you just said that
8 you didn't work for him at any time during the year
9 of 1982. Did you work for him after the primary and
10 during the general?

11 A Well, what do you mean by work? I mean, what do you--

12 Q Did you volunteer? Were you at headquarters? Were
13 you paid?

14 A No, I wasn't paid. I mean, I went by headquarters
15 an hour a day, and I said, "Maybe y'all ought to go
16 see this person over here, and I'll go talk to the
17 fellow out here at this precinct for y'all." I mean,
18 no, I wasn't paid. I never got a dime from 'em.

19 Q But you did have the promise that you'd be his
20 administrative assistant.

21 A I did. He promised me that.

22 Q And did he give you that job?

23 A No, sir. And he told me that he would match my
24 salary that I was making in Atlanta, and he didn't do
25 that either.

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2 Q What job did he give you?

3 A Special Assistant.

4 Q Located in Columbia?

5 A Washington.

6 Q Were you in Washington, working in Washington?

7 A Yes, sir.

8 Q What dates?

9 A From January until July.

10 Q 1983?

11 A Yes, sir.

12 Q You left his employ at that point?

13 A I would have left before then. I'll tell you why I
14 didn't leave before then. My son, who goes to the
15 Lawrenceville School--- Have you ever heard of the
16 Lawrenceville School?

17 Q Where is it located?

18 A Four miles from Princeton.

19 Q No, I don't know of it.

20 A You've heard of Exeter and Andover?

21 Q Yes.

22 A The same difference. Anyway, he was -- I knew he was
23 going off to school the next year. He was going to
24 the Rectory School, which goes through the ninth
25 grade. It's a junior prep school. Real smart little

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2 kid. And I wasn't going to see him after he left,
3 and I wanted him to see Washington, and that's the
4 reason I waited as long as I did to leave, to bring
5 him up there and let him stay up there two or three
6 weeks and for us to go around.

7 Q What were your duties as Special Assistant?

8 A I didn't ever do anything. They froze me out
9 completely.

10 Q Did you report to the office every day?

11 A Yes. I was there at nine o'clock every morning
12 until five o'clock. I returned some calls to people,
13 you know.

14 Q Did you have any responsibilities as such?

15 A Well, my responsibility was to screen his calls and
16 talk to the people -- the political people in the
17 district as to what they wanted and to deal with
18 the Federal agencies because I had connections in
19 Atlanta. That was supposed to be my responsibilities.

20 Q Who was his administrative assistant?

21 A He did not have one at the time. He did not hire one.
22 He had a black girl who is now his administrative
23 assistant. She was Executive Assistant, and I was
24 Special Assistant.

25 Q What's her name?

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2 A Marva Smalls.

3 Q Spell that.

4 A S-m-a-l-l-s.

5 Q What's her first name?

6 A Marva, M-a-r-v-a.

7 Q In 1982 did you make any contributions to the Tallon
8 for Congress Committee?

9 A Yes, sir, I did.

10

MR. WHITEHEAD: Would you mark that for
11 identification as FEC Exhibit for Identification
12 Number 1?

13

FEC EXHIBIT #1 WAS MARKED FOR
14 PURPOSES OF IDENTIFICATION.

15

16 Q I show you what has been marked for identification
17 as FEC Exhibit Number 1, which consists of two sides.
18 It's a copy of the front of a check and a copy of
19 the back of a check in the amount of One Hundred
20 Dollars from R.P. Endless Endeavors, signed by a
21 Jan W. Pearce, Jr. Are you familiar with that hand-
writing?

22

A No, sir.

23

Q Have you ever seen this check before?

24

A No, sir.

25

Q Thank you very much.

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2 A I know who it is though.

3 Q Who is it?

4 A It's Rocky Pearce. He's the Mayor of Florence.

5 Q Do you have any familiarity as to the source of these
6 funds by Mr. Pearce?

7 A No, sir.

8 MR. WHITEHEAD: Would you mark this for
9 identification as FEC Exhibit 2?

10 FEC EXHIBIT #2 WAS MARKED FOR
11 PURPOSES OF IDENTIFICATION.

12 Q I show you what has been marked for identification as
13 FEC Exhibit 2, consisting of a front and a back of a
14 check dated 6/18/82, Check Number 334 on the account
15 of Gary Slavens, and there's a signature which
16 purports to be your signature. Is that indeed your
17 signature?

18 A Yes, sir, that is.

19 Q Was this a contribution that you made to the Tallon
20 campaign?

21 A Yes, sir.

22 MR. WHITEHEAD: I'll ask the court reporter to
23 mark that as FEC Exhibit 3.

24 FEC EXHIBIT #3 WAS MARKED FOR
25 PURPOSES OF IDENTIFICATION.

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Q I show you what has been marked for identification as
3 FEC Exhibit 3, which is the front and back of a check
4 drawn on the account of Gary Slavens, dated 7/30/82.
5 purported to have -- in the amount of A Thousand
6 Dollars, purporting to be the signature of Gary H.
7 Slavens. Is that indeed your signature?

8

A That was a loan.

9

Q This particular one was a loan.

10

A Yes, sir.

11

Q You realize a loan, of course, is a contribution
12 under the Act.

13

A Yes, sir.

14

Q You did know that at the time?

15

A Yes, sir. In other words, I'd have to eat it if they
16 lost the campaign.

17

Q But I mean it is a contribution just the same as
18 any cash contribution.

19

A Yes, sir, I know that. I mean, that's what Glenn
20 Odom told me.

21

Q Did you get any kind of a note for this loan?

22

A No, sir.

23

Q Was it an oral agreement that you'd be repaid?

24

A He told me, he said, "I'm just going to put this down
25 as a loan," and I said, "That's fine." He said, "And

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if we win and we raise the money, you'll get your money back." Glenn told me that, see.

Q Let's have that again. Mr. Odom told you this?

A Right.

Q Glenn Odom?

A They paid me back the money. The Tallon Campaign paid me back the money.

Q They paid you back the money for the---

A For this check and another check you should have.

Q ---for this check of 7/30/82. Right?

A I don't know when they paid me back, now, but they paid me back.

Q You were paid. This FEC Exhibit 3, the check dated 7/30/82, is in the nature of a loan. How about Check 334, FEC Exhibit 2, dated June 18? Was that a loan or was that a contribution?

A That was a contribution. See, at the time, Mr. Whitehead, I did not know you could make a loan.

Q I want to warn you that a loan is the same as a contribution.

A I understand that, but I did not know you could make---

I did not know you could make a loan and if the candidate won and he raised the money he could pay you back. I didn't know that, see, until Glenn told

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2 me. Glenn said, "Instead of you giving all this
3 money, if Robin gets elected, he's going to go to
4 Washington and he's going to raise some money, and
5 you can get your money back." He said, "There's no
6 sense in you doing this."

7 Q Did he tell you in any way--- Did he explain to you
8 or did you have any knowledge of the contribution
9 limitations that you could give to a candidate?

10 A Yes, sir, he told me that. He told me I could give
11 A Thousand Dollars and my wife could give A Thousand
12 Dollars. Is that correct? Is that true?

13 Q You can give A Thousand Dollars for the primary and
14 A Thousand Dollars for the general, in fact.

15 A And my wife can give A Thousand Dollars for each.

16 Q Yes, that's right.

17 A Yes, he explained that all to me.

18 Q Did he tell you that a loan was the same as a con-
19 tribution?

20 A Yes, he told me that. Right, he told me that.

21 Q So that means that you---

22 A In other words, I couldn't give up 'til three because
23 there was--- He said, "You can give one for the
24 primary, one for the runoff, and one for the general
25 election."

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2 Q Was there a runoff?

3 A Yes, sir.

4 Q There was a runoff in South Carolina?

5 A Yes, sir, between Tallon and Harwell.

6 Q Oh, I see. Okay. So there was an opportunity to give---

7 A Three.

8 Q ---three individuals.

9 A Right.

10 Q Which one of these checks was for the runoff?

11 A I believe it was the first check that's dated.

12 Q Okay, the---

13 A 6/18, is that the first check?

14 Q That's FEC Exhibit 2. Right?

15 A That's right. That's the first check. That's right.

16 The first check I gave him was a contribution. The
17 first check I gave him was a contribution.

18 Q Toward the runoff?

19 A Right. The last check---

20 Q Is that right? Is that correct?

21 A Yes, sir. The last checks I gave him--- The last
22 dated checks I gave him were the loans.

23 Q Now, let's introduce this, and we'll get the checks
24 in order so that we know what we're talking about.

25 MR. WHITEHEAD: This is FEC Exhibit 4.

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FEC EXHIBIT #4 WAS MARKED FOR
PURPOSES OF IDENTIFICATION.

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4 Q I show you what has been marked for identification as
5 FEC Exhibit 4, Check Number 445, dated 10/15/82,
6 on the account of Gary Slavens, which has what pur-
7 ports to be your signature on the back -- I mean on
8 the front, and it's a two-sided exhibit. Can you
9 identify that? Is that your signature?
- 10 A Yes, sir. I just happened to put "loan" on that one.
11 I didn't on the other one.
- 12 Q In connection with the 7/30/82 check, was that for
13 the primary?
- 14 A No, sir. What he did was--- Let me see. 7/30.
- 15 Q You want to get the dates straight.
- 16 A Here's what he was doing. He was going back. He
17 said, "You can go back and give it. You can give
18 it now. You can go back." Do you follow what I'm
19 saying?
- 20 Q No, I do not.
- 21 A This is what he was telling me, that I could---
- 22 Q Odom?
- 23 A Yes. He said that I could -- in other words, I
24 could go back---
- 25 Q Am I correct in saying "he" in this context is Glenn

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Odom?

A Right. Now, he was reading the rules. I didn't know the rules. He said, "You can go back and give this to the first election." In other words, I think the 6/18 might have been the runoff.

Q Did you write this on 6/18? Did you write the check on 6/18/82?

A I wrote the date of the check that it was dated. If it was dated 6/16, I wrote it on 6/16.

Q So you gave this check, FEC Exhibit 2, for the runoff. Is that your testimony?

A Yes, sir.

Q Now, the check of 7/30/82, was that for the primary?

A Let me see all three checks.

Q Certainly.

A I'm kind of confused.

Q I've given you FEC Exhibits 2, 3, and 4.

A All right, sir. 10/15. All right, this was the loan for the general election.

Q Witness is identifying FEC Exhibit Number 4.

A All right, this check was a contribution for the runoff, I believe. I believe that was for the runoff. I can't swear to that under oath, but I believe that was for the runoff.

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2 Q Well, I don't mean to--- This is your testimony, and
3 I don't want to interject, but--- Let's go off the
4 record.

5 (Off the record.)

6 Q Let's refer back to the check dated 6/18/82, which is
7 FEC Exhibit 2.

8 A That was a contribution for the runoff, I believe.

9 Q For the runoff, you believe. Taking FEC Exhibit 3,
10 which is the June check, what was this for?

11 A This was for--- He told me I could go back and make
12 this loan for the first race prior to the runoff.
13 He said I could give it now and make it retroactive.
14 Do you follow what I'm saying?

15 Q This is Mr. Odom telling you that.

16 A Yes, sir.

17 Q This was intended for a primary which had already
18 taken place.

19 A That's right. That's what he told me I could do.
20 Can I do that or not?

21 Q Well, I'm not going to give you a legal opinion
22 right here.

23 A Well, if I didn't know, I didn't have any intent.
24 I'm listening to him. This 10/15 was a loan for
25 the general election.

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2 Q So, in effect, you gave Three Thousand Dollars that
3 years, and there was a primary, there was a runoff,
4 and the general election, and, as I understand your
5 testimony, the check that was dated 7/30/82 was
6 intended to be retroactive to the primary.

7 A To the primary.

8 Q This is the instruction you got from Mr. Odom. Is
9 that correct?

10 A Yes, sir. He was the treasurer.

11 Q Yes, I understand that. And you stated in connection
12 with the two checks which are identified as Exhibits
13 3 and 4, these were intended to be loans and that
14 you were indeed repaid.

15 A Yes, sir, I was repaid.

16 Q Did Representative Tallon ever discuss campaign
17 contributions with you other than those?

18 A He discussed the one he said he got from "Bo" Stokes.

19 Q Tell me what he told you about the "Bo" Stokes
20 contribution.

21 A He said, "Gary," he said, "I don't know what to do."

22 Q What date is this we're talking about?

23 A Have you got a copy of Vicki's check? I'll tell you
24 the date. We tried to find it, and we gave the FBI
25 permission to go look for it.

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2 Q It's August 17th, 1982.

3 A Sometime he got--- This was like two days before
4 then or three days.

5 Q Let the record show--- Excuse me for interrupting
6 you. Let the record show that Mr. Slavens asked me
7 if I had the check from his wife, Vicki Slavens,
8 and, if I did, what date that was. I just told
9 him that the date of the check was August 17, 1982.

10 A See, I was in South Carolina then. This--- We're
11 still on the record. Can I talk just a minute?

12 Q Sure. Go right ahead.

13 A My conversation with "Bo" Stokes yesterday was
14 "Bo" said the reason that he didn't want to give
15 any money -- the reason he didn't give Robin any
16 money was because he was a close friend of Hicks
17 Harwell's. I said, "'Bo,'" I said, "they're going
18 to trip you up up there," I said, "because you didn't
19 give the money then. You gave it in the general
20 election, not the primary."

21 Q Excuse me for interrupting you, but is this the
22 conversation you had yesterday?

23 A Yes. I told "Bo," I said, "You'd better tell them
24 the truth, 'Bo.'"

25 Q Excuse me again. Did Mr. Stokes say something to you

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about his---

A No. He said, "I told my son-in-law to give the money because Hicks Harwell was a friend of mine. I didn't want to get into it with Hicks Harwell," but Hicks Harwell wasn't even in the race when that money existed. That was in August. The primary was already over in June. Do you see what I'm saying?

Q Okay.

A I mean, he's trying to lie around and do this and do that, you know, and I didn't even -- you know, I could have come up here and refused to talk to Henry or done anything else. Henry McMasters was the U.S. Attorney and was a friend of mine. He dated my wife. He knew that I was honest. He told me, he said, "Look here, I'm not going to do anything to hurt you. Vicki is not going to get hurt." She's a schoolteacher, and she's real fragile, you know. He said, "Just come in and tell me about it." What he was worried about was some vote-buying. See, y'all had an investigation into some things down in Williamsburg County which I have no knowledge of. I guess you do. Do you?

Q I'm not familiar with it. I don't know what you're speaking of.

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A Anyway, it came up somebody wrote a letter and there was an investigation and all that junk, and that's when Henry called me. He said, "Gary, would you know anything about anything?," and I told him that's the only thing I knew about was this thing at the time. I said, "Now, I heard a lot of things." But anyway, this check--- What happened--- Let's get back to this check.

Q We're talking about Vicki Slavens' check dated August 17, 1982.

A Right. When I gave this check--- What was the last check?

Q October.

A Wait a minute. Wait a minute. He said---

Q "He" is whom?

A Glenn Odom told me, he said, "Gary, you can give A Thousand Dollars and Vicki can give A Thousand Dollars." In other words, he said, "You can give up to Six Thousand Dollars if you want to." Is that correct or is that not correct?

Q Go ahead. You tell me what he told you.

A Well, I want to know if I'm right or wrong.

Q You're asking me for a legal opinion on the record. What I'm saying to you is I want to know what Mr.

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Odom told you.

A He told me that a wife could give A Thousand and a husband could give A Thousand.

Q That's right.

A In each race. So sometime--- What's the date on that check again?

Q Which check are we talking about now?

A Talking about Vicki's check.

Q August 17, 1982.

A All right. Sometime two or three days -- maybe two days prior to that or maybe it was the 16th -- I don't know what day it was -- Robin got the money from "Bo" Stokes. He told me he got it from "Bo" Stokes.

Q Robin Tallon told you that he received money from---

A One Thousand Dollars from "Bo" Stokes. He said, "Gary, we've got problems with the phone bills, with the electric bill and everything down here. I've got to get some money to campaign. How can I do it?" I said, "Well, just go ahead and give me the money, and I'll tell Vicki to write a check for A Thousand Dollars," and so Vicki thinks that that's my money. She never knew the difference. I said, "You can do that, Vicki." I said, "Glenn

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EXHIBIT 115

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Odom said that you could write a check for A Thousand Dollars whether I give it to you or not. It's our money."

Q But it was in her account.

A Right. I put it in her account. I put it in her account.

Q Did you physically get cash from Mr. Tallon?

A I made a cash deposit in her account.

Q It was a cash deposit.

A I made the deposit, I believe.

Q Do you have the deposit slip with you?

A No, sir.

Q So in and around August 16th---

A We looked---

Q Let me finish my question. I just want to make the record clear, and correct me where I'm wrong. In and around or on or about August 16th or the 15th, Representative Tallon gave you A Thousand Dollars in cash.

A That's correct.

Q Do you recall what denomination of bills?

A One Hundred Dollar bills.

Q Ten One Hundred Dollar bills.

A That's right.

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And asked you to get this into the campaign.

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No. He asked me this. He said, "Gary, how can we get this into the campaign?" He said, "We've got to pay telephone bills. We haven't got any money. We're short on money." And I said, "Well," I said, "I've already given you, Robin." I said, "Vicki can give you A Thousand Dollars." I said, "Glenn told me that I could give A Thousand and Vicki could give A Thousand. So I'll just let Vicki give A Thousand Dollars."

Q

So then what did you do?

A

And Vickie said, "Are you sure I can do this?," and I said, "Yes."

Q

You took the Thousand Dollars from Congressman Tallon?

A

Yes, and I told her to write a check for A Thousand Dollars, and I said, "I'm putting A Thousand Dollars in your account," and wrote out a deposit slip. I don't know whether she wrote the deposit slip or I wrote the deposit slip. I can't remember. I put it in her account, and she wrote a check, and I took it down there and gave it to Glenn Odom.

(Break.)

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She thought that the Thousand Dollars was my money, see. I said, "I've got to give Robin another Thousand

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2 Dollars, and," I said, "I can't do it because I'm
3 going to give him some more on down the road," but
4 I said, "Together we could give him Two Thousand
5 Dollars apiece by what Glenn Odom told me." I said,
6 "Those are the rules in my understanding." And so
7 she thought that she was giving him A Thousand Dollars
8 and I was giving him A Thousand Dollars is what she
9 thought.

10 Q But yet she knew that it was your money.

11 A Yes, that it was my money.

12 Q Let the---

13 A My money and her money are the same money though.

14 Q But they were two separate accounts.

15 A Yes, but that's--- We had IRAs and stuff together.
16 We had joint house together and all that. That's
17 not---

18 MR. WHITEHEAD: Mark this for identification
19 as FEC Exhibit Number 5, I guess.

20 FEC EXHIBIT #5 WAS MARKED FOR
21 PURPOSES OF IDENTIFICATION.

22 A First of all, let me tell you something. My wife is
23 a very, very nice person, Tom, and she---

24 Q I'm not disputing that.

25 A I mean, she's been president of everything in Florence.

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She wouldn't do anything wrong. She's president of Friends of the Museum. She's been on the Junior Welfare League. And she just wouldn't do anything wrong, I can tell you that. I mean, even if we get a divorce I'd tell you that.

Q Let me show you what has been marked for identification as FEC Exhibit Number 5, which is a Check Number 2883 drawn on the account of Vicki Slavens, spelled V-i-c-k-i, dated August 16th -- I'm sorry, dated August 17th, 1982, in the amount of One Thousand Dollars, payable to Tallon for Congress, and it's signed by what purports to be the signature of Vicki Slavens.

A That's her signature.

Q Are you familiar with that signature?

A Yes, sir.

Q That is her signature?

A She handed me the check, yes, sir.

Q This is the check that we have been discussing previously.

A Yes, sir.

(Break.)

Q Is it your testimony that you deposited the One Thousand Dollars received from Congressman Tallon

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into your wife's checking account?

A In cash. I think she did or I did, but I think I did it because I think she told me, "You'd better put this money in." She's pretty--- She's thorough.

Q And is it your testimony that she did indeed write the check which has been identified as FEC Exhibit Number 5---

A Yes, sir, she did.

Q ---on the basis of having the Thousand Dollars in her account?

A Right, which she thought was our money. Let me say this. Like our IRA money, I put up the IRA money for her, see, our IRA accounts.

Q She pays for it out of her account.

A No. I pay for it out of my account. I mean, it's our money. I consider what's ours as ours.

Q Why did you have it put into her account on this particular occasion?

A Because I couldn't sit there and write three checks on my one account.

Q Four checks.

A Yes, four checks. Right, four checks.

Q Forgetting yesterday's conversation with Mr. Stokes, did you have a previous conversation with Mr. Stokes

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about this Thousand Dollars?

A Yes, sir.

Q When was this?

A I do not remember.

Q What year?

A When all this stuff came up.

Q That doesn't tell me. What year was when all this---

A I don't remember.

Q What do you mean by "that stuff?"

A When it came up, and I said, "'Bo,' go up there and tell them the truth," and I said, "They're probably going to fine the campaign Four or Five Hundred Dollars for violations," I said, "but don't go lie." He said, "I didn't give him any money." He stutters kinda. He's tied-tongued, and he said, "I didn't--- I didn't do that." I said, "'Bo,' you told me later you did." I said, "You said you had helped Robin."

Q Let's fix the conversation. I'd like to get some dates on this. Forgetting yesterday's conversation which we have discussed in some detail, when did you discuss the Thousand Dollars with Mr. Stokes?

A Right after they wrote me a letter and---

Q Who are "they?"

A You.

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Q The FEC?

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A Yes.

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Q The Federal Election Commission.

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A They wrote me a letter, and I went to see John Napier,
and he called Judge---

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Q Schoener.

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A Schoener. He called up Jim Schoener, and he told
him, he said, "Well, that's not a real big thing."
He said, "We can get an affidavit." He said, "They
probably won't even fine you for that." That's what
he said. He said, "It's not a real big thing."

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Q I don't want to hear about your conversations with
your attorney. That's confidential information. I
really don't care about that, but what I'm saying to
you is, I'm trying to place in time when you dis-
cussed it with Mr. Stokes. Now, was it after---

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A Well, tell me when I got the letter. I don't know
when I first got the letter. If you could give me
some dates, I could---

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Q I'll be happy to find you that date.

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A But I can't---

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Q I understand. I understand.

23

A First of all, I'm taking Tagamet, and it makes you
forget, to start off with. I just got out of the

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2 hospital Monday, Mr. Whitehead.

3 Q Is that right? I'm sorry to hear that.

4 A I was in there a week. That was Tuesday. I was in
5 there six days. I believe I went in Tuesday or
6 Wednesday.

7 Q I would guess that you got the letter sometime in
8 late August of 1985.

9 A Well, that's when I discussed it with him, sometime
10 during that time.

11 Q With Mr. Stokes.

12 A Yes.

13 Q Tell us that conversation. What was that conver-
14 sation all about?

15 A I just told him, I said, "'Bo,'" I said, "they're
16 asking me about this Thousand Dollars, and," I said,
17 "now, that was not mine and Vicki's money. It was
18 your money, and Robin told me it was your money."
19 He said no, that he didn't give him any money. He
20 said he told his son-in-law to give him some money.
21 So he stuck to that story all the time, and I know
22 it's untrue, and when you talk to him you're going
23 to know it's untrue.

24 Q Where was the conversation held? Do you recall?

25 A I think it was probably over the phone really.

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2 Q You called him or he called you?

3 A I called him probably. I told him I was going to tell
4 them the truth, and I said, "The best thing for you to
5 do is just go ahead and tell them the truth, and if
6 they fine the campaign or if they fine me Three OR
7 Four Hundred Dollars, Five Hundred Dollars or whatever,
8 that's fine." I said, "But it's not fair..."---

9 Q Just repeat one more time. What did Mr. Stokes say
10 at that time?

11 A He said he told his son-in-law to give Robin some
12 money, but he didn't know whether he ever gave it
13 to him or not.

14 Q Is this the same story he told you yesterday morning?

15 A Same story. He's sticking with the same story.
16 Y'all will trip him up. I'm going to tell you how
17 you're going to trip him up. He's going to start
18 talking about the primary and Hicks, and that check
19 is dated in August. The primary was already over.

20 Q Are you acquainted with Mr. Pearce, the Mayor of
21 Florence?

22 A Not that well.

23 Q Are you aware of any contributions that Mr. Pearce
24 made to Tallon?

25 A I heard he made some.

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Q You heard. Who did you hear that from?

A I can't remember who I heard it from.

Q Did you hear anything from Mr. Pearce himself?

A No, sir.

Q Did Mr. Tallon say anything to you about Mr. Pearce's contribution?

A No, sir.

Q Did Mr. Odom say anything to you about a Pearce contribution?

A No, sir.

Q Did anyone connected with the organization---

A Somebody did, but I can't remember who it was.

Q Let me finish my question. Did anyone connected with the Tallon for Congress Committee discuss a contribution by Mr. Pearce to Tallon for Congress?

A I think Jeff Lee.

Q Jeff Lee. Further identify Mr. Lee.

A He's District Administrator for Robin.

Q District Administrator for Mr. Tallon?

A Now, yes.

Q Was he active in the campaign?

A I thought he was the campaign manager, but they had somebody else running it, some fellow from Virginia. See, I was not a volunteer. I'd go by the office

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2 probably for one hour a day, generally just to have
3 something to do, and then I would go to the stock
4 market, and they would call me down there and ask me
5 about some fellow down there that I knew because I
6 had run some campaigns before.

7 Q What campaigns were those?

8 A Ran Senator McGill's campaign, Senator Ellis'
9 campaign, Judge Wallace's campaign.

10 Q These were local South Carolina campaign?

11 A Yes, sir.

12 Q Did you run them?

13 A Yes, sir, I ran them. I ran Judge Anderson's campaign.
14 I ran Judge Cottingham's campaign for Circuit Judge-
15 ship. John Napier and I ran that campaign together.
16 These are three Circuit Judges. I was a strategist
17 for it. Let's back up and say I was a strategist,
18 but, you know, when you've got two people--- You
19 know what I'm talking about.

20 Q Is it your testimony that you were involved in the
21 campaigns of the individuals you've so mentioned.

22 A Right.

23 Q Along with former Congressman John Napier. Is that
24 right?

25 A Right. Judge Cottingham's.

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Q Were you a paid---

A No, sir. I've never been paid to run a campaign.

Q So you've had an interest in politics for a lot of years.

A Until the last year and a half.

Q Well, I'm talking about previous to that. When did you start into---

A 1972.

Q 1972. You've been involved in politics since that time?

A Right.

Q Are there any other names that come to mind in connection with political activities?

A As I said, Ralph Ellis, Johnny Wallace, Frank McGill.

Q Too fast. Don't go too fast.

A Okay. He's a Circuit Judge now, too. He was a Senator. He's a Circuit Judge. Frank McGill, State Senator; Ralph Ellis, who's a former State Senator. He did not seek re-election.

Q Okay, that's fine.

A He served two terms.

Q Did you personally see any contributions from Mr. Pearce to the Tallon Campaign?

A No, sir.

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- 2 Q Did you accept any contributions?
- 3 A No, sir.
- 4 Q Did you receive any contributions from Mr. Pearce?
- 5 A No, sir.
- 6 Q Are you familiar with Ed Saleeby?
- 7 A Ed Saleeby? Yes, sir.
- 8 Q Tell me the basis for that familiarity or that
- 9 acquaintanceship.
- 10 A Because he is in the Senate and I ran those Senate
- 11 campaigns and I know him from being in the Senate.
- 12 He lives about twenty-five miles from where I live.
- 13 Q You ran a Senate campaign? I'm sorry.
- 14 A These Senators were in the Senate.
- 15 Q So that's how you're familiar with him.
- 16 A That's how I'm familiar with Senator Saleeby.
- 17 Q Are you aware of any contributions from Senator
- 18 Saleeby to the---
- 19 A I never saw any.
- 20 Q You never saw, accepted or received any contributions
- 21 from him?
- 22 A (Nods in the negative.)
- 23 Q Okay.
- 24 A Never asked him for any.
- 25 Q You neither saw, accepted nor received any contributions

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from Saleeby to the Tallon Campaign.

A No, sir. I never solicited any campaign contributions except one time.

Q And that was the incident that you have talked about.

A When I told you that we were at a Democratic some kind of meeting and walked outside and I told Senator Tom Smith, I said, "If y'all haven't given anything, why don't y'all loan Robin Three Thousand Dollars?" Charles Godwin loaned him Three Thousand Dollars. Tom Smith loaned him Three Thousand Dollars.

Q A little too fast now. Let's get back on this. When did this take place? And tell me what exactly happened and when did it take place.

A Well, Robin came to me at this meeting and he said---

Q What meeting?

A It was a Democratic meeting in Florence.

Q What date?

A Mr. Whitehead, I can't remember that date.

Q Well, I know. I'm trying to get it for the record. Would it be in April, May, June?

A It should have been in October.

Q Of 1982?

A It should have been September or October.

Q 1982.

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2 A It was some big Democratic rally which I went to.
3 They had me out there, and Robin said---

4 Q It was in Florence?

5 A It was in Florence, at the Armory. Robin said,
6 "Gary, we don't have the money to get on t.v."
7 I said, "Well, maybe we can get three or four people
8 to loan you Three Thousand Dollars because Glenn said
9 you could go back retroactively with a loan." So
10 Tom Smith agreed to do it. I went to---

11 Q Say that name again.

12 A Tom Smith. He's a State Senator.

13 Q S-m-i-t-h?

14 A Yes, sir.

15 Q Go ahead.

16 A And Charles Godwin, who used to be a former -- is
17 an attorney in Lake City, who used to be a former
18 Representative, agreed to do it. They would pay them
19 back.

20 Q How do you spell his name?

21 A G-o-d-w-i-n, Charles Godwin. And he agreed to do it.
22 I went to Lake City and picked his check up. Tom
23 carried his check to them. I went to his office
24 and---

25 Q When you say "his office," who do you mean?

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A Charles Godwin's office.

Q You went to Charles Godwin's office.

A In Lake City, South Carolina.

Q Lake City, South Carolina. After the October meeting at the Armory, when you picked up his check physically,

A Right. I rode down there and asked him would he do that, and I said, "I think he's going to win," I said, "There's too much black vote. They're turning them out." I said, "I think he's going to win," and I said, "Would you loan him Three Thousand Dollars?" I said, "If you could give him anything, would you loan him that?" I said, "Glenn said you could go back retroactively."

Q Okay. Go ahead.

A And so I believe he gave a check for Three Thousand Dollars.

Q Did you physically see the check for Three Thousand Dollars?

A I brought it back to the campaign headquarters.

Q But it was for Three Thousand Dollars. That's your recollection.

A I believe that's my recollection, unless he had took some interest out. They might have taken some interest out. He got it from the bank. He told his girl to go

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2 down there and sign a note or tell them to fix
3 a check for Three Thousand Dollars at the bank or
4 something. I can't remember.

5 Q What's his name again?

6 A Charles Godwin.

7 Q Charles Godwin.

8 A If you'll tell me what date, if you've got it in
9 there---

10 Q Well, that's what I'm trying to find. I don't have
11 all of the--- Is that G-o-d-w-i-n? Right?

12 A Yes, sir. Charles E. Godwin.

13 Q You're talking about October. Right?

14 A Yes, sir. Now, it could have been September, but I
15 believe it was October. It's got to be in there.

16 Q Let the record reflect that I am perusing some receipt
17 records obtained from the Tallon for Congress
18 Committee.

19 A Because they paid him back.

20 (Off the record.)

21 Q Let the record reflect that, while looking through
22 the receipts records of the Tallon for Congress
23 Committee through October 23, 1982, I was unable to
24 find any receipt for a Three Thousand Dollar check
25 from Charles E. Godwin in and around that date.

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2 Let the record further reflect that I do not have
3 any receipt book for dates after October 23, 1982.

4 A Wait a minute. Could I ask you a question? We're
5 still on the record. Do you see a receipt for Tom
6 Smith? I think they both occurred at the same time.
7 Did you see one for him while you were in there?

8 Q Well, I don't know. I wasn't looking for Tom Smith.
9 I was looking for Charles Godwin.

10 A Well, both of them did the same thing.

11 Q Did you pick up the Smith check?

12 A No, sir.

13 Q You did not. What was Tom Smith's position?

14 A He's a State Senator and an attorney and a farmer.
15 Tom offered to come down here with me this morning.

16 Q Let the record show that on October 18, 1982, there
17 is a cash receipt in the amount of Two Thousand,
18 Eight Hundred and Eighty Dollars for Thomas E.
19 Smith, P.O. Box 308, Pamplico, South Carolina,
20 and that the record entry is 029982 and that the
21 receipt reads "loan of One Thousand for P/One
22 Thousand for RO and Eight Eight eighty for
23 G."

24 A See, what he did, see, he was going back.

25 Q It's signed by C. Collins.

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2 A C. Collins is the fellow that he got it from at
3 the bank. He just endorsed it. Tom endorsed probably
4 the back of the check over to them, see. See, he
5 went to the bank and borrowed the money and took the
6 interest out is what he did probably. I think
7 Charles did the same thing, if my memory serves me
8 correct. The other one could have been two or three
9 days after that.

10 (Break.)

11 Q The last testimony had to do with checks received
12 from Charles E. Godwin by you in October of 1982.

13 A And I think he might have done the same. I think he
14 might have taken the interest out, too. I can't
15 remember whether--- I remember he told his
16 secretary to tell that fellow to make a note of it
17 and bring it up there and he'd sign it, and the
18 fellow from the bank, his office is like from here
19 to the Russell Building to the bank, and I think
20 somebody might have brought the note and the check
21 up there with the interest taken out, and I think it
22 might come out the same thing like the other. I
23 think that's right, now. I believe that's right.

24 Q Were there any other names in connection with that
25 particular transaction?

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- 2 A No, I can't remember any.
- 3 Q So you're talking about Mr. Godwin and Tom Smith.
- 4 A Right.
- 5 Q And you've identified the receipt of Mr. Smith's
- 6 check.
- 7 A And my understanding is they've paid them back.
- 8 Q It's your understanding that the campaign paid back---
- 9 A It's my understanding. I heard that. I don't know.
- 10 I mean, I have no facts of that.
- 11 Q Tell me are you familiar with Jimmy Brown?
- 12 A Yes, sir.
- 13 Q Tell me what is the basis of your familiarity with
- 14 Mr. Brown.
- 15 A He's a friend of mine.
- 16 Q He lives in Florence?
- 17 A Yes, sir. He's the one that started the thing off.
- 18 Q What do you mean, "he started the thing off?" Could
- 19 you explain what you mean by that?
- 20 A Draft Robin Tallon movement for Congress.
- 21 Q Do you know this from personal experience?
- 22 A Yes, sir.
- 23 Q Explain that for me if you will for the record.
- 24 What date? Approximately what date?
- 25 A I think this was sometime the first of '82. Jimmy

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Brown---

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Q January or February?

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A Yes, sir.

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Q Was it called the "draft Robin Tallon---"

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A Right. He started it. That's the way he started

7

that, "draft Robin Tallon."

8

Q Committee?

9

A Yes, sir.

10

Q You think this was around February or March of '82?

11

A Yes, sir. I'm trying to help you a little bit, too.

12

Q That's fine. I appreciate the help.

13

A Do you know fellow Mark Stroman? Have you heard his name?

14

15

Q I've heard his name, yes. I know the name. Tell me about him. Well, we'll get to Stroman later. That's S-t-r-o-m-a-n.

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18

A Yes, sir. He lives in Charleston. He works for Blue Cross-Blue Shield, I think.

19

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Q This "draft Robin Tallon committee," did that have any organization to you knowledge?

21

22

A I don't know anything about the thing. All I know is Jimmy did that, that's all.

23

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Q Did you have banners or stickers or---

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A I don't even know because I was in Atlanta.

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2 Q So you don't know.

3 A I don't know. I just know they were forming this
4 thing, draft Robin Tallon.

5 Q How did you get to know this?

6 A How did I get to know this?

7 Q How did you get knowledge of it?

8 A Either Robin or Jimmy told me, one of the two.

9 Q When you came home on a weekend? Is that what you're
10 saying?

11 A That's right. They were going to handle it that way
12 because they didn't want Hicks, see.

13 Q That's Hicks---

14 A Harwell.

15 Q ---Harwell, okay. Was Jimmy Brown active in the
16 campaign?

17 A Very active. He knew everything that went on.

18 Q Was he a paid---

19 A No, sir, but he knew everything that went on. He
20 was a confidante, whatever you call it. He knew
21 everybody that made a contribution. He has told me
22 some things that I probably shouldn't even repeat
23 because it's hearsay.

24 Q No. Go ahead.

25 A Well, somebody could read my record, and if it's not

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2 true I'm going to get sued for slander. I'll let
3 him tell you. He'll tell you everything. If it's
4 not true, there's some lawyers involved in it, and
5 I could get a big lawsuit, because I wasn't there.
6 Jim was there every day. I was the one that told
7 Mr. Toby about Jimmy Brown.

8 Q I understand.

9 A I told him to talk to Jimmy, that Jimmy knew more
10 about it than I did.

11 Q Are you familiar with the name Conyers O'Brien?

12 A Yes, sir.

13 Q Do you have any knowledge about him giving any cash
14 contributions?

15 A No, sir. I don't know him except when I seen him.
16 Never been to his home. Never talked to him on the
17 phone.

18 Q Are you familiar with the name Edward Floyd -- C.
19 Edward Floyd?

20 A Yes, sir. I've been in his home before. He's a
21 surgeon.

22 Q Do you have any knowledge of him giving any cash
23 contributions into the campaign?

24 A No, sir. I think he gave a contribution.

25 Q Do you have any knowledge?

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2 A No, sir. I mean, I think he gave a check. Somebody
3 told me he gave a---

4 Q Did you see the check?

5 A No, sir. I don't have any knowledge of that.

6 Q Are you familiar with the name David Keller?

7 A Yes, sir.

8 Q What's the basis of your familiarity with him?

9 A He's an attorney in Florence.

10 Q Is he a personal friend?

11 A No. He was in the House of Representatives. We
12 aren't friends. I mean, we're not social friends.

13 Q Acquaintances?

14 A Yes, acquaintances. I mean, I like him.

15 Q Do you have any knowledge of Mr. David Keller giving
16 any cash contributions into the Tallon for Congress
17 Committee?

18 A Not of my own knowledge.

19 Q You have no personal knowledge of him giving any.
20 Right?

21 A Nothing but hearsay.

22 Q Let's go back to Mr. Stroman, which I believe is
23 spelled S-t-r-o-m-a-n.

24 A That's right.

25 Q Tell me what you know about Mr. Stroman and his

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2 connection with the Tallon for Congress Committee.

3 A Well, that's where I first met the boy. He graduated
4 from Clemson, and he wanted a job, and so I think
5 they gave him a job driving a car.

6 Q Driving a car for whom?

7 A For Robin Tallon. He drove him everywhere he went.

8 Q During the campaign?

9 A Right.

10 Q Was he paid?

11 A He was paid.

12 Q Was it you that was instrumental in getting the job
13 or was it---

14 A No, no. I didn't even know him. I didn't even know
15 the boy. He's a very nice boy. He's a very nice
16 boy. And he told me, he said, "Gary, some things
17 aren't right in this thing." I said, "What do you
18 mean?" He said, "Well, there's just some things
19 that aren't right." He never would tell me. He
20 said, "I see some things I don't like." I said,
21 "Well, Mark, if you see some things you don't like,
22 you ought to get out of it." He said, "I'm not so
23 sure about this," and he never did tell me what it
24 was. I don't know whether they were getting some
25 cash or what they were doing or anything. The FBI

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took a statement from him, he told me. He told me he told them the truth.

Q That's all you know about Mr. Stroman? Is that right?

A Yes, sir.

Q Okay, fine. Is there anything you want to add to the deposition, Mr. Slavens?

A Well, I've told it like I saw it, like I feel like is right.

Q Okay, good.

A If you were to call my wife, if you'd be kind enough to let her -- I'll get an attorney and let her just send you an affidavit.

Q Well, we'll see what develops. I can't give you definite word as to what's going to happen here and now. She may be outside. I don't know.

A But I'd appreciate one thing. I'm really trying hard to get back with her, and we're going to counseling, and I'd appreciate it if you'd handle it gently.

Q Right.

A I know you're not a marriage counselor, but---
(Off the record.)

MR. WHITEHEAD: That concludes my questioning of Mr. Slavens at the present time. However,

I am not going to close the record at this time on the possibility that there may be further information needed from Mr. Slavens, but let the record reflect that we ended the deposition at approximately eleven o'clock.

DEPOSITION ADJOURNED.

(Signing waived.)

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20463, who shall retain the said deposition in his possession and become custodian thereof until such time as it shall be needed at trial.

I do further certify that I am not of counsel or attorney for any of the parties to the said action nor in any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 28th day of May, 1986.

Eric B. Gore
Eric B. Gore

Notary Public for South Carolina

My Commission expires: 4/28/87.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
)
Gary H. Slavens, et al.)
)
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Office of the
GENERAL COUNSEL

DEPOSITION OF VICKI SLAVENS

Deposition of Vicki Slavens, scheduled to be commenced at the hour of 11:15 a.m., on Thursday, May 22, 1986, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Subpoena.

APPEARANCES:

Thomas J. Whitehead, Esquire,
Assistant General Counsel,
Federal Election Commission.

No appearance by Deponent.

Eric B. Gore, Reporter.

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ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO. S.C. 29063

(803) 781-1400

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STATEMENT FOR THE RECORD

MR. WHITEHEAD: Let the record reflect that Mrs. Vicki Slavens, V-i-c-k-i S-l-a-v-e-n-s, was subpoenaed by the Federal Election Commission to appear in Columbia, South Carolina, at the U.S. Attorney's Office on May 22nd, 1986, to give testimony in MUR Number 2071. Let the record further reflect that the subpoena was issued by the Commission, was sent to her home address return receipt requested. Let the record further reflect that we have not received the return receipt from her. Let the record further reflect that Mrs. Slavens' testimony would have been in connection with a contribution to the Tallon for Congress Committee made by her on August 17, 1982, in the amount of One Thousand Dollars, drawn on her account in the C & S Bank in Florence, South Carolina, as reflected in her Check Number 2833, as evidenced by FEC Exhibit 5 included in the deposition testimony of her husband, Gary Slavens. Let the record further reflect that this deposition remains open until further notice.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
)
Gary H. Slavens, et al.)
)
_____)

DEPOSITION OF G.B. STOKES

Deposition of G.B. Stokes, taken before Eric B. Gore,
a Notary Public in and for the State of South Carolina,
commencing at the hour of 9:24 a.m., on Friday, May 13,
1936, at the U.S. Attorney's Office, 1100 Laurel Street,
Columbia, South Carolina, pursuant to Subpoena.

APPEARANCES:

Thomas J. Whitehead, Esquire,
Assistant General Counsel,
Federal Election Commission.

David Stanton, Esquire,
appearing on behalf of
Deponent.

Eric B. Gore, Reporter.

ANNETTE B. GORE

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GENERAL COUNSEL

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STIPULATIONS

It is stipulated by and between counsel for the respective parties that all objections are reserved until the time of trial, except as to the form of the question. The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

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Direct Examination by Mr. Whitehead-----	3
Cross Examination by Mr. Stanton-----	26
Redirect Examination by Mr. Whitehead-----	27
Certificate of Notary Public-----	32

EXHIBITS

(There are no exhibits to the deposition.)

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2 WHEREUPON,

3 G.B. STOKES, HAVING BEEN DULY SWORN AND
4 CAUTIONED TO SPEAK THE TRUTH, THE WHOLE
5 TRUTH, AND NOTHING BUT THE TRUTH, TESTIFIED
6 AND DEPOSED AS FOLLOWS:

7 DIRECT EXAMINATION BY

8 MR. WHITEHEAD:

9 Q Could you state your name, address -- that is home
10 address and then business address and telephone
11 number both if you will for the record?

12 A My name is G.B. Stokes, Jr. I live at 1000 Third
13 Loop in Florence, South Carolina. My home phone
14 number is 662-0740. My office number is 662-3291.

15 Q What is your occupation, Mr. Stokes?

16 A I'm in the hotel/motel business.

17 Q Just exactly what do you do in the hotel/motel busi-
18 ness?

19 A I own and operate Howard Johnson's in Florence,
20 South Carolina, and several other small businesses,
21 service stations, gift shops, this kind of thing.

22 Q In Florence?

23 A Yes, sir.

24 Q And is that Howard Johnson's a hotel in the city?

25 Is that a franchise operation?

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2 A Yes, a franchise operation. Yes, sir.

3 Q And you own the franchise for the Howard Johnson's
4 in Florence?

5 A Yes, sir.

6 Q And you're represented here today by counsel.

7 MR. WHITEHEAD: Would counsel identify himself
8 for the record, please?

9 MR. STANTON: My name is David Stanton, and
10 I'm an attorney from Florence, South Carolina.

11 MR. WHITEHEAD: Let the record reflect that
12 Mr. Stanton has informed us that Mr. Stokes
13 has no documents to produce at this time
14 pursuant to the subpoena, that there were
15 none in existence that fit the various speci-
16 fications of the subpoena. Is that right,
17 Counsel?

18 MR. STANTON: That's correct.

19 Q Have you been involved in a deposition before, Mr.
20 Stokes? Have you had your deposition taken in any
21 other proceeding?

22 MR. STANTON: You mean in relation to this
23 or at any time in his life?

24 Q At any time.

25 A I'm sure I probably have over the years, but I don't

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recall exactly when and where.

Q Let me explain it. I will ask questions, and I'll anticipate answers from you. If you do not understand any of my questions, please tell me you do not. I'll rephrase the question until you do understand.

A Fine.

Q If you answer the question, I'm under the assumption that you understood the question as I posed it.

A Fine.

Q Thank you. Mr. Stokes, did you refer to any documents prior to coming here this morning in connection with this particular matter?

A No, sir.

Q You did not. Did you discuss this case outside of discussions with counsel with anyone?

A Yes, sir.

Q Who was that?

A Gary Slavens.

Q When was that?

A Day before yesterday morning, in the coffee shop in Florence.

Q Could you tell us what was discussed? What was said by Mr. Slavens and what was said by yourself?

A He just informed me that he had--- It's sorta detailed,

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but I'll go into it the best that I can.

Q Give me your best recollection of what happened.

A Okay.

MR. STANTON: If we could set it up first,
Mr. Stokes, if you would state for the record
who approached whom and where you were.

Q That's fine.

A My normal procedure is to go to the Eat More Lunch
every morning. I usually go to my business first and
then go to the Eat More Lunch, which is back downtown,
and drink coffee with some friends of mine. We've
been doing it for years. I walked in the Eat More
Lunch, and Gary Slavens was sitting in a booth, and
he asked me to come and sit with him, which I did.

Q Did anyone join you in that booth?

A No, sir.

Q It was just the two of you?

A Just the two of us.

Q And this was two days ago. That would be May the 21st,
I believe.

A Yes, sir. He said that he had--- He said, "You're
going up there--- Are you supposed to go Friday
morning to give a deposition?," and I said, "Yes,
I am." He said, "On this allegedly giving money to

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2 a Congressional candidate, to Robin Tallon," maybe
3 he said. I don't know. I don't remember the exact
4 wording he used. And we talked. He said, "Be sure
5 and tell the truth up there." He said, "You know,
6 perjury is a bad thing." I said, "I have nothing to
7 tell but the truth." He said, "Well, it looks like
8 we're going to have conflicting testimony." I said,
9 "Sir, all I can tell you is I'm going to tell what
10 happened," and that's about the crux of the matter
11 as to what we talked about. I don't remember every
12 detailed bit of the conversation.

13 Q What contribution was he referring to to your
14 recollection, to the best of your knowledge?

15 A He was referring to the fact that he had made the
16 statement that I had given a Thousand Dollar contri-
17 bution in cash to Congressman Tallon.

18 Q He made that statement to you---

19 A Yes, sir.

20 Q ---the day before yesterday. Has he made that
21 statement or any statement pertaining to this matter
22 to you previous to that?

23 A Yes, sir.

24 Q When was that and under what circumstances and what
25 was said?

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- 2 A It was after I received a letter from--- It was
3 after I received a letter from the Elections
4 Commission in reference to the fact, and it was
5 after an FBI agent came by the office and spoke with
6 me about it.
- 7 Q How long ago was this in time, especially the FBI
8 agent?
- 9 A Gosh, I don't know when it was. I guess it's been
10 eight or ten months ago or something like this.
- 11 Q This is the FBI agent.
- 12 A Yes. It's been quite a while.
- 13 Q I take it the Election Commission letter is the
14 letter from us---
- 15 A Yes.
- 16 Q ---in connection with this case.
- 17 A Yes. Well, the Elections Commission letter came,
18 as well as I remember now, after the FBI agent came
19 by and talked to me about it.
- 20 Q What was said between you at that time, that is
21 conversation between you and Mr. Slavens? I think
22 that you said that he also discussed this matter
23 with you back then.
- 24 A He just said--- He said, oh, something to the effect
25 and he mentioned this yesterday morning also. He

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2 said something to the effect that, "You know, I
3 called you and asked you to help Robin Tallon out,
4 and you told me you would, and you told me later on
5 you had."

6 Q In what connection was he posing this? Did he explain
7 how you had and did you respond to him? I'm not sure
8 I understand what he was saying and what you were---

9 A Yes, sir.

10 Q Tell me what that's all about.

11 A What he was--- I did help Congressman Tallon out.
12 I advised my son-in-law, who was at that time working
13 for me, to make a donation to Congressman Tallon's
14 campaign.

15 Q What is your son-in-law's name?

16 A Mike Lynch.

17 Q That's L-y-n-c-h?

18 A He is not my son-in-law now. He and my daughter are
19 divorced at this time.

20 Q And did he make a contribution to your knowledge?

21 A To the best of my knowledge, he did, but I don't
22 recall seeing him actually hand the check to
23 Congressman Tallon or anyone else.

24 Q Approximately at what point in time would that have
25 been?

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2 A That would have been sometime in--- I was trying to
3 sort of reconstruct it in my mind. I would think it
4 would be sometime in April or May of '82.

5 Q Why didn't you give a contribution to Congressman
6 Tallon's campaign rather than directing your son-in-
7 law to do the same?

8 A Well, for two reasons. One of them was Hicks Harwell
9 was opposing Mr. Tallon at the time, or Congressman
10 Tallon. He wasn't Congressman Tallon then. He was
11 Robin Tallon then. He was opposing him, and what I---
12 I wanted to help him. I was not going to--- The
13 Harwells and I have some strong ties back, but I did
14 not want to support Hicks Harwell. I supported him
15 in the first election, but I did not want to support
16 him in the second. So what I did is I helped--- What
17 I did then is I helped him by getting my son-in-law
18 to do it, and also I felt like that it would give
19 my son-in-law -- make him better known and make him
20 more politically active with the Tallon campaign.
21 I didn't---

22 Q Let me interrupt. You stated that you helped Hicks
23 Harwell in his first election. What were you referring
24 to when you said that?

25 A Well, I politicked for him. He and I are close

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your payroll?

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A He was manager of one of my little businesses.

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Q What business is that?

5

A That's Interstate Amoco.

6

Q Interstate Amoco?

7

A Yes.

8

Q Is that a South Carolina corporation?

9

A The Interstate Amoco is GB & S Corporation, doing business as Interstate Amoco.

10

11

Q It's a South Carolina corporation.

12

A Yes, sir.

13

Q What were his duties in connection with the Amoco business?

14

15

A He managed the place. He hired and fired the employees. He did the buying. We also have a gift shop in connection with that.

16

17

18

Q Where is that located?

19

A Next door, adjoining the Interstate Amoco.

20

Q So what is the address of Interstate Amoco? Where is it located?

21

22

A I-95 and U.S. 52 Intersection in Florence County.

23

Q Was he on a salary or was he on an hourly basis?

24

A No. He was on a salary.

25

Q So you reimbursed him somehow through his salary---

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- 2 A Yes.
- 3 Q ---for the contribution he made to---
- 4 A I'm sure--- I'm not saying I did because I don't
5 remember actually doing it, but I'm sure that in
6 some way or form I'm sure I replaced it. He wasn't
7 making---
- 8 Q How much money did he give? How much did you direct
9 him to give to Tallon's campaign?
- 10 A I don't remember whether it was Five Hundred or A
11 Thousand Dollars, but it was probably one or the
12 other.
- 13 Q And it was in and around April of '82? Is that what
14 you said? March or April?
- 15 A I'm not absolutely sure of these dates. '82 is a
16 long time, and I don't -- I can't be absolutely sure
17 of the dates, but I was thinking it was somewhere
18 before the primary to the best of my recollection.
19 This is what I'm saying.
- 20 Q Did you make any contributions to Hicks Harwell's
21 campaign?
- 22 A Yes, sir.
- 23 Q How did you do that?
- 24 A By check, I'm sure.
- 25 Q Your check? That is, you, G.B. Stokes, to Mr. Harwell's

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campaign?

A I'm not sure. I'm not absolutely sure as to how I did it, but I'm sure it was by check or---

Q But did you go through your son-in-law, Mike Lynch?

A No, no. He wasn't my son-in-law at that time.

Q I'm talking about--- This is '80 we're talking about now?

A I understand what you're talking about.

Q Now let's go into 1982. Hicks Harwell's campaign in 1982, did you contribute to that?

A Not to the best of my knowledge I did not, sir.

Q Through Mr. Lynch or not at all?

A No, sir, not at all, not to Mr. Harwell's campaign.

Q Are there any documents that you've looked at prior to coming to this deposition that would reflect any contributions to Mr. Harwell?

A No, sir. No, sir.

Q No checks?

A No, sir.

Q No loans? No loan instruments? No notes or anything of that nature?

A You mean prior to coming up here?

Q Yes.

A No, sir. No, sir. I don't recall them. I'm sure

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2 that there was some---

3 Q Getting back to the conversation had with Slavens,
4 I'm sure we've totally explored that. I'm not
5 talking about Tuesday's conversation, that is two
6 days ago, or Wednesday conversation, whenever it
7 was, but the prior conversation after receiving
8 this information from the Election Commission and
9 also having talked to the FBI. Maybe you've
10 testified to it. If so, I've forgotten. Let's
11 pursue that a little bit further. Where was this
12 conversation held?

13 A Which conversation is this, now?

14 Q The one back, let's say, several months ago. You said
15 that there was a prior one prior to---

16 A I do not remember whether I bumped into him somewhere
17 or whether he came by the office or what. I really
18 don't. I see Mr. Slavens I wouldn't say frequently,
19 but I bump into him occasionally, and he always
20 wants to talk politics, and he's always asking me
21 about political things.

22 Q How long have you known Gary Slavens?

23 A Gosh, I guess I've known Gary for twenty-five years.

24 Q Have you been friends socially or in a business---

25 A No, sir, I wouldn't say that.

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2 Q On a business basis?

3 A No, sir.

4 Q Just acquaintances around town?

5 A Just acquaintances, yes, sir. You know, Florence is
6 not a large place. You can know pretty well every-
7 body.

8 Q Are you familiar with his wife, Vicki Slavens?

9 A Yes, sir, I do know her.

10 Q How do you know her?

11 A I've seen her socially at the Museum, which I think
12 she is connected with it in some way. My wife is
13 on the board of the Museum -- the local Museum in
14 Florence there, and I've seen her there. How I
15 know her? I don't know how I know her. I've
16 just known her for a long time.

17 Q What is that, an art museum or what kind of a museum
18 are you referring to?

19 A The Florence Museum is an art museum, yes.

20 Q An art museum?

21 A Yes.

22 Q Do you know Jeff Lee?

23 A Yes, sir. You're talking about Jeff Lee that works
24 for Congressman Tallon?

25 Q Yes.

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2 A Yes, sir, I do know him.

3 Q When did you first meet Mr. Lee? How long have you
4 known him?

5 A I've probably known him -- known of him or known him
6 eight or ten years.

7 Q In what connection?

8 A The first I recall ever knowing Jeff Lee, he was
9 in the Jaycees in Florence and was running for some
10 office or something in the Jaycees in Florence there,
11 and I used to be a member of the Jaycees before I
12 exhausted out, and that's my first recollection of
13 him. Like I said, Florence is a small place. You
14 can know pretty well everybody.

15 Q Did you have any dealings with Mr. Lee during the
16 1982 campaign of Congressman Tallon?

17 A No, sir.

18 Q None at all?

19 A I mean, I might have spoke to him about it. I'm not
20 saying I didn't, but I don't recall any conversations
21 with him.

22 Q Were you ever asked to give a contribution to
23 Congressman Tallon's campaign by Mr. Lee?

24 A I cannot--- I don't recall. I'm sure I may have
25 been, but I don't recall whether I was or not.

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2 Q Do you recall being asked to give a contribution to
3 Congressman Tallon's campaign by anybody connected
4 with the campaign?

5 A Oh, yes.

6 Q Who solicited you for a contribution?

7 A We--- I don't remember specific names or anything,
8 but I'm sure that people have asked me to give to
9 Congressman Tallon's campaign.

10 Q If I give you some names, it might jar your recollection?

11 A It may, yes.

12 Q How about Mr. Glenn Odom?

13 A I don't know him.

14 Q He was the treasurer for the campaign.

15 A Yes, sir. I don't know him.

16 Q Jimmy Brown?

17 A No, sir. I do not know him. I know who he is, but
18 I do not know him.

19 Q Slavens himself, Gary Slavens?

20 A Slavens may have asked me, but I don't actually
21 recall whether he did or not.

22 Q Congressman Tallon?

23 A Congressman Tallon has asked me to donate to his
24 campaign on several occasions.

25 Q We're talking about the '82 campaign.

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2 A I can't remember whether he did or whether he didn't,
3 but I'm sure he must have.

4 Q Did any of your family contribute aside from your
5 son-in-law?

6 A Not to my knowledge.

7 Q Slavens has submitted an affidavit in this case and
8 has also testified under oath in deposition that he
9 was given a Thousand Dollar cash contribution by
10 Mr. Tallon or Congressman Tallon which was allegedly
11 from you to be gotten into the campaign. Is there
12 any truth to this particular statement?

13 A No, sir. I did not give him A Thousand Dollars cash.

14 Q You're stating unequivocally that you did not give
15 A Thousand Dollars---

16 A I did not give him A Thousand Dollars cash.

17 Q I ask you that because your affidavit, which I want
18 to refer to--- Your affidavit says--- And I refer
19 to the affidavit submitted in this matter sworn to
20 on the 4th day of September, 1985, and I quote it
21 in total: "Personally appeared before me G.B.
22 Stokes, Jr., who, being duly sworn, deposes and
23 says that to the best of his recollection he did
24 not make a direct contribution of One Thousand
25 Dollars in cash to Robin Tallon during Representative

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2 Tallon's 1982 general election campaign for election
3 to the House of Representatives from South Carolina's
4 Sixth District."

5 A That's what I mean, that I don't have any recollection
6 of it whatsoever.

7 Q But can you state unequivocally that you did not give
8 One Thousand Dollars in cash to the campaign?

9 A To the best of my recollection I can.

10 Q We're talking about ten One Hundred Dollar bills.
11 Now, that's a pretty--- That's a---

12 A I know what it is.

13 Q You know what it is.

14 A I understand.

15 Q Can you state unequivocally, not going to recollection,
16 that you did not give---

17 A I can state unequivocally I did not give any cash
18 money to Congressman Tallon's campaign.

19 Q Your affidavit also says that you did not give it
20 to the 1982 general election campaign. Did you---
21 Can you state unequivocally that you did not give
22 One Thousand Dollars in cash to the primary election
23 campaign?

24 A Yes, sir. To the best of my knowledge, I don't
25 recall it. That's unequivocally.

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2 Q No, it is not unequivocally. That is recollection.

3 A Well, to the best---

4 Q That means that you cannot recall having done or not
5 done that. I'm saying can---

6 A To the best of my recollection, I don't remember
7 giving it.

8 Q Can you state that you did not give One Thousand
9 Dollars in cash to Mr. Tallon for either the primary,
10 the runoff, or the general election in 1982?

11 A I can state to the best of my knowledge I did not
12 give any money to the primary or to the general
13 election in 1982.

14 Q To the best of your knowledge.

15 A To the best of my knowledge.

16 Q You could have.

17 A No, sir, I can't say I could have because I don't
18 recall giving him money. Like I said, 1982 has been
19 a long time.

20 Q A Thousand Dollars in cash is a lot of money to
21 be passing hands.

22 A I understand it is.

23 Q Did you give any other cash contributions over a
24 political lifetime to anybody?

25 A No, sir.

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2 Q You have not.

3 A No, sir.

4 Q You can state that unequivocally, but you can't
5 state unequivocally that you---

6 A To the best of my knowledge, I don't recall giving
7 cash to anybody in a political campaign.

8 Q You see the difference, don't you?

9 A I understand.

10 Q You understand the difference between, "No, I did not,
11 and, "No, I don't have any recollection of giving it."

12 A Well, let's state it this way. I don't have any
13 recollection of giving it.

14 Q But you cannot state that you did not give it.

15 A I can state that I don't have any knowledge of doing
16 it. I don't know how much plainer I can be to that.

17 Q You can say that you didn't give it.

18 A I could say that I didn't give it, but all you can
19 do is go by your memory. I don't have any recollection
20 of giving it.

21 Q It's a pretty big incident. I mean, we're talking
22 about ten One Hundred Dollar bills.

23 A I understand what you're talking about.

24 Q And never to the best of your recollection have you
25 ever given cash---

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2 A I've never given cash.

3 Q But you can't state unequivocally, "No, I did not
4 give..."---

5 A To the best of my knowledge, I don't recall ever
6 giving anyone cash for a contribution. I might have
7 bought a ticket to a supper or something and gave
8 'em ten bucks or twenty bucks out of my pocket.

9 Q I'm not talking about that.

10 A But that would be a political contribution. That's
11 what these suppers are for.

12 Q I'm talking about ten One Hundred Dollar bills in cash.

13 A No, sir, I did not to the best of my knowledge.

14 Q To the best of your knowledge and recollection.

15 A To the best of my knowledge.

16 Q It could have happened however.

17 A Well, you'd have to answer that, sir. I can't answer
18 that because all I can do is go by my knowledge.
19 To the best of my knowledge, I don't remember doing
20 it.

21 Q I don't think we can carry that much further.
22 Getting back to Mr. Lynch, his contribution to the
23 Tallon campaign, which was either Five Hundred or
24 One Thousand Dollars, you said in some manner or form
25 you reimbursed him. Could you explain that a little

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further? How would you have reimbursed him?

3

A I don't know how I reimbursed him. I don't have any knowledge of how I reimbursed him. I have not seen Mr. Lynch since Christmas a year -- this past Christmas one year ago. So I have not discussed this with him. I did not look at any records where I may have reimbursed him or not reimbursed him. I may have given it to him in a check or how I did it---

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Q Would it be kind of a bonus check?

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A Maybe it might have been in a bonus check because he earned a bonus each year, but I would have---

12

13

Q But would this bonus check be over and above anything he earned in a particular year?

14

15

A Well, of course, he didn't work for me but two years. I believe it was two years. And he, of course, would--- I'd give him--- I probably didn't--- He probably didn't get the same bonus either year. He probably got more in the second year than he did the first year.

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21

Q To compensate for the---

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A No, not necessarily to compensate him for that.

23

I'm just sure I made it up to him in some kind of way, not necessarily to compensate for this contri-

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25

bution, but Mike was always spending money out of his

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2 pocket, you know, for such things as travel or going
3 places or doing things, and, of course, like I said
4 while ago, you tend to give money out of your pocket
5 to your children. I don't recall giving him any
6 large amounts of cash, but I'm sure that--- I'm sure
7 that in some way, shape or form that I probably made
8 it up to him, if in fact he did give this, and I
9 do not remember to the best of my ability whether
10 he actually gave Robin Tallon the money or not, but
11 I feel like he did give Robin Tallon the money
12 because I wanted him to get known politically and
13 people to know him. He was a young man just out of
14 college, by the way, at that time, just getting
15 started in the business world, and---

16 Q What's he doing now?

17 A I do not know.

18 Q Is he still in Florence?

19 A Yes, he is still in Florence. Since he and my
20 daughter have been divorced, I don't have any contact
21 with him anymore.

22 Q He's not connected with your businesses?

23 A No, sir.

24 Q And you don't know where he's working now?

25 A No, sir, I do not.

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MR. WHITEHEAD: I don't have any further questions, Counsel?

A Do you want to corss examine me?

CROSS EXAMINATION BY

MR. STANTON:

Q Let me ask you a couple of questions, please, Mr. Stokes. I'm not sure the record is clear on this business about Mike Lynch and any contributions he made. You just said you feel like he did make a contribution to Robin Tallon. Isn't it true though that you in fact don't have any knowledge at all as to whether he made a contribution to Robin Tallon?

A I do not have any knowledge.

Q Did you see him make a contribution to Robin Tallon?

A No, sir, I did not. I don't recall seeing him make a contribution.

Q Did he ever tell you that he made a contribution to Robin Tallon's campaign?

A I don't recall whether he did or not.

Q You don't recall him ever telling you that he made a contribution to that campaign.

A No.

Q Do you recall -- specifically recall reimbursing him for a contribution he made to that campaign?

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2 A No, I do not.

3 Q So what you are saying today is, because he was your
4 son-in-law and you had kind of a father-son relation-
5 ship with him and you would kind of advice him, you
6 feel like---

7 MR. WHITEHEAD: Let him testify, Counsel.

8 Ask him a question.

9 A That's true. I feel like I did have a father-son
10 relationship with this young man.

11 Q But I'm trying to get behind your statement that you
12 feel like he did make a contribution. The reason
13 you feel like he did make that is not because you
14 saw him make it or you know of your own knowledge
15 that he made the statement. Right?

16 A No. However, quite a few pieces of mail, flyers or
17 mailouts or whatever you want to call them, from
18 Congressman Tallon's office still come to the office
19 address to Mike Lynch.

20 REDIRECT EXAMINATION BY

21 MR. WHITEHEAD:

22 Q Did you tell him to make a contribution? I believe
23 your testimony earlier was that you told him.

24 A I'm almost positive I did tell him, yes, sir.

25 Q To make a contribution.

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2 A To make a contribution, and I explained to him it
3 would help him politically should he ever need a
4 favor from the Congressman or a favor from others.
5 It would establish him in the community as being a
6 person was sincerely interested in good government
7 and good politics.

8 Q And you testified, I believe, that you told him that
9 you would make it up to him -- if he made a contribu-
10 tion that you would make it up.

11 A I don't know, sir.

12 MR. STANTON: I don't believe that was his
13 testimony.

14 MR. WHITEHEAD: If it wasn't, he can testify.

15 A No, sir. I don't believe I said that, now. I said
16 I'm almost certain I did reimburse him in some sort
17 of way. That's what I said, and I am almost certain
18 I did. But like I said, 1982 has been a long time.

19 Q Have you been involved in politics for a good long
20 time?

21 A Yes, sir. I was a member of County Council for eight
22 years in Florence, back from '68 up until '76.

23 Q Did you take part in any other campaigns aside from
24 your own?

25 A Oh, yes, sir. I've taken a part in campaigns before

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as far as getting votes and helping raise funds and things.

Q Do you have any recollection of who it would have been for?

A Oh, gosh. Several different ones. Dick Riley. Governor Riley I've helped, and, of course, Senator Leatherman, just to name a few people. Malloy McEachin, who is a member of the House. Those are just the ones I can remember right offhand.

Q Hicks Harwell?

A Hicks Harwell, yes.

Q What kind of participation did you take in Hicks Harwell's campaign?

A I traveled with him some just on occasion once or twice. I'm sure I must have made some contributions to his campaign.

Q Is this the Congressional campaign or when he was running for the State Legislature?

A Both.

Q Both?

A Yes, sir.

Q How many times did he run? Was it '80 and '82 or more than that?

A I think he just ran for Congress twice, '80 and '82.

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I was trying to decide in my mind the other day what years it was.

Q There's some testimony which is not totally clear, and maybe you could help. There was some sort of--- He had a State office, did he not, Hicks Harwell?

A He was a member of the House of Representatives for two years.

Q He also had a State position, did he not, in one of the State agencies?

A Not to my knowledge.

Q Well, there was some testimony that there was some scandal connected with it that hurt Harwell. I didn't get it clear.

A He was a member of the House, but I don't recall---

Q You don't remember any incident that made the papers? This was Slavens who said this.

MR. STANTON: Seems like there was an incident when Harwell was involved with another Representative, Norma Russell, and they got into some fight. She accused him of something.

A They got in a verbal argument about something, but I wouldn't consider -- and I'm sure it made the newspapers, but I don't---

MR. STANTON: She accused him of something, and

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that made the newspapers, and it was a big
stink, but I don't remember exactly what it is
she was accusing him of. She was subsequently
a State Senator, and I think she's out of
politics now -- or out of office now.

A So much goes on, I can't keep up with it.

Q It's not that relevant. I mean, I just didn't under-
stand what it was all about, and I couldn't get it
cleared up. I thought perhaps you could clear it up.

MR. WHITEHEAD: I don't feel that we have to
pursue this much further.

FURTHER DEPONENT SAYETH NOT.

(Signing waived.)

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE

This is to certify that the foregoing is the deposition of G.B. Stokes, Jr., taken before me, Eric B. Gore, a Notary Public in and for the State of South Carolina, duly commissioned and qualified as such, commencing at the hour of 9:24 a.m., on Friday, May 23, 1986, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Subpoena.

I do further certify that the said witness was first duly sworn by me and cautioned to speak the whole truth; that he was examined as per the foregoing; that notes were taken by me of the questions propounded and the answers given; and that the foregoing thirty-one (31) typewritten pages represent a true, accurate, and complete transcription of said testimony to the best of my skill and ability.

I do further certify that counsel for the respective parties reserved all objections until the time of trial, except as to the form of the question. The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

I do further certify that I have sealed up and delivered the original of said deposition to Thomas J. Whitehead, Esquire, General Counsel, Federal Election Commission,

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999 "E" Street Northwest, Washington, D.C., who shall retain the said deposition in his possession and become custodian thereof until such time as it shall be needed at trial.

I do further certify that I am not of counsel or attorney for any of the parties to the said action nor in any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 30th day of May,

Eric B. Gore
Eric B. Gore

Notary Public for South Carolina

My Commission expires: 4/28/87

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

James A. Brown, Jr.
P.O. Box 5227
Florence, SC 29502

RE: MUR 2071

Dear Mr. Brown:

Confirming your conversation with Laurence E. Tobey of our staff on July 14, 1986, enclosed please find a draft affidavit for your testimony in this matter. This draft is based on your conversations with Mr. Whitehead and Mr. Tobey.

Please review the draft affidavit and make any corrections, additions, or deletions as you believe are appropriate. The purpose of the affidavit is to accurately record your testimony, and therefore, it is important that it reflect the testimony as you wish it to be recorded. You may add additional pages, or rewrite and retype the affidavit as necessary.

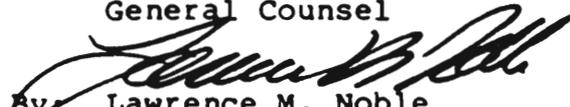
After you have made any desired changes to the affidavit, please sign it in the presence of a notary public and return it to the following address:

Federal Election Commission
Attn: OGC-Tobey
999 E Street, N.W.
Washington, D.C. 20463

If you have any questions, or wish to discuss the matter further, please contact Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200. Thank you for your cooperation in this matter.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosure:
draft affidavit

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RECEIVED AT THE FEC
GCC# 1151
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens, et al.) MUR 2071

AFFIDAVIT OF JAMES A. ("JIMMY") BROWN, JR.

36 AUG 6 P 3: 15
GENERAL COURSE

James A. ("Jimmy") Brown, Jr., being duly sworn, deposes and says:

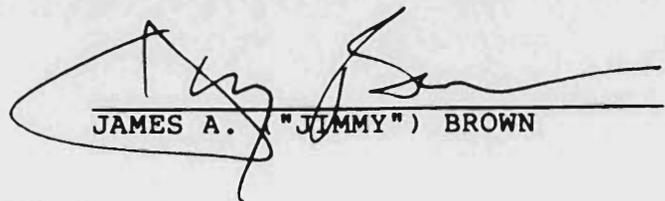
1. My name is James A. ("Jimmy") Brown. I reside at 702 McKeithen Road, Florence, South Carolina. I was a resident of Florence, South Carolina in 1982.
2. I am acquainted with Representative Robin M. Tallon, Jr., the Member of Congress from the Sixth District of South Carolina. I, along with others, urged Mr. Tallon to run for Congress in 1982 for the seat he now holds.
3. During the 1982 campaign for Congress, I did volunteer work for the Tallon for Congress Committee, and helped out at the campaign headquarters. I was not an official of the Tallon campaign, and I was not a paid employee of the Tallon campaign.
4. It is my understanding in 1982 that Robin M. Tallon owned several clothing stores in Florence, South Carolina, and other cities in South Carolina.
5. In April of 1982, I was at the Tallon's campaign headquarters. While I was there, I overheard conversations between individuals associated with the campaign. I overheard a conversation in

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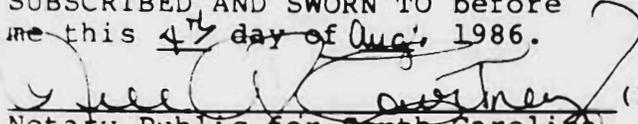
which someone mentioned that "seed money" was needed for the campaign. There was a discussion that \$1,000 bonuses were to be paid to several employees of Tallon's clothing stores, which were to be converted into contributions to the campaign. I do not have any independent recollection as to who made these statements or any of the individuals were that participated in these conversations. Further, I have no knowledge as to any of the individuals who were employees of Tallon's clothing stores or who may have received any "bonuses".

6. I am acquainted with Gary H. Slavens. To my knowledge, he was not a paid employee of the Tallon campaign, but he did raise funds for the campaign.

7. I have no knowledge of any alleged cash contribution by G. B. Stokes to the Tallon for Congress campaign.


JAMES A. ("JIMMY") BROWN

SUBSCRIBED AND SWORN TO before
me this 4th day of Aug. 1986.


(L.S.)
Notary Public for South Carolina
My Commission Expires: 2-24-87

7104063203

STATE OF SOUTH CAROLINA
 SECRETARY OF STATE
 ARTICLES OF INCORPORATION

OF

ROBIN'S OF FLORENCE, INC.

For Use By
 The Secretary of State
 File No. D 28939
 Fee Paid \$ 45.00
 R. N. 15868
 Date 6-28-76

(File This Form in
 Duplicate Originals)
 (Sect. 12-14.3 of 1962 Code)

This Space For Use By
 The Secretary of State
C. Frank Hamilton
 SECRETARY OF STATE
FILED
 JUN 28 1976
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- The name of the proposed corporation is ROBIN'S OF FLORENCE, INC.
- The initial registered office of the corporation is 2031 W. Evans Street
Street and Number
 located in the city of Florence, county of Florence and
 the State of South Carolina and the name of its initial registered agent at such address is
Robert M. Tallon, Jr. - 2031 W. Evans Street - Florence, S.C.
- The period of duration of the corporation shall be perpetual ~~XXXXXX~~.
- The corporation is authorized to issue shares of stock as follows:

Class of shares	Authorized No. of each class	Par Value
Common	1,000	\$100.00

If shares are divided into two or more classes or if any class of shares is divided into series within a class, the relative rights, preferences, and limitations of the shares of each class, and of each series within a class, are as follows:

N/A

Total authorized capital stock \$100,000.00

It is represented that the corporation will not begin business until there has been paid into the corporation the minimum consideration for the issue of shares, which is \$1,000.00 of which at least \$500.00 is in cash.

The number of directors constituting the initial board of directors of the corporation is TWO and the names and addresses of the persons who are to serve as directors until the first annual meeting of shareholders or until their successors be elected and qualify are:

<u>Robert M. Tallon, Jr.</u> Name	<u>2031 W. Evans Street-Florence, S.C. 29</u> Address
<u>Cameron T. Minshew</u> Name	<u>2031 W. Evans Street-Florence, S.C. 29</u> Address
Name	Address
Name	Address
Name	Address

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Name

Address

Name

Address

8. The general nature of the business for which the corporation is organized is (it is not necessary to set forth in the purposes powers enumerated in Section 2.2) (12-12.2 Supplemental Code 1962)

To operate a retail men's clothing business, including selling and buying goods and merchandise at wholesale and retail prices; and to do all things necessary or appropriate to those and other corporate business purposes as are authorized by the laws of the State of South Carolina.

9. Provisions which the incorporators elect to include in the articles of incorporation are as follows

None

10. The name and address of each incorporator is:

Name	Street & Box No	City	County	State
------	-----------------	------	--------	-------

Robert M. Tallon, Jr.	- 2031 W. Evans St.	- Florence,	S.C.	29501
-----------------------	---------------------	-------------	------	-------

Robert M. Tallon, Jr.
(Signature of Incorporator)

Date June 21, 1976

Robert M. Tallon, Jr.
(Type or Print Name)

(Signature of Incorporator)

(Type or Print Name)

(Signature of Incorporator)

(Type or Print Name)

21040363250

STATE OF SOUTH CAROLINA

COUNTY OF SUMTER

ss:

The undersigned Robert M. Tallon, Jr.

INC.

do hereby certify that they are the incorporators of ROBIN'S OF FLORENCE, / corporation and are authorized to execute this verification; that each of the undersigned for himself does hereby further certify that he has read the foregoing document, understands the meaning and purport of the statements therein contained and the same are true to the best of his information and belief.

Robert M. Tallon, Jr.
(Signature of Incorporator)

Robert M. Tallon, Jr.

(Signature of Incorporator)

(Signature of Incorporator)
(Each Incorporator Must Sign)

CERTIFICATE OF ATTORNEY

I, David W. Goldman, an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of chapter 4 of the South Carolina Business Corporation Act of 1962, relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date June 21, 1976

David W. Goldman
(Signature)

David W. Goldman
Bryan, Bahnmuller, ~~King~~ Goldman & McElveen
Attorneys at Law
Address 17 E. Calhoun Street
P. O. Box 2038
Sumter, S.C. 29150

SCHEDULE OF FEES

Payable at time of filing Articles of With Secretary of State:

Fee for filing Articles \$ 5.00
In addition to the above, \$40 for each \$1,000.00 of the aggregate value of shares which the Corporation is authorized to issue, but in no case less than 40.00
not more than 1,000.00

NOTE THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING

11040360261

STATE OF SOUTH CAROLINA
 SECRETARY OF STATE
 ARTICLES OF INCORPORATION

OF

LeMASTERS, INC.

For Use By
 The Secretary of State
 File No. **D41355**
 Fee Paid \$ **45.00**
 R. N. **22555**
 Date **7-27-79**

(File This Form in
 Duplicate Originals)

(Sect. 33-7-30 of 1976 Code)

This Space For Use By
 The Secretary of State

T. Campbell
FILED
 SEP 27 1979
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- The name of the proposed corporation is LeMasters, Inc.
- The initial registered office of the corporation is Magnolia Mall
Street and Number
 located in the city of Florence, county of Florence and
 the State of South Carolina and the name of its initial registered agent at such address is
Robert M. Tallon, Jr.
- The period of duration of the corporation shall be perpetual ~~()~~.
- The corporation is authorized to issue shares of stock as follows:

Class of shares	Authorized No. of each class	Per Value
Common	100,000	\$ 1.00

If shares are divided into two or more classes or if any class of shares is divided into series within a class, the relative rights, preferences, and limitations of the shares of each class, and of each series within a class are as follows:

None

- Total authorized capital stock One Hundred Thousand (\$100,000.00) Dollars
- It is represented that the corporation will not begin business until there has been paid into the corporation the minimum consideration for the issue of shares, which is \$1,000.00 or which, at least \$500.00 is in cash.
- The number of directors constituting the initial board of directors of the corporation is 2 and the names and addresses of the persons who are to serve as directors until the first annual meeting of shareholders or until their successors be elected and qualify are:

Robert M. Tallon, Jr.	2182 W. Evans Street, Florence, S.
<small>Name</small>	<small>Address</small>
Cameron T. Minshew	2182 W. Evans Street, Florence, S.
<small>Name</small>	<small>Address</small>

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Name

Address

Name

Address

8 The general nature of the business for which the corporation is organized is (it is not necessary to set forth in the purposes powers enumerated in Section (33-3-10 of 1976 Code).

Purchase and retail sales of men s clothing and accessories related thereto.

9 Provisions which the incorporators elect to include in the articles of incorporation are as follows.

None

10. The name and address of each incorporator is.

Name

Street & Box No.

City

County

State

Robert M. Tallon, Jr., 2182 W. Evans St., Florence, Florence, S. C.

Robert M. Tallon, Jr.
(Signature of Incorporator)

Date Sept. 24, 1979

Robert M. Tallon, Jr.

(Type or Print Name)

(Signature of Incorporator)

(Type or Print Name)

(Signature of Incorporator)

(Type or Print Name)

2104060253

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

} ss.

The undersigned Robert M. Tallon, Jr

do hereby certify that they are the incorporators of LeMasters, Inc. Corporation and are authorized to execute this verification; that each of the undersigned for himself does hereby further certify that he has read the foregoing document, understands the meaning and purport of the statements therein contained and the same are true to the best of his information and belief.

Robert M. Tallon, Jr.
(Signature of Incorporator)

Robert M. Tallon, Jr.
(Signature of Incorporator)

(Signature of Incorporator)
(Each Incorporator Must Sign)

CERTIFICATE OF ATTORNEY

11. I, Wylie H. Caldwell, Jr., an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached has complied with the requirements of chapter 7 of Title 33 of the South Carolina Code of 1976, relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date September 24, 1979

Wylie H. Caldwell, Jr.
(Signature)

Wylie H. Caldwell, Jr.
(Type or Print Name)

Address P. O. Box 1323
Florence, S. C. 29503

21040050254

SCHEDULE OF FEES

Payable at time of filing Articles of With Secretary of State

Fee for filing Articles	\$	5.00
In addition to the above, \$40 for each \$1,000.00 or the aggregate value of shares which the Corporation is authorized to issue, but in no case less than nor more than		40.00 1,000.00

NOTE: THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING. THIS FORM MUST BE ACCOMPANIED BY THE FIRST REPORT OF CORPORATIONS AND A CHECK IN THE AMOUNT OF \$10 PAYABLE TO THE SOUTH CAROLINA TAX COMMISSION.

S.C. DEPT. OF ARCHIVES & HISTORY
1430 Senate St. / P.O. Box 11669, 2nd Floor (803) 758-5816
Columbia, South Carolina 29211-1669

No. 001447

Date 8/8 86

Received *Federal Election Comm.*

The Sum of *Eight and 10/100 -* Dollars \$ *8.10*

For *ph 2.10 hc 3.00 cont 3.00*

THANK YOU!

Cash Check M.O. B. *QCB*

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 22, 1986

ARM

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Vicki Slavens
864 Indian DR
Florence, SC 29501

RE: MUR 2071

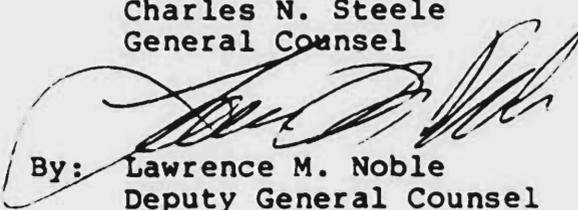
Dear Ms. Slavens:

This letter will confirm the conversation which took place on August 18, 1986 between you and Laurence E. Tobey of our staff. Enclosed please find copies of the notification in the above-captioned matter which was originally mailed to you on August 23, 1985. We have included a copy of our revised Description of Preliminary Procedures which is current as of June, 1986. You have stated that you have not previously been notified of this matter.

Please submit a response in writing within ten (10) days of your receipt of this letter. If you have any questions, please direct them to Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Letter of August 23, 1985
and enclosures stated therein

015406335

RECEIVED BY THE CLERK
GCC#1448
SEP 10 09:17

2071

STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE)
)
AFFIDAVIT

PERSONALLY appeared before me Vicki Slavens who, after being duly sworn, deposes and says that during 1982 she was married to Gary Slavens and she was told by him that he had been advised that a man and wife could each contribute \$1,000.00 to the Tallon for Congress Campaign, and that he had already contributed \$1,000.00 ^{from} that he would like her to contribute \$1,000.00. She told her husband that she was not sure that she had the money in her checking account and he said that he would deposit the \$1,000.00 out of his personal checking account into hers. Both accounts were used interchangeably for family expenses. Deponent gave her husband a deposit slip for her account; he made the deposit and she wrote a check for \$1,000.00 to the Tallon for Congress Campaign and gave it to him.

Deponent does not know the source of the funds for her contribution. As far as she knows, it was to be a \$1,000.00 contribution by her to the Tallon for Congress Campaign.

Further, deponent sweareth not.

Vicki Slavens
Vicki Slavens

SWORN to before me this
5th day of September, 1986.

Martha M. Spert (SEAL)
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 8-17-89

SEP 10 P12:16

01040360267

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens, et al.) MUR 2071
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

During May 21-23, 1986, this Office conducted depositions in Columbia, South Carolina pursuant to subpoenas issued previously by the Commission. Gary H. Slavens, G. B. Stokes, and Michael Glenn Odom appeared as ordered and were deposed. The Tallon for Congress Committee, and Lamar J. Rabon, as treasurer, produced documents in compliance with the subpoena directed to them.

A. Vicki Slavens

Vicki Slavens (former wife of Gary Slavens) did not appear. The letter forwarding the subpoena to her (sent by certified mail, return receipt requested) was returned by the Postal Service as "unclaimed." In his deposition, Gary Slavens stated that he and his wife are separated, and that she would not necessarily have received notice of the letter containing the subpoena. Gary Slavens provided an address and telephone number for Vicki Slavens. This Office contacted her on August 18, 1986.

Vicki Slavens stated that she is divorced from Gary Slavens, that she had never received any notification from the Commission, and that she was unaware of MUR 2071. This Office mailed a duplicate reason to believe notification to her on August 19, 1986. Delivery to her on August 28, 1986 has been confirmed by

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the certified mail receipt.

Vicki Slavens filed an affidavit with the Commission on September 10, 1986. Attachment I. She stated that in 1982, she was married to Gary Slavens, and that he asked her to make a \$1,000 contribution to the Tallon for Congress campaign. She stated that she was not sure that she had the money at the time, and so Gary Slavens said that he would deposit \$1,000 into her account out of his personal checking account. Vicki Slavens further stated that Gary Slavens made the deposit into her checking account, and that she then wrote a check for that amount to the Tallon for Congress committee. She further stated that she does not know the source of the funds for the contribution.

B. Testimony of Jimmy Brown

The Commission should be aware that in telephone conversations with this Office, and during his deposition, Gary Slavens indicated that we should contact an individual named "Jimmy" Brown. Slavens stated that Brown was aware of illegal practices in the Tallon for Congress campaign in 1982. Slavens suggested that Brown could corroborate some of Slavens' allegations regarding cash contributions to the Tallon campaign.

Because of this, Thomas J. Whitehead, Assistant General Counsel had a telephone conversation with Jimmy Brown on May 21, 1986 while in Columbia, South Carolina. Brown related the following information in that conversation.

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Brown stated that he is a personal friend of Representative Tallon. In 1982, Brown and others urged Tallon to run for Congress in the Sixth District (the seat which Tallon now holds). Brown stated that he was not an official or paid employee of the Tallon campaign, but that he did help out at headquarters. Brown stated that there were many rumors about cash contributions to the Tallon campaign, and that these rumors led to an investigation by the Department of Justice. (This Matter Under Review arose as a referral from that investigation.) Brown stated that he had no direct knowledge of cash going into the campaign, as Slavens had alleged. Brown also specifically denied any knowledge of a cash contribution by G.B. Stokes.

However, Brown did relate the following information. Robin Tallon owns a number of clothing stores in South Carolina.^{1/} In early April, 1982, when "seed money" was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then allegedly contributed these funds to the Tallon campaign. Brown supplied the following names as having received these bonuses and contributed them to the campaign: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, Jane Harris, Roland Minshew, and Mark Lawson.

1/. The corporations owning the stores are: Robins of Florence, Inc. (organized in 1976) and LeMasters, Inc. (organized in 1979). Certified copies of their incorporation documents have been received from South Carolina. Attachment II. Robert [sic] M. Tallon, Jr. is listed as incorporator and director of each.

Brown related that the bonuses were openly discussed at Tallon headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), both of whom worked at the campaign headquarters.

Brown agreed during the telephone conversation on May 21, 1986 to testify to this information either in a deposition or in affidavit form. On August 6, 1986, this Office received a signed and sworn affidavit from Brown. Attachment III. This affidavit differs significantly from Brown's earlier statement because Brown now states that he does not know who allegedly received the bonuses and made the contributions. He states:

I do not have any independent recollection as to who made these statements or any of the individuals were that participated [sic] in these conversations. Further, I have no knowledge as to any of the individuals who were employees of Tallon's clothing stores or who may have received any "bonuses".

Notwithstanding the inconsistency between Brown's May 21, 1986 statement and his August 6, 1986 affidavit, this Office would point out the following additional information which has been obtained during the investigation.

First, pursuant to the Commission's subpoena, the Tallon for Congress Committee produced its receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that the individuals named by Brown did in fact make the following contributions early in the Tallon campaign:

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<u>Receipt #</u>	<u>Date</u>	<u>Name</u>	<u>Amount</u>
93732	April 14, 1982	Roland G. Minshew	\$ 1000
93733	"	Jane Harris	500
93734	"	Robert Welch	1000
93736	"	Jerry Harris	500
93737	"	Mark Lawson	1000
93800	May 4, 1982	Lynn Hartnett	1000

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These contributions must have been made early in the Tallon campaign because the first contribution listed in the book was made on March 12, 1982, receipt number 93701. It should be noted that five of the six contributions listed above were received on the same day, April 14, 1982, that the receipt numbers are virtually sequential, and that the amounts are an even \$1000 except for contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to create "seed money."

This Office also notes that during his deposition testimony, Michael Glenn Odom, the former treasurer of the Tallon for Congress Committee, stated that he became aware of these allegations in 1984, two years after the events:

Jack Lawson, who is an attorney in Florence... He had a brother named Mark. Mark worked for Robin Tallon, Mark Lawson, and I think it was in '84 that Jack told me that Mark had been, quote, "declared a bonus" and then told to give it to the Tallon campaign.

Odom also identified the following as employees of the Tallon clothing stores during 1982: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, and Ronald Minshew. Odom also stated that to his knowledge, Robert Hartnett is the husband of Lynn Hartnett, and Cameron Tallon Minshew is the wife of Ronald Minshew and the sister of Robin M. Tallon, Jr. Odom could not confirm whether Jerry Harris and Jane Harris are married.

Odom further testified that he was aware that it is illegal for a person to give a contribution in the name of another, or to knowingly permit his name to be used to effect a contribution in the name of another. However, Odom stated that he was not aware of the alleged conduct in 1982 when he was treasurer, and that he became aware of it only in 1984, when he was no longer connected with the Tallon campaign.

Representative Robin M. Tallon, Jr.

The Commission also authorized a subpoena for deposition and production of documents to Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina). This Office has not yet attempted to serve the subpoena on Representative Tallon because of the additional facts described above which came to light during the investigation. This Office believes it necessary to obtain the testimony of all other witnesses and parties in this matter and further documentation prior to deposing Representative Tallon. Therefore, the subpoena to Representative Tallon will be served as soon as the other aspects of the investigation are completed.

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II. LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act") provides that it is unlawful for any corporation whatever to make a contribution in connection with a federal election. 2 U.S.C. § 441b(a). The Act also provides that no person shall make a contribution in the name of another person, or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another. 2 U.S.C. § 441f. The definition of "person" in the Act includes an individual, a corporation, and a committee. 2 U.S.C. § 431 (11).

The evidence gathered by this investigation to date suggests that one or both of the corporations owned by Representative Tallon may have violated either 2 U.S.C. § 441b(a) or 2 U.S.C. § 441f or both. If it is true that a corporation owned by Representative Tallon made contributions to his campaign, then that corporation has violated 2 U.S.C. § 441b(a). Accordingly, if that is true, then the Tallon for Congress Committee, and its treasurer,^{2/} have also violated 2 U.S.C. § 441b(a) by accepting contributions from a corporation. In light of the allegations by Jimmy Brown that bonuses were paid to employees of the Tallon stores, as corroborated by the other information outlined above, this Office recommends that the Commission find reason to

^{2/}. M. Glenn Odom was the treasurer of the Tallon for Congress committee at the time the alleged violations occurred. LaMar J. Rabon is the current treasurer.

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believe that Robin's of Florence, Inc., and LeMasters, Inc. violated 2 U.S.C. § 441b(a). Further, this Office recommends that the Commission find reason to believe that the Tallon for Congress Committee, and Lamar J. Rabon, as treasurer, violated 2 U.S.C § 441b(a).

Additionally, if it is true as Brown originally alleged that one or both of the corporations made contributions to the Tallon committee in the names of others (i.e., the names of the store employees who allegedly received the bonuses), then any such corporation has also violated 2 U.S.C. § 441f. Therefore, this Office recommends that the Commission find reason to believe that Robin's of Florence, Inc. and LeMasters, Inc. have each violated 2 U.S.C. § 441f.

Finally, if it is true that employees of Tallon's stores did in fact knowingly permit their names to be used to effect contributions by Representative Tallon or his corporations, then those employees have violated 2 U.S.C. § 441f. At this stage of the investigation, this Office recommends reason to believe findings against employees who meet all three of the following criteria: 1). those who were named by Jimmy Brown as participants; 2). those whose names appear in the Tallon Committee's receipt book as having made contributions early in the campaign; and 3). those who were identified by Glenn Odom as employees of Tallon's stores. The individuals who meet these criteria are: Robert (Bobby) Welch, Lynn Hartnett, Jerry Harris, Jane Harris, Roland Minshe, and Mark Lawson. This Office

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recommends that the Commission find reason to believe that each of these individuals violated 2 U.S.C. § 441f by knowingly permitting his or her name to be used to effect a contribution by Robin M. Tallon to the Tallon for Congress Committee.

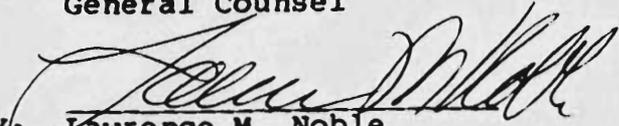
III. RECOMMENDATIONS

1. Find reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. § 441b(a).
2. Find reason to believe that LeMasters, Inc. violated 2 U.S.C. § 441b(a).
3. Find reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. § 441f.
4. Find reason to believe that LeMasters, Inc. violated 2 U.S.C. § 441f.
5. Find reason to believe that the Tallon for Congress Committee, and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441b(a).
6. Find reason to believe that Jane Harris violated 2 U.S.C. § 441f.
7. Find reason to believe that Jerry Harris violated 2 U.S.C. § 441f.
8. Find reason to believe that Lynn Hartnett violated 2 U.S.C. § 441f.
9. Find reason to believe that Mark Lawson violated 2 U.S.C. § 441f.
10. Find reason to believe that Roland Minshew violated 2 U.S.C. § 441f.
11. Find reason to believe that Robert (Bobby) Welch violated 2 U.S.C. § 441f.
12. Approve and send the attached Factual and Legal Analyses.
13. Approve and send the attached letters.

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Charles N. Steele
General Counsel

11/6/86
Date


BY: Lawrence M. Noble
Deputy General Counsel

Attachments

- I. Affidavit of Vicki Slavens
- II. Certified Corporate Records
- III. Affidavit of Jimmy Brown
- IV. Proposed Factual and Legal Analyses (8)
- V. Proposed letters to respondents (8)

21040363277

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Gary H. Slavens, et al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 12, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2071:

1. Find reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. § 441b(a).
2. Find reason to believe that LeMasters, Inc. violated 2 U.S.C. § 441b(a).
3. Find reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. § 441f.
4. Find reason to believe that LeMasters, Inc. violated 2 U.S.C. § 441f.
5. Find reason to believe that Tallon for Congress Committee, and Lamar J. Fabon, as treasurer, violated 2 U.S.C. § 441b(a).
6. Find reason to believe that Jane Harris violated 2 U.S.C. § 441f.
7. Find reason to believe that Jerry Harris violated 2 U.S.C. § 441f.
8. Find reason to believe that Lynn Hartnett violated 2 U.S.C. § 441f.
9. Find reason to believe that Mark Lawson violated 2 U.S.C. § 441f.
10. Find reason to believe that Roland Minshew violated 2 U.S.C. § 441f.
11. Find reason to believe that Robert (Bobby) Welch violated 2 U.S.C. § 441f.

(continued)

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- 12. Approve and send the Factual and Legal Analyses, as recommended in the General Counsel's Report signed November 6, 1986.
- 13. Approve and send the letter, as recommended in the General Counsel's Report signed November 6, 1986.

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

Attest:

11-13-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

21040050279

Received in Office of Commission Secretary:	Thurs.,	11-6-86,	4:45
Circulated on 48 hour tally basis:	Fri.,	11-7-86,	2:00
Deadline for vote:	Mon.,	11-13-86,	4:00

mm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jane Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

RE: MUR 2071

Dear Ms. Harris:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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Jane Harris
Page Two

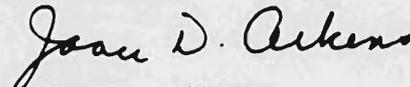
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jerry Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

RE: MUR 2071

Dear Mr. Harris:

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Jerry Harris
Page Two

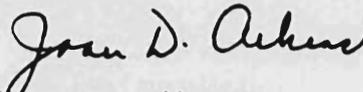
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Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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llm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Lynn Hartnett
1150 Pinckney Avenue
Florence, SC 29501

RE: MUR 2071

Dear Ms. Hartnett:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

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Lynn Hartnett
Page Two

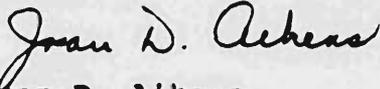
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Sincerely,


Joan D. Aikens
Chairman

Enclosures

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

21040360235

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert L. Welch
309 Reseda Drive
Columbia, SC 29204

RE: MUR 2071

Dear Mr. Welch:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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.

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Robert L. Welch
Page Two

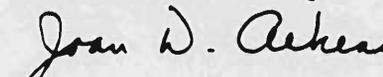
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

40565237

mm



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Roland G. Minshew
120 Lakewood Drive
Florence, SC 29501

RE: MUR 2071

Dear Mr. Minshew:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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Roland G. Minshew
Page Two

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Joan D. Aikens
Chairman

Enclosures

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

01040365209

plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mark Lawson
2718 N. Main St.
Anderson, SC 29621

RE: MUR 2071

Dear Mr. Lawson:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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Mark Lawson
Page Two

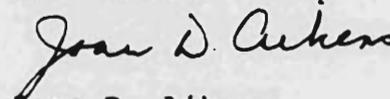
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications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

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

21 J 4 0 : 6 5 2 2 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert M. Tallon, Jr., Registered Agent
Robin's of Florence, Inc.
2031 W. Evans Street
Florence, SC

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Tallon:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that Robin's of Florence, Inc. ("the Corporation"), violated 2 U.S.C. §§ 441b(a) and 441f, 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 the Corporation. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against the Corporation, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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plm

Robin's of Florence, Inc.
Page Two

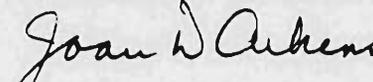
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications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

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert M. Tallon, Jr.
LeMasters, Inc.
Magnolia Mall
Florence, SC 29501

RE: MUR 2071
LeMasters, Inc.

Dear Mr. Tallon:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that LeMasters, Inc. ("the Corporation") violated 2 U.S.C. §§ 441b(a) and 441f, 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 the Corporation. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against the Corporation, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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LeMasters, Inc.
Page Two

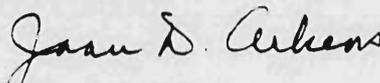
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications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

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

2104060275

plum



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Lamar J. Rabon, Treasurer
Tallon for Congress Committee
P.O. Box 1984
Florence, SC 29530

RE: MUR 2071
Tallon for Congress Committee

Dear Mr. Rabon:

The Federal Election Commission has previously notified you that on August 13, 1985, it determined that there was reason to believe that the Tallon for Congress Committee and you, as treasurer, violated certain sections of the Federal Election Campaign Act of 1971, as amended (hereinafter, "the Act"). Please be advised that on November 12, 1986, the Commission also found reason to believe that the Tallon for Congress Committee, and you, as treasurer, violated 2 U.S.C. § 441b(a). 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, and you, as treasurer. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against the Committee, and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. 111.18(d). Upon receipt of that request, the Office of General Counsel will make recommendations to the Commission either

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Tallon for Congress Committee
Page Two

proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

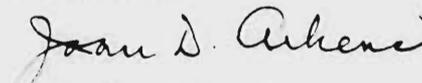
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If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications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

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

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86 DEC 8 8:28

LAW OFFICES
JAMES R. BELL
163 NORTH COIT STREET
P.O. BOX 567
FLORENCE, S. C. 29503

ROBERT W. LOWMAN, JR.
ASSOCIATE

TELEPHONE 669-5221

December 4, 1986

CERTIFIED, RETURN
RECEIPT REQUESTED

REC'D
AG: 58

Mr. Laurence E. Tobey
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2071
Tallon for Congress Committee

Dear Mr. Tobey:

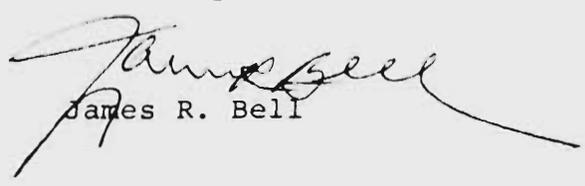
Pursuant to our telephone conversation of yesterday, please allow this letter to serve as my notification of representation of Lamar J. Rabon, the current treasurer of the Tallon for Congress Committee. As I indicated to you yesterday, Mr. Rabon was not the treasurer of the Tallon for Congress Committee prior to November, 1983, and thus we feel that the allegations referred to in the above matter certainly do not relate to him at all. It is my understanding however that it was necessary to address him any correspondence concerning the investigation because he is the current treasurer.

It is my further understanding that Mr. Rabon has previously furnished you with information substantiating the fact that he was not treasurer prior to November, 1983, however, if you need any further information from him, please advise.

I am enclosing herewith Mr. Rabon's statement of designation of counsel so that you may forward to me any further correspondence.

With kind regards, I am

Sincerely,


James R. Bell

JRB/dd

enclosure
cc: Lamar Rabon

1040565223

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: James R. Bell

ADDRESS: P.O. Box 567
Florence, SC 29503

TELEPHONE: (803) 669-5221

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

December 4, 1986
Date


Signature

RESPONDENT'S NAME: Lamar J. Rabon

ADDRESS: P.O. Box 12517
Florence, SC 29504

HOME PHONE: (803) 665-7610

BUSINESS PHONE: (803) 667-1000

71040365279

GCC# 2246

Robin's

"Men's Quality Clothing"
TELEPHONE 803-354-1111
2031 WEST EVANS STREET
P. O. BOX 3867
FLORENCE, SOUTH CAROLINA 29502

RECEIVED
FEDERAL ELECTION COMMISSION
DEC 11 11:00 AM '86

86 DEC 10 P 3:58
OFFICE OF THE
COMMISSIONER
SECRETARY

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

As bookkeeper and secretary of the above named corporation, I would like to help clarify this allegation.

Roland G. Minshew is the only individual named in the legal analysis that is employed by Robin's of Florence, Inc. He was paid two bonuses in April 1982 totaling \$2380.00 of which all taxes were deducted.

Jane Harris has never been employed by any of our companies.

Robert Welch was employed by Robin's of Dentsville, Inc. in April 1982.

Jerry Harris was employed by Robin's of North Myrtle Beach, Inc. in April 1982.

Mark Lawson was employed by Robin's of Anderson, Inc. in April 1982.

Lynn Hartnett was employed by Robin's Ladies' Wear, Inc. in April 1982.

None of the above mentioned persons was paid a bonus by Robin's of Florence, Inc. or LeMasters, Inc. in April 1982, except Roland G. Minshew.

If I can be of further assistance in this matter, please contact me.

Sincerely yours,

Cameron T. Minshew
Cameron T. Minshew

Sworn to before me
December 8, 1986

Carole B. Meier
Notary Public, South Carolina State at Large
My Commission Expires May 12, 1991
Notary Republic

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CC# 2255



LeMasters

Traditionally Distinctive

MAGNOLIA MALL
FLORENCE, SOUTH CAROLINA 29501
(803) 667-0454

December 8, 1986

05 DEC 11 P 3: 46

OFFICE SECRETARY
FEDERAL ELECTION COMMISSION

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

As bookkeeper and secretary of the above named corporation, I would like to say that no bonuses were paid to any of the persons mentioned in the legal analysis of your letter. These persons include: Roland G. Minshew, Jane Harris, Robert Welch, Jerry Harris, Mark Lawson and Lynn Hartnett. None of these people has ever been employed by LeMasters, Inc.

If I can be of further assistance, please contact me.

Sincerely yours,

Cameron T. Minshew
Cameron T. Minshew

Sworn to before me
December 8, 1986

Carole B. Meier
Notary Republic

Notary Public, South Carolina State of Large
My Commission Expires May 19, 1991

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REC'D
GEN. E. SEL

QCC# 2281

Tohey

6 DEC 15 P 4: 57

Roland G. Minshew
120 Lakewood Drive
Florence, S. C. 29501

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

66 DEC 15 P 3: 06

COMM. FEED. ARRY

Dear Ms. Aiken:

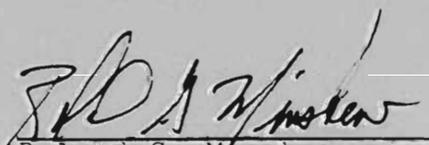
My name is Roland G. Minshew. I have been employed at Robin's of Florence, Inc. for sixteen years.

In April 1982, I was paid two bonuses totaling \$2,380.00, one for \$1,500.00 and one for \$880.00. All federal, state and social security taxes were deducted from these amounts and these were included on my end of the year W-2 form.

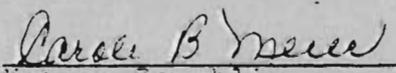
I did make a personal contribution to the Tallon for Congress campaign in the amount of \$1,000.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely,


Roland G. Minshew

Sworn to before me
December 8, 1986


Notary Republic

Notary Public, South Carolina State at Large
My Commission Expires May 19, 1991

21040363302

RECEIVED
GENERAL INVESTIGATIVE
DIVISION

Jerry Harris
2006 Highway 17
North Myrtle Beach, S. C.

16-115879 P12: 59
295879

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

My name is Jerry Harris. I was not an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. I was and still am employed by Robin's of North Myrtle Beach, Inc.

In April 1982, I was paid two bonuses totaling \$2,330.00 (\$830.00 and \$1,500.00). All FICA, federal and state taxes were deducted from these amounts and these were included on my W-2 form at the end of the year.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,

Jerry Harris
Jerry Harris

Sworn to before me
December 5, 1986

Camara Salla Minshel
Notary Republic

My Commission Expires February 2, 1987

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COMMUNICATIONS SECTION

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Tokey

16 DEC 15 P4:57

Robert L. Welch
P. O. Box 618
N. Myrtle Beach, S. C.
29597

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

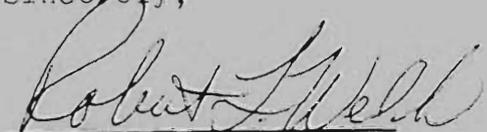
My name is Robert Welch. I was not an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. I was employed by Robin's of Dentsville, Inc. in April 1982.

I was paid two bonuses totaling \$2,330.00, one for \$830.00 and the other for \$1,500.00 in April 1982 by Robin's of Dentsville, Inc. All taxes; federal, state, and social security, were deducted from these bonuses and these were included on my W2 form for that year.

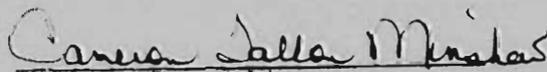
I did make a personal contribution to the Tallon for Congress campaign in the amount of \$1,000.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely,


Robert L. Welch

Sworn to before me
December 8, 1986


Notary Republic

My Commission Expires February 2, 1987

91040363304

16 DEC 15 P3:06

COMMUNICATIONS SECTION

GCC # 2313

REC'D
GENERAL
TEL

Jane Harris
2006 Highway 17
North Myrtle Beach, S. C. 29582

6 DEC 22 AM 11:49

06 DEC 19 11:43

SECRETARY

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

My name is Jane Harris. I have never been employed at Robin's of Florence, Inc. or LeMasters, Inc. I have never received any bonus from these corporations.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,

Jane Harris
Jane Harris

Sworn to before me
December 8, 1986

Cameron J. Miller
Notary Republic

My Commission Expires February 2, 1987

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Robert L. Welch
P. O. Box 618
N. Myrtle Beach, S. C.
29597

December 15, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

DEC 23 1986
FEDERAL ELECTION COMMISSION
SECRETARY

Dear Ms. Aiken:

In follow-up to my individual reply to the allegations of wrongdoing on my part during Congressman Tallon's 1982 campaign, I would like to make you aware of two points which might clear this up.

First, as general manager of the stores, I want to let you know that bonuses are paid on a regular basis to our employees and have been long before Congressman Tallon ever decided to enter politics.

Secondly, I volunteered to serve as chairman of the out-of-district fund raising efforts during the 1982 campaign. I solicited contributions from employees of the Congressman's stores, from individuals with whom I did business, and from friends of both the Congressman and myself. I am quite proud of this and certainly did not have to resort to wrongdoing in order to accomplish my goals. I had all solicitations sent directly to me and dropped these by the campaign office on a regular basis.

I hope this will help to clear up this matter.

Sincerely,

Robert L. Welch
Robert L. Welch

Sworn to before me
December 15, 1986

Carrie Jatta Winters
Notary Republic

My Commission Expires February 2, 1987

21040365306

CC#2292
RECEIVED AT THE FEC

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REAVES & MOORE
ATTORNEYS & COUNSELORS AT LAW
901 WEST EVANS STREET
P.O. BOX 5012
FLORENCE, SOUTH CAROLINA 29502-2012

THOMAS G. REAVES
BENJAMIN D. MOORE

TELEPHONE
(803) 662-0211

December 15, 1986

Federal Election Commission
Washington, D. C. 20463

Attention: Laurence E. Toby
Office of the General Counsel

Re: MUR 2071
Tallon for Congress Committee

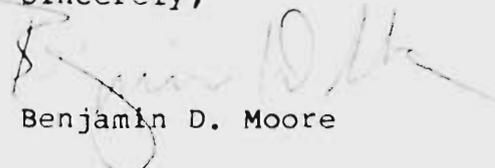
Dear Mr. Toby:

In regard to the above captioned matter, please find the submissions of the Tallon for Congress Committee. Please notify us as soon as possible as to the determination of your office as to how you plan to proceed. The Committee has no desire to enter into any pre-probable cause conciliation at this time.

Also, please find enclosed the Statement of Designation of Counsel, and please direct all further correspondence concerning this matter on behalf of the Tallon for Congress Committee to me at this address.

With kindest personal regards,

Sincerely,



Benjamin D. Moore

BDM/jas
Enclosure
CERTIFIED MAIL

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DEC 18 49:01

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: Benjamin D. Moore

ADDRESS: P. O. Box 5012

Florence, SC 29502

TELEPHONE: (803)662-0211

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

December 15, 1986
Date

Lamar J. Rabon
Signature

RESPONDENT'S NAME: Lamar J. Rabon, Treas.- Tallon for Congress Committee

ADDRESS: P. O. Box 1984

Florence, SC 29503

HOME PHONE: _____

BUSINESS PHONE: (803)667-1000

303040165308

IN THE FEDERAL ELECTION COMMISSION
WASHINGTON, D. C.

AFFIDAVIT

RE: MUR 2071
TALLON FOR CONGRESS COMMITTEE

PERSONALLY appeared before me Lamar J. Rabon, who being
duly sworn, deposes and states:

1. That he is a citizen and resident of the County of
Florence, State of South Carolina, and is the present Treasurer
of the Tallon for Congress Committee which is the subject of the
above captioned investigation.

2. That during the time the allegations which are the
subject of this action allegedly took place, he was in no way
connected with the Tallon for Congress Committee, and was not its
Treasurer until some time thereafter.

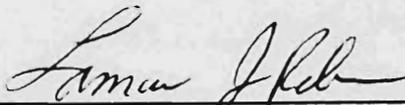
3. As a result of the charges which have been made in this
matter, he has made a good faith investigation to determine
whether or not it has substance, and has found, as a result of
this investigation, that he can locate no one who was a part of
or connected with the Tallon for Congress Committe in 1982 who
has any knowledge whatsoever of an effort on the part of any
person or entity to violate any statutes or regulations of the
Federal Election Law; specifically he knows of no effort on the
part of anyone to attempt to violate the prohibition against
corporate contributions by paying bonuses to employees of
corporations, with said employees then contributing all or any
part of this bonus to the Tallon for Congress Committee.

4. Your Affiant has determined from his investigation, through contact with one of the persons alleged to have participated in this matter, that some of the individuals who are named in the investigation who were employees of various corporations, have provided the Federal Election Commission with statements concerning their position in the matter, and your Affiant craves reference to these Affidavits concerning the various positions of the said employees.

5. Your Affiant, as a result of his investigation, is informed and believes that these allegations are false, have no substance, and therefore this matter should be dismissed for lack of probable cause.

FUTHER AFFIANT SAIETH NOT.

SWORN to before me this 15th
day of December, 1986.



LAMAR J. RABON, TREASURER
TALLON FOR CONGRESS COMMITTEE

NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: _____

1033634031

FURTHER AFFIANT SAIETH NOT.

SWORN to before me this 15th
day of December, 1986.

M. Glenn Odom
M. GLENN ODOM

Judith A. Stark
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 7-27-88

21540365312



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 10, 1987

Mrs. Robert (Lynn) Hartnett
1150 Pinckney Avenue
Florence, SC 29501

Dear Ms. Hartnett:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because it appears that our first attempt to notify you of the Commission's determination was unsuccessful.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble *by GFR*
Acting General Counsel

Enclosures

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

21040363313



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Lynn Hartnett
1150 Pinckney Avenue
Florence, SC 29501

RE: MUR 2071

Dear Ms. Hartnett:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

2104036314

Lynn Hartnett
Page Two

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Laurence E. Tobey, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Joan D. Aikens
Chairman

Enclosures

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

21040063315

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2071
STAFF MEMBER & TEL. NO.
Laurence E. Tobey
(202) 376-8200

RESPONDENT: Lynn Hartnett

SUMMARY OF ALLEGATIONS

Lynn Hartnett knowingly permitted her name to be used to effect a contribution by Robin's of Florence, Inc. or by LeMasters, Inc. to the Tallon for Congress Committee during 1982, in violation of 2 U.S.C. § 441f.

FACTUAL BASIS AND LEGAL ANALYSIS

Lynn Hartnett was an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. The Office of General Counsel has received information that during April, 1982, "bonuses" of \$1,000 each were paid to employees of Robin's of Florence, Inc. or LeMasters, Inc. and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, who did volunteer work for the Tallon for Congress Committee during 1982.

This Office has learned that Lynn Hartnett received a bonus of \$1,000 from her employer which she then gave as a contribution to the Tallon for Congress Committee. Lynn Hartnett has been identified as an employee of Robin's of Florence, Inc. or LeMasters, Inc. by Glenn Odum, the treasurer of the Tallon for

2154056316

Congress Committee in 1982 and by reports filed by the Tallon Committee. Pursuant to a subpoena issued by the Commission, the Tallon for Congress Committee produced its receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that Lynn Hartnett made a \$1,000 contribution to the Tallon for Congress Committee on May 4, 1982, Receipt # 93800.

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person, or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

Wherefore, the Office of General Counsel recommends that the Commission find reason to believe that Lynn Hartnett violated 2 U.S.C. § 441f.

2104036317

**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of the General Counsel where they are assigned to a staff member.

Following review of the information which generated the matter, a recommendation on how to proceed, based on a preliminary legal and factual analysis, shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act of 1971, as amended (hereinafter "the Act") may have occurred or is about to occur; or (b) that the Commission find no reason to believe that a possible violation of the Act has occurred or is about to occur, and that the Commission close the file in the matter.

Thereafter, if the Commission decides by an affirmative vote of four Commissioners to open a Matter Under Review (MUR) and finds that there is reason to believe that a violation of the Act has been committed or is about to be committed, the Office of the General Counsel shall conduct an investigation into the matter. Within 15 days of notification of the Commission's finding(s), a respondent(s) may submit any factual or legal materials relevant to the allegations. During its investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order written answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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If the investigation warrants, and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief stating their position on the issues. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four Commissioners that there is probable cause to believe that a violation of the Act has been committed, or is about to be committed, conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the Act through conciliation the Office of the General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Act. Thereafter, the Commission may, upon an affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

January 1987

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1987

Secretary of State for South Carolina
Wade Hampton Office Building
Attn: Corporation Division
P.O. Box 11350
Columbia, South Carolina 29211

RE: Request for Certified
Corporate Records

Dear Sir/Madam:

The Office of the General Counsel of the Federal Election Commission, an agency of the U.S. Government, in the performance of its official duties requires a copy of the incorporation papers of two South Carolina corporations, Robin's of Anderson, and Robin's of Dentsville.

As requested by your office, on May 26, 1987, a check in the amount of \$8.00, payable to the South Carolina Secretary of State is enclosed as payment for the above copies.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

George F. Rishel
By: George F. Rishel
Acting Associate General Counsel

Enclosure
Check for \$8.00

21040060320

plm

7/10/71

Columbia, S.C., June 16, 1987

No. 04490

622 # 30 25

M George F. Rishel
Federal Election Commission
Washington, DC 20463

TO Office of Secretary of State DR.

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2	certified copies of charters (1 each)			8.00
	RE: ROBIN'S OF ANDERSON			
	ROBIN'S OF DENTSVILLE			
	PAID BY CHECK 6-16-87			

The general nature of the business for which the corporation is organized is (it is not necessary to set forth in the purposes powers enumerated in Section 22) (12-122 Supplemental Code 1925)

To operate a retail men's clothing business, including selling and buying goods and merchandise at wholesale and retail prices; and to do all things necessary or appropriate to those and other corporate business purposes as are authorized by the laws of the State of South Carolina.

Provisions which the incorporators elect to include in the articles of incorporation are as follows

None

The name and address of each incorporator is

Name	Street & Box No.	City	County	State
Robert M. Tallon, Jr.	1122 W. Evans St.	Florence	Florence	S. C. 29501

Robert M. Tallon, Jr.
Signature of Incorporator

Robert M. Tallon, Jr.
Type in Full Name

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

The undersigned **Robert M. Tallon, Jr.**

do hereby certify that they are the incorporators of **Robin's of Anderson, Inc.** corporation and are authorized to execute this verification, that each of the undersigned for himself does hereby further certify that he has read the foregoing document, understands the meaning and purport of the state laws therein contained and the same are true to the best of his information and belief

Robert M. Tallon, Jr.
(Signature of Incorporator)

Robert M. Tallon, Jr.
(Signature of Incorporator)

(Signature of Incorporator)
(Each Incorporator Must Sign)

CERTIFICATE OF ATTORNEY

I, **Wylie H. Caldwell, Jr.**, an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of chapter 4 of the South Carolina Business Corporation Act of 1962, relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose

Date **October 16, 1978**

Wylie H. Caldwell, Jr.
(Signature)

Wylie H. Caldwell, Jr.
(Type or Print Name)

Address **P. O. Box 1323**

Florence, S. C. 29503

Name

Address

Name

Address

8. The general nature of the business for which the corporation is organized is (it is not necessary to set forth in the purposes powers enumerated in Section 2.2) (12-12.2 Supplemental Code 1962)

To operate a retail men's clothing business, including selling and buying goods and merchandise at wholesale and retail prices; and to do all things necessary or appropriate to those and other corporate business purposes as are authorized by the laws of the State of South Carolina.

9. Provisions which the incorporators elect to include in the articles of incorporation are as follows:

None

10. The name and address of each incorporator is.

Name	Street & Box No.	City	County	State
Robert M. Tallon, Jr.,	2182 W. Evans St.,	Florence,	Florence,	S.C. 29501

Robert M. Tallon Jr.
(Signature of Incorporator)

Date May 27, 1977

Robert M. Tallon, Jr.
(Type of Print Name)

(Signature of Incorporator)

(Type of Print Name)

(Signature of Incorporator)

(Type of Print Name)

21040363326

STATE OF SOUTH CAROLINA }
COUNTY OF FLORENCE } ss:

The undersigned Robert M. Tallon, Jr.

do hereby certify that they are the incorporators of ROBIN'S OF DENTSVILLE, INC. corporation and are authorized to execute this verification; that each of the undersigned for himself does hereby further certify that he has read the foregoing document, understands the meaning and purport of the statements therein contained and the same are true to the best of his information and belief.

Robert M. Tallon Jr
(Signature of Incorporator)

(Signature of Incorporator)

(Signature of Incorporator)
(Each Incorporator Must Sign)

CERTIFICATE OF ATTORNEY

I, Wylie H. Caldwell, Jr., an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of chapter 4 of the South Carolina Business Corporation Act of 1962, relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date May 27, 1977

Wylie H. Caldwell Jr
(Signature)

Wylie H. Caldwell, Jr.
(Type or Print Name)

Address P. O. Box 1323
Florence, S. C. 29503

2104036327

SCHEDULE OF FEES

(Payable at time of filing Articles of With Secretary of State)

Fee for filing Articles	\$	5.00
In addition to the above, \$40 for each \$1,000.00 of the aggregate value of shares which the Corporation is authorized to issue, but in no case less than		40.00
nor more than		1,000.00

NOTE THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 22, 1987

Department of Archives and History
1430 Senate Street,
P.O. Box 11669
Columbia, South Carolina 29211

RE: Request for Certified
Corporate Records

Dear Sir/Madam:

The Office of the General Counsel of the Federal Election Commission, an agency of the U.S. Government, in the performance of its official duties requires a copy of the incorporation papers of three South Carolina corporations, Robin's of North Myrtle Beach, Inc., Robin's Ladies Wear, Inc., and Oceanside, Inc.

As requested by your office, on May 26, 1987, and as indicated on the enclosed Photocopy Order Form, a check in the amount of \$12.15, payable to the South Carolina Department of Archives and History is enclosed as payment for the above copies.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosures

1. Check for \$12.15
2. Photocopy Order Form

21040565328

12/22/87

GCC 4029



INTERNATIONAL
TRACING
SERVICES

07/20/1987

Telephone
TOLL FREE
1-800-663-2255

Alaska/Hawaii
1-800-426-9850

Direct
1-604-294-1811

UNITED STATES
P.O. Box 34000
Seattle, WA 98124-1000

CANADA
P.O. Box 33889, Str. D
Vancouver, Canada
V6J 4L6

Reply to: Seattle

Mr. Phil Wyatt,
Federal Election Commission,
Office of General Counsel,
999 E St. N.W.,
Washington, DC 20463

Dear Mr. Wyatt:

CLIENT NUMBER 6301

Re: LAWSON, MARK
Your File MUR 2071
Case No: B35017
Listing Expires: 15 OCT 1987
Locate Fee: \$250.00 "No Trace No Charge"

We acknowledge with thanks your **REGULAR** locate request named herein. Our guaranteed "No Trace - No Charge" search has now commenced and we again confirm that your only obligation is to allow us our exclusive three month assignment period to handle this case on your behalf. **Early cancellations are subject to a handling charge equal to one half of our normal fee.**

Upon a successful locate occurring you will be advised of our result by telephone then invoiced at the applicable rate. Unless otherwise arranged, invoices are due and payable upon receipt. Overdue interest is charged at the rate of 1.5% per month from date of invoice.

In the event that our initial efforts do not result in locating this person, we will correspond with you again in approximately six weeks time. If additional information comes to your attention that you feel could help us in our search, please call us immediately on our toll-free line 1-800-ONE-CALL(663-2255).

Trusting this is satisfactory, you may expect to hear from us further in the near future.

Yours truly,

INTERNATIONAL TRACING SERVICES, INC.

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ASSOCIATED WITH
INTERNATIONAL
EXAMINERS
SEARCHING

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INTERNATIONAL
TRACING
SERVICES

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INVOICE 29018

07/21/1987

IRS# 98 0055762

Reply to: Seattle

Telephone
TOLL FREE
1-800-863-2255

Alaska/Hawaii
1-800-426-9850

Direct
1-604-294-1811

UNITED STATES
P O Box 34000
Seattle, WA 98124-1000

CANADA
P O Box 33889, Sth D
Vancouver, Canada
V6J 4L6

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Mr. Phil Wyatt,
Federal Election Commission,
Office of General Counsel,
999 E St. N.W.,
Washington, DC 20463

Re: LAWSON, MARK
Your File: MUR 2071
Client/Case No: 6301B35017

Address: 350 Fair Forest Way, #7207,
Greenville, SC 29607

Telephone: 803-288-9339

Parents Address: 1112 Pinecroft Drive,
West Columbia, SC 29169

Telephone: 803-794-6876

Search initiated from address dated 1982:
5 Years at \$50.00 per year: \$250.00

OUR FEE: \$250.00

OUR GUARANTEE

The information provided in this report was obtained from sources deemed reliable. We guarantee the accuracy of the information subject only to the reliability of our sources which we cannot guarantee. **ANY QUESTIONS CONCERNING THIS REPORT SHOULD BE MADE WITHIN TEN DAYS OF THIS DATE TO AVOID FURTHER HANDLING CHARGES.** Your cooperation is appreciated.

TERMS OF PAYMENT

ACCOUNTS ARE DUE AND PAYABLE UPON PRESENTATION IN U.S. FUNDS. When submitting payment please return one copy of this invoice with your remittance. 1.5% interest charge per month on overdue accounts. Thank you.

AFFILIATED WITH
INTERNATIONAL
GENEALOGICAL
SEARCH, INC.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

rlm

August 6, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mark Lawson
350 Fair Forest Way
7207
Greenville, SC 29607

Dear Mr. Lawson:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because it appears that our first attempt to notify you of the Commission's determination was unsuccessful.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
Acting General Counsel

Enclosures

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

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INTERNATIONAL
TRACING
SERVICES

08/05/1987

Reply to: Seattle

Mr. Phil Wise,
Federal Election Commission,
Office of General Counsel,
999 E St. N.W.,
Washington, DC 20463

Telephone
TOLL FREE
1-800-663-2255

Alaska/Hawaii
1-800-426-9850

Direct
1-604-294-1811

FAX
1-604-294-1780

UNITED STATES
P.O. Box 34000
Seattle, WA 98124-1000

CANADA
P.O. Box 33889, Stn D
Vancouver, Canada
V6J 4L6

Dear Mr. Wise: CLIENT NUMBER 6301

Re: HARTNETT, LYNN
Your File 2071
Case No: G35342
Listing Expires: 02 NOV 1987
Locate Fee: \$195.00 "No Trace No Charge"

We acknowledge with thanks your **REGULAR** locate request named herein. Our guaranteed "No Trace - No Charge" search has now commenced and we again confirm that your only obligation is to allow us our exclusive three month assignment period to handle this case on your behalf. **Early cancellations are subject to a handling charge equal to one half of our normal fee.**

Upon a successful locate occurring you will be advised of our result by telephone then invoiced at the applicable rate. Unless otherwise arranged, invoices are due and payable upon receipt. Overdue interest is charged at the rate of 1.5% per month from date of invoice.

In the event that our initial efforts do not result in locating this person, we will correspond with you again in approximately six weeks time. If additional information comes to your attention that you feel could help us in our search, please call us immediately on our toll-free line 1-800-ONE-CALL(663-2255).

Trusting this is satisfactory, you may expect to hear from us further in the near future.

Yours truly,

INTERNATIONAL TRACING SERVICES, INC.

37 AUG 10 P12:37

RECEIVED
GENERAL
FILE

37 AUG 10 11:28

AFFILIATED WITH
INTERNATIONAL
GENEALOGICAL
SEARCH, INC

210436532



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John

August 11, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

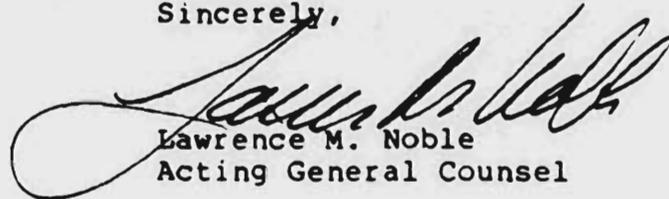
Mrs. Lynn Hartnett
3706 Gentry Drive
Florence, SC 29501

Dear Mrs. Hartnett:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because it appears that our first attempt to notify you of the Commission's determination was unsuccessful.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosures

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

21040565333



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

plm
August 11, 1987

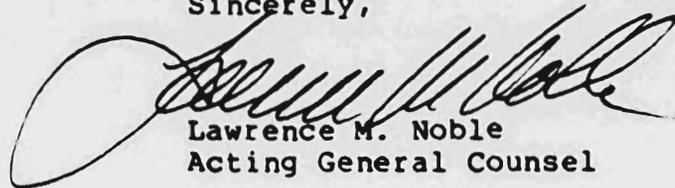
Mrs. Lynn Hartnett
3706 Gentry Drive
Florence, SC 29501

Dear Mrs. Hartnett:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). We are sending you the enclosed notification letter and supporting documents because it appears that our first attempt to notify you of the Commission's determination was unsuccessful.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosures

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

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**INTERNATIONAL
TRACING
SERVICES**

COPY 1

INVOICE 29189

08/07/1987

IRS# 98 0055762

Reply to: Seattle

CCC# 4183
Telephone
TOLL FREE
1-800-863-2255

Alaska/Hawaii
1-800-426-9850

Direct
1-604-294-1811

FAX
1-604-294-1780

UNITED STATES
P.O. Box 34000
Seattle, WA 98124-1000

CANADA
P.O. Box 33889, Stn. D
Vancouver, Canada
V6J 4L6

Mr. Phil Wise,
Federal Election Commission,
Office of General Counsel,
999 E St. N.W.,
Washington, DC 20463

Re: **HARTNETT, LYNN**
Your File: **2071**
Client/Case No: **6301G35342**

Address: **3706 Gentry Drive,
Florence, SC 29501**

Telephone: **803-669-8917**

Employer: **Robins Ladies Shop,
2184 Evans Street,
Florence, SC 29501**

Telephone: **803-665-1990**

OUR FEE: \$195.00

OUR GUARANTEE

The information provided in this report was obtained from sources deemed reliable. We guarantee the accuracy of the information subject only to the reliability of our sources which we cannot guarantee. **ANY QUESTIONS CONCERNING THIS REPORT SHOULD BE MADE WITHIN TEN DAYS OF THIS DATE TO AVOID FURTHER HANDLING CHARGES.** Your cooperation is appreciated.

TERMS OF PAYMENT

ACCOUNTS ARE DUE AND PAYABLE UPON PRESENTATION IN U.S. FUNDS. When submitting payment please return one copy of this invoice with your remittance. 1.5% interest charge per month on overdue accounts. Thank you.

37 AUG 18 A10:09

37 AUG 18 A8:41

AFFILIATED WITH
INTERNATIONAL
GENEALOGICAL
SEARCH INC

QCC# 4204

Lynn A. Hartnett
3706 Gentry Drive
Florence, S.C. 29501

87 AUG 20 P 12: 24

August 17, 1987

87 AUG 20 P 3: 10

GENERAL COUNSEL

Mr. Lawrence M. Noble
Acting General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: 2071

21040363336

Dear Mr. Noble:

My name is Lynn A. Hartnett. I have employed at Robin's Ladies' Wear, Inc. for ten years.

I received a certified letter today stating that I have abused a federal election rule. First of all, this was my first notification.

In may 1982, I was paid two bonuses totaling the amount of \$2,200.00, one for \$1,500.00 and one for \$700.00. All federal, state and social security taxes were deducted from these amounts and these were included on my end of the year W-2 form.

I did make a personal contribution to the Tallon for congress campaign in the amount of \$1,00.00 in May 1982, but this was one of many other political contributions that I have made in the past to other political candidates.

I hope that this letter is sufficient to determine that no violations were made on my part.

Sworn to before me
August 17, 1987

Carole B. Meier
Notary Public
Notary Public, South Carolina State at Large
My Commission Expires May 19, 1991

Sincerely,
Lynn A. Hartnett



INTERNATIONAL
TRACING
SERVICES

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL COPY 1

87 AUG 28 AM 10: 26 INVOICE 29018

07/21/1987

IRS# 98 0055762

Reply to: Seattle

Telephone
TOLL FREE
1-800-863-2255

Alaska/Hawaii
1-800-426-9850

Direct
1-604-294-1811

FAX
1-604-294-1780

UNITED STATES
P O Box 34000
Seattle, WA 98124-1000

CANADA
P O Box 33889, Stn D
Vancouver, Canada
V6J 4L6

Mr. Phil Wyatt, *(Wise)*
Federal Election Commission,
Office of General Counsel,
999 E St. N.W.,
Washington, DC 20463

Re: LAWSON, MARK
Your File: MUR 2071
Client/Case No: 6301B35017

COPY

Address: 350 Fair Forest Way, #7207,
Greenville, SC 29607

Telephone: 803-288-9339

Parents Address: 1112 Pinecroft Drive,
West Columbia, SC 29169

Telephone: 803-794-6876

Just a
**FRIENDLY
REMINDER**

Your
account
is now
past due!

Search initiated from address dated 1982:
5 Years at \$50.00 per year: \$250.00

OUR FEE: \$250.00

OUR GUARANTEE

The information provided in this report was obtained from sources deemed reliable. We guarantee the accuracy of the information subject only to the reliability of our sources which we cannot guarantee. **ANY QUESTIONS CONCERNING THIS REPORT SHOULD BE MADE WITHIN TEN DAYS OF THIS DATE TO AVOID FURTHER HANDLING CHARGES.** Your cooperation is appreciated.

TERMS OF PAYMENT

ACCOUNTS ARE DUE AND PAYABLE UPON PRESENTATION IN U.S. FUNDS. When submitting payment please return one copy of this invoice with your remittance. 1.5% interest charge per month on overdue accounts. Thank you.

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SEARCH INC

CCC# 4365

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

JACK W. LAWSON, JR., P.A.
ATTORNEY AT LAW

87 SEP 14 AM 9:38

TELEPHONE (803) 667-0585

603 WEST PALMETTO STREET
POST OFFICE BOX 309
FLORENCE, SOUTH CAROLINA 29503

August 19, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP 14 AM 11:23

Federal Election Commission
999 E Street NW
Washington, DC 20463

ATTN: Phillip L. Wise
Attorney at Law

RE: MUR #2071

Dear Mr. Wise:

Please find enclosed the Statement of Designation of Counsel signed by Mark E. Lawson appointing me as his attorney for this proceeding. I would ask that you immediately contact me upon receipt so that we can discuss your intentions in this matter as I am quite interested in a speedy resolution since Mr. Lawson is my brother as well as my client.

It appears from a review of the materials provided that you allege that Mark Lawson was an employee of Robin's of Florence, Inc. in April of 1982 which is incorrect nor was he an employee of LeMaster's, Inc. He was, in fact, at that time, an employee of Robin's of Anderson, Inc., a separate and distinct corporation from those listed in your factual basis and legal analysis. It would therefore appear that there has been some mistake as to his employment which may also infer that other mistakes are also contained in this analysis.

Your further analysis states that it is against the Federal Election Campaign Act of 1971 to make a contribution in the name of another person or to knowingly permit your name to be used to effectuate such a contribution, neither of which occurred. I assure you that Mark Lawson, in fact, is the person who made contribution and further that the \$1,000.00 bonus was a bonus, in fact, which Mr. Lawson claimed on his Federal Income Tax Return for that tax year. I therefore see no violation of law involved

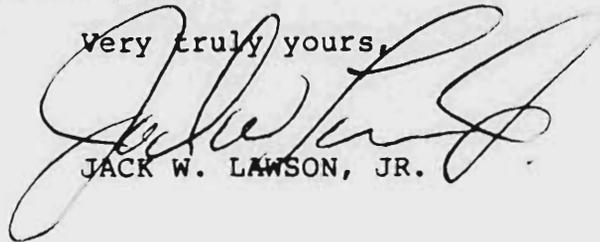
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Federal Election Commission
Page two (2)
August 19, 1987

in this contribution and would ask that you immediately notify me of any evidence which you might have to a contrary so that I can fully assess this matter. I cannot, based on these facts, see how the commission could find reason to believe that Mark Lawson violated two USC Section 441 F, nor any other provisions of the Federal Election Campaign Act of 1971. If, however, you have additional evidence to the contrary, I would appreciate your immediately notifying me of this or any other matters which in this contribution and would ask that you immediately notify me of any evidence which you might have to a contrary so that I can fully assess this matter. I cannot, based on these facts, see how the commission could find reason to believe that Mark Lawson violated two USC Section 441 F, nor any other provisions of the Federal Election Campaign Act of 1971. If, however, you have additional evidence to the contrary, I would appreciate your immediately notifying me of this or any other matters which concern Mr. Lawson.

Thanking you for your assistance, I remain

Very truly yours,



JACK W. LAWSON, JR.

JWLjr:pj

Enclosure

91040360332

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2071

NAME OF COUNSEL: Jack W. Lawson, Jr.

ADDRESS: 603 West Palmetto Street

Post Office Box 309

Florence, South Carolina 29503

TELEPHONE: (803) 667-0585

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

8/14/87
Date

Mark E. Lawson
Signature

RESPONDENT'S NAME: Mark E. Lawson

ADDRESS: 350 Fair Forestway

#7207

Greenville, South Carolina 29607

HOME PHONE: (803) 288-9339

BUSINESS PHONE: same

9104036340

CCC#4326

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

JACK W. LAWSON, JR., P.A.
ATTORNEY AT LAW

87 SEP -8 PM 2:32

TELEPHONE (803) 667-0585

603 WEST PALMETTO STREET
POST OFFICE BOX 309
FLORENCE, SOUTH CAROLINA 29503

September 4, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP -8 PM 4:10

Mr. Phillip L. Wise
Attorney at Law
999 E Street NW
Washington, DC 20463

RE: Mur #2071

Dear Mr. Wise:

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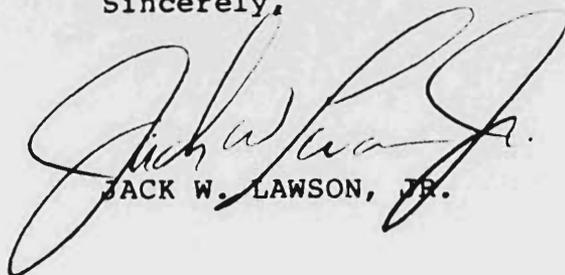
On September 4, 1987, an article appeared in the State newspaper written by Lee Bandy indicating that an investigation was being conducted by the Federal Election Commission concerning employee contributions to the 1982 Robin Tallon campaign. On about September 2, 1987, I was contacted by the reporter, Lee Bandy, who advised that he understood that Mark Lawson had received a letter from the Federal Election Commission concerning a contribution to the 1982 Robin Tallon campaign and that I had responded on his behalf. The information which was received from the Federal Election Commission indicated that this matter was subject to the Privacy Act and could not be made public unless authorized by the individual to whom the inquiry was directed. In my response, I did not authorize the release of this information nor did my client desire that this information be released and from the article which appeared in the State newspaper, an unnamed Federal Election Commission source is quoted as having given the information to Mr. Bandy. In light of this statement, I feel that the Federal Election Commission, by and through its agents, servants or employees, have violated the confidentiality to which my client was entitled. If your commission had no intention of keeping this matter private as required by Federal Law, then it seems unnecessary to give the individual the authority to release this information when, in fact, the intention was to leak this information to the press regardless of whether or not the individual authorized such release. This is particularly aggravating in light of the fact that based on the evidence contained in your initial inquiry, it appears that there has been no violations as far as my client is concerned of any Federal Election Law, however, in spite of this fact, your commission specifically revealed the essential allegations to a reporter knowing that there was a strong

likelihood that the reporter would publish this story thereby revealing information which is not subject to disclosure without the express permission of the subject of the inquiry.

It is further stated in this article that this matter was investigated by the Justice Department and apparently, no criminal wrong-doing was discovered and the matter was referred back to the Federal Election Commission. I believe that this finding should have been revealed to my client, and by this letter, I am specifically requesting a copy of the Findings of the Justice Department and further am renewing my request for information as contained in my prior response to your initial letter. I demand that this information be provided to me within ten (10) days of the date of this letter and would ask that if you have no intention of complying with my request, that you immediately so advise to allow me the opportunity to obtain this information by legal process.

Your immediate response is appreciated.

Sincerely,



JACK W. LAWSON, JR.

JWLJr:pj

21040563342

pen



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

15 October 1987

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, South Carolina 29503

RE: MUR 2071

Dear Mr. Lawson:

On September 14, 1987 the Office of the General Counsel received the Statement of Designation of Counsel naming you as attorney for Mark E. Lawson in the above referenced Matter Under Review. With receipt of that document this Office is now able to answer your two letters, dated August 19, 1987 and September 4, 1987, requesting information.

On August 24, 1987 your client, Mark E. Lawson, received the Federal Election Commission's ("the Commission") notification that there is reason to believe he violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Attached thereto was the General Counsel's Factual and Legal Analysis upon which the Commission based its finding. No additional information about your client was considered by the Commission in making its finding. This matter is currently in the investigative stages, and, once such investigation has been completed, a General Counsel's Brief will be furnished for your response, unless your client should choose to request conciliation prior to a finding of probable cause.

In your letter dated September 4, 1987 you make a request for a "copy of the Findings of the Justice Department." If such findings exist they are the property of the Justice Department. Thus any effort to secure any such findings should be directed to that agency.

Your September 4, 1987 letter also alleges violations of the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A), to which your client was entitled. This allegation is of great concern to the Commission because 2 U.S.C. § 437g(a)(12)(A) mandates that

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any notification or investigation in matters such as this shall not be made public by the Commission or by any person without the written consent of the person receiving such notification or the person with respect to whom such investigation is made.

Therefore, if you have specific information concerning leaks of confidential information, we suggest that you include such information in a complaint pursuant to 2 U.S.C. § 437g and 11 C.F.R. § 111.4 so that the situation may be fully investigated.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

21040363344

BEFORE THE FEDERAL ELECTION COMMISSION

87 OCT 19 AM 10:50

In the Matter of)

Gary H. Slavens, et al.)

MUR 2071)

GENERAL COUNSEL'S REPORT

~~SENSITIVE~~
EXECUTIVE SESSION
OCT 27 1987

BACKGROUND

On August 13, 1985, the Commission found reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3). The Commission also found reason to believe that Vicki Slavens violated 2 U.S.C. §§ 432(b)(3) and 441f. On the same date, the Commission found reason to believe that G. B. Stokes violated 2 U.S.C. § 441g. In addition, the Commission found reason to believe that Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina) violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). On the same date, the Commission found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon,^{1/} as treasurer violated 2 U.S.C. § 441f.

From September to December of 1985 the above respondents, excluding Vicki Slavens, filed affidavits, and letters with the Commission. As a result of their inconclusive nature, on March 18, 1986 the Commission authorized subpoenas and orders to Gary H. Slavens, Vicki Slavens, G.B. Stokes, Representative Robin Tallon, Michael Glenn Odom, and the Tallon for Congress Committee and Lamar Rabon, as treasurer.

^{1/} Lamar J. Rabon is the current treasurer of the Tallon Committee. He was not the treasurer of the Committee in 1982. The treasurer at the time the alleged violations occurred was Michael Glenn Odom.

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During May 21-23, 1986, this Office conducted depositions in Columbia, South Carolina. Gary H. Slavens, G.B. Stokes, and Michael Glenn Odom were deposed. The Tallon for Congress Committee (hereinafter "Committee"), and Lamar J. Rabon, as treasurer, produced documents in compliance with the subpoena directed to them.

Vicki Slavens did not appear. The letter forwarding the subpoena to her was returned by the Postal Service as "unclaimed." Gary Slavens provided an address and telephone number for Vicki Slavens. On August 18, 1986 Vicki Slavens informed this Office that she had never received any notification and was unaware of MUR 2071. A duplicate reason to believe notification was mailed to her on August 19, 1986, which she received on August 28, 1986.

Subsequently, Vicki Slavens filed an affidavit with the Commission on September 10, 1986, stating that in 1982, she was married to Gary Slavens who asked her to make a \$1,000 contribution to the Committee. After she indicated uncertainty as to having the money, Gary Slavens said he would deposit \$1,000 into her account. Gary Slavens made the deposit and she then wrote a check for that amount to the Committee.

During his deposition, Gary Slavens indicated that we should contact a James A. ("Jimmy") Brown, Jr. who, according to Slavens, was aware of illegal practices in the Tallon campaign in 1982. Slavens declared that Brown could corroborate his allegations regarding cash contributions to the Tallon campaign.

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In a telephone conversation on May 21, 1986 with a staff member of this Office, Brown stated that he was a personal friend of Representative Tallon, and although he had never been an official or paid employee of the Committee he did help out at headquarters. Brown stated that there were many rumors about cash contributions to the Tallon campaign, and that these had led to an investigation by the Department of Justice. Brown further stated that he had no direct knowledge of any cash going into the campaign, as Slavens had indicated he had.

Brown also furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina.^{2/} In early April, 1982, when "seed money" was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then allegedly contributed these funds to the Tallon campaign. Brown supplied the following names as having received these bonuses and having contributed them to the campaign: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, Jane Harris, Roland Minshew, and Mark Lawson.

^{2/} The corporations owning the stores are: Robin's of Florence, Inc. (organized in 1976), LeMasters, Inc. (organized in 1979), Robin's of North Myrtle Beach, Inc. (organized in 1976), Robin's Ladies Wear, Inc. (organized in 1977), Robin's of Anderson, Inc. (organized in 1978), and Robin's of Dentsville, Inc. (organized in 1977). Certified copies of the incorporation documents have been received from South Carolina. Robert M. [sic] Tallon, Jr. is listed as incorporator and director of each.

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Brown revealed that the bonuses were openly discussed at Tallon headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), both of whom worked at the campaign headquarters. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On August 6, 1986, this Office received a signed and sworn affidavit from Brown. Attachment 1. The affidavit differed significantly from Brown's telephone statement. He claimed to have no independent recollection as to the individuals who made statements concerning bonuses, or who participated in the conversation. Further, Brown declared that he had no knowledge of who worked in Tallon's clothing stores or who may have received any bonuses.

At the depositions, the Tallon for Congress Committee produced its receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown, on May 21, 1986, made contributions early in the Tallon campaign, as follows: on April 14, 1982 Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00. Lynn Hartnett contributed \$1,000.00 on May 4, 1982.

It should be noted that five of the six contributions listed above were received on the same day, April 14, 1982, that the receipt numbers are virtually sequential, and that the amounts

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are an even \$1000 except for contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to create "seed money".

During his deposition, Michael Glenn Odom, the former treasurer of the Tallon for Congress Committee, stated that he became aware of these allegations in 1984. Odom identified the following as employees of the Tallon clothing stores during 1982: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, and Ronald Minshew. Odom also stated that to his knowledge, Robert Hartnett is the husband of Lynn Hartnett, and Cameron Tallon Minshew is the wife of Ronald Minshew and the sister of Robin M. Tallon, Jr.

Odom further testified that he was aware that it is illegal for a person to give a contribution in the name of another, or to knowingly permit his name to be used to effect a contribution in the name of another. Odom declared that he was not aware of the alleged conduct in 1982 when he was treasurer.

The subpoena for deposition and production of documents to Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina) has not yet been served. This Office believes it necessary to obtain the testimony of all other witnesses and

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parties in this matter as well as further documentation prior to deposing Representative Tallon.^{3/}

On November 12, 1986 the Commission found reason to believe that Robin's of Florence, Inc. and LeMasters, Inc. violated 2 U.S.C. § 441b(a) and 2 U.S.C. § 441f. The Commission also found reason to believe that Tallon for Congress Committee, and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441b(a). In addition, the Commission found reason to believe that Jane Harris, Jerry Harris, Lynn Hartnett, Mark Lawson, Roland Minshew and Robert (Bobby) Welch violated 2 U.S.C. § 441f.

On November 21, 1986 the above named parties were mailed notice of the Commission's findings. The notice letters to Mark Lawson, and Lynn Hartnett were unclaimed and returned to this Office.^{4/} The responses received from the others were all dated December 8, 1986, and contain the same basic response.

^{3/} This Office has had several conversations with Congressman Tallon. During these conversations, the Congressman indicated he wanted to help get this matter straightened out as soon as possible and would do everything he could to cooperate with the Commission's investigation. As indicated above, the subpoena to Representative Tallon will be served as soon as the other aspects of the investigation are completed.

^{4/} The letters to Lynn Hartnett and Mark Lawson were remailed to them. Their responses have been received, and contain the same basic response as the others.

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Although the answers indicate that each received bonuses well in excess of the contributions, i.e., bonuses of either \$2,330 or \$2,380, there is a lack of specific information surrounding the payment of the bonuses, such as whether these bonuses were given on a regular basis in April of each year or were paid only in April of 1982;^{5/} what criteria were used to determine the amount of the bonuses and whether the recipients of the bonuses received any instructions or suggestions regarding contributing the bonuses to Tallon's campaign.

In light of the inconsistency between the phone conversation and subsequent affidavit of James A. ("Jimmy") Brown, Jr. regarding bonuses being used as "seed money", the similarity of the responses of the individual respondents and the inconclusive information as to the bonuses given by Robin's of Florence, Inc., and LeMasters, Inc., this Office believes that the only effective means to resolve these factual matters is to take the depositions of James A. ("Jimmy") Brown, Jr., Jane Harris, Jerry Harris, Roland Minschew, Robert Welch, Lynn Hartnett, Mark Lawson, an officer from Robin's of Florence, Inc., and of LeMasters, Inc. In addition, as the respondents indicate that bonuses were received from corporations other than Robin's of Florence, Inc. and LeMasters, Inc., it appears necessary to take depositions of an officer of each of those corporations to resolve this matter.

⁵ Robert Welch contends the bonuses are paid on a regular basis, however, no documents have been presented to support this contention. Attachment 8.

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Therefore, the Office of the General Counsel recommends that the Commission authorize the appropriate subpoenas and orders to Robin's of North Myrtle Beach, Inc., Robin's Ladies Wear, Inc., Robin's of Anderson, Inc., and Robin's of Dentsville, Inc., in addition to those mentioned above.

II RECOMMENDATIONS:

1. Authorize the attached subpoenas and orders to:

James A. ("Jimmy") Brown, Jr., Jane Harris, Jerry Harris, Roland Minshew, Robert Welch, Lynn Hartnett, and Mark Lawson.

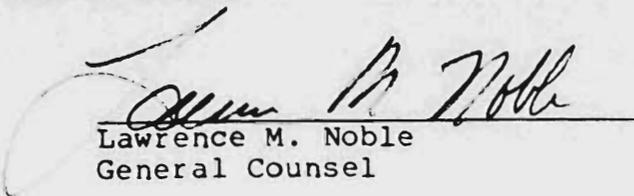
2. Authorize the attached subpoenas and orders to:

Robin's of Florence, Inc., LeMasters, Inc., Robin's of North Myrtle Beach, Inc., Robin's Ladies Wear, Inc., Robin's of Anderson, Inc., and Robin's of Dentsville, Inc.

3. Approve and send the attached letters.

Date

10/16/87


Lawrence M. Noble
General Counsel

Attachments:

1. Affidavit of James A. ("Jimmy") Brown, Jr.
2. Letter response from Robin's of Florence, Inc.
3. Letter response from LeMasters, Inc.
4. Letter response from Jane Harris
5. Letter response from Jerry Harris
6. Letter response from Roland Minshew
7. Letter response from Robert Welch dated December 8, 1986
8. Letter response from Robert Welch dated December 15, 1986
9. Letter response from Lynn Hartnett
10. Subpoenas (13)
11. Letters (13)
12. Mark Lawson's response through his attorney Jack Lawson dated August 19, 1987 and received at the Commission on September 14, 1987
13. Mark Lawson's response through his attorney Jack Lawson dated September 4, 1987 and received at the Commission on September 8, 1987

910405332

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gary H. Slavens, et al.) MUR 2071

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 27, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2071:

1. Authorize the sending of subpoenas and orders to the following persons as recommended in the General Counsel's report dated October 16, 1987:

James A. ("Jimmy") Brown, Jr., Jane Harris, Jerry Harris, Roland Minshew, Robert Welch, Lynn Hartnett, and Mark Lawson.

2. Authorize the sending of subpoenas and orders to the following as recommended in the General Counsel's report dated October 16, 1987:

Robin's of Florence, Inc., LeMasters, Inc., Robin's of North Myrtle Beach, Inc., Robin's Ladies Wear, Inc., Robin's of Anderson, Inc., and Robin's of Dentsville, Inc.

(continued)

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3. Approve and send the letters attached to the General Counsel's report dated October 16, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

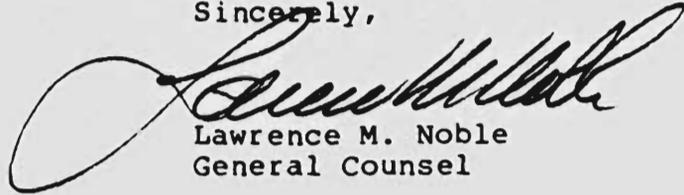
10/27/87
Date

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

21040363355

Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: James A. ("Jimmy") Brown, Jr.
P.O. Box 5227
Florence, SC 29502

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding Representative Robin M. Tallon's 1982 Congressional Campaign. Notice is hereby given that the deposition is to be taken on November 30, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of James A. ("Jimmy") Brown, Jr. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to James A. ("Jimmy") Brown, Jr., in his capacity as agent, express or implied, of the Tallon for Congress Committee, as well as in his individual capacity.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each

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such document for which the privilege or objection is claimed, together with the following information:

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and/or loans by you to the Tallon for Congress Committee.

21040363360

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this 30th day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

1040363351



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Lynn Hartnett
3706 Gentry Drive
Florence, SC 29501

RE: MUR 2071
Lynn Hartnett

Dear Ms. Hartnett:

On August 17, 1987, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

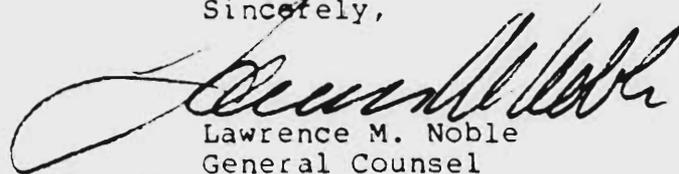
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on November 30, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

010405552

materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Lynn A. Hartnett. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;

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

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5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and/or loans by you to the Tallon for Congress Committee.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this 30th day of October, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert L. Welch
309 Reseda Drive
Columbia, SC 29204

RE: MUR 2071
Robert L. Welch

Dear Mr. Welch:

On December 5, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

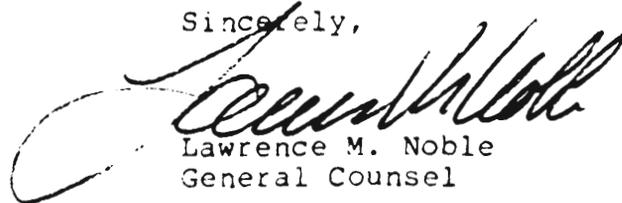
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on November 30, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **Robert L. Welch**
309 Reseda Drive
Columbia, SC 29204

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to your contribution to the Tallon for Congress Committee in 1982. Notice is hereby given that the deposition is to be taken on November 30, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 3:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Robert L. Welch. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

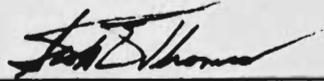
Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and or loans by you to the Tallon for Congress Committee.

31040365370

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

21040565371



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Florence, South Carolina 29503

RE: MUR 2071
Mark Lawson

Dear Mr. Lawson:

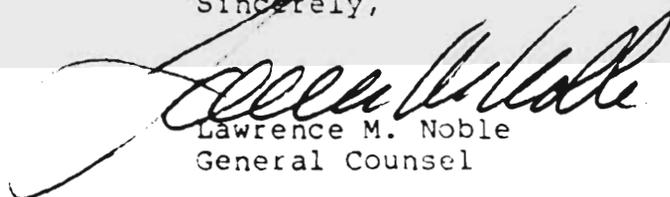
On August 24, 1987, your client, Mark Lawson, was notified that the Federal Election Commission had found reason to believe that he had violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring your client to appear and give sworn testimony on December 1, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. Your client will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **Mark Lawson**
350 Fair Forest Way
#7207
Greenville, SC 29607

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election

Commission hereby subpoenas you to appear for deposition with regard to your contribution to the Tallon for Congress Committee in 1982. Notice is hereby given that the deposition is to be taken on December 1, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Mark Lawson. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

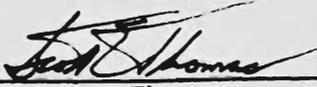
Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and/or loans by you to the Tallon for Congress Committee.

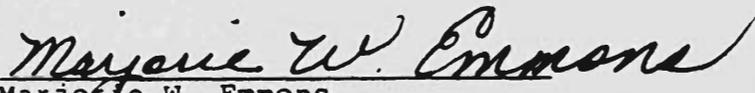
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

7104033376



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jane Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

RE: MUR 2071
Jane Harris

Dear Ms. Harris:

On November 21, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

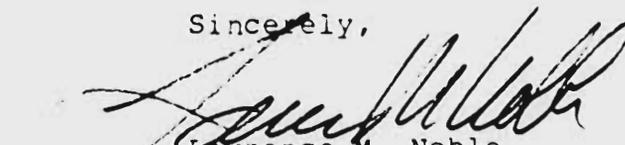
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on December 1, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (300/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

01040365377

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **Jane Harris**
2006 Highway 17
N. Myrtle Beach, SC 29582

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to your contribution to the Tallon for Congress Committee in 1982. Notice is hereby given that the deposition is to be taken on December 1, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Jane Harris. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and/or loans by you to the Tallon for Congress Committee.

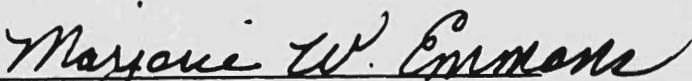
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this 30th day of October, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

2104056031



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jerry Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

RE: MUR 2071
Jerry Harris

Dear Mr. Harris:

On November 21, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on December 1, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Subpoena

2104063302

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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) MUR 2071
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SUBPOENA

To: Jerry Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to your contribution to the Tallon for Congress Committee in 1982. Notice is hereby given that the deposition is to be taken on December 1, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 3:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Jerry Harris.

Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

(a) a description of the subject matter;

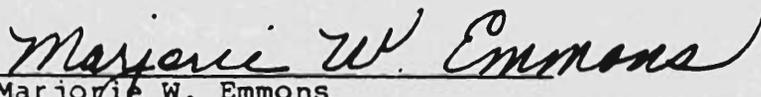
2104036334

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

210405336



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Roland G. Minshew
120 Lake Wood Drive
Florence, SC 29501

RE: MUR 2071
Roland G. Minshew

Dear Mr. Minshew:

On November 29, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on December 2, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Subpoena

91040363337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **Roland Minshew**
120 Lake Wood Drive
Florence, SC 29501

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to your contribution to the Tallon for Congress Committee in 1982. Notice is hereby given that the deposition is to be taken on December 2, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic

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materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Roland Minshew. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

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

- (a) a description of the subject matter;

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

1. All documents and materials related to contributions and loans you made to the Tallon for Congress Committee, including, but not limited to, letters, memoranda, bank records of contributions and loans made, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions from you or making contributions and/or loans by you to the Tallon for Congress Committee.

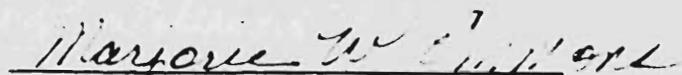
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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at the office of the Commission at
Washington, D.C., this 30th day of October, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

1040363371

llm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
Robin's of North Myrtle Beach
2301 West Evans Street
Florence, SC 29501

RE: MUR 2071

Dear Sir/Madam:

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The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on December 3, 1987, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina and provide certain information in connection with an investigation it is conducting.

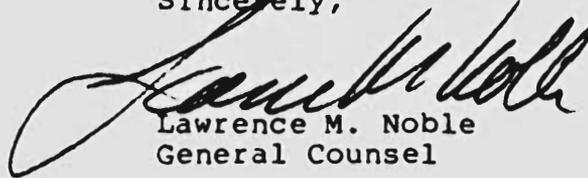
Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **President
Robin's of North Myrtle Beach, Inc.
2031 W. Evans Street
Florence, South Carolina 29501**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 3, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

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writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to the Corporation, the President, the Board of Directors, agents, express or implied.

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.

2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

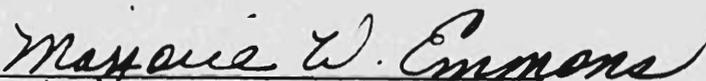
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

7104035337



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
Robin's of Anderson, Inc.
2182 West Evans Street
Florence, SC 29501

RE: MUR 2071

Dear Sir/Madam:

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The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on December 3, 1987, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina and provide certain information in connection with an investigation it is conducting.

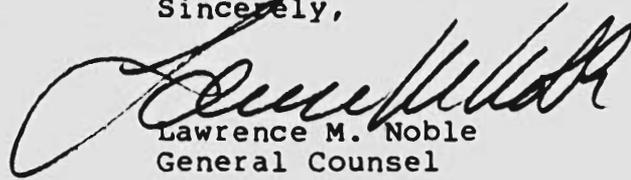
Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

21040565373

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **President
Robin's of Anderson, Inc.
2182 West Evans Street
Florence, South Carolina 29501**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 3, 1987, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

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writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to the Corporation, the President, the Board of Directors, agents, express or implied.

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.

2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

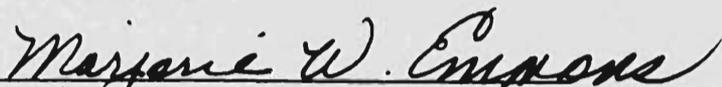
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

21040363403



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
LeMasters, Inc.
Magnolia Mall
Florence, South Carolina 29501

RE: MUR 2071
LeMasters

Dear Sir/Madam:

On November 26, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. §§ 441f and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended.

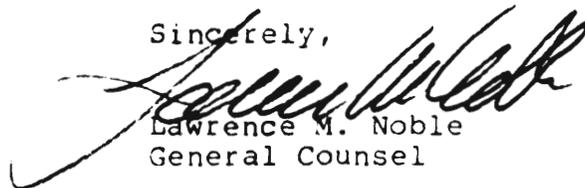
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on December 2, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

21040365404

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **President
LeMasters, Inc.
Magnolia Mall
Florence, South Carolina 29501**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 2, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 1:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

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writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to the Corporation, the President, the Board of Directors, agents, express or implied.

21040360406

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.

2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

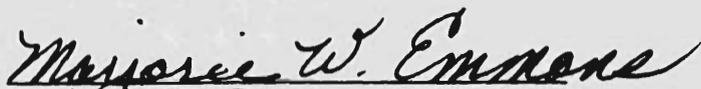
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this 30th day of October, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

21040363403



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
Robin's of Florence, Inc.
2031 West Evans Street
Florence, South Carolina 29502

RE: MUR 2071
Robin's of Florence, Inc.

Dear Sir/Madam:

On November 26, 1986, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. §§ 441f and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended.

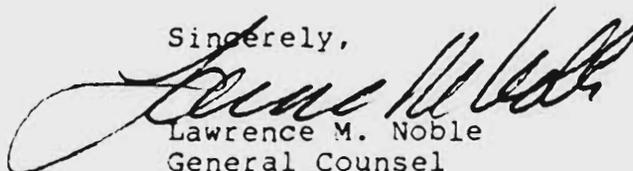
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on December 2, 1987 and provide information, which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00 plus mileage at the rate of 20.5 cents per mile. You will be given a check for the witness fee and mileage at the time of the deposition.

Please confirm the scheduled appearance with Phillip L. Wise, the attorney handling this matter, on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

21040565409

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **President
Robin's of Florence, Inc.
2301 W. Evans Street
Florence, South Carolina 29502**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 2, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 3:30 p.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

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writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.

2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

21040363412

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

21040363413



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
Robin's Ladies Wear, Inc.
2184 West Evans Street
Florence, SC 29501

RE: MUR 2071

Dear Sir/Madam:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on December 3, 1987, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina and provide certain information in connection with an investigation it is conducting.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

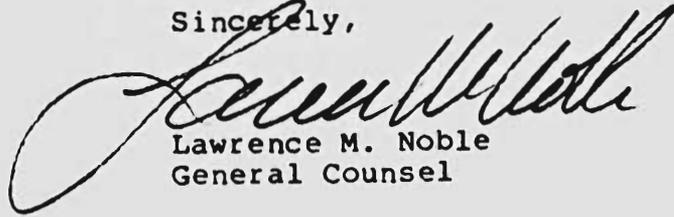
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Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

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Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

91040363415

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: **President
Robin's Ladies Wear, Inc.
2184 West Evans St.
Florence, South Carolina 29501**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 3, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 3:30 p.m. continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

1040060416

writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to the Corporation, the President, the Board of Directors, agents, express or implied.

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.
2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

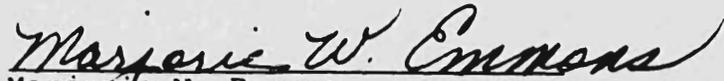
11040363413

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

71-40363419



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

03 November 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

President
Robin's of Dentsville, Inc.
2182 West Evans Street
Florence, SC 29501

RE: MUR 2071

Dear Sir/Madam:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on December 4, 1987, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina and provide certain information in connection with an investigation it is conducting.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

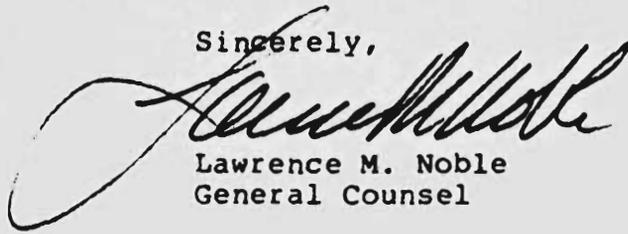
You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 20.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

01060440

Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

21040565441

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)
)

MUR 2071

SUBPOENA

To: **President
Robin's of Dentsville, Inc.
2182 West Evans Street
Florence, South Carolina 29501**

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding the policy, practices and procedures for giving employee bonuses for the years 1980 through 1982. Notice is hereby given that the deposition is to be taken on December 4, 1987 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 9:30 a.m. and continuing each day thereafter as necessary.

Further, pursuant to 2 U.S.C. § 437d(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. by November 13, 1987.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of

21040563422

210403363423
writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of the corporation. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to the Corporation, the President, the Board of Directors, agents, express or implied.

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

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1980, through December 31, 1982.

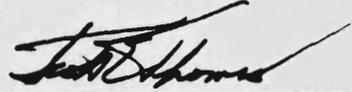
Please provide in their entirety the following:

1. A list which will show all bonuses paid to employees with the name of each employee, and the date and amount of each bonus received from the corporation for the years 1980 through 1982, if any.

2. All documents relating to the corporate procedures for authorizing employee bonuses for the years 1980 through 1982.

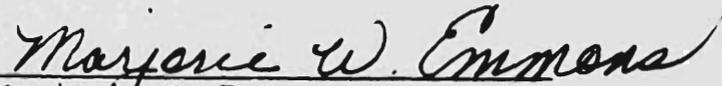
44053424

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *30th* day of *October*, 1987.



Scott E. Thomas
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

21040360425

CCC # 4746

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 NOV 13 AM 10:50
RODNEY C. JERNIGAN, JR.
ATTORNEY AT LAW
POST OFFICE BOX 2130
FLORENCE, SOUTH CAROLINA 29503

87 NOV 13 AM 9:13
TELEPHONE (803) 664-2884

BUSINESS & TECHNOLOGY CENTER
THIRD FLOOR
181 EAST EVANS STREET
SUITE 314
FLORENCE, SOUTH CAROLINA 29501

TELEX # 5106011431
FAC # (803) 664-2803

November 9, 1987

Mr. Phil Wise
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Re: James A. "Jimmy" Brown, Jr.
MUR 2071

Dear Mr. Wise:

This will confirm our telephone conversation of November 9, 1987 regarding the above matter. As I advised you, I have been retained to represent Mr. James A. Brown, Jr. regarding the subpoena he received in the above matter. Please be advised that Mr. Brown will be in attendance at his deposition on November 30, 1987. Please take this official notice that I will be present at that same time.

This will also confirm, that Mr. Brown is not under any investigation but his deposition is being taken solely as a witness. You also indicated to me that he is not facing any liability for any of the actions regarding the Agency's investigation into the above matter.

As I advised you, Mr. Brown does not have any records. We are in the process of making a diligent effort to try to obtain copies of cancelled checks from the donations he made to the Tallon campaign in 1982. As I advised you, we do not presently have the checks, but we are attempting to obtain the same from the bank.

You also indicated to me that you would have with you copies of all prior statements given by Mr. Brown. As I indicated to you, Mr. Brown recalls giving one statement, but he failed to retain a copy of the statement. We would appreciate very much if you would forward us copies of any statements made by Jimmy Brown, as soon as possible, so that he can review them prior to the deposition.

21040063426

Mr. Phil Wise
November 9, 1987
Page 2

If we can be of any further assistance to you, please do not hesitate to give me a call. Otherwise, we will look forward to seeing you on November 30, 1987.

With warmest personal regards,

Sincerely yours,


Rodney C. Jernigan, Jr.

/jal

cc: Mr. James A. Brown, Jr.

91040365427

CCC#4768

November 11, 1987

Roland G. Minshew
120 Lakewood Drive
Florence, S. C. 29501

87 NOV 16 AM 9:40

Federal Election Commission
999 East Street, N. W.
Washington, D. C. 20463

RE: MUR 2071
Roland G. Minshew

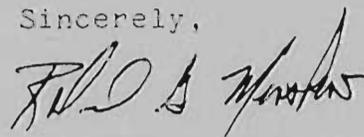
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 NOV 16 AM 11:48

Dear Sir:

Enclosed please find all documents and materials relating to contributions I made to the Tallon for Congress Committee during the period of January 1, 1982, through December 31, 1982.

I will be present on December 2, 1987 at 9:30 a.m. in the Conference Room at the U. S. Attorney's Office in Columbia, S. C.

Sincerely,



Roland G. Minshew

RGW/ctm

Enclosures

21040363428

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 665-7178
FLORENCE, SC 29501

2122

March 12, 1982

67-5
5320

PAY TO THE
ORDER OF

Concerned Veterans of the 6th Dist 100-

One hundred & ^{no} _____ DOLLARS

 **First National Bank**
First National Bank of South Carolina
Florence, South Carolina 29501

Cameron T. Minshew

FOR

⑆05320005⑆: 251075289⑆ 2122 ⑆00000⑆0000⑆

MARKING 438

21040363429

*Concerned Veterans of
the 6th Region
District
Zim Brown Area
1004 17502*

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 665-7176
FLORENCE, SC 29501

2185

April 13 1982

67-5
532

PAY TO THE ORDER OF *Roller For Congress*

\$ 1000

One thousand dollars 100/100

DOLLARS

First National Bank
First National Bank of South Carolina
Florence, South Carolina 29501

FOR *Contribution*

R. G. Minshew

⑆053200051⑆ 251075289⑆ 2185 ⑆0000100000⑆

HARLAND 338

21040050430

*see deposit slip
Roller For Congress
March
1980-7068*

FIRST NATIONAL BANK OF
SOUTH CAROLINA
FLORENCE, SOUTH CAROLINA

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 665-7178
FLORENCE, SC 29501

2410

Aug 10, 1982

67-5
532

PAY TO THE
ORDER OF

Tallon For Congress

750⁰⁰

Seven hundred fifty + ^{no}

DOLLARS



First National Bank
First National Bank of South Carolina
Florence, South Carolina 29501

Roland G. Minshew, Jr.

FOR

⑆05320005⑆ 251075289⑆ 2410⑆ ⑆0000075000⑆

MARLAND 438

21040360431

FOR DEPOSIT ONLY
TALLON FOR CONGRESS
COMMITTEE
#1907168

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 665-7176
FLORENCE, SC 29501

2458

Sept. 1, 1982

67-6
632

PAY TO THE
ORDER OF

Rolla De Congress

\$ 82⁰⁰

Eighty-Two and no

DOLLARS



First National Bank
First National Bank of South Carolina
Florence, South Carolina 29501

FOR

Cameron T. Minshew

⑆05320005⑆ 251075289⑆ 2458 ⑆00000008200⑆

HARLAND A 58

21040563432

FOR POST OFFICE
DELIVERY ONLY
COMMUNITY
ADDRESS
7/11/82

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 665-7178
FLORENCE, SC 29501

2502

Sept. 29, 1982

07-5
832

PAY TO THE
ORDER OF

Tallon for Congress

50⁰⁰

Fifty + no

DOLLARS



First National Bank
First National Bank of South Carolina
Florence, South Carolina 29501

FOR

Cameron J. Minshek

⑆053200051⑆ 251075289⑈ 2502 ⑈0000005000⑈

HARLAND 433

21040363433

FOR DEPOSIT ONLY
TALLON FOR CONGRESS
COMMITTEE
#1907463

ROLAND G. MINSHEW, JR.
OR CAMERON T. MINSHEW
120 LAKEWOOD DR 685-7178
FLORENCE, SC 29501

2543

Oct 22, 1982

87-5
632 00

PAY TO THE
ORDER OF

Tallon for Congress

\$ 1,000⁰⁰

One thousand ^{no}

DOLLARS



First National Bank
First National Bank of South Carolina
Florence, South Carolina 29501

Cameron T. Minshek

FOR

⑆05320005⑆ 251075289⑈ 2543

⑈0000100000⑈

HARLAND 538

21040565454

FOR DEPOSIT ONLY
TALLON FOR CONGRESS
COMMITTEE
#1907468



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 23, 1987

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Robert L. Welch
P.O. Box 618
N. Myrtle Beach, South Carolina 29597-0618

RE: MUR 2071

Dear Mr. Welch:

On October 27, 1987, the Federal Election Commission authorized a subpoena requiring you to appear and give sworn testimony. We are sending you a copy of the original notification letter and subpoena because it appears that our first attempt to notify you of the Commission's determination was unsuccessful. However, you have informed this Office, by telephone, that you will appear on behalf of all the various corporations involved; therefore, your testimony will be taken on all matters concerning you, individually, and on behalf of the corporations, beginning at 1:30 p.m. on December 2, 1987.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble (LM)

Lawrence M. Noble
General Counsel

Enclosures
Notification Letter
Subpoena

7104053435



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 23, 1987

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Rodney C. Jernigan, Jr., Esquire
Post Office Box 2130
Florence, South Carolina 29503

Re: MUR 2071

Dear Mr. Jernigan:

In response to your letter dated November 9, 1987, received by the Office of the General Counsel on November 13, 1987, in which you requested a copy of the statement filed by your client, James A. ("Jimmy") Brown, Jr., we are herewith enclosing a copy of his affidavit of August 4, 1986.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Affidavit

710405456

Robin's

"Men's Quality Clothing"

TELEPHONE 680-3641

2031 WEST EVANS STREET

P. O. BOX 3667

FLORENCE, SOUTH CAROLINA 29502

GCC 4845

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 NOV 27 AM 10:00

November 23, 1987

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 NOV 27 PM 12:40

Office of the General Counsel
Federal Election Commission
999 East Street, N. W.
Washington, D. C. 20463

RE: MUR 2071

Dear Sir:

As per my telephone conversation with Phillip L. Wise, the attorney handling this matter, enclosed please find the records you requested for hearings of the various Robin's Men Stores, scheduled to begin Wednesday, December 2, at 1:30 P.M.

If I can be of further assistance prior to our meeting in Columbia on December 2, please don't hesitate to call on me at (803) 272-2381.

Sincerely yours,

Robert L. Welch (ctm)

Robert L. Welch

RLW/ctm

enclosures

7 1 1 4 0 3 6 3 4 3 7

4 Robin's of Dentsville, Inc.
7359 Two Notch Road
Columbia, SC 29204

MUR 2011

1-2-80	Mike Banknight	200 00	5-6-80	Mike Banknight	40531
1-2-80	Tony Meadows	24600	5-6-80	Bobby Welch	105160
1-2-80	Steven Zobel	127 00	5-6-80	Myles Weinberg	24867
1-2-80	Geoff Gabriel	7000	5-6-80	Geoff Gabriel	21105
1-2-80	Staffy Crowley	130 00	5-6-80	Steve Zobel	6481
1-4-80	Bobby Welch	43600	5-6-80	Tim Hunter	7368
1-7-80	Mike Banknight	1308 00	5-21-80	Bobby Welch	6000
1-7-80	Tony Meadows	47658	5-21-80	Mike Banknight	12000
1-7-80	Steve Zobel	35537	5-21-80	Myles Weinberg	10300
1-7-80	Geoff Gabriel	31796	5-21-80	Geoff Gabriel	9400
1-7-80	Staffy Crowley	33071	5-21-80	Tim Hunter	3120
2-6-80	Bobby Welch	15586	5-21-80	Steve Zobel	1920
2-7-80	Mike Banknight	46759	6-4-80	Bobby Welch	97322
2-7-80	Tony Meadows	180 00	6-4-80	Mike Banknight	41900
2-7-80	Steve Zobel	13418	6-4-80	Myles Weinberg	20431
2-7-80	Geoff Gabriel	22456	6-4-80	Geoff Gabriel	21912
2-7-80	Tim Hunter	376	6-4-80	Tim Hunter	13203
3-5-80	Mike Banknight	45200	6-8-80	Myles Weinberg	12177
3-5-80	Tony Meadows	14833	7-3-80	Bobby Welch	70933
3-5-80	Steve Zobel	11320	7-3-80	Mike Banknight	21825
3-5-80	Geoff Gabriel	18966	7-3-80	Geoff Gabriel	13943
3-5-80	Tim Hunter	6921	7-3-80	Tim Hunter	10632
3-5-80	Bobby Welch	15000	7-3-80	Steve Zobel	8065
4-3-80	Myles Weinberg	5565	8-5-80	Bobby Welch	50544
4-3-80	Tony Meadows	6778	8-5-80	Mike Banknight	15656
4-3-80	Tim Hunter	1700	8-5-80	Tim Hunter	7638
4-3-80	Geoff Gabriel	11754	8-5-80	Geoff Gabriel	11905
4-3-80	Steve Zobel	6482	8-5-80	Steve Zobel	9583
4-3-80	Bobby Welch	11586			
4-3-80	Mike Banknight	34758			

2 1 0 4 0 Robbig's of Dentonville, Inc.
 1359 Two Notch Road
 Columbia, S.C. 29204

(2)

9-4-80	Bobby Welch	47517	12-2-80	Bobby Welch	83520
9-4-80	Cam Kreps	428	12-2-80	Mike Bauknight	20325
9-4-80	Steve Zobel	4167	12-2-80	Jimmy Gillis	4991
9-4-80	Tim McElveen	1259	12-2-80	Steve Zobel	15044
9-4-80	Tim Hunter	9668	12-2-80	Allen Stewart	8494
9-4-80	Geoff Gabriel	12477	12-2-80	Warren Merck	2868
9-5-80	Mike Bauknight	14307	12-2-80	Ray Derrick	13111
10-2-80	Bobby Welch	66037	12-2-80	Geoff Gabriel	4299
10-2-80	Mike Bauknight	22354	12-30-80	Bobby Welch	7800
10-2-80	Cam Kreps	10422	12-30-80	Mike Bauknight	10700
10-2-80	Steve Zobel	4968	12-30-80	Stephen Zobel	9100
10-2-80	Dexter Truax	926	12-30-80	Allen Stewart	6900
10-2-80	Warren Merck	6880	12-30-80	Ray Derrick	10200
10-2-80	Ray Derrick	3771	12-30-80	Geoff Gabriel	3400
11-4-80	Steve Zobel	2897	12-30-80	John Hodge	3400
11-4-80	Jimmy Gillis	4901	12-30-80	Warren Merck	500
11-4-80	Cam Kreps	1255	12-30-80	James Gillis	1100
11-4-80	Mike Bauknight	21906	1-5-81	Bobby Welch	180113
11-4-80	Bobby Welch	74423	1-5-81	Mike Bauknight	32443
11-4-80	Warren Merck	10874	1-5-81	Steve Zobel	22892
11-4-80	Geoff Gabriel	1579	1-5-81	Allen Stewart	27899
11-4-80	Geoff Gabriel	344	1-5-81	Ray Derrick	32866
11-4-80	Bobby Welch	4515	1-5-81	Geoff Gabriel	17126
11-4-80	Warren Merck	2718	1-5-81	John Hodge	20306
11-4-80	Ray Derrick	3287	2-3-81	Bobby Welch	64669
11-4-80	Jimmy Gillis	1225	2-3-81	Mike Bauknight	15456
11-4-80	Mike Bauknight	5476	2-3-81	Geoff Gabriel	657
11-4-80	Cam Kreps	313	2-3-81	Steve Zobel	10287
11-4-80	Steve Zobel	724	2-3-81	Allen Stewart	11258
11-4-80	Ray Derrick	13149	2-3-81	Ray Derrick	10124

4 Robin's Sof, Dentonville, Inc.
 7359 Two Notch Road
 Columbia, SC 29204

(3)

2-3-81	John Hodge	8012	6-2-81	Tony Meadows	10091
3-3-81	Bobby Welch	80869	7-2-81	Bobby Welch	58000
3-3-81	Mike Banknight	20194	7-2-81	Tony Meadows	20819
3-3-81	Steve Zobel	17339	7-2-81	Steve Zobel	11729
3-3-81	Allen Stewart	10380	7-2-81	Allen Stewart	14836
3-3-81	Ray Derrick	9925	7-2-81	Ray Derrick	9961
3-3-81	John Hodge	12394	8-4-81	Bobby Welch	61309
4-2-81	Bobby Welch	75083	8-4-81	Tony Meadows	21281
4-2-81	Mike Banknight	22147	8-4-81	Steve Zobel	12222
4-2-81	Steve Zobel	10843	8-4-81	Allen Stewart	10174
4-2-81	Allen Stewart	12258	8-4-81	Ray Derrick	17169
4-2-81	John Hodge	6594	9-3-81	Bobby Welch	50482
4-3-81	Ray Derrick	14634	9-3-81	Tony Meadows	18638
4-22-81	Bobby Welch	2960	9-3-81	Steve Zobel	17990
4-22-81	Mike Banknight	3840	9-3-81	Allen Stewart	13572
4-22-81	Tony Meadows	3465	9-3-81	Ray Derrick	4388
4-22-81	Steve Zobel	5680	10-2-81	Bobby Welch	85461
4-22-81	Allen Stewart	3680	10-2-81	Tony Meadows	20170
4-22-81	Ray Derrick	3920	10-2-81	Dennis Letts	14004
5-5-81	Bobby Welch	98702	10-2-81	Steve Zobel	19187
5-5-81	Tony Meadows	24647	10-2-81	Allen Stewart	10601
5-5-81	Mike Banknight	8629	10-2-81	Ray Derrick	5117
5-5-81	Steve Zobel	22161	10-2-81	Laine Dunbar	9260
5-5-81	Allen Stewart	21210	10-2-81	Margaret Bulk	9981
5-5-81	Ray Derrick	12714	11-4-81	Bobby Welch	92636
6-1-81	Bobby Welch	77452	11-4-81	Tony Meadows	18392
6-1-81	Tony Meadows	20193	11-4-81	Dennis Letts	12800
6-1-81	Steve Zobel	17591	11-4-81	Steve Zobel	17989
6-1-81	Allen Stewart	18513	11-4-81	Allen Stewart	14799
6-1-81	Ray Derrick	10666	11-4-81	Ray Derrick	7636

4 Robin's of Dentonville, Inc.
 7359 Two Notch Road
 Columbia, S.C. 29204

(4)

DATE	NAME	AMOUNT	DATE	NAME	AMOUNT
11-4-81	Elaine Dunbar	7869	3-1-82	Bobby Welch	78538
11-4-81	Margaret Belk	12970	3-1-82	Margaret Belk	14773
12-2-81	Bobby Welch	96742	3-1-82	Tony Meadows	5501
12-2-81	Tony Meadows	22504	3-1-82	Dennis Letts	19843
12-2-81	Dennis Letts	16738	3-1-82	Allen Stewart	17126
12-2-81	Steve Zobel	12401	3-1-82	Pati Melton	11388
12-2-81	Allen Stewart	12713	4-5-82	Bobby Welch	83343
12-2-81	Ray Derrick	11808	4-5-82	Margaret Belk	21187
12-2-81	Laine Dunbar	1211	4-5-82	Dennis Letts	17380
12-2-81	Margaret Belk	16372	4-5-82	Allen Stewart	13676
12-24-81	Bobby Welch	6400	4-5-82	Ray Derrick	6078
12-24-81	Tony Meadows	11700	4-5-82	Pat Melton	11570
12-24-81	Dennis Letts	10600	4-12-82	Bobby Welch	150000
12-24-81	Allen Stewart	10800	5-3-82	Bobby Welch	90288
12-24-81	Ray Derrick	14500	5-3-82	Margaret Belk	16287
12-24-81	Margaret Belk	10000	5-3-82	Ray Derrick	23634
1-5-82	Bobby Welch	205986	5-3-82	Dennis Letts	16000
1-5-82	Tony Meadows	46555	5-3-82	Allen Stewart	12138
1-5-82	Dennis Letts	36398	5-3-82	Pati Melton	7960
1-5-82	Allen Stewart	34647	6-3-82	Bobby Welch	94440
1-5-82	Ray Derrick	43753	6-3-82	Margaret Belk	14326
1-5-82	Margaret Belk	33936	6-3-82	Ray Derrick	27453
2-2-82	Bobby Welch	73068	6-3-82	Dennis Letts	18284
2-2-82	Tony Meadows	27778	6-3-82	Allen Stewart	18616
2-2-82	Dennis Letts	12890	6-22-82	Bobby Welch	3500
2-2-82	Margaret Belk	13516	6-22-82	Margaret Belk	7500
2-2-82	Allen Stewart	11639	6-22-82	Dennis Letts	5500
2-2-82	Ray Derrick	7989	6-22-82	Ray Derrick	12750
2-2-82	Patti Melton	1850	6-22-82	Allen Stewart	9125

1 4 Robinsons of Dentonville 2
 7359 Two Notch Rd.
 Columbia, SC 29204

(5)

DATE	NAME	AMOUNT	DATE	NAME	AMOUNT
7-2-82	Bobby Welch	63306	12-2-82	James Neal	11086
7-2-82	Margaret Belk	13742	12-2-82	Bobby Welch	8000
7-2-82	Ray Derrick	19403	12-2-82	Margaret Belk	7200
7-2-82	Allen Stewart	17102	12-2-82	Ray Derrick	8375
8-2-82	Bobby Welch	94785	12-2-82	Bobby Guider	11625
8-2-82	Margaret Belk	21261	12-2-82	James Neal	6100
8-2-82	Ray Derrick	30552			
8-2-82	J. P. Neal	22198			
9-2-82	Bobby Welch	77909			
9-2-82	Margaret Belk	2200			
9-2-82	Ray Derrick	20250			
9-2-82	James Neal	21600			
9-2-82	Allen Stuart	5701			
10-4-82	Bobby Welch	90500			
10-4-82	Ray Derrick	26865			
10-4-82	Margaret Belk	18305			
10-4-82	Bobby Guider	2505			
10-4-82	James Neal	13005			
10-4-82	Allen Stewart	16137			
10-15-82	Allen Stewart	3502			
11-3-82	Bobby Welch	85257			
11-3-82	Margaret Belk	12442			
11-3-82	Ray Derrick	22145			
11-3-82	Bobby Guider	23922			
11-3-82	James Neal	9408			
12-2-82	Bobby Welch	100613			
12-2-82	Margaret Belk	14106			
12-2-82	Ray Derrick	28281			
12-2-82	Bobby Guider	30578			

1 2 4 LeMaster St, 4th Fl.
9. Magnolia Mall
Florence, S.C. 29501

MAR 2071

3-6-80	Briley Altman	1675	8-1-80	Briley Altman	3554
3-6-80	Brian Speas	1339	8-1-80	Woody Lynch	13839
3-6-80	Sim O'Conner	3451	9-3-80	Staffy Crowley	65047
3-6-80	Bob ELLEN	1718	9-3-80	Woody Lynch	6560
3-6-80	Stafford Crowley	15200	9-3-80	Briley Altman	3861
4-3-80	Stafford Crowley	53142	9-3-80	Brian Speas	4176
4-3-80	Bob ELLEN	5934	9-3-80	Johnny Gasque	3839
4-3-80	Sim O'Conner	13460	10-2-80	Stafford Crowley	70983
4-3-80	Brian Speas	7073	10-2-80	Ken Elmore	3927
4-3-80	Briley Altman	4097	10-2-80	Harold	6555
5-6-80	Bob Ellen	9291	10-2-80	John Gasque	2443
5-6-80	Sim O'Conner	12405	10-2-80	Scott Goodkowsky	1650
5-6-80	Staffy Crowley	57827	10-2-80	Woody Lynch	710
5-6-80	Brian Speas	3769	10-2-80	Candi Harris	1889
5-6-80	Briley Altman	5822	11-4-80	Candi Harris	1475
6-3-80	Bob ELLEN	10759	11-4-80	Scott Goodkowsky	3809
6-3-80	Sim O'Conner	12240	11-4-80	Harold Miles	3356
6-3-80	Brian Speas	6043	11-4-80	Ken Elmore	8433
6-3-80	Briley Altman	4004	11-4-80	Stafford Crowley	86967
6-3-80	Marvin Lynch	4236	11-4-80	Woody Lynch	685
6-5-80	Staffy Crowley	67406	11-4-80	Karen Hewitt	849
6-5-80	Staffy Crowley	20000	12-2-80	Stafford Crowley	99180
7-4-80	Briley Altman	685	12-2-80	Ken Elmore	10092
7-4-80	Staffy Crowley	63611	12-2-80	Harold Miles	6120
7-4-80	Bob ELLEN	9042	12-2-80	Scott Goodkowsky	1092
7-4-80	Woody Lynch	8338	12-2-80	Karen Hewitt	4027
7-4-80	Brian Speas	9457	12-2-80	Woody Lynch	4820
8-1-80	Staffy Crowley	80939	12-31-80	Ken Elmore	19584
8-1-80	Bob ELLEN	3728	1-6-80	Norwood Turner	38956
8-1-80	Brian Speas	6494	1-6-80	Harold Miles	24178

LeMasters, Inc.
 Magnolia Mall
 Florence, S.C. 29501

(2)

1-6-81	Karen Hewitt	11259	5-5-81	Milton Miles	3160
1-6-81	Woody Lynch	16686	5-5-81	Karen Hewitt	2192
1-6-81	Briley Altman	12422	6-3-81	Staffy Crowley	80114
1-6-81	Brian Speas	7179	6-3-81	Norwood Turner	13598
1-6-81	Johnny Gasque	4358	6-3-81	Dennis Abbott	8145
1-7-81	Staffy Crowley	248598	6-3-81	Milton Miles	2813
2-4-81	Staffy Crowley	94276	6-3-81	Karen Hewitt	3040
2-4-81	Norwood Turner	12389	6-3-81	Craig Cutter	14814
2-4-81	Harold Miles	10512	7-2-81	Staffy Crowley	95628
2-4-81	Karen Hewitt	3433	7-2-81	Norwood Turner	14710
2-4-81	Briley Altman	2465	7-2-81	Craig Cutter	15057
2-4-81	Woody Lynch	19292	7-2-81	Dennis Abbott	11707
3-3-81	Stafford Crowley	47402	7-2-81	Milton Miles	5085
3-3-81	Norwood Turner	10349	7-2-81	Karen Hewitt	3069
3-3-81	Harold Miles	2986	8-4-81	Stafford Crowley	85060
3-3-81	Karen Hewitt	1580	8-4-81	Norwood Turner	13300
3-3-81	Woody Lynch	4650	8-4-81	Craig Cutter	10780
3-3-81	Dennis Abbott	4148	8-4-81	Dennis Abbott	8473
4-2-81	Staffy Crowley	78558	8-4-81	Milton Miles	8715
4-2-81	Norwood Turner	16024	8-4-81	Karen Hewitt	4539
4-2-81	Milton Miles	4244	9-1-81	Staffy Crowley	56608
4-2-81	Karen Hewitt	3962	9-1-81	Norwood Turner	12457
4-2-81	Craig Cutter	1344	9-1-81	Dennis Abbott	11266
4-2-81	Woody Lynch	2004	9-1-81	Milton Miles	6321
4-2-81	Dennis Abbott	7571	9-1-81	Karen Hewitt	1115
4-2-81	Briley Altman	157	10-2-81	Norwood Turner	5223
5-1-81	Norwood Turner	23952	10-2-81	Dennis Abbott	10238
5-5-81	Staffy Crowley	111827	10-2-81	Candi Altman	6504
5-5-81	Craig Cutter	17591	10-2-81	Erwin Carrowan	4741
5-5-81	Dennis Abbott	9349	10-5-81	Staffy Crowley	54688

1 4 0 LeMasters, Inc. 4 4 5
 Magnolia Mall
 Florence, S.C. 29501

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11-5-81	Staffy Crowley	79385	3-2-82	Milton Mikes	2620
11-5-81	Dennis Abbott	14782	3-2-82	Donnie Lloyd	8900
11-5-81	Harold Mikes	7015	3-2-82	Bob Geiger	3065
11-5-81	Candi Altman	4258	4-2-82	Billy Gamble	36224
11-5-81	Buddy Carrowan	6207	4-2-82	Mike Daniel	5890
12-2-81	Stafford Crowley	134478	4-2-82	Dennis Abbott	10687
12-2-81	Dennis Abbott	20596	4-2-82	Milton Mikes	3116
12-2-81	Karen Hewitt	1363	4-2-82	Donnie Lloyd	8389
12-2-81	Harold Mikes	17769	4-2-82	Bob Geiger	2974
12-2-81	Candi Altman	12575	4-4-82	Martin Redd	50000
12-2-81	Buddy Carrowan	12042	5-4-82	Briley Altman	4203
1-5-82	Billy Gamble	152070	5-4-82	Martia Redd	22149
1-5-82	Dennis Abbott	25185	5-4-82	Dennis Abbott	9195
1-5-82	Michael Daniel	22655	5-4-82	Mike Daniel	3736
1-5-82	Milton Mikes	23217	5-4-82	Milton Mikes	7116
1-5-82	Candi Altman	18945	5-4-82	Dennis Lloyd	10078
1-5-82	Buddy Carrowan	16191	6-3-82	Martin Redd	53809
1-5-82	Karen Hewitt	6403	6-3-82	Dennis Abbott	15278
1-5-82	Staffy Crowley	152070	6-3-82	Mike Daniels	3908
2-2-82	Billy Gamble	53851	6-3-82	Milton Mikes	4800
2-2-82	Dennis Abbott	10647	6-3-82	Donnie Lloyd	9900
2-2-82	Mike Daniel	8031	6-3-82	Briley Altman	2954
2-2-82	Milton Mikes	3760	7-1-82	Martin Redd	63604
2-2-82	Buddy Carrowan	9679	7-1-82	Dennis Abbott	13803
2-2-82	Karen Hewitt	4502	7-1-82	Mike Daniel	368
2-2-82	Don Lloyd	1609	7-1-82	Donnie Lloyd	11431
2-2-82	Bob Geiger	917	7-1-82	Milton Mikes	4849
3-2-82	Billy Gamble	39391	7-1-82	Dusty Grainger	13668
3-2-82	Dennis Abbott	9036	8-2-82	Martin Redd	73435
3-2-82	Michael Daniel	3812	8-2-82	Dennis Abbott	14315

1 0 4 LeMaster, Inc. 414 6
 Magnolia Mall
 Florence, S.C. 29501

	DEBIT	CREDIT
8-2-82 Dusty Grainger	19583	
8-2-82 Milton Miles	7481	
8-2-82 Donnie Lloyd	4007	
9-2-82 Martin Redd	51455	
9-2-82 Dennis Abbott	12852	
9-2-82 Dusty Grainger	15144	
9-2-82 Milton Miles	8746	
10-1-82 Martin Redd	51932	
10-1-82 Milton Miles	2615	
10-1-82 Dennis Abbott	17449	
10-1-82 Dusty Grainger	11122	
10-1-82 Joe O'Conner	9286	
10-1-82 Darrin Thomas	359	
11-4-82 Martin Redd	60838	
11-4-82 Dennis Abbott	12858	
11-4-82 Dusty Grainger	13967	
11-4-82 Joe O'Conner	11289	
11-4-82 Milton Miles	2785	
11-4-82 Darrin Thomas	4661	
12-2-82 Martin Redd	78039	
12-2-82 Dennis Abbott	16420	
12-2-82 Dusty Grainger	19973	
12-2-82 Joe O'Conner	11834	
12-2-82 Milton Miles	3506	
12-2-82 Darrin Thomas	4793	

4 Robbin's of Florence, Inc.
 2180 W. EVANS St.
 Florence, S.C. 29501

MUR 2071

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1-2-80	Butch Minshew	334264	5-11-80	Dennis Abbott	4720
1-2-80	Bob Ellen	44172	5-19-80	Ricky Simmons	240
1-2-80	Ronnie Critz	53975	6-2-80	Butch Minshew	148003
1-2-80	Robert Hartnett	65920	6-2-80	Tommy Tumblin	55142
1-2-80	Tommy Tumblin	63633	6-2-80	Ronnie Critz	19515
1-2-80	Ricky Simmons	45152	6-2-80	Robert Hartnett	43437
2-4-80	Butch Minshew	83000	6-2-80	Dennis Abbott	30175
2-4-80	Tommy Tumblin	21106	6-2-80	Bob McDonald	7408
2-4-80	Robert Hartnett	21821	7-1-80	Butch Minshew	96353
2-4-80	Ronnie Critz	13706	7-1-80	Tommy Tumblin	32258
2-4-80	Ricky Simmons	8495	7-1-80	Robert Hartnett	27796
3-4-80	Butch Minshew	107191	7-1-80	Bob McDonald	23000
3-4-80	Tommy Tumblin	26232	7-1-80	Dennis Abbott	18256
3-4-80	Robert Hartnett	26587	7-11-80	Butch Minshew	200000
3-4-80	Ronnie Critz	14383	8-1-80	Butch Minshew	65275
3-4-80	Ricky Simmons	16918	8-1-80	Dennis Abbott	10800
4-1-80	Butch Minshew	84394	8-1-80	Bob McDonald	15162
4-1-80	Tommy Tumblin	20982	8-1-80	Robert Hartnett	14072
4-1-80	Robert Hartnett	24510	8-1-80	Tommy Tumblin	24530
4-1-80	Ronnie Critz	11459	9-2-80	Butch Minshew	496411
4-1-80	Ricky Simmons	5071	9-4-80	Butch Minshew	95670
5-2-80	Butch Minshew	119100	9-4-80	Bob McDonald	25982
5-2-80	Tommy Tumblin	48583	9-4-80	Ricky Simmons	3020
5-2-80	Robert Hartnett	45380	9-4-80	Robert Hartnett	1948
5-2-80	Ronnie Critz	21638	9-4-80	Dennis Abbott	21197
5-2-80	Dennis Abbott	7518	9-4-80	Tommy Tumblin	35000
5-19-80	Butch Minshew	13125	10-1-80	Butch Minshew	58239
5-19-80	Tommy Tumblin	18125	10-1-80	Tommy Tumblin	24198
5-19-80	Robert Hartnett	20525	10-1-80	Dennis Abbott	13659
5-19-80	Ronnie Critz	9000	10-1-80	Bob McDonald	9421

4 Robin's of Florence, Inc.
 2180 W. Evans St.
 Florence, S.C. 29501

(2)

10-1-80	Ricky Simmons	3444	2-3-81	Bob Mc Donald	11802
11-3-80	Butch Minshew	102143	2-3-81	Ricky Simmons	9498
11-3-80	Bob Mc Donald	21421	2-3-81	Dennis Abbott	9483
11-3-80	Tommy Tumblin	37899	3-2-81	Butch Minshew	116329
11-3-80	Dennis Abbott	21785	3-2-81	Tommy Tumblin	32516
11-3-80	Ricky Simmons	11172	3-2-81	Robert Hartnett	39849
12-1-80	Butch Minshew	147888	3-2-81	Ricky Simmons	12586
12-1-80	Tommy Tumblin	41575	3-2-81	Bob Mc Donald	25926
12-1-80	Robert Hartnett	18593	4-1-81	Butch Minshew	95553
12-1-80	Dennis Abbott	23522	4-1-81	Bob Mc Donald	16162
12-1-80	Ricky Simmons	19766	4-1-81	Tommy Tumblin	36582
12-1-80	Ronnie Critz	3080	4-1-81	Robert Hartnett	35741
12-1-80	Bob Mc Donald	26312	4-1-81	Ricky Simmons	11816
12-30-80	Butch Minshew	27300	4-21-81	Butch Minshew	8200
12-30-80	Tommy Tumblin	16500	4-21-81	Tommy Tumblin	10426
12-30-80	Dennis Abbott	12800	4-21-81	Robert Hartnett	10420
12-30-80	Robert Hartnett	13500	4-21-81	Bob Mc Donald	6946
12-30-80	Bob Mc Donald	16700	4-21-81	Ricky Simmons	4900
12-30-80	Ricky Simmons	11700	4-21-81	Frank Jones	246
12-30-80	Ronnie Critz	2700	5-1-81	Butch Minshew	146237
1-2-81	Butch Minshew	322860	5-1-81	Ricky Simmons	15447
1-2-81	Tommy Tumblin	83958	5-1-81	Robert Hartnett	43597
1-2-81	Robert Hartnett	63160	5-1-81	Tommy Tumblin	56450
1-2-81	Dennis Abbott	44807	5-1-81	Frank Jones	5132
1-2-81	Ronnie Critz	19210	5-1-81	Bob Mc Donald	24522
1-2-81	Bob Mc Donald	54475	6-1-81	Butch Minshew	108089
1-2-81	Ricky Simmons	44619	6-1-81	Tommy Tumblin	42932
2-3-81	Butch Minshew	89081	6-1-81	Robert Hartnett	35850
2-3-81	Tommy Tumblin	28232	6-1-81	Bob Mc Donald	14611
2-3-81	Robert Hartnett	28952	6-1-81	Frank Jones	13923

4 Robin's of Florence, Inc.
 2180 W. Evans St.
 Florence, S.C. 29501

(3)

6-1-81	Ricky Simmons	11.10	12-2-81	Butch Minshew	1327.21
7-1-81	Butch Minshew	946.47	12-2-81	Robert Hartnett	453.23
7-1-81	Tommy Tumblin	368.38	12-2-81	Tommy Tumblin	466.37
7-1-81	Robert Hartnett	363.85	12-2-81	Ronnie Critz	80.83
7-1-81	Bob Mc Donald	161.91	12-2-81	Ken Elmore	157.30
7-1-81	Frank Jones	125.48	12-2-81	Jeff Lee	79.52
8-3-81	Butch Minshew	878.98	12-2-81	Luke Hinson	520.5
8-3-81	Tommy Tumblin	418.15	12-28-81	Butch Minshew	179.00
8-3-81	Robert Hartnett	234.96	12-28-81	Tommy Tumblin	183.00
8-3-81	Bob Mc Donald	146.40	12-28-81	Robert Hartnett	207.00
8-3-81	Frank Jones	84.58	12-28-81	Ken Elmore	130.00
8-13-81	Butch Minshew	5692.06	12-28-81	Jeff Lee	165.00
8-6-81	Butch Minshew	1000.00	12-28-81	Luke Hinson	138.00
8-27-81	Bob Mc Donald	140.00	12-28-81	Ronnie Critz	112.00
9-1-81	Butch Minshew	720.56	12-30-81	Ken Elmore	411.25
9-1-81	Tommy Tumblin	233.71	12-31-81	Ronnie Critz	288.60
9-1-81	Robert Hartnett	274.96	1-4-82	Butch Minshew	3630.82
9-1-81	Frank Jones	84.13	1-2-82	Tommy Tumblin	985.41
9-1-81	Ken Elmore	108.4	1-2-82	Robert Hartnett	968.99
10-1-81	Butch Minshew	1074.57	1-2-82	Jeff Lee	548.8
10-1-81	Ken Elmore	110.49	1-2-82	Luke Hinson	432.22
10-1-81	Robert Hartnett	357.40	2-1-82	Tommy Tumblin	291.50
10-1-81	Tommy Tumblin	400.71	2-1-82	Jeff Lee	186.77
10-1-81	Frank Jones	170.29	2-1-82	Butch Minshew	849.64
11-2-81	Butch Minshew	974.83	2-1-82	Robert Hartnett	299.43
11-2-81	Tommy Tumblin	417.95	2-1-82	Luke Hinson	86.37
11-2-81	Robert Hartnett	372.07	3-1-82	Butch Minshew	941.26
11-2-81	Zane Leake	433.9	3-1-82	Tommy Tumblin	281.53
11-2-81	Frank Jones	500.6	3-1-82	Robert Hartnett	331.63
11-2-81	Ken Elmore	65.85	3-1-82	Jeff Lee	190.69
			3-1-82	Luke Hinson	121.73

4 Robins of 4 Florence, Inc.

2180 W. Evans St.
Florence, SC 29501

(4)

4-1-82 Tommy Tumblin
4-1-82 Robert Hartnett
4-1-82 Jeff Lee
4-1-82 Luke Hinson
4-1-82 Butch Minshew
4-12-82 Butch Minshew
5-3-82 Butch Minshew
5-3-82 Tommy Tumblin
5-3-82 Robert Hartnett
5-3-82 Luke Hinson
6-1-82 Butch Minshew
6-1-82 Tommy Tumblin
6-1-82 Robert Hartnett
6-1-82 Brian Anderson
6-1-82 Luke Hinson
6-21-82 Butch Minshew
6-21-82 Tommy Tumblin
6-21-82 Robert Hartnett
6-21-82 Luke Hinson
6-21-82 Brian Anderson
7-1-82 Butch Minshew
7-1-82 Tommy Tumblin
7-1-82 Robert Hartnett
7-1-82 Luke Hinson
7-1-82 Brian Anderson
8-1-82 Butch Minshew
8-2-82 Butch Minshew
8-2-82 Tommy Tumblin
8-2-82 Robert Hartnett

32771 8-2-82 Luke Hinson
34476 8-2-82 Brian Anderson
7726 8-9-82 Butch Minshew
14038 9-1-82 Butch Minshew
87680 9-1-82 Tommy Tumblin
15000 9-1-82 Robert Hartnett
115170 9-1-82 Brian Anderson
50815 9-1-82 Luke Hinson
33996 10-1-82 Butch Minshew
24311 10-1-82 Tommy Tumblin
105235 10-1-82 Robert Hartnett
46376 10-1-82 Luke Hinson
36157 10-1-82 Jerry Keith
3823 10-1-82 Brian Anderson
26861 11-1-82 Butch Minshew
7395 11-1-82 Jerry Keith
16350 11-1-82 Brian Anderson
11250 11-1-82 Robert Hartnett
12750 11-1-82 Luke Hinson
2700 12-1-82 Butch Minshew
89081 12-1-82 Tommy Tumblin
34771 12-1-82 Robert Hartnett
28478 12-1-82 Jerry Keith
19016 12-1-82 Brian Anderson
13482 12-1-82 Luke Hinson
50000 12-1-82 Mark Stroman
92323 12-28-82 Butch Minshew
40935 12-28-82 Tommy Tumblin
24090 12-28-82 Robert Hartnett
12-29-82 Mark Stroman

19241
17999
718541
85258
25599
31779
16156
14168
97361
39530
26407
11186
4484
12014
98331
10573
13816
33220
10914
140629
47813
37113
13973
18283
18536
7199
10625
15000
16750
35130

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 Robin's of Anderson, Inc.
 2718 N. MAIN Street
 Anderson, SC. 29621

MUR 2071

1-3-80	John Tyler	28600	6-4-80	Carroll Hart	7998
1-3-80	Phil Harrison	31700	7-7-80	Phil Harrison	37945
1-3-80	Carroll Hart	1000	7-7-80	Raleigh Heard	10490
1-3-80	David Kay	2400	7-7-80	Chris Williams	3247
1-7-80	John Tyler	114474	7-7-80	Carroll Hart	16906
1-7-80	Phil Harrison	56881	7-7-80	Mark Christopher	458
1-7-80	Charles Tatham	5669	8-6-80	Carroll Hart	9698
1-7-80	Carroll Hart	9939	8-6-80	Raleigh Heard	10609
2-7-80	John Tyler	43200	8-6-80	Phil Harrison	30785
2-7-80	Phil Harrison	15809	9-4-80	Phil Harrison	67197
2-7-80	Carroll Hart	2668	9-4-80	Raleigh Heard	13000
2-7-80	Chris Williams	12671	9-4-80	Carroll Hart	4545
3-5-80	Chris Williams	8671	9-4-80	Raymond Hickman	14630
3-5-80	Phil Harrison	13902	9-4-80	Randy Mc Dougald	10859
3-5-80	John Tyler	30674	9-4-80	Gregg Alexander	11625
4-4-80	Phil Harrison	21700	10-3-80	Randy Mc Dougald	1768
4-4-80	John Tyler	43428	10-3-80	Ray Hickman	5732
4-4-80	Chris Williams	12922	10-3-80	Gregg Alexander	5223
5-6-80	Phil Harrison	25714	10-3-80	Raleigh Heard	6681
5-6-80	Chris Williams	13461	10-3-80	Phil Harrison	22687
5-6-80	Raleigh Heard	2354	11-5-80	Phil Harrison	51481
5-6-80	Tim Mc Elveen	2182	11-5-80	Phil Harrison	4800
5-21-80	Phil Harrison	6880	11-5-80	Gregg Alexander	17945
5-21-80	Chris Williams	6800	11-5-80	Randy Mc Dougald	7753
5-21-80	Raleigh Heard	2240	11-5-80	Raymond Hickman	10423
5-21-80	Carroll Hart	800	11-5-80	Raleigh Heard	17063
5-21-80	Tim Mc Elveen	240	12-2-80	Phil Harrison	67850
6-4-80	Phil Harrison	58576	12-2-80	Raleigh Heard	15981
6-4-80	Raleigh Heard	14869	12-2-80	Raymond Hickman	14580
6-4-80	Chris Williams	16869	12-2-80	Randy Mc Dougald	4358

Robins of Anderson, Inc.

2718 N. Main St.
Anderson, S.C. 29621

12-2-80	Gregg Alexander	15498	4-22-81	Raleigh Heard	2800
12-2-80	Phil Harrison	11600	4-22-81	Ray Hickman	3400
12-30-80	Raleigh Heard	22400	4-22-81	Randy M ^c Dougald	300
12-30-80	Ray Hickman	13200	4-22-81	Barry Hicks	3840
12-30-80	Randy M ^c Dougald	3800	5-5-81	Barry Hicks	21669
12-30-80	Gregg Alexander	11900	5-5-81	Raleigh Heard	2279
12-30-80	Fanny Russell	800	5-5-81	Phil Harrison	53965
12-30-80	Carroll Hart	400	5-5-81	Ray Hickman	14190
1-5-81	Phil Harrison	122034	5-5-81	Randy M ^c Dougald	668
1-5-81	Raleigh Heard	27636	5-15-81	Phil Harrison	18308
1-5-81	Ray Hickman	21185	5-26-81	Mark Lawson	50000
1-5-81	Randy M ^c Dougald	10213	6-2-81	Mark Lawson	11408
1-5-81	Gregg Alexander	14919	6-2-81	Barry Hicks	17324
1-5-81	Fanny Russell	6679	6-2-81	Raleigh Heard	6329
1-5-81	Carroll Hart	4761	6-2-81	Mark Christopher	6202
2-3-81	Phil Harrison	51432	6-2-81	Ray Hickman	7071
2-3-81	Raleigh Heard	15005	6-3-81	Raleigh Heard	10000
2-3-81	Ray Hickman	12049	7-2-81	Mark Lawson	45256
2-3-81	Randy M ^c Dougald	8738	7-2-81	Raleigh Heard	13457
2-3-81	Fanny Russell	1195	7-2-81	Pam Campbell	399
2-3-81	Carroll Hart	1076	7-2-81	Barry Hicks	9457
3-4-81	Phil Harrison	55141	7-2-81	Mark Christopher	8389
3-4-81	Raleigh Heard	19859	7-2-81	Fanny Russell	161
3-4-81	Ray Hickman	13456	8-4-81	Mark Lawson	39744
3-4-81	Randy M ^c Dougald	5867	8-4-81	Raleigh Heard	7778
4-3-81	Phil Harrison	42307	8-4-81	Pam Campbell	880
4-3-81	Raleigh Heard	16078	8-4-81	Barry Hicks	8696
4-3-81	Randy M ^c Dougald	2919	8-4-81	Sandra Cooley	6812
4-3-81	Ray Hickman	9646	8-4-81	Mark Christopher	604
4-22-81	Phil Harrison	4735			

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Robins of Anderson, Inc.
2718 N. MAIN ST
Anderson, S.C. 29621

(3)

9-8-81	Mark Lawson	339 24	1-6-82	Randy M ^c Dougald	91 00
9-8-81	Raleigh Heard	78 67	2-2-82	Mark Lawson	408 90
9-8-81	Pam Campbell	118 30	2-2-82	Pam Campbell	50 77
9-8-81	Barry Hicks	46 30	2-2-82	Barry Hicks	118 95
9-8-81	Sandra Cooley	50 60	2-2-82	Sandra Cooley	83 81
10-2-81	Mark Lawson	623 45	2-2-82	Randy M ^c Dougald	88 44
10-2-81	Raleigh Heard	148 27	3-2-82	Mark Lawson	482 68
10-2-81	Pam Campbell	211 15	3-2-82	Barry Hicks	107 55
10-2-81	Barry Hicks	117 84	3-2-82	Sandra Cooley	133 09
10-2-81	Sandra Cooley	65 59	3-2-82	Randy M ^c Dougald	120 69
11-4-81	Mark Lawson	535 76	4-5-82	Mark Lawson	510 17
11-4-81	Raleigh Heard	278 60	4-5-82	Barry Hicks	174 13
11-4-81	Pam Cooley	208 93	4-5-82	Randy M ^c Dougald	94 51
11-4-81	Barry Hicks	135 07	4-5-82	Sandra Cooley	137 73
11-4-81	Sandra Cooley	69 98	4-12-82	Mark Lawson	1500 00
12-3-81	Mark Lawson	500 08	5-5-82	Mark Lawson	539 95
12-3-81	Pam Campbell	139 23	5-5-82	Barry Hicks	212 72
12-3-81	Barry Hicks	109 14	5-5-82	Sandra Cooley	126 33
12-3-81	Sandra Cooley	124 55	5-5-82	Randy M ^c Dougald	97 18
12-3-81	Mark Christopher	74 40	6-3-82	Mark Lawson	473 20
1-5-82	Mark Lawson	1314 01	6-3-82	Barry Hicks	186 26
1-5-82	Pam Campbell	295 87	6-3-82	Sandra Cooley	120 74
1-5-82	Sandra Cooley	276 96	6-3-82	Randy M ^c Dougald	90 49
1-5-82	Barry Hicks	380 54	6-23-82	Mark Lawson	34 00
1-5-82	Randy M ^c Dougald	147 67	6-23-82	Sandra Cooley	41 00
1-6-82	Mark Lawson	72 00	6-23-82	Barry Hicks	86 25
1-6-82	Pam Campbell	115 00	6-23-82	Randy M ^c Dougald	39 00
1-6-82	Barry Hicks	155 00	7-7-82	Mark Lawson	332 00
1-6-82	Sandra Cooley	103 00	7-7-82	Barry Hicks	112 98

4 Robin's Golf Anderson, Inc.
218 N. Main St.
Anderson, S.C. 29621

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7-7-82	Randy McDougal	6840	12-28-82	Tim McElveen	6600
7-7-82	Mark Christopher	677	12-28-82	Sandra Cooley	8625
7-7-82	Sandra Cooley	6512	12-28-82	Lyles Castles	4100
8-4-82	Mark Lawson	43745	12-28-82	Franny Russell	4300
8-4-82	Barry Hicks	14681	12-28-82	Kyle Smith	2100
8-4-82	Randy McDougal	8254			
8-4-82	Mark Christopher	12358			
9-3-82	Mark Lawson	48403			
9-3-82	Barry Hicks	6973			
9-3-82	Randy McDougal	12271			
9-3-82	Sandra Cooley	16064			
9-3-82	Lyles Castles	231			
9-3-82	Mark Christopher	4429			
10-4-82	Mark Lawson	45000			
10-5-82	Mark Lawson	65442			
10-5-82	Randy McDougal	23396			
10-5-82	Lyles Castles	10751			
10-5-82	Sandra Cooley	13585			
11-3-82	Tim McElveen	47315			
11-4-82	Randy McDougal	16380			
11-4-82	Sandra Cooley	13975			
11-4-82	Lyles Castles	4299			
11-18-82	Randy McDougal	38000			
12-3-82	Tim McElveen	56669			
12-3-82	Randy McDougal	12152			
12-3-82	Sandra Cooley	19501			
12-3-82	Lyles Castles	8964			
12-3-82	Franny Russell	1485			

4 Robin's Ladies Wear, Inc.
2194 W. EVANS ST.
Florence, S.C. 29501

MUR 2071

1-2-80	Lynn Hartnett	126521	4-1-80	Jane Squires	6574
1-2-80	Jewell Cannon	7778	4-1-80	Muffie Tuthill	5541
1-2-80	Vicki Horton	15376	4-1-80	Mary Tallon	1744
1-2-80	Terri Calcutt	16133	4-1-80	Susan Humphries	1192
1-2-80	Jane Squires	13299	5-1-80	Lynn Hartnett	60500
1-2-80	Muffie Tuthill	11363	5-1-80	Lynn Hartnett	6754
1-2-80	Debbie Owen	9301	5-1-80	Terri Calcutt	11719
1-2-80	Leigh Altman	5937	5-1-80	Leigh Billups	1300
1-2-80	Mary Tallon	8478	5-1-80	Jewell Cannon	11482
1-2-80	Susan Humphries	5817	5-1-80	Jane Squires	11315
2-4-80	Lynn Hartnett	42857	5-1-80	Susan Humphries	1987
2-4-80	Terri Calcutt	7416	5-1-80	Muffie Tuthill	9062
2-4-80	Leigh Altman	9727	5-1-80	Mary Tallon	6879
2-4-80	Jewell Cannon	5422	5-1-80	Geri Lesanto	302
2-4-80	Jane Squires	4662	6-2-80	Terri Calcutt	10749
2-4-80	Muffie Tuthill	3124	6-2-80	Lynn Hartnett	67512
2-4-80	Susan Humphries	569	6-2-80	Leigh Hartnett	841
2-4-80	Mary Tallon	2600	6-2-80	Jewell Cannon	8000
3-4-80	Lynn Hartnett	34720	6-2-80	Geri Lesando	6867
3-4-80	Terri Calcutt	6650	6-2-80	Muffie Tuthill	6070
3-4-80	Leigh Billups	7210	6-2-80	Fran Calcutt	5838
3-8-80	Jewell Cannon	3817	6-2-80	Mary Tallon	7952
3-8-80	Jane Squires	4798	6-2-80	Susan Humphries	3980
3-8-80	Muffie Tuthill	2368	6-2-80	Jane Squires	1407
3-8-80	Mary Tallon	1579	7-1-80	Lynn Hartnett	47278
3-8-80	Susan Humphries	1063	7-1-80	Terri Calcutt	7382
4-1-80	Lynn Hartnett	50836	7-1-80	Leigh Hartnett	4860
4-1-80	Terri Calcutt	9027	7-1-80	Camilla Jones	8103
4-1-80	Leigh Billups	10500	7-1-80	Geri Lesando	1793
4-1-80	Jewell Cannon	5715	7-1-80	Jewell Cannon	2381

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 Robin's Ladies Wear, Inc.
 2184 W. Evans St.
 Florence, S.C. 29501

7-1-80	Muffie Tuthill	625	11-3-80	Vera Gregg	4060
7-1-80	Fran Calcutt	2324	11-3-80	Jewell Cannon	5782
7-1-80	Susan Humphries	3528	11-3-80	Jane Squires	7591
7-1-80	Mary Tallon	1851	11-3-80	Fran Calcutt	6105
8-1-80	Lynn Hartnett	53098	11-3-80	Susan Humphries	1756
8-1-80	Mary Tallon	7209	11-3-80	Mary Tallon	8648
8-1-80	Susan Humphries	2734	12-1-80	Lynn Hartnett	69434
8-1-80	Jane Squires	3143	12-1-80	Terri Calcutt	11344
8-1-80	Camilla Jones	8659	12-1-80	Jewell Cannon	7172
8-1-80	Terri Calcutt	5830	12-1-80	Jane Squires	8262
8-1-80	Fran Calcutt	8120	12-1-80	Fran Calcutt	8061
8-1-80	Leigh Hartnett	8603	12-1-80	Nancy McKay	6074
9-2-80	Lynn Hartnett	43319	12-1-80	Mary Tallon	9036
9-2-80	Terri Calcutt	8322	12-1-80	Susan Humphries	2882
9-2-80	Vera Gregg	2197	12-1-80	Harriet Moseley	217
9-2-80	Jane Squires	6929	1-2-81	Lynn Hartnett	143415
9-2-80	Fran Calcutt	6385	1-2-81	Lynn Hartnett	15345
9-2-80	Camilla Jones	2793	1-2-81	Terri Calcutt	26872
9-2-80	Susan Humphries	2443	1-2-81	Jewell Cannon	19666
9-2-80	Mary Tallon	5243	1-2-81	Jane Squires	21788
10-1-80	Lynn Hartnett	56705	1-2-81	Nancy McKay	17475
10-1-80	Terri Calcutt	9310	1-2-81	Fran Calcutt	24760
10-1-80	Vera Gregg	9100	1-2-81	Harriet Moseley	13505
10-1-80	Jewell Cannon	4821	1-2-81	Susan Humphries	8859
10-1-80	Jane Squires	5734	1-2-81	Jane Gause	1640
10-1-80	Fran Calcutt	5207	1-2-81	Mary Tallon	16751
10-1-80	Susan Humphries	2059	1-2-81	Camilla Jones	9074
10-1-80	Mary Tallon	6196	2-3-81	Lynn Hartnett	46954
11-3-80	Lynn Hartnett	63118	2-3-81	Terri Calcutt	9843
11-3-80	Terri Calcutt	12299	2-3-81	Jewell Cannon	3790

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4
Robin's Ladies Wear, Inc.
2184 W. Evans St.
Florence, S.C. 29501

2-3-81	Jane Squires	7163	5-1-81	Fran Calcutt	2022
2-3-81	Fran Calcutt	5764	5-1-81	Susan Humphries	3227
2-3-81	Allicyn Fleck	2601	5-1-81	Allicyn Fleck	12234
2-3-81	Nancy Mc Kay	1096	6-1-81	Lynn Hartnett	59493
2-3-81	Susan Humphries	1298	6-1-81	Terri Calcutt	10705
2-3-81	Mary Tallon	2243	6-1-81	Jane Squires	7803
3-2-81	Lynn Hartnett	39032	6-1-81	Nancy Tuthill	5711
3-2-81	Terri Calcutt	7780	6-1-81	Allicyn Fleck	7171
3-2-81	Jane Squires	6131	6-1-81	Joy Ingram	7032
3-2-81	Jewell Cannon	4226	6-1-81	Susan Humphries	3010
3-2-81	Fran Calcutt	1231	6-1-81	Mary Tallon	2920
3-2-81	Allicyn Fleck	3632	7-1-81	Lynn Hartnett	51647
3-2-81	Susan Humphries	873	7-1-81	Terri Calcutt	9306
3-2-81	Mary Tallon	2567	7-1-81	Jane Squires	3604
4-1-81	Terri Calcutt	12562	7-1-81	Nancy Tuthill	7978
4-1-81	Lynn Hartnett	53389	7-1-81	Allicyn Fleck	3316
4-1-81	Jane Squires	7948	7-1-81	Joy Ingram	5729
4-1-81	Jewell Cannon	4376	7-1-81	Brenda Ridehour	7165
4-1-81	Allicyn Fleck	6039	7-1-81	Susan Humphries	719
4-1-81	Mary Tallon	3068	7-1-81	Mary Tallon	930
4-1-81	Joy Ingram	5785	8-3-81	Lynn Hartnett	50208
4-1-81	Susan Humphries	466	8-3-81	Terri Calcutt	10728
4-1-81	Fran Calcutt	333	8-3-81	Jane Squires	1684
5-1-81	Nancy Tuthill	725	8-3-81	Nancy Tuthill	5318
5-1-81	Jewell Cannon	10622	8-3-81	Allicyn Fleck	5511
5-1-81	Joy Ingram	9390	8-3-81	Joy Ingram	6164
5-1-81	Terri Calcutt	23648	8-3-81	Brenda Ridehour	9693
5-1-81	Lynn Hartnett	83415	8-3-81	Susan Humphries	603
5-1-81	Mary Tallon	8439	8-3-81	Mary Tallon	1690
5-1-81	Jane Squires	12413	8-13-81	Lynn Hartnett	136323

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 Robin's Ladies Wear, Inc.
 2184 W. Evans St.
 Florence, S.C. 29501

Account No.

(4)

9-1-81	Lynn Hartnett	47146	12-2-81	Allicyn Fleck	5352
9-1-81	Terri Calcutt	7220	12-2-81	Joy Ingram	1218
9-1-81	Jane Squires	2793	12-2-81	Rochelle Banks	5429
9-1-81	Nancy Tuthill	7514	12-2-81	Barbara Governor	9419
9-1-81	Allicyn Fleck	7120	12-2-81	Carol Tripp	3120
9-1-81	Joy Ingram	4964	12-2-81	Susan Humphries	1650
9-1-81	Brenda Ridenhour	1347	1-2-82	Lynn Hartnett	159404
9-1-81	Susan Humphries	688	1-2-82	Diane Wellington	24804
10-1-81	Lynn Hartnett	70725	1-2-82	Nancy Tuthill	22298
10-1-81	Terri Calcutt	7883	1-2-82	Rochelle Banks	26033
10-1-81	Jane Squires	4782	1-2-82	Allicyn Fleck	15771
10-1-81	Nancy Tuthill	15693	1-2-82	Jane Squires	1933
10-1-81	Allicyn Fleck	4940	1-4-82	Barbara Governor	14483
10-1-81	Joy Ingram	4244	1-4-82	Carol Tripp	10638
10-1-81	Rochelle Banks	10890	1-4-82	Susan Humphries	5410
10-1-81	Barbara Governor	6110	1-4-82	Mary Tallo	1948
10-1-81	Susan Humphries	1238	2-1-82	Lynn Hartnett	33498
11-2-81	Lynn Hartnett	64692	2-1-82	Diane Wellington	5874
11-2-81	Jane Squires	2999	2-1-82	Nancy Tuthill	7611
11-2-81	Nancy Tuthill	12425	2-1-82	Allicyn Fleck	3734
11-2-81	Allicyn Fleck	4733	2-1-82	Barbara Governor	3063
11-2-81	Joy Ingram	6046	2-1-82	Carol Tripp	2664
11-2-81	Rochelle Banks	10713	2-1-82	Susan Humphries	1075
11-2-81	Barbara Governor	11272	2-1-82	April Britt	1577
11-2-81	Mary Tallo	1728	3-1-82	Lynn Hartnett	39709
11-2-81	Susan Humphries	882	3-1-82	Barbara Governor	3095
12-2-81	Lynn Hartnett	63174	3-1-82	Carol Tripp	2354
12-2-81	Diane Wellington	10104	3-1-82	April Britt	3209
12-2-81	Jane Squires	1741	4-1-82	Diane Wellington	19257
12-2-81	Nancy Tuthill	10535	4-1-82	Nancy Tuthill	16377

Robin's Ladies Wear, Inc.
 2184 W. Evans St.
 Florence, S.C. 29501

Account No.

(5.)

4-1-82	Allilyn Fleck	5607	8-2-82	Nancy Tutthill	11461
4-1-82	Barbara Governor	4544	8-2-82	Allilyn Fleck	7196
4-1-82	April Britt	5403	8-2-82	Barbara Governor	10576
4-1-82	Carol Tripp	5747	8-2-82	Carol Tripp	7275
4-1-82	Lynn Hartnett	72642	8-10-82	Lynn Hartnett	138386
5-3-82	Lynn Hartnett	69426	8-30-82	Lynn Hartnett	50000
5-3-82	Lynn Hartnett	4060	9-1-82	Lynn Hartnett	57218
5-3-82	Nancy Tutthill	18199	9-1-82	Diane Wellington	5885
5-3-82	Allilyn Fleck	12227	9-8-82	Kathy Wilcox	1775
5-3-82	Barbara Governor	6528	9-8-82	Carol Tripp	7144
5-3-82	Carol Tripp	6515	9-8-82	Barbara Governor	8753
5-3-82	April Britt	10260	9-8-82	Allilyn Fleck	10283
5-3-82	Diane Wellington	17382	9-8-82	Nancy Tutthill	10185
5-4-82	Lynn Hartnett	150000	10-1-82	Lynn Hartnett	68028
6-1-82	April Britt	3443	10-1-82	Nancy Tutthill	13474
6-1-82	Lynn Hartnett	61122	10-1-82	Allilyn Fleck	6667
6-1-82	Diane Wellington	15627	10-1-82	Barbara Governor	8284
6-1-82	Nancy Tutthill	11626	10-1-82	Carol Tripp	11941
6-1-82	Allilyn Fleck	5227	10-1-82	Kathy Wilcox	6196
6-1-82	Barbara Governor	8731	10-1-82	Glenda Harrison	8459
6-1-82	Carol Tripp	3902	11-1-82	Lynn Hartnett	65000
7-1-82	Lynn Hartnett	43819	11-1-82	Nancy Tutthill	12405
7-1-82	Nancy Tutthill	7727	11-1-82	Allilyn Fleck	9205
7-1-82	Allilyn Fleck	5726	11-1-82	Carol Tripp	7428
7-1-82	Barbara Governor	7786	11-1-82	Kathy Wilcox	5940
7-1-82	Carol Tripp	4153	11-1-82	Barbara Governor	6934
7-1-82	April Britt	421	11-1-82	Glenda Harrison	8758
8-2-82	Lynn Hartnett	57476	12-1-82	Lynn Hartnett	64946
8-2-82	Diane Wellington	10684	12-1-82	Nancy Tutthill	12050
			12-1-82	Allilyn Fleck	3640

11040

Robins Ladies Wear, Inc.

12-1-82 Carol Tripp
 12-1-82 Barbara Governor
 12-1-82 Kathy Wilcox
 12-1-82 Glenda Harrison
 12-1-82 Fran Calcutt

10609
 8106
 8090
 5706
 4990

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4 Robin's 455 N. Myrtle Beach
 2006 Hwy. 17
 N. Myrtle Beach, SC. 29582

MUR 2011

1-4-80	Jerry Harris	1491 83	6-5-80	Jerry Harris	781 25
1-4-80	Dale Richardson	317 34	6-5-80	Dale Richardson	237 80
1-4-80	Lester Erving	375 37	6-5-80	Lester Erving	161 11
1-4-80	Mark Saunders	244 28	6-5-80	Mark Saunders	49 27
1-4-80	Sam Durham	307 39	6-5-80	Sam Durham	170 19
2-7-80	Jerry Harris	476 35	6-5-80	Bob Wright	601
2-7-80	Dale Richardson	142 55	7-3-80	Jerry Harris	769 64
2-7-80	Lester Erving	132 36	7-3-80	Mark Saunders	123 31
2-7-80	Mark Saunders	62 74	7-3-80	Dale Richardson	226 26
2-7-80	Sam Durham	78 98	7-3-80	Robert Wright	113 27
3-5-80	Jerry Harris	529 01	7-3-80	Sam Durham	194 86
3-5-80	Dale Richardson	148 17	8-5-80	Jerry Harris	794 47
3-5-80	Lester Erving	148 54	8-5-80	Dale Richardson	229 97
3-5-80	Mark Saunders	70 14	8-5-80	Mark Saunders	94 31
3-5-80	Sam Durham	98 76	8-5-80	Sam Durham	243 17
4-4-80	Sam Durham	155 44	8-5-80	Bob Wright	144 84
4-4-80	Jerry Harris	798 96	9-4-80	Jerry Harris	721 05
4-4-80	Lester Erving	185 08	9-4-80	Dale Richardson	235 03
4-4-80	Mark Saunders	140 00	9-4-80	Mark Saunders	89 95
4-4-80	Dale Richardson	219 51	9-4-80	Bob Wright	119 80
5-6-80	Jerry Harris	794 79	9-4-80	Sam Durham	197 12
5-6-80	Dale Richardson	185 80	10-6-80	Jerry Harris	653 07
5-6-80	Lester Erving	250 00	10-6-80	Dale Richardson	232 52
5-6-80	Mark Saunders	65 70	10-6-80	Mark Saunders	100 00
5-6-80	Sam Durham	150 00	10-6-80	Bob Wright	41 88
5-21-80	Jerry Harris	52 00	10-6-80	Sam Durham	144 92
5-21-80	Dale Richardson	72 00	11-4-80	Bob Wright	64 96
5-21-80	Lester Erving	94 00	11-4-80	Mark Saunders	181 28
5-21-80	Mark Saunders	20 00	11-4-80	Dale Richardson	30 491
5-21-80	Sam Durham	73 60	11-4-80	Jerry Harris	43 20

2 1 0 4 2 Robins at N. Myrtle Beach
2006 N. Hwy. 17
N. Myrtle Beach, S.C. 29582

(2)

11-4-80	Jerry Harris	67617	3-3-81	Sam Durham	13248
11-4-80	Sam Durham	22017	3-3-81	Chip White	437
12-3-80	Jerry Harris	68673	4-3-81	Jerry Harris	48894
12-3-80	Dale Richardson	21401	4-3-81	Dale Richardson	14795
12-3-80	Mark Saunders	15153	4-3-81	Mark Saunders	9110
12-3-80	Bob Wright	5535	4-3-81	Bob Wright	5887
12-3-80	Sam Durham	12363	4-3-81	Sam Durham	8800
12-3-80	Chip White	3933	4-3-81	Chip White	1696
12-31-80	Jerry Harris	6600	4-22-81	Jerry Harris	3200
12-31-80	Dale Richardson	13500	4-22-81	Dale Richardson	6205
12-31-80	Mark Saunders	9200	4-22-81	Mark Saunders	2890
12-31-80	Bob Wright	3300	4-22-81	Bob Wright	720
12-31-80	Sam Durham	6500	4-22-81	Sam Durham	3200
12-31-80	Chip White	1700	5-5-81	Jerry Harris	83029
1-5-81	Jerry Harris	141684	5-5-81	Dale Richardson	31600
1-5-81	Dale Richardson	35998	5-5-81	Mark Saunders	17880
1-5-81	Mark Saunders	31754	5-5-81	Bob Wright	6328
1-5-81	Bob Wright	16629	5-5-81	Sam Durham	13839
1-5-81	Sam Durham	27061	6-2-81	Jerry Harris	84467
1-5-81	Chip White	8347	6-2-81	Dale Richardson	24266
2-4-81	Dale Richardson	17733	6-2-81	Mark Saunders	18187
2-4-81	Jerry Harris	49624	6-2-81	Sam Durham	14807
2-4-81	Mark Saunders	9404	6-2-81	Bob Wright	12971
2-4-81	Bob Wright	4046	7-2-81	Jerry Harris	73972
2-4-81	Sam Durham	10195	7-2-81	Dale Richardson	26260
2-4-81	Chip White	2124	7-2-81	Mark Saunders	10487
3-3-81	Jerry Harris	72260	7-2-81	Bob Wright	13890
3-3-81	Dale Richardson	25508	7-2-81	Sam Durham	16216
3-3-81	Mark Saunders	14922	8-4-81	Jerry Harris	76549
3-3-81	Bob Wright	7390	8-4-81	Dale Richardson	21765

4 Robin's of N Myrtle Beach
 2006 N. Hwy 17
 N. Myrtle Beach, SC 29582

(3)

8-4-81	Mark Saunders	15721	1-4-82	Bob Wright	29049
8-4-81	Bob Wright	13533	1-4-82	Randy Craft	48615
8-4-81	Sam Durham	18388	1-4-82	Gina Spikes	8681
9-3-81	Jerry Harris	72865	2-2-82	Jerry Harris	47174
9-3-81	Dale Richardson	23552	2-2-82	Gene Spikes	6594
9-3-81	Mark Saunders	9196	2-2-82	Randy Craft	14883
9-3-81	Bob Wright	13925	2-2-82	Bob Wright	8225
9-3-81	Sam Durham	17170	2-2-82	Sam Durham	11539
10-2-81	Jerry Harris	87069	3-2-82	Jerry Harris	79233
10-2-81	Dale Richardson	29158	3-2-82	Gene Spikes	13689
10-2-81	Mark Saunders	13823	3-2-82	Randy Craft	20896
10-2-81	Bob Wright	12060	3-2-82	Sam Durham	20763
10-2-81	Sam Durham	22098	3-2-82	Bob Wright	13444
11-4-81	Jerry Harris	77181	4-5-82	Jerry Harris	82620
11-4-81	Dale Richardson	24522	4-5-82	Sam Durham	20450
11-4-81	Sam Durham	25231	4-5-82	Randy Craft	25576
11-4-81	Mark Saunders	11266	4-5-82	Gene Spikes	1058
11-4-81	Bob Wright	6010	4-5-82	Bob Wright	11253
12-3-81	Jerry Harris	77517	4-12-82	Jerry Harris	15000
12-3-81	Dale Richardson	23902	5-3-82	Jerry Harris	92314
12-3-81	Sam Durham	20385	5-3-82	Sam Durham	27309
12-3-81	Randy Craft	10376	5-3-82	Randy Craft	27207
12-3-81	Bob Wright	8735	5-3-82	Gene Spikes	4657
12-29-81	Jerry Harris	1200	5-3-82	Bob Wright	18544
12-29-81	Sam Durham	13700	6-3-82	Jerry Harris	88936
12-28-81	Randy Craft	13500	6-3-82	Sam Durham	21227
12-29-81	Gene Spikes	3700	6-3-82	Randy Craft	27597
12-29-81	Bobby Wright	8800	6-3-82	Bob Wright	19865
1-4-82	Jerry Harris	165849	6-3-82	Betty Jean Lambert	3545
1-4-82	Sam Durham	46360	6-23-82	Randy Craft	5375

Robin's of N.M.B. 4
 2006 Hwy. 17
 N.M.B., SC 29582

(4)

6-23-82	Serry Harris	5750	11-4-82	Bob Wright	6493
6-23-82	Sam Durham	7500	11-4-82	Betty Jane Lambert	21346
6-23-82	Bob Wright	3900	12-3-82	Serry Harris	71970
6-23-82	Tom Player	1200	12-3-82	Sam Durham	18543
6-23-82	Betty Jane Lambert	1100	12-3-82	Randy Craft	14899
7-2-82	Serry Harris	77993	12-3-82	Bob Wright	5258
7-2-82	Sam Durham	19446	12-3-82	Jane Lambert	20452
7-2-82	Randy Craft	15621	12-24-82	Serry Harris	6600
7-2-82	Bob Wright	9246	12-24-82	Sam Durham	10875
7-2-82	Betty Jane Lambert	9021	12-24-82	Randy Craft	5200
7-2-82	Tommy Player	12375	12-24-82	Jane Lambert	5000
8-3-82	Serry Harris	99305	12-24-82	Bob Wright	3300
8-3-82	Sam Durham	22217	12-24-82	Gary Brown	2500
8-3-82	Randy Craft	25806			
8-3-82	Bob Wright	14298			
8-3-82	Betty Jane Lambert	8990			
8-30-82	Serry Harris	100000			
9-2-82	Serry Harris	90322			
9-2-82	Sam Durham	24480			
9-2-82	Randy Craft	27782			
9-2-82	Bob Wright	14705			
9-2-82	Jane Lambert	12815			
10-5-82	Serry Harris	91242			
10-5-82	Sam Durham	27430			
10-5-82	Bobby Wright	11092			
10-5-82	Randy Craft	22064			
10-5-82	Jane Lambert	18793			
11-4-82	Serry Harris	88507			
11-4-82	Sam Durham	25938			
11-4-82	Randy Craft	15109			

OCM#450

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

RODNEY C. JERNIGAN, JR.
ATTORNEY AT LAW
POST OFFICE BOX 2130
FLORENCE, SOUTH CAROLINA 29503

87 DEC -7 AM 9:03

TELEPHONE (803) 664-2884

BUSINESS & TECHNOLOGY CENTER
THIRD FLOOR
181 EAST EVANS STREET
SUITE 314
FLORENCE, SOUTH CAROLINA 29503

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OFFICE OF GENERAL COUNSEL
87 DEC -7 PM 1:41

TELEX # 5106011431
FAC # (803) 664-2803

December 2, 1987

Mr. Phil Wise
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Re: James A. "Jimmy" Brown, Jr.
MUR 2071

Dear Mr. Wise:

This will confirm our telephone conversation of Friday, November 27, 1987. We had discussed rescheduling Mr. Brown's deposition for Thursday, December 10, 1987 at 3:30 p.m. This date is convenient for Mr. Brown. Unless a conflict arises due to a case I have coming up in the State of South Carolina Court of Commons Pleas for Florence County, we will be available for that date.

It very well may be that if a conflict appears to develop, you may be able to have someone in your office drive over from Columbia to Florence during the evening of the 9th or 10th and take Mr. Brown's deposition here.

Hopefully that problem will not arise. I would appreciate very much if you would give me a call after you have had a chance to review this letter.

With warmest personal regards,

Sincerely yours,

Rodney C. Jernigan, Jr.

Rodney C. Jernigan, Jr.

/jal

cc: Mr. James A. Brown, Jr.

01040360405

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MJR 2071
)
Gary H. Slavens, et al.,)
)

DEPOSITION OF ROBERT L. WELCH

Deposition of Robert L. Welch, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 1:26 p.m., on Wednesday, December 9, 1987, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

APPEARANCES: Thomas J. Whitehead, Esquire,
and Phillip L. Wise, Esquire,
Assistant General Counsel,
Federal Election Commission,
Washington, D.C.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO, S. C. 29053

(803) 781-1400

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STIPULATIONS

The reading and signing of the deposition
by the deponent is reserved.

I N D E X

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Direct Examination by Mr. Whitehead-----	3
Signature of Deponent-----	68
Certificate of Notary Public-----	69

EXHIBITS

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WHEREUPON,

ROBERT L. WELCH, HAVING BEEN DULY SWORN
AND CAUTIONED TO SPEAK THE TRUTH, THE WHOLE
TRUTH, AND NOTHING BUT THE TRUTH, TESTIFIED
AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Would you state your name for the reporter and also
spell the last name for us?

A Robert L. Welch, W-e-l-c-h.

Q And your home address, sir?

A Is 1020 Hunter Avenue, North Myrtle Beach, South
Carolina.

Q And your home phone number, with Area Code?

A 803-249-8265.

Q What is your business address?

A In care of LeMasters, L-e-M-a-s-t-e-r-s, E-3
Briarcliffe Mall, Myrtle Beach, South Carolina, 29577.

Q And your business phone number?

A 803-272-2375.

Q What position do you hold with LeMasters?

A I'm President of LeMasters of Briarcliffe, Incorporated,
and Manager of the store.

Q Is that a South Carolina corporation?

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Q How old is that as a corporation? When was it incorporated?

A I think around the Spring of '86. We opened the store in April. I'm not sure of the exact incorporation dates.

Q So it's recently in business, in effect?

A Yes.

Q It's only a year or a little better, maybe two years.

A Yes.

Q You are not represented by an attorney here today. Is that correct?

A No, sir.

Q I'm going to ask some questions, and if at any time you don't understand a question, please ask me to clarify it. Otherwise I will take it that your response is to the question as posed, that you do understand the question. Is that clear?

A Yes, sir.

Q Did you review any documents in preparation for this particular deposition?

A I've looked over the documents that I sent you in Washington as far as the---

Q And those documents consist of what?

A It was the bonuses paid to all employees I think from

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2 the period January 1st, 1980, through December 31st
3 of '82, whatever you required in the subpoena.

4 Q And these documents refer to each of the corporations,
5 and we will, I'm sure, take each corporation in turn,
6 but you submitted them for how many corporations?
7 Do you recall?

8 A Let me count it and see. Six. I think that's what
9 you had asked for.

10 Q Did you review any other documents such as your
11 checks for the year 1982?

12 A Yes, sir, I went back through my bank statements and
13 found those, amazingly enough.

14 Q And you turned in to us checks made payable to the
15 Tallon for Congress Committee, three separate checks,
16 one dated April 13, 1982, in the amount of One
17 Thousand Dollars, signed by you, drawn on an account
18 for Robert L. or Billie E. Welch, 308 Reseda Drive,
19 Columbia, South Carolina.

20 A Yes, sir.

21 Q A check for Fifty Dollars to Tallon for Congress
22 Committee, signed by you on the same account, dated
23 September 26, 1982.

24 A Yes, sir.

25 Q And a check drawn on the same account payable to the

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A Yes, sir.

Q Did you discuss this document with Mrs. Minshew at the time it was prepared?

A I don't remember specifically discussing it, but I'm sure I would have told her what it was as she notarized it. I feel sure I would.

Q Did you personally make out this particular response?

A Yes.

Q It wasn't something that Mrs. Minshew put together for you for you to sign.

A I don't think it was, no, sir. I'm sure I did it.

Q Did you discuss the form of the letter response with Mrs. Minshew at any time?

A I don't remember that I did. I could have.

Q Did you discuss this deposition with anyone except a lawyer prior to today's testimony?

A Yes, sir.

Q Who did you discuss it with?

A There again, I'm not positive, but I would imagine Roland Minshew, who also I work with and he was subpoenaed; with Mr. Wise; and I don't think anybody else.

Q What was the subject of your conversation with Mr. Minshew in connection with this deposition? What was

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said?

A Basically that--- Well, at the time I had not received a subpoena individually.

Q You say at the time. Could you pin down the time?

A I don't know the exact date. Shortly after the subpoena for Robin's of Dentsville was received as to the President of Robin's of Dentsville.

Q When was that?

A Are you asking about the subpoena or the original letter?

Q Well, I'm trying to pin down the time that you had the discussion with Mr. Minshew more than anything else.

A The original subpoena to Robin's of Dentsville is dated the 3rd of November, 1987. I'm not sure how long after that it got into my hands.

Q Did you talk to Mr. Minshew since that time, since receiving that subpoena?

A Yes.

Q Where?

A Where?

Q Yes, where?

A That I don't remember. Possibly over the phone or possibly in person.

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2 Q You don't recall whether it was in person or whether
3 it was by phone?

4 A No, sir.

5 Q Did you make a trip up here to talk with Mr. Minshew?

6 A Did I walk?

7 Q Would you have---

8 A Not a special trip. It would have been a casual
9 conversation, "I received a subpoena and have to
10 go to Columbia," because of the knowledge that the
11 letters had been received." Most of these came to
12 one office anyway, addressed incorrectly, and,
13 therefore, it was fairly common knowledge among
14 several of us.

15 Q What did you discuss with Mr. Minshew?

16 A Basically that I was asked to come up here and that
17 the president of each of the corporations was asked
18 to come and that it seemed to make more sense that I
19 come for all of the corporations rather than the
20 president of each corporation, which changed, I think,
21 in May of this year, because the time period you had
22 asked about was covered, I was president of the
23 corporations during that time and felt more qualified
24 to answer any questions.

25 Q Okay, that makes sense. Did you discuss with Mr.

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2 Minshew anything over and above the receipt of the
3 subpoenas?

4 A I don't think I did. There would have been no reason
5 to. I didn't really know what the subpoenas were
6 about. I mean, I know what they say, but, I mean,
7 I wouldn't know what else to discuss.

8 Q You didn't discuss with him any contributions made
9 to the Tallon for Congress Committee?

10 A I don't know that I did specifically, but I could have.
11 I mean, it was fairly common knowledge that I have
12 contributed to the campaign during this period as well
13 as since then.

14 Q Is it your testimony that you did not have any dis-
15 cussion with him concerning contributions to the
16 campaign?

17 A I guess my testimony would be that I don't remember
18 specifically having a conversation about that. I
19 could have. It appeared that we were all in basically
20 the same situation.

21 Q Well, did he discuss with you the fact that he had
22 received a subpoena also?

23 A Well, I knew he did because he received the one as
24 president of Robin's of Florence.

25 Q Because he is currently the president of Robin's of

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Florence? Is that it?

A Yes, sir.

Q So you knew that he received that particular subpoena. Did you discuss with him the fact that he received a deposition notice personally?

A I probably did because I knew he was coming up here today. He and I are very close friends as well as business associates.

Q Did you discuss what your testimony might be?

A No, sir, because I didn't know what questions you might ask.

Q So there was no discussion had between the two of you as it pertains to contributions to the Tallon for Congress Campaign Committee?

A No, sir.

Q You've just testified that the six corporate entities have changed presidents recently.

A Yes.

Q During the period between 1980 and 1982 were you the president of each of the corporations?

A That's a question I'm not sure about. I feel like I was at the end of the period, but I don't know if I was at the beginning of the period.

Q What was your position in each one of those corporations?

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2 A At one point in time I was vice president of all of
3 the corporations and later was made president of all
4 of the corporations.

5 Q Let's identify the corporations for the record.

6 A Okay. They would be Robin's of Florence, Incorporated;
7 Robin's of North Myrtle Beach, Incorporated; Robin's
8 of Dentsville, Incorporated; Robin's of Anderson,
9 Incorporated; Robin's Ladies' Wear, Incorporated;
10 and LeMasters, Incorporated.

11 Q These are located in various locations in the state,
12 however.

13 A Yes, sir. Several of these have been closed.

14 Q I understand. So you are by virtue of the period of
15 time--- Well, let's go back. You said that at one
16 time you know you were vice president. Were you ever
17 other than vice president?

18 A I was president.

19 Q Of each one of these corporations?

20 A Yes.

21 Q Who was president while you were vice president?

22 A I don't remember. It could have been each store
23 manager.

24 Q Was Robin Tallon the president?

25 A I would imagine at some point in time he may have been.

SF 404
PLS. ADVISE BY PHONE (714) 471-024
910403477

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2 I'm not positive though. I don't know if I succeeded
3 him or if I succeeded someone else.

4 Q Are you authorized to answer on behalf of each of
5 these corporations?

6 A Yes, sir. Several of them I'm still president of.

7 Q Are you a director of each of these corporations?
8 Do they have a board of directors?

9 A Yes, sir, I think so.

10 Q You're a director of each one of the six corporations?

11 A Yes, sir, I think I am. Now, there again, as of May
12 that could have changed.

13 Q May of 1987?

14 A '87.

15 Q Because there seems to be a restructuring as of May of
16 1987.

17 A Right. Our organization had become quite smaller than
18 we had been at one time.

19 Q Do you own stock in any of these corporations?

20 A No, sir.

21 Q Never have?

22 A I don't think so, no, sir.

23 Q Never bought any stock?

24 A No, sir.

25 Q I assume they're closely-held corporations. They're

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not public corporations.

A No, sir.

Q What is the registered name of each of these corporations? And then go into the address of these corporations. Can we do that?

A Okay, as I stated before when I gave you the names, that was the incorporated names to the best of my knowledge.

Q Could you give us the address of each one of these corporations?

A I can on some of them; some of them I'm not sure of today. The ones that are closed, I don't know if they have their old address listed as the address or if they would have become -- their address is our post office box in Florence.

Q Have any of these corporations been dissolved?

A No, sir.

Q They're still active corporations?

A They exist, but they're not active.

Q Strike the word "active." They are still corporations in---

A ---the State of South Carolina to the best of my knowledge, yes, sir.

Q Not doing business.

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2 Q Was that ever located in--- Oh, I see, in Florence.

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4 A There are two -- basically two different LeMasters
5 stores. The one that I'm presently involved in was
6 not in existence during this period.

4

5

6

7 Q I see. Do you have any idea when these various
8 corporations were incorporated?

7

8

9 A No, sir.

9

10

11 Q How many employees are there at--- Let's start with
12 the Robin's of Florence, Inc.

11

12

13 A Today?

13

14

15 Q Today.

15

16 A There again, to the best of my knowledge because I'm
17 not actively involved in the inner workings of that
18 particular store at this time, I think there's a
19 manager, an assistant manager, and I think right now
20 a third fulltime employee who may be there on a
21 temporary basis, and two or three or four part-
22 time employees, plus a seamstress.

16

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19

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21 Q So the president is Mr. Minshew. Right?

21

22

23 A At this point, yes, sir.

23

24 Q He's also the manager of that store, is he not?

24

25 A Right, sir.

25

Q Was he managing that store back in 1982?

A Yes, sir.

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Q How about Lemasters of Magnolia Mall in Florence, South Carolina? How many employees?

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A That's LeMasters, Incorporated. There again, they have a manager, an assistant manager, a seamstress, and three or four part-time employees. I don't really know the correct number. I may but just can't remember.

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Q And the Robin's Ladies' Wear, which is located in Florence?

10

11

A They have a manager, an assistant manager, and I don't honestly know how many part-time employees. It could be three or four or five. I just don't know.

12

13

14

Q How about back in 1982 for each one of those corporations?

15

16

A I don't have any idea off the top of my head, sir.

17

Q That seems -- correct me if I'm wrong -- to take into consideration all of the active corporations.

18

19

A Yes, sir.

20

Q Do you recall who was employed by Robin's of Dentsville, which is the Columbia store, back in 1982?

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22

A Okay, there were two Columbia stores. That was one of them. I was manager, and I can look on here and

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tell you the exact names. Off the top of my head, I'm

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not sure who was employed exactly during that particular

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period.

Q So you were up here in Columbia during that period of time.

A Yes, sir.

Q You traveled back and forth?

A Sir?

Q Did you travel around?

A At that point in time, as president and general manager of the corporations, I did visit each of the other stores on a regular basis.

Q Do all of the employees of the corporations receive a salary?

A Yes, sir, either a weekly salary or an hourly wage.

Q I'm talking about fulltime employees. Are they all on salary?

A It depends on what you consider fulltime. We may have what we consider part-time employees who work in excess of forty hours at times. What we consider fulltime employees, yes, they are all on salary.

Q And you have some employees paid on an hourly basis. Is that right?

A Yes, sir. Now, some of the seamstresses that might be considered fulltime I think are still paid by the hour. I believe they are.

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2 and I don't know exactly how far it went back. He is
3 paid a smaller percentage on his individual sales,
4 but it's not paid but once a year.

5 Q When is that?

6 A I'm going to say it's probably paid in June.

7 Q Was that true back then also?

8 A To the best of my knowledge.

9 Q Is it a round figure or is it computed on a percentage
10 basis?

11 A It's a percentage basis. It's a floating scale, one
12 percentage up to a certain point, an additional
13 percentage after that.

14 Q Was there a policy on bonuses aside from commission
15 on sales, if you know what I'm talking about?

16 A Yes, sir.

17 Q Tell me what that policy was on bonuses.

18 A Well, when I say policy, there was, I guess, during
19 a given period, but it changed frequently.

20 Q Back in the 1981-82 period, did it pertain to each of
21 the six corporations or did it vary individually with
22 the corporations?

23 A It probably varied from corporation to corporation.

24 Q Tell us what Robin's Men's Store in Florence -- what
25 the policy on bonuses back then was.

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2 A Well, there again, this is from the best of my
3 memory. I don't have anything to refer to. From
4 time-to-time we had what we call contests where
5 employees were paid different amounts on their sales
6 over and above their commissions, on the number of
7 units sold during a given period of time, a bonus
8 for reaching a certain sales figure individually or
9 storewise. There were quite a few different things
10 from time to time. As I explained to you over the
11 phone when we got into what was a bonus and what was
12 not a bonus, we always considered everything other
13 than salary a bonus. I mean, it basically was.
14 There were some that were more regular than others,
15 but, for us, anything other than a salary was to
16 create an incentive within the store for the store
17 to do better, both in volume, cutting expenses,
18 increasing profits, decreasing wages, a lot of
19 different reasons for those.

20 MR. WHITEHEAD: I'm going to ask the reporter
21 to mark this as the next FEC exhibit. It's a
22 document consisting of four pages, and it's a
23 copy of information supplied by the deponent
24 to us pertaining to bonuses, as you call them,
25 paid between January, 1980, and December of

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2 1982.

3 FEC EXHIBIT #2 WAS MARKED FOR
4 PURPOSES OF IDENTIFICATION.

5 A Is that on an individual store?

6 Q That's on the Florence store, the first one.

7 A Okay.

8 Q Is that a correct copy--- I'll let you take a look
9 at it and ask you if that's a correct copy of the
10 material that you forwarded to us. You might want
11 to just for your own satisfaction compare it.

12 A Okay, I've got a copy of what I sent you.

13 Q Right.

14 A Now, if I can assume that this is a copy---

15 Q Well, I want you to make sure.

16 A Figure by figure?

17 Q This is what you sent me, and this is what I want you
18 to compare it against.

19 A Do you want me to go through figure by figure?

20 Q No, not necessarily. Just take a look at it.

21 (Off the record.)

22 A Unless there have been any changes made without my
23 knowledge, that is a copy of the document that I sent
24 you. Unless I check it figure for figure, I would
25 certainly want that in there.

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2 Q We'll put that on the record, that he verifies that
3 it is---

4 A If it's a copy of what I sent, without verifying
5 every figure.

6 Q Referring to the copy that you have of this particular
7 document and going from the top, on 1/2/80 Butch
8 Minshew -- and that's Roland Minshew, who goes under
9 the name Butch -- was paid Thirty-Three Hundred and
10 Forty-Two Dollars and sixty-four cents.

11 A Right.

12 Q And this was submitted to us pursuant to subpoena,
13 and this is what you have said was a compilation of
14 bonuses for the period of time from January, '80, to
15 December, '82.

16 A Right.

17 Q Would you have any idea what that figure, Thirty-
18 Three Hundred and Forty-Two Dollars and sixty-four
19 cents, represents?

20 A I feel like that it represents his bonus paid on
21 sales in December of 1979, which we don't know until
22 the end of the month. Therefore, any bonus checks
23 would be written in January. And it could also
24 include any contest monies or anything like that.
25 I don't know that this exact figure is an exact percent

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of sales.

Q And the next name on there is Bob Ellen, and he was paid Four Hundred and Forty-One seventy-two. Do you have any idea what that might be?

A I would imagine that was based on the same type thing. It could be commission on sales or--- Now, I would assume in going back just a little bit--- Butch Minshew is the manager of the store. His commission and/or any contests or anything during that time would have been based basically on the volume of the store during that period. Any other employees, their bonuses would have been based on their individual sales and/or contest earnings or anything else we may have decided to do as an incentive during that period.

Q Going through these figures, and they seem to be -- in fact, they are recurring--- The same names appear each month.

A Right. There may be a change from time-to-time when an employee starts or leaves.

Q So we have Mr. Minshew, Bob Ellen, Ronnie Critz, C-r-i-t-z, Robert Harnett, Tommy Tumblin, Ricky Simmons. Those names appear almost every month.

A Well, I notice that Bob Ellen's name doesn't appear

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2 much after that. He could have been just extra help
3 hired for Christmas or during a certain period.

4 Q Taking out Mr. Ellen then---

5 A I see new names added further down in the last.

6 Q In each of these--- In connection with each of these
7 figures, is it your testimony that this would represent
8 the various bonuses for the previous month based on
9 sales, contests--- You explain it.

10 A Well, these figures represent bonuses that were paid
11 to these employees on the dates specified on the list.
12 Each one could be comprised of different reasons for
13 a particular bonus. Occasionally there were advances
14 on bonuses or either partial bonuses paid.

15 Q Who would determine whether advances were to be paid
16 or partial payments to be made?

17 A I assume I would. It could have been after consulting
18 with our bookkeeper.

19 Q Who was the bookkeeper?

20 A Cameron Minshew.

21 Q Who is Cameron Tallon Minshew.

22 A Right.

23 Q Do these figures represent net after taxes, do you
24 know?

25 A That I'm not sure of. I would assume that this was the

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gross, but I'm not positive.

Q Do you have any kind of an employment contract between the various corporations and the employees?

A No, sir.

Q No written employment contract?

A No, sir.

Q Do you have any policy of giving bonuses at regular intervals in a given year?

A Regular intervals?

Q Yes. Let's say an April bonus, a June bonus, an October bonus, a December Christmas bonus.

A Yes, sir.

Q What was that policy?

A Well, there again, it's an understood policy and not anything that's written anywhere, and it's as I've explained the bonus system. Part of it's commission on store volume; part of it's commission on individual sales. We have contests a lot. We give incentives if they reach a certain sales goal, and there are some more regular than others.

Q So, in effect, it really isn't anything that is particularly regular in that it's quarterly, semi-annually or annually.

A Or on the spur of the moment.

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Q Or on the spur of the moment.

A If we have a store that's not doing real well, we may offer a given bonus during a period of time to try to increase business there. Or if expenses is the problem, we may give a bonus to try to cut expenses. If it's to increase profits, the bonus may be given to increase profits. I would imagine there probably have been bonuses paid to individuals for a job well done.

Q Are the bonuses paid after the fact?

A Sir?

Q Are they paid after the fact; that is, after the job well done, after the---

A In most cases I would say they would be.

Q Are there any cases where they were given prior to some sales quota fulfillment?

A I don't recall any, but I can't say there absolutely weren't any. This is a long time ago.

Q I understand.

A And quite a few individuals included to keep up with.

MR. WHITEHEAD: Let me have each one of these marked as exhibits, please, from North Myrtle Beach.

FEC EXHIBIT #3 WAS MARKED FOR

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PURPOSES OF IDENTIFICATION.

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3 Q There's FEC Exhibit 3, and that pertains to the
4 Robin's of North Myrtle Beach for the period of time
5 we're discussing, January of '80 to December of '82.

6 A May I assume that this is an unaltered copy of what
7 I sent you?

8 Q You can be assured that it is.

9 A Okay. I mean, I feel like I need to ask that without
10 verifying every figure.

11 Q That's fine. This particular exhibit, FEC Exhibit 3,
12 is the same type of exhibit that we referred to in
13 our earlier one.

14 A Right.

15 Q That is, it is a compilation of bonuses paid by this
16 particular corporation for the period of time in
17 question. Right?

18 A Right.

19 Q Who was the manager of that particular store in 1982
20 to your knowledge?

21 A Jerry Harris.

22 Q Jerry Harris was the manager of that store. Okay.
23 And like the previous one that pertained to Robin's
24 of Florence, Inc., I take it each one of these entries
25 pertains to bonuses paid.

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A Right.

Q This does not reflect anything in salary, does it?

A No, sir, not a thing. That was left out because it was not included in the request.

Q But that's bonuses paid in that period of time by Robin's of North Myrtle Beach. Right?

A Yes, sir.

MR. WHITEHEAD: This will be FEC Exhibit 4, pertaining to Robin's Ladies' Wear, Inc.

FEC EXHIBIT #4 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

Q I'll show you now FEC Exhibit 4, which pertains to Robin's Ladies' Wear of Florence, South Carolina. I ask you if that is a copy of---

A May I also assume that it's an unaltered copy?

Q Yes.

A Yes, sir.

Q It conforms with the copy pretty much that you have in your possession?

A Right. If you want to do them all at one time, like I say, if I can assume they're unaltered copies of what I sent you, I see no problem with them.

Q Well, I want to take them so we can identify them as supplied by virtue of the corporation.

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2 A All right.

3 FEC EXHIBIT #5 WAS MARKED FOR
4 PURPOSES OF IDENTIFICATION.

5 Q This is FEC Exhibit 5, which pertains to Robin's
6 of Anderson, Inc.

7 A Assuming this is an unaltered copy of what I sent you,
8 then that would be fine.

9 FEC EXHIBIT #6 WAS MARKED FOR
10 PURPOSES OF IDENTIFICATION.

11 Q This is FEC Exhibit 6, which pertains to Robin's of
12 Dentsville, Inc.

13 A Yes, sir. Assuming this is an unaltered copy of
14 what I sent, that should present no problem.

15 MR. WHITEHEAD: This last will be FEC Exhibit 7.

16 FEC EXHIBIT #7 WAS MARKED FOR
17 PURPOSES OF IDENTIFICATION.

18 (Off the record.)

19 Q The last that I gave you was FEC Exhibit 7, which
20 pertains to LeMasters of---

21 A LeMasters, Incorporated.

22 Q ---LeMasters, Incorporated.

23 A Yes, sir. There again, assuming this is an unaltered
24 copy. One difference here is this started at a
25 different date than the rest of them.

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2 Q Yes. It started on March 6, 1980. What was the
3 reason for that?

4 A That's when the store opened. It was not in existence
5 prior to that date.

6 Q All of these were documents compiled from original
7 records.

8 A Yes, sir.

9 Q Where are those original records retained?

10 A Normally in Florence.

11 Q Who put this particular exhibit together for us --
12 I mean all six of these exhibits?

13 A Cameron Minshew.

14 Q She was the one who went to the original records---

15 A Right.

16 Q ---and prepared these particular documents. Do you
17 know her handwriting?

18 A Yes, sir.

19 Q Is that her handwriting that we're looking at?

20 A Yes, sir.

21 Q It is?

22 A (Nods in the affirmative.)

23 Q What instructions did you give her when you asked her
24 to compile these particular documents?

25 A After talking with Mr. Wise to find out what he wanted

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2 exactly as per the subpoenas, I asked her to go
3 through and try to find the records, if we still
4 had them as many of these stores had closed, to find
5 all of the bonuses that were paid to all employees
6 from January 1st of 1980 through, I think, December
7 31st of '82 was the last time you asked for.

8 Q And that pertained to all of the different corporations
9 that had received subpoenas.

10 A The different corporations that I had received
11 subpoenas, yes, sir.

12 Q And the compilation was done per direction from you
13 by physically by Cameron Minshew.

14 A Right.

15 Q Who is the bookkeeper for the entire organization,
16 I take it.

17 A Right, and with about forty-eight hours' work doing it.
18 That probably did not count finding the records.

19 Q Is she employed by any one of the corporations
20 involved here or is she employed by the Tallon Sales
21 Company?

22 A She is employed by Tallon Sales Company.

23 Q What is Tallon Sales Company?

24 A It basically is a bookkeeping or management service.

25 Q It's not a holding company. It doesn't hold title to

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any of these corporations.

A It may very well do that, yes, sir.

Q You don't know offhand.

A (Nods in the negative.)

Q But it's kind of the administrative arm, would you say?

A Yes, sir.

Q I'm not trying to put testimony in your mouth, but I'd like to---

A Right. I mean, yes, depending on what you mean by that. Yes, I would say that would be---

Q What would you mean by it?

A Well, the Tallon Sales Company basically decides what to do and when to do it on things that don't pertain to everyday business within a given store which the manager decides on.

Q What would some of those things be that Tallon Sales Company would decide on?

A It could be to open a store, to close a store, a change in personnel at certain levels, any number of things.

Q How long has that been in existence, that particular store?

A Well, that's not a store.

Q I mean that particular company.

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time.

Q Were these officers also the board of directors?

A I think so, but I'm not positive. I don't have any documents.

Q Could it be said that this is the parent corporation for the other corporations?

A There again, depending on what you mean by parent as while ago administrative arm, how that can be construed, yes, sir.

Q Were individual store policy questions decided by this corporation or by the individual stores?

A There was a mixture, depending on what the policy was. As far as who vaccinated, that was probably on a store level decision. You can understand what I'm talking about. Major decisions would have been decided by myself and others possibly.

Q In April of 1982 bonuses of Fifteen Hundred Dollars were given to apparently each one of the store managers in the stores in question.

A April of '82?

Q Yes. For example, Robin's of Florence, Inc., on April the 12th, 1982, a Fifteen Hundred Dollar bonus was paid to Mr. Butch Minshew, who is Roland Minshew.

A Right. Correct.

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2 Q On April 12th of 1982 a Fifteen Hundred Dollar bonus
3 was paid to Mr. Jerry Harris, whom you just told me
4 was the manager of the Robin's of North Myrtle Beach
5 store.

6 A Right.

7 Q On April 12th, 1982, a Fifteen Hundred Dollar bonus
8 was paid to Mr. Mark Lawson, who has testified that
9 he was the manager of that particular store at that
10 particular time.

11 A Right.

12 Q Turning to FEC Exhibit 6--- I'm sorry. Turning to
13 Robin's of Dentsville first, not identifying the
14 FEC exhibit, on April 12th of 1982 a check in the
15 amount of Fifteen Hundred Dollars for bonus was paid
16 to Mr. Bobby Welch. Is that correct?

17 A Yes, sir.

18 Q Taking those particular checks and directing our
19 attention just to those particular checks for the
20 time being, what was the nature of those bonuses?
21 Why were those bonuses given each on the same day
22 in the same amount?

23 A I don't remember as I don't remember what any of these
24 were specifically given for.

25 Q Well, I think it's your testimony, however, that most

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2 of these were given based on sales, the two percent
3 commission. This is one that's given in an even amount
4 of Fifteen Hundred all at the same time to each of
5 the managers in question.

6 A Right.

7 Q Including yourself.

8 A Right.

9 Q You have no recollection, is that what your testimony
10 is, of what the purpose for each one of those checks
11 was?

12 A I can't tell you today exactly why those checks were
13 written. I could give a list of possible reasons.

14 Q Let's take those. Let's take what possible reasons.

15 A Okay.

16 Q Let me point out that each one of these individuals,
17 including yourself, on the following day made a
18 contribution to the Tallon for Congress Committee in
19 the amount of A Thousand Dollars.

20 A Right.

21 Q Knowing that fact, what were some of the possible
22 reasons for the Fifteen Hundred Dollar bonus checks?

23 A It could have been an incentive, as I've said before,
24 where we promised everybody a given amount of money
25 if a certain figure was reached. It could have been

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2 a year that we were doing real well, and, not meaning
3 to say that anything was done wrong, it could have
4 helped us tax-wise to pay a given bonus. Our fiscal
5 year end is -- or was May 31st, I believe, at that
6 time. We could have had an indication of a profit
7 picture at tha tpoint. I don't remember. I mean,
8 there are several reasons any amount could have been
9 paid, as any other amount on here could have been paid.

10 Q But that particular maount is in an even amount, and
11 it was not paid in '80 or in '81. It was only paid in
12 '82.

13 A Right.

14 Q But it could have been for the reasons that you
15 mentioned?

16 A I'm sure it was for something along those lines, yes,
17 sir. I see other amounts paid periodically that don't
18 conform to uneven amounts on all of these sheets.

19 Q Were there any suggestions--- First of all, were any
20 of your employees instructed as to how to use bonuses
21 when bonuses were given?

22 A No, sir. There was an occasional time when we might
23 encourage people to start an IRA or anything else that
24 might benefit them.

25 Q Were there any suggestions on the use of bonuses given

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to the employees?

A No, sir, not on a regular basis.

Q Well, in particular, let's direct our attention to the April 12 bonus. Was there any suggestion, given the fact that each one of these gave A Thousand Dollar bonus the following day to the Tallon for Congress Committee, as to contributing to the Tallon for Congress Committee?

A I feel certain there was.

Q Did you make that suggestion?

A Yes, sir.

Q How was that suggestion made? Did you make it by phone? Did you assemble them or what?

A I had discussed with all of the employees once Robin announced he was going to run for Congress---

Q When was that? Do you know offhand?

A No, sir.

Q Okay.

A ---that it would probably be a good idea for us, as well as our friends and families, to give to the Campaign Committee if we could. Knowing--- I had volunteered to be--- I won't say in charge of. I had volunteered to raise funds for the -- I guess that was an election committee, Tallon for Congress

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2 Committee, during that time from outside of the
3 district. As I stated before, I lived in Columbia.
4 As general manager of the stores, I solicited con-
5 tributions from people we did business with, from
6 the principals in some companies we did a lot of
7 business with, from employees, from employees'
8 families, from friends of mine, from friends of
9 Robin's, a lot of people that did not live within the
10 district that wouldn't have been contacted any other
11 way.

12 Q In talking with the managers of each of these stores
13 and suggesting contributions after he announced, let's
14 say, but prior to April, did you ever make mention of
15 the fact that any contribution would be reimbursed
16 by the store?

17 A No.

18 Q You never told any of the employees that if a contri-
19 bution were given to the Tallon for Congress Committee
20 it would be made up by way of bonus in the form of a
21 bonus check?

22 A No, sir.

23 Q That statement was never made by you?

24 A No, sir.

25 Q But in your mind there's nothing unusual about the fact

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2 that they received a bonus for Fifteen Hundred Dollars
3 on one day and each gave A Thousand Dollar bonus the
4 following day to the Tallon for Congress Committee.

5 A It depends on what you consider unusual. I feel sure
6 I probably talked to each of them about a contribution
7 during this period, either when those bonuses were
8 paid or when other bonuses were paid or whatever.
9 The best time to ask somebody for money is, I guess,
10 when they've got it.

11 Q Did you assemble the store managers in one place to
12 talk to them this way?

13 A No, sir.

14 Q How would it have been done?

15 A It could have been in the form of a letter. It could
16 have been a telephone call. It could have been during
17 a conversation.

18 Q Do you have any recollection of sending a letter to
19 each one of these individuals?

20 A Yes, sir.

21 Q Asking for a contribution?

22 A Yes, sir.

23 Q Do you have copies of those letters at all available?

24 A I have copies of one. I cannot locate--- Well, I have
25 copies of several but one that was specifically addressed

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2 to employees. I don't have a copy of the letter that
3 preceded that one.

4 Q Can I take this? I want to mark it.

5 A That's the only copy I've got of it.

6 Q We'll get two copies Xeroxed.

7 A Do you want the rest of these?

8 Q Yes.

9 A Okay. These are the only copies I've got of those,
10 if you want to make copies of all of them.

11 (Off the record.)

12 Q The April 22nd letter is the two-pager. Right?

13 A Right.

14 MR. WHITEHEAD: I want to mark this next
15 exhibit for identification.

16 FEC EXHIBIT #8 WAS MARKED FOR
17 PURPOSES OF IDENTIFICATION.

18 Q I show you FEC Exhibit Number 8, which is an unsigned,
19 two-page letter dated April 22nd, 1982, which has the
20 salutation "Dear" but leaves space for a name to be
21 inserted.

22 A Right.

23 Q I'm going to ask you if you're familiar with that
24 particular document since it has your name typed at
25 the bottom.

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A Yes, sir.

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Q In connection with that particular document, who were to be the recipients of this document?

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A This was probably written to salesmen that we did business with that called on us in the stores, principals of companies that I knew personally.

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I think this is directed toward people we did business with.

9

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Q Was this letter sent?

11

A Sir?

12

Q To your knowledge, was this letter sent?

13

A Yes, sir.

14

Q To people on a particular mailing list?

15

A It's probably a list that I got out of some of our show books which just gives a home address and name of salesmen, and I would go through it and pick out people to send it to.

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Q Did you do this on your time or on company time?

19

20

A On my time.

21

Q You signed it as president of Tallon Sales Company though.

22

23

A Right.

24

Q Were you working with the campaign at that particular time?

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2 A On a voluntary basis, just in my spare time, as I
3 said before, trying to solicit funds from outside
4 of the district. We felt we had a fairly captive
5 audience and that I knew these people better than
6 anyone else, and so I volunteered to do it.

7 Q How much time do you think you contributed to put this
8 whole thing together?

9 A I have no idea.

10 Q But you did sign a letter--- It's your testimony
11 that this letter did go out and that your signature
12 was on it. Right?

13 A Yes, sir. I don't see any reason why I wouldn't have
14 mailed it after I had gone to the trouble to type it.

15 Q Did you have this photocopied or did you do individual
16 typing?

17 A I'm sure I probably did photocopying at a print shop.

18 Q Some sort of an offset printing?

19 A Well, more like a copy machine like that one out there
20 but one that--- There are some that have higher
21 quality than others.

22 Q Do you recall signing each one of these individually?

23 A I'm sure I probably did.

24 MR. WHITEHEAD: Mark this for identification.

25 FEC EXHIBIT #9 WAS MARKED FOR

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PURPOSES OF IDENTIFICATION.

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3 Q Let me show you Exhibit Number 9 for identification,
4 which is a copy of an unsigned letter dated April 27,
5 1982, which contains the typed block "Bobby Welch"
6 at the bottom of that particular document. I ask
7 you if you're familiar with that.

8 A Yes, sir, I am.

9 Q First of all, to whom would this particular document
10 be directed?

11 A To the best of my memory, I think this was sent to
12 friends of mine, customers that I did business with,
13 relatives, and anybody else I could think of.

14 Q The paragraph does talk in terms of, "I'm asking you
15 as a customer and a friend to help me do something
16 that I strongly believe in."

17 A Right.

18 Q And then you're requesting personal checks made out
19 to the Tallon for Congress Committee.

20 A Right.

21 MR. WHITEHEAD: I'll have this marked.

22 FEC EXHIBIT #10 WAS MARKED FOR
23 PURPOSES OF IDENTIFICATION.

24 Q This is FEC Exhibit 10, which is a signed copy of
25 a letter on the Robin's stationery, as the others

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2 that sent in a contribution. I really feel that
3 each of us should make a contribution if for no other
4 reason than the fact that we owe our jobs to Robin.
5 I also feel that each of you should ask your family
6 members that receive a discount on their purchases
7 for a contribution. I feel very strongly on both
8 these counts." Do you recall any contributions coming
9 in as a result of this particular letter to the
10 employees?

11 A I feel sure there were. I don't recall specifically.
12 I don't have any list or anything. Most of my letters
13 were pretty successful.

14 MR. WHITEHEAD: And lastly, let's make this
15 the next exhibit.

16 FEC EXHIBIT #11 WAS MARKED FOR
17 PURPOSES OF IDENTIFICATION.

18 Q This is FEC Exhibit 11. This is a letter which is
19 unsigned but has the typed block at the bottom,
20 "Bobby Welch." It's on Robin's stationery, Columbia,
21 South Carolina, and it's dated June 9th. It has the
22 salutation "Dear," without any identified individual
23 to whom it was sent. Do you recall this letter?

24 A Yes, sir.

25 Q To whom was this sent?

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were, of Columbia, South Carolina, dated June 1,
which is signed "Bobby." Is that your signature?

A Yes, sir.

Q And there's some written text that says, "Managers:
Please show to all employees immediately!" Is that
your handwriting?

A Yes, sir.

Q This is addressed, "To all Employees of Robin's,
Robin's Ladies' Shop, LeMasters, and Tallon Sales
Company." Right?

A Yes, sir.

Q I quote from the first paragraph: "About a month ago
I sent a letter to about sixty of you asking for con-
tributions for Robin Tallon's campaign for United
States Congress." Do you recall sending that other
letter?

A No, sir. That's what I said. I don't recall sending
it and I don't have a copy of it. I don't know.
I don't know if it was a letter. I don't know if it
was a memo. I don't have any idea.

Q Why would the figure sixty be significant?

A At that point we probably had sixty employees, I would
imagine.

Q You say, "I would very much like to thank each of you

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2 A I'm going to assume that I sent it to everyone that
3 I had sent previous letters to. It's just been so
4 long ago it's hard to remember exact specifics, but
5 I feel sure that's probably what I would have done.

6 Q Did you do any followup on the contributions that
7 were coming in by virtue of these letters to check
8 who was contributing and who was not contributing?

9 A I kept up with it, yes, sir.

10 Q At that time you kept up with it?

11 A (Nods in the affirmative.)

12 Q You stated that you probably talked to each one of
13 these store managers that received the April 12th
14 bonus of Fifteen Hundred Dollars.

15 A I talked to most of the store managers every day or
16 every other day.

17 Q But I think you also testified that you probably talked
18 to them about a contribution.

19 A Right.

20 Q Do you have any recollection of whether they asked you
21 how much they could give?

22 A I probably told them the maximum they could give,
23 which was A Thousand Dollars.

24 Q Was anything suggested as to the--- Strike that
25 question. Did you indicate to each of these store

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2 managers that you had already given?

3 A I either told them I had or had planned to.

4 Q Did any of the store managers to your recollection
5 say, "I can't afford A Thousand Dollars?"

6 A I don't think I phrased it that way. I don't think I
7 asked for a reply. I think I just said, "You and
8 I both know you're receiving a bonus. I'm going to
9 make a contribution, and we'd appreciate it if you
10 could, and A Thousand Dollars is what I plan to give,
11 and that's the most anybody can give, and we would
12 really appreciate anything you could do." I can't
13 say what I said. I mean, I can't remember what I may
14 or may not have said. I assume it would have been
15 something along those lines. A lot of times you
16 mention things to people wher eyou don't want an
17 immediate reply. I mean, if anybody would have said
18 that, that would have been fine, and they may have.
19 I don't know.

20 Q Do you recall talking to the individual store managers
21 prior to the Fifteen Hundred Dollar bonus about their
22 contributions to Mr. Tallon's campaign?

23 A Could you ask the question again?

24 Q All right, let me rephrase it.

25 A Well, not--- I just---

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2 Q If you think you understand it, I'll have him read
3 it back.

4 A Well, I think I understand it. I just don't remember
5 exactly what you said.

6 Q Did you have any conversation prior to the Fifteen
7 Hundred Dollar bonus to each of these particular store
8 managers about A Thousand Dollar contribution to Mr.
9 Tallon's campaign?

10 A I don't know, to be honest with you. The letter I
11 have dated April 22nd that was put in as Exhibit---
12 That would be this two-page one.

13 Q That was going to salespeople.

14 A Right.

15 Q To salesmen that sold to your company.

16 A Right. That makes mention that all checks must be
17 personal and A Thousand Dollars is the maximum total
18 contribution. I could have discussed that with
19 employees. I don't remember specifically doing it or
20 not doing it. I was aware that that was the most
21 anyone could give.

22 Q You said you worked for the Tallon Campaign Committee
23 as a volunteer. What period of time was that? I'm
24 talking about the '82 campaign.

25 A I don't remember. It was shortly after Robin announced

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2 and we were all excited about it, and I volunteered
3 that I felt like I would have a captive audience that
4 might not be reached through other fundraising methods.
5 I don't remember the exact time.

6 Q How much time did you spend as a volunteer for the
7 campaign, if you recall?

8 A I don't have any idea. I don't know.

9 Q Where was the headquarters for the Tallon for Congress
10 Committee located?

11 A In Florence.

12 Q At what address?

13 A I don't remember.

14 Q Was it near the store?

15 A Well, nothing in Florence is too far.

16 Q But you were at that point based in Columbia. Right?

17 A Right.

18 Q So did you get down to the campaign headquarters?

19 A Yes.

20 Q Very often?

21 A No, not really. I have always been in Florence a lot
22 because our headquarters was there, and I had a lot
23 of free time when I was there.

24 Q Did there come a time in late March or early April
25 to your knowledge that the campaign was running short

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of funds?

A I wouldn't have any knowledge of that. I was not that closely involved in it.

Q Cameron Minshew never mentioned the fact that they were low in funds?

A I don't know how she would have known.

Q She was Assistant Treasurer. She had an official capacity with the campaign.

A I didn't realize that.

Q Do you know Mr. Robert Odom, who was the Treasurer of record?

A I know a Glenn Odom.

Q It's Robert Glenn Odom.

A Okay, I know a Glenn Odom.

Q He was the Treasurer of the Tallon for Congress Committee. Did you ever have any discussions with Mr. Odom in connection with the campaign finances?

A Not other than about my raising funds, if he's the one I talked to, and I don't remember who I talked to. I don't remember who I made mention of that I'd be glad to try to solicit contributions. I mean, I don't know if it was Glenn or who.

Q Did you have any discussions with Congressman Tallon himself in connection with that?

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- 2 A No, sir, at that point, not to my knowledge. He was
- 3 very much involved in several different things.
- 4 Q Did you go on the campaign trail with him?
- 5 A No.
- 6 Q You never traveled with him at all?
- 7 A No, not as far as that goes. I went to some functions,
- 8 the stump meeting in Galivant's Ferry and that sort
- 9 of thing. I don't remember if it was that year or not.
- 10 Q Did Mr. Tallon ever advise you to solicit contributions
- 11 from the employees of the various corporations?
- 12 A No, sir. All of that would have been my idea.
- 13 Q All your idea and not his.
- 14 A (Nods in the affirmative.)
- 15 Q Did Mr. Talion ever advise you that the campaign in
- 16 late March or early April was low on funds?
- 17 A No, sir. I wouldn't have any knowledge of that from
- 18 anybody. I didn't--- I was not that involved. I
- 19 mean, when I went down to the campaign office it was
- 20 to speak to a few people that I knew, but I never got
- 21 into anything any more indepth than that.
- 22 Q Was the question of seed money ever discussed with you,
- 23 startup money for the campaign?
- 24 A No. I'm not familiar with that.
- 25 Q Startup money, was that ever discussed with you?

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2 "We need startup money in order to get ourselves under-
3 way?"

4 A Not to my knowledge, no, sir.

5 Q Not that you don't have any recollection of it.

6 A I don't think it was ever discussed. I was not that--

7 I don't know when he announced that he was going to
8 run for Congress. I had gone a couple of times when
9 he was involved in his State House elections, and
10 Robin is a personal friend and has been for a number
11 of years. We grew up together, and I saw him on a
12 regular basis, but I can't remember any specific
13 discussions of anything like that. He was very busy
14 and I was very busy handling business matters.

15 Q Did anybody advise you to give these Fifteen Hundred
16 Dollar bonuses to each of the store managers at that
17 particular point in time?

18 A No, sir.

19 Q So you had no knowledge of any problems with the
20 campaign's financing, that they were running low on
21 funds?

22 A No, sir.

23 Q You had no knowledge of the need for so-called seed
24 money?

25 A No, sir.

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2 Q But you declared a bonus of Fifteen Hundred Dollars
3 which you paid to each one of these various store
4 managers on April the 12th, with the exception of
5 Lynn Harnett, which came later in May.

6 A Yes.

7 Q And each one of these turned around and contributed
8 One Thousand Dollars to the campaign on April the 13th.

9 A I'm aware of all of that except I don't remember---
10 I mean, it was not like the bonuses were declared on
11 the--- What are the dates?

12 Q April 12th.

13 A It's not like they were declared that morning and
14 given that afternoon. Whatever the bonus was given
15 for would have been something everybody would have
16 been aware of.

17 Q Yet no Fifteen Hundred Dollar bonus was paid in '80
18 or '81 in and around April.

19 A I would have to check and see.

20 Q It wasn't. You can take a look at each one, but---

21 A Right. I mean, like I say, I haven't gone through
22 this figure by figure. I had no idea what dates you
23 might ask about or anything else. There's A Thousand
24 Dollar bonus to Butch Minshew in August of '81.
25 There's many others. That one sticks out because it's

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2 an even amount. There's a Two Thousand Dollar bonus
3 in July of '80. There's a Five Hundred Dollar bonus
4 in August of '82 to him. There's A Hundred and Fifty
5 Dollar bonus to Tommy Tumblin in December of '82.
6 I don't recall why any of these might have been given.
7 Specifics I could guess at, as I have already explained.

8 Q Well, let's take Mr. Lawson down there in Anderson.
9 He was only employed with the company for a short
10 period of time. He, in turn, also received a
11 Fifteen Hundred Dollar bonus on April the 12th.
12 You have no recollection of why that particular
13 Fifteen Hundred Dollar bonus was declared on April the
14 12th of 1982 to each one of the various store managers?

15 A Well, I don't feel like it was declared on that day.
16 It may have been paid on that day.

17 Q All right, paid on that day.

18 A All right. Now, Mark Lawson, if my recollection is
19 correct, had worked in one of our other stores prior
20 to his going to Anderson to work.

21 Q He had worked part-time in Florence, I believe.

22 A Columbia, I believe.

23 Q Columbia, yes, for some years.

24 A Right, while he was in school and that sort of thing.

25 Q But you had no written policy on payment of these

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2 even numbered, if you will -- I don't know how else
3 to explain it -- bonuses.

4 A Those nor any others.

5 Q We do have some two percent commission kind of policy
6 on sales, and you've included those in your bonuses.

7 A Right. Right.

8 Q So that is a policy of sorts.

9 A Yes. Like I said, I don't know if these were incentive
10 bonuses. I just don't recall what they were given
11 for. If somebody had told me to keep up with every-
12 thing--- There's a Four Hundred and Fifty Dollar
13 bonus given on October the 4th of '82 to Mark Lawson
14 that's an even amount; a Three Hundred and Eighty
15 Dollar bonus given to Randy McDougall.

16 Q But there seems to be no pattern, for example. Take
17 Mark Lawson's Four Hundred and Fifty Dollar bonus.
18 What's the date on that one?

19 A October the 4th of '82.

20 Q October 4th of '82.

21 A There was one bonus given on 10/4 and one on 10/5.

22 Q Four Hundred and Fifty. But going over to 10/4 of
23 '82, there was no corresponding Five Hundred Dollar
24 bonus given to, let's say, Mr. Harnett at Robin's
25 of Florence. He got different types of bonuses during

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2 that month. Yet in April of '82 there's one flat
3 Fifteen Hundred Dollar bonus given across-the-board.
4 In April one day later One Thousand Dollars goes into
5 the campaign from each one of these managers.

6 A Yes.

7 Q Is that a little bit unusual to you?

8 A As I stated, no, sir. I would probably not have
9 solicited a contribution unless I felt like it were
10 there.

11 Q I'm sorry. Unless you felt like it was what?

12 A Unless I felt like somebody could afford it at a given
13 time. It's like I said; it's certain times of the
14 year, the month, whatever, or certain years are
15 better than others, and my contributions certainly
16 reflect that over the years to this and other things.
17 But, I mean, the fact that the contributions were all
18 given a day after the bonus could simply mean that
19 they knew the bonuses were coming and I could have
20 asked them to contribute. I would never told them
21 an amount to give or put any pressure on them, but
22 it's their money. They can do what they want to.

23 Q You set out an amount in one of the letters, A
24 Thousand Dollars, to the various people who sold to you.

25 A Right.

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2 Q And you sent that out.

3 A Right. And I would have told everybody probably. The
4 people that I sent the letter to that asked for the
5 Five, Ten, Twenty, whatever, those were people that
6 would have had no reason other than just to simply pick
7 up a checkup and write a small contribution, and those
8 add up. Other people may have had more reason to give
9 more.

10 Q So is it your testimony that you received no suggestion
11 from anybody connected with the campaign, from Mr.
12 Tallon on down, that you were to solicit contributions
13 in the period--- Strike the question. Is it your
14 testimony that you received no direction or suggestions
15 from anyone connected with the campaign in April of
16 1982 that money was needed to keep the campaign going?

17 A No, sir, other than the fact that that's just common
18 knowledge that you always need money to finance a
19 campaign.

20 Q More to the effect that they were particularly low on
21 funds at this period of time?

22 A No, sir. I just wasn't that actively involved in it
23 to have any need to know that. I don't know if---
24 If, in fact, they were, I don't know if it would
25 have been something they would have wanted out.

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(Break.)

Q I think that I had made some mention of the fact that the contributions were received at headquarters on April 13th. They weren't. They were received on April the 14th, each one of these store manager contributions, with the exception of Lynn Hartnett's, which came in May. Did you at any time in that time period between 12 April and 14 April, 1982, collect any of these checks payable to the Tallon for Congress Committee?

A Yes, sir.

Q Whose checks did you collect?

A I don't have any idea. Are you talking about through the period--- What period again?

Q I'm talking about these particular checks, the Thousand Dollar checks from---

A I don't know if I did or not, to be honest with you. I collected checks during that period, but I don't know if I collected a specific check. I had a lot of people send me checks through the mail.

Q Do you recall how you delivered the checks to the headquarters?

A I don't know if I mailed them or took them, and it could have been a combination of both. If I were going

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2 to be going, I probably would have taken them. If I
3 weren't, I probably would have mailed them.

4 Q These locations were fairly scattered throughout the
5 state. Was there a time in that timeframe, again
6 referring to April 12 through April 14, that the
7 various store managers were assembled in the Florence
8 area, for example?

9 A I don't have any idea.

10 Q So you have no recollection of how the checks got to
11 the headquarters of the Tallon for Congress Committee.

12 A No, sir. I was only involved in that if the checks
13 were sent to me.

14 Q They all came on the 14th of April, except for Lynn
15 Harnett's check, and all of the checks were, I believe,
16 like yours--- I won't say all of the checks, but
17 some of the checks, like yours, were made out on
18 April the 13th. I don't assume that the United States
19 Post Office delivers them that quickly. That was the
20 reason for my---

21 A We normally get all of our payroll checks in a day.

22 Q In a day within the state?

23 A There have been exceptions, sure, but they guarantee
24 in a lot of the boxes if you drop them by five the
25 mail is delivered the next day.

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2 Q Within anywhere in the state?

3 A Yes.

4 Q I didn't know that.

5 A They have "five o'clock" on the boxes.

6 Q We have those in the District, but it only pertains
7 to the immediate area of the District of Columbia.

8 I never realized they had a state---

9 A We've only got one Zip Code in South Carolina. That
10 may have some bearing on it, too. I don't know.

11 We've got more than one Zip Code.

12 Q I would imagine you have more than one Zip Code.

13 A We've got more than one Zip Code. I'm thinking
14 Area Code.

15 Q Were you ever informed by anyone connected with the
16 campaign that checks for A Thousand Dollars were
17 received by the campaign on April 14, 1982, from
18 the store managers?

19 A I would imagine that I was. I had asked somebody to
20 let me know what checks came in that could have been
21 from my solicitations so I could kind of keep up
22 with what was going on.

23 Q I'm referring specifically to the April 14---

24 A Right. I was aware of the store managers that had
25 given the contributions. I don't remember exactly how

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I found out or how long after the fact I found out.

Q Did any of the store managers not give a contribution to the 1982 campaign?

A I wouldn't know that.

Q Did you ever inquire as to whether they had?

A No, sir.

Q Did you ever ask each one of the store managers did they give a contribution?

A I don't think I did, no, sir.

Q In your letter of June 1, 1982, which is FEC Exhibit 10---

A Of what date?

Q June 1, your letter to the employees.

A Yes.

Q ---you wrote in the first paragraph, third sentence, "I really feel that each of us should make a contribution if for no other reason than the fact that we owe our jobs to Robin." Do you have any idea what you meant by that?

A Well, because of him we were all working. It was his business we were employed by.

Q That was your reason for that particular sentence.

A I see no other reason.

Q The sentence speaks for itself, but I want you to give

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2 me whatever impression you have.

3 A "I really feel that each of us should make a contribution
4 if for no other reason than the fact we owe our jobs
5 to Robin." That's what I meant. We all worked for
6 him. We were employed by him, and most of us were
7 friends of his.

8 Q And you then talked about the family members receiving
9 a discount on their purchases for a contribution, and
10 you say, "I feel very strongly on both of these
11 counts."

12 A Yes.

13 Q Was that an emotional---

14 A There again, it speaks for itself. It would express
15 some emotion, sure.

16 Q Was ever anything said about an employee losing his
17 job if he didn't make a contribution?

18 A Certainly not.

19 Q Not at all.

20 A We didn't mix the business with politics. The business
21 had to survive on its own. In retrospect, some have
22 and some haven't, but no. There wasn't any pressure
23 or anything put on the employees to give other than
24 what is basically stated. Regardless of what I felt,
25 I couldn't make anybody do anything. If the limit

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2 had been Five Thousand and we all had Five Thousand
3 or Two Thousand or Three Thousand or whatever, there's
4 a certain -- I've got a certain loyalty to Robin.
5 I've known him all of my life and have worked for
6 him since 1971 in this operation and before that
7 while I was in high school, and he's just been a
8 very, very dear friend to me. He's helped me out in
9 a lot of different situations.

10 MR. WHITEHEAD: Phil, do you have anything else?

11 MR. WISE: No, I don't have anything else.

12 MR. WHITEHEAD: You don't have any questions
13 you want to ask?

14 MR. WISE: No.

15 Q I'm not going to close the deposition for the simple
16 reason that I might want to get some testimony later
17 without going forward to the Commission again for
18 another subpoena. In these circumstances you have
19 the right to take a look at the deposition and see
20 that everything in there is correct. You can make
21 minor corrections such as grammatical corrections
22 and that sort or you can waive signature. All you're
23 going to do is say, "Yes, he copied it pretty much
24 as it -- or as it was said." By waiving signature
25 you don't have to then read the deposition and look it

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2 over. I leave that up to you. You can waive
3 signature or you can wait to look at the deposition.

4 A I would love to look at it just to see what it says.
5 I don't know if I get a copy of it or anything.

6 Q Not automatically, no. We don't send a copy
7 automatically to you.

8 A I'd love to have one. It's amazing that I found the
9 stuff that I found, and I don't know how long---

10 Q Okay. Well, then we'll hold on that, but we'll just
11 consider this deoposition as still being open, subject
12 to closing.

13 (Off the record.)

14 DEPOSITION RECESSED.

15 (Signing reserved.)
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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

I have read the foregoing transcript of my deposition,
so given at the time and place aforementioned, and the
foregoing sixty-seven (67) typewritten pages represent
a true, accurate, and complete transcription of my
testimony so given, and I do hereby subscribe to the same.
I have/have not submitted a change sheet regarding this
deposition.

Robert L. Welch

Date: _____

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JULY 1968

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STATE OF SOUTH CAROLINA)
) CERTIFICATE
COUNTY OF RICHLAND)

This is to certify that the foregoing is the deposition of Robert L. Welch, taken before me, Eric B. Gore, a Notary Public in and for the State of South Carolina, duly commissioned and qualified as such, commencing at the hour of 1:26 p.m., on Wednesday, December 9, 1987, at the U.S. Attorney's Office 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

I do further certify that the said witness was first duly sworn by me and cautioned to speak the whole truth; that he was examined as per the foregoing; that notes were taken by me of the questions propounded and the answers given; and that the foregoing sixty-seven (67) typewritten pages represent a true, accurate, and complete transcription of said testimony to the best of my skill and ability.

I do further certify that the reading and signing of the deposition by the deponent was reserved.

I do further certify that I have sealed up and delivered the original of said deposition to Thomas J. Whitehead, Esquire, Assistant General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C., who

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ROBERT L. OR BILLIE E. WELCH
309 RESEDA DR. 788-1345
COLUMBIA, S.C. 29204

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EXHIBIT

PAY TO THE
ORDER OF

Tallon for Congress \$ 1000.00
One thousand dollars and no/100 DOLLARS

#1 FEC
Welch ERM

First National Bank
First National Bank of South Carolina
Columbia, South Carolina 29201

Robert L. Welch

MEMO

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ROBERT L. OR BILLIE E. WELCH
309 RESEDA DR. 788-1345
COLUMBIA, S.C. 29204

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539

PAY TO THE
ORDER OF

Tallon for Congress \$ 50.00
Fifty and no/100 DOLLARS

First National Bank
First National Bank of South Carolina
Columbia, South Carolina 29201

Robert L. Welch

MEMO

⑆053906889⑆ 031677990⑆ 1135 ⑆0000005000⑆



ROBERT L. OR BILLIE E. WELCH
309 RESEDA DR. 788-1345
COLUMBIA, S.C. 29204

1146

10-18 82

67-688
539

PAY TO THE
ORDER OF

Tallon for Congress \$ 450.00
Four hundred fifty and no/100 DOLLARS

First National Bank
First National Bank of South Carolina
Columbia, South Carolina 29201

Robert L. Welch

MEMO

⑆053906889⑆ 031677990⑆ 1146 ⑆0000045000⑆

1040,60506

You Repair Bill
Allentown for Congress

19880174628 147

PAY ANY BANK, P.E.
FEB COLUMBIA
8539-6803-9

07-038

FOR DEPOSIT ONLY
TALLON FOR CONGRESS
COMMITTEE
#1907468

0001 16719

6/1 3 6/1-038

FOR DEPOSIT ONLY
TALLON FOR CONGRESS
COMMITTEE
#1907468

0001 19192

6/1 3 6/1-038

SE 30
FEB. OF S.C.

888-75

DT 22
PROCESSED BY
FEB. OF S.C.

888-75

1 5 5 3 7

Form
 Party
 Code Limit

40 Robin's of Florence, Inc.
 ADDRESS 2180 W. Evans St.
 Florence, S.C. 29501

MUR 2011

①

EXHIBIT

#2 FEC
 Welch/EAR

DATE	NAME	DEBIT	DATE	NAME	CREDIT
1-2-80	Butch Minshew	334264	5-11-80	Dennis Abbott	4720
1-2-80	Bob Ellen	44172	5-19-80	Ricky Simmons	240
1-2-80	Ronnie Critz	53975	6-2-80	Butch Minshew	148003
1-2-80	Robert Hartnett	65920	6-2-80	Tommy Tumblin	55142
1-2-80	Tommy Tumblin	63635	6-2-80	Ronnie Critz	19515
1-2-80	Ricky Simmons	45152	6-2-80	Robert Hartnett	43437
2-4-80	Butch Minshew	83000	6-2-80	Dennis Abbott	30175
2-4-80	Tommy Tumblin	21106	6-2-80	Bob Mc Donald	7408
2-4-80	Robert Hartnett	21821	7-1-80	Butch Minshew	96353
2-4-80	Ronnie Critz	13706	7-1-80	Tommy Tumblin	32258
2-4-80	Ricky Simmons	8495	7-1-80	Robert Hartnett	27796
3-4-80	Butch Minshew	107191	7-1-80	Bob Mc Donald	23000
3-4-80	Tommy Tumblin	26232	7-1-80	Dennis Abbott	18256
3-4-80	Robert Hartnett	26587	7-11-80	Butch Minshew	200000
3-4-80	Ronnie Critz	14383	8-1-80	Butch Minshew	65275
3-4-80	Ricky Simmons	16918	8-1-80	Dennis Abbott	10800
4-1-80	Butch Minshew	84394	8-1-80	Bob Mc Donald	15162
4-1-80	Tommy Tumblin	20982	8-1-80	Robert Hartnett	14072
4-1-80	Robert Hartnett	24510	8-1-80	Tommy Tumblin	24530
4-1-80	Ronnie Critz	11459	9-2-80	Butch Minshew	496411
4-1-80	Ricky Simmons	5071	9-4-80	Butch Minshew	95670
5-2-80	Butch Minshew	119100	9-4-80	Bob Mc Donald	25982
5-2-80	Tommy Tumblin	48583	9-4-80	Ricky Simmons	3020
5-2-80	Robert Hartnett	45380	9-4-80	Robert Hartnett	1948
5-2-80	Ronnie Critz	21638	9-4-80	Dennis Abbott	21197
5-2-80	Dennis Abbott	7518	9-4-80	Tommy Tumblin	35000
5-19-80	Butch Minshew	13125	10-1-80	Butch Minshew	58239
5-19-80	Tommy Tumblin	18125	10-1-80	Tommy Tumblin	24198
5-19-80	Robert Hartnett	20525	10-1-80	Dennis Abbott	13659
5-19-80	Ronnie Critz	9000	10-1-80	Bob Mc Donald	9421

2 1 5 4 0 5 5 9

Form
Rating
Credit Limit

NAME
ADDRESS

Robin's of Florence, Inc.
2180 W. Evans St.
Florence, S.C. 29501

(2)

DATE	NAME	AMOUNT	DATE	NAME	AMOUNT
10-1-80	Ricky Simmons	3444	2-3-81	Bob Mc Donald	11802
11-3-80	Butch Minshew	102143	2-3-81	Ricky Simmons	9498
11-3-80	Bob Mc Donald	21421	2-3-81	Dennis Abbott	9483
11-3-80	Tommy Tumblin	37899	3-2-81	Butch Minshew	116327
11-3-80	Dennis Abbott	21785	3-2-81	Tommy Tumblin	32516
11-3-80	Ricky Simmons	11172	3-2-81	Robert Hartnett	39847
12-1-80	Butch Minshew	147888	3-2-81	Ricky Simmons	12586
12-1-80	Tommy Tumblin	41575	3-2-81	Bob Mc Donald	25926
12-1-80	Robert Hartnett	18593	4-1-81	Butch Minshew	95553
12-1-80	Dennis Abbott	23582	4-1-81	Bob Mc Donald	16162
12-1-80	Ricky Simmons	19766	4-1-81	Tommy Tumblin	36542
12-1-80	Ronnie Critz	3080	4-1-81	Robert Hartnett	35741
12-1-80	Bob Mc Donald	26312	4-1-81	Ricky Simmons	11816
12-30-80	Butch Minshew	27300	4-21-81	Butch Minshew	8200
12-30-80	Tommy Tumblin	16500	4-21-81	Tommy Tumblin	10420
12-30-80	Dennis Abbott	12800	4-21-81	Robert Hartnett	10420
12-30-80	Robert Hartnett	13500	4-21-81	Bob Mc Donald	6946
12-30-80	Bob Mc Donald	16700	4-21-81	Ricky Simmons	4900
12-30-80	Ricky Simmons	11700	4-21-81	Frank Jones	246
12-30-80	Ronnie Critz	2700	5-1-81	Butch Minshew	146237
1-2-81	Butch Minshew	322860	5-1-81	Ricky Simmons	15447
1-2-81	Tommy Tumblin	83958	5-1-81	Robert Hartnett	43597
1-2-81	Robert Hartnett	63160	5-1-81	Tommy Tumblin	56450
1-2-81	Dennis Abbott	44807	5-1-81	Frank Jones	5132
1-2-81	Ronnie Critz	19210	5-1-81	Bob Mc Donald	24522
1-2-81	Bob Mc Donald	54475	6-1-81	Butch Minshew	108089
1-2-81	Ricky Simmons	44619	6-1-81	Tommy Tumblin	42932
2-3-81	Butch Minshew	89081	6-1-81	Robert Hartnett	35850
2-3-81	Tommy Tumblin	28232	6-1-81	Bob Mc Donald	14611
2-3-81	Robert Hartnett	28952	6-1-81	Frank Jones	13923

1040 5540

NAME
 PHONE
 CREDIT LIMIT

Robin's of Florence, Inc.
 ADDRESS 2180 W. EVANS ST.
 Florence, S.C. 29501

3.

DATE	NAME	DEBIT	DATE	NAME	CREDIT
6-1-81	Ricky Simmons	11.10	12-2-81	Butch Minsheu	1327.21
7-1-81	Butch Minsheu	946.47	12-2-81	Robert Hartnett	433.23
7-1-81	Tommy Tumblin	368.38	12-2-81	Tommy Tumblin	466.37
7-1-81	Robert Hartnett	363.85	12-2-81	Rannie Critz	80.83
7-1-81	Bob Mc Donald	161.91	12-2-81	Ken Elmore	157.30
7-1-81	Frank Jones	125.48	12-2-81	Jeff Lee	79.52
8-3-81	Butch Minsheu	878.98	12-2-81	Luke Hinson	520.5
8-3-81	Tommy Tumblin	418.15	12-28-81	Butch Minsheu	179.00
8-3-81	Robert Hartnett	234.96	12-28-81	Tommy Tumblin	183.00
8-3-81	Bob Mc Donald	146.40	12-28-81	Robert Hartnett	207.00
8-3-81	Frank Jones	84.58	12-28-81	Ken Elmore	130.00
8-13-81	Butch Minsheu	5692.06	12-28-81	Jeff Lee	165.00
8-6-81	Butch Minsheu	1000.00	12-28-81	Luke Hinson	138.00
8-27-81	Bob Mc Donald	140.00	12-28-81	Rannie Critz	112.00
9-1-81	Butch Minsheu	720.56	12-30-81	Ken Elmore	411.25
9-1-81	Tommy Tumblin	233.71	12-31-81	Rannie Critz	288.60
9-1-81	Robert Hartnett	274.96	1-4-82	Butch Minsheu	3630.82
9-1-81	Frank Jones	84.13	1-2-82	Tommy Tumblin	985.41
9-1-81	Ken Elmore	108.4	1-2-82	Robert Hartnett	968.99
10-1-81	Butch Minsheu	1074.57	1-2-82	Jeff Lee	548.8
10-1-81	Ken Elmore	110.49	1-2-82	Luke Hinson	432.22
10-1-81	Robert Hartnett	357.40	2-1-82	Tommy Tumblin	291.50
10-1-81	Tommy Tumblin	400.71	2-1-82	Jeff Lee	186.77
10-1-81	Frank Jones	170.29	2-1-82	Butch Minsheu	849.64
11-2-81	Butch Minsheu	974.83	2-1-82	Robert Hartnett	299.43
11-2-81	Tommy Tumblin	417.95	2-1-82	Luke Hinson	86.37
11-2-81	Robert Hartnett	372.07	3-1-82	Butch Minsheu	941.26
11-2-81	Zane Leake	433.9	3-1-82	Tommy Tumblin	281.53
11-2-81	Frank Jones	500.6	3-1-82	Robert Hartnett	331.63
11-2-81	Ken Elmore	65.85	3-1-82	Jeff Lee	190.69
				Luke Hinson	121.72

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Robin's of Florence, Inc.
2180 W. Evans St.
Florence, S.C 29501

(4)

4-1-82 Tommy Tumblin	32771	8-2-82 Luke Hinson	19241
4-1-82 Robert Hartnett	34476	8-2-82 Brian Anderson	17999
4-1-82 Jeff Lee	7726	8-9-82 Butch Minshew	718541
4-1-82 Luke Hinson	14038	9-1-82 Butch Minshew	85258
4-1-82 Butch Minshew	87680	9-1-82 Tommy Tumblin	25599
4-12-82 Butch Minshew	15000	9-1-82 Robert Hartnett	31779
5-3-82 Butch Minshew	115170	9-1-82 Brian Anderson	16136
5-3-82 Tommy Tumblin	50815	9-1-82 Luke Hinson	14168
5-3-82 Robert Hartnett	33996	10-1-82 Butch Minshew	97361
5-3-82 Luke Hinson	24311	10-1-82 Tommy Tumblin	39536
6-1-82 Butch Minshew	105235	10-1-82 Robert Hartnett	26407
6-1-82 Tommy Tumblin	46376	10-1-82 Luke Hinson	11186
6-1-82 Robert Hartnett	36157	10-1-82 Jerry Keith	9434
6-1-82 Brian Anderson	3823	10-1-82 Brian Anderson	12014
6-1-82 Luke Hinson	26861	11-1-82 Butch Minshew	98331
6-21-82 Butch Minshew	7375	11-1-82 Jerry Keith	10573
6-21-82 Tommy Tumblin	16350	11-1-82 Brian Anderson	13816
6-21-82 Robert Hartnett	11250	11-1-82 Robert Hartnett	33220
6-21-82 Luke Hinson	12750	11-1-82 Luke Hinson	10914
6-21-82 Brian Anderson	2700	12-1-82 Butch Minshew	140629
7-1-82 Butch Minshew	89081	12-1-82 Tommy Tumblin	47813
7-1-82 Tommy Tumblin	34771	12-1-82 Robert Hartnett	37113
7-1-82 Robert Hartnett	28478	12-1-82 Jerry Keith	13973
7-1-82 Luke Hinson	19016	12-1-82 Brian Anderson	18283
7-1-82 Brian Anderson	13482	12-1-82 Luke Hinson	18536
8-1-82 Butch Minshew	50000	12-1-82 Mark Stroman	7199
8-2-82 Butch Minshew	92323	12-28-82 Butch Minshew	10625
8-2-82 Tommy Tumblin	40935	12-28-82 Tommy Tumblin	15000
8-2-82 Robert Hartnett	24090	12-28-82 Robert Hartnett	16750
		12-29-82 Mark Stroman	35130

Form
Name
Code Unit

040

Robin's of

N. Myrtle Beach

2006 Hwy. 17
N. Myrtle Beach, SC. 29582

MUR 2011

DATE	NAME	DATE	NAME	AMOUNT	
1-4-80	Jerry Harris	149183	6-5-80	Jerry Harris	78125
1-4-80	Dale Richardson	31734	6-5-80	Dale Richardson	23780
1-4-80	Lester Erving	37531	6-5-80	Lester Erving	16111
1-4-80	Mark Saunders	24428	6-5-80	Mark Saunders	4927
1-4-80	Sam Durham	30739	6-5-80	Sam Durham	17019
2-7-80	Jerry Harris	47635	6-5-80	Bob Wright	601
2-7-80	Dale Richardson	14255	7-3-80	Jerry Harris	76964
2-7-80	Lester Erving	13236	7-3-80	Mark Saunders	12331
2-7-80	Mark Saunders	6274	7-3-80	Dale Richardson	22626
2-7-80	Sam Durham	7898	7-3-80	Robert Wright	11327
3-5-80	Jerry Harris	52901	7-3-80	Sam Durham	19486
3-5-80	Dale Richardson	14817	8-5-80	Jerry Harris	79447
3-5-80	Lester Erving	14854	8-5-80	Dale Richardson	22997
3-5-80	Mark Saunders	7014	8-5-80	Mark Saunders	9431
3-5-80	Sam Durham	9876	8-5-80	Sam Durham	24317
4-4-80	Sam Durham	15544	8-5-80	Bob Wright	14484
4-4-80	Jerry Harris	79896	9-4-80	Jerry Harris	72105
4-4-80	Lester Erving	18508	9-4-80	Dale Richardson	23503
4-4-80	Mark Saunders	14000	9-4-80	Mark Saunders	8995
4-4-80	Dale Richardson	21951	9-4-80	Bob Wright	11980
5-6-80	Jerry Harris	79479	9-4-80	Sam Durham	19712
5-6-80	Dale Richardson	18580	10-6-80	Jerry Harris	65307
5-6-80	Lester Erving	25000	10-6-80	Dale Richardson	22252
5-6-80	Mark Saunders	6570	10-6-80	Mark Saunders	10000
5-6-80	Sam Durham	15000	10-6-80	Bob Wright	4188
5-21-80	Jerry Harris	5200	10-6-80	Sam Durham	14492
5-21-80	Dale Richardson	7200	11-4-80	Bob Wright	6496
5-21-80	Lester Erving	9400	11-4-80	Mark Saunders	18128
5-21-80	Mark Saunders	2000	11-4-80	Dale Richardson	30491
5-21-80	Sam Durham	7360	11-4-80	Jerry Harris	4320

EXHIBIT

#3 FEC
Welch EAM

Robins at N. Myrtle Beach
 2006 N. Hwy. 17
 N. Myrtle Beach, S.C. 29582

(2)

11-4-80	Jerry Harris	67617	3-3-81	Sam Durham	13248
11-4-80	Sam Durham	22017	3-5-81	Chip White	431
12-3-80	Jerry Harris	68673	4-3-81	Jerry Harris	48894
12-3-80	Dale Richardson	21401	4-3-81	Dale Richardson	14795
12-3-80	Mark Saunders	15153	4-3-81	Mark Saunders	9110
12-3-80	Bob Wright	5535	4-3-81	Bob Wright	5881
12-3-80	Sam Durham	12363	4-3-81	Sam Durham	8800
12-3-80	Chip White	3933	4-3-81	Chip White	1696
12-31-80	Jerry Harris	6600	4-22-81	Jerry Harris	3200
12-31-80	Dale Richardson	13500	4-22-81	Dale Richardson	6205
12-31-80	Mark Saunders	9200	4-22-81	Mark Saunders	2880
12-31-80	Bob Wright	3300	4-22-81	Bob Wright	720
12-31-80	Sam Durham	6500	4-22-81	Sam Durham	3200
12-31-80	Chip White	1700	5-5-81	Jerry Harris	83029
1-5-81	Jerry Harris	141684	5-5-81	Dale Richardson	31600
1-5-81	Dale Richardson	35998	5-5-81	Mark Saunders	17880
1-5-81	Mark Saunders	31754	5-5-81	Bob Wright	6328
1-5-81	Bob Wright	16629	5-5-81	Sam Durham	13839
1-5-81	Sam Durham	27061	6-2-81	Jerry Harris	84467
1-5-81	Chip White	8347	6-2-81	Dale Richardson	24266
2-4-81	Dale Richardson	17733	6-2-81	Mark Saunders	18187
2-4-81	Jerry Harris	49624	6-2-81	Sam Durham	14807
2-4-81	Mark Saunders	9404	6-2-81	Bob Wright	12971
2-4-81	Bob Wright	4046	7-2-81	Jerry Harris	75972
2-4-81	Sam Durham	10195	7-2-81	Dale Richardson	26260
2-4-81	Chip White	2124	7-2-81	Mark Saunders	10487
3-3-81	Jerry Harris	72260	7-2-81	Bob Wright	13890
3-3-81	Dale Richardson	25508	7-2-81	Sam Durham	16216
3-3-81	Mark Saunders	14922	8-4-81	Jerry Harris	76549
3-3-81	Bob Wright	7390	8-4-81	Dale Richardson	21765

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 Robin's of N Myrtle Beach
 2006 N. Hwy. 17
 N. Myrtle Beach, SC. 29582

(3)

8-4-81	Mark Saunders	15721	1-4-82	Bob Wright	29049
8-4-81	Bob Wright	19533	1-4-82	Randy Craft	48615
8-4-81	Sam Durham	18388	1-4-82	Gina Spikes	8681
9-3-81	Jerry Harris	72865	2-2-82	Jerry Harris	47174
9-3-81	Dale Richardson	23552	2-2-82	Gena Spikes	6594
9-3-81	Mark Saunders	9196	2-2-82	Randy Craft	14803
9-3-81	Bob Wright	13925	2-2-82	Bob Wright	8225
9-3-81	Sam Durham	17110	2-2-82	Sam Durham	11539
10-2-81	Jerry Harris	87069	3-2-82	Jerry Harris	79233
10-2-81	Dale Richardson	29158	3-2-82	Gena Spikes	13689
10-2-81	Mark Saunders	13873	3-2-82	Randy Craft	20896
10-2-81	Bob Wright	12060	3-2-82	Sam Durham	20763
10-2-81	Sam Durham	22098	3-2-82	Bob Wright	13446
11-4-81	Jerry Harris	77181	4-5-82	Jerry Harris	82620
11-4-81	Dale Richardson	24522	4-5-82	Sam Durham	20450
11-4-81	Sam Durham	25231	4-5-82	Randy Craft	25576
11-4-81	Mark Saunders	11266	4-5-82	Gena Spikes	1058
11-4-81	Bob Wright	6010	4-5-82	Bob Wright	11253
12-3-81	Jerry Harris	77517	4-12-82	Jerry Harris	150000
12-3-81	Dale Richardson	23902	5-3-82	Jerry Harris	92314
12-3-81	Sam Durham	20385	5-3-82	Sam Durham	27309
12-3-81	Randy Craft	10376	5-3-82	Randy Craft	27207
12-3-81	Bob Wright	8735	5-3-82	Gena Spikes	4657
12-29-81	Jerry Harris	12000	5-3-82	Bob Wright	18544
12-29-81	Sam Durham	13700	6-3-82	Jerry Harris	88936
12-29-81	Randy Craft	13500	6-3-82	Sam Durham	21227
12-29-81	Gena Spikes	3700	6-3-82	Randy Craft	27597
12-29-81	Bobby Wright	8800	6-3-82	Bob Wright	19865
1-4-82	Jerry Harris	165849	6-3-82	Betty Jean Lambert	3545
1-4-82	Sam Durham	46360	6-23-82	Randy Craft	5375

2 1 0 4 Robins of N.M.B.
 2006 Hwy. 17
 N.M.B., SC 29582

(4)

6-23-82	Jerry Harris	5750	11-4-82	Bob Wright	6493
6-23-82	Sam Durham	7500	11-4-82	Betty Jane Lambert	21346
6-23-82	Bob Wright	3900	12-3-82	Jerry Harris	71970
6-23-82	Tom Player	1200	12-3-82	Sam Durham	18543
6-23-82	Betty Jane Lambert	1100	12-3-82	Randy Craft	16899
7-2-82	Jerry Harris	77993	12-3-82	Bob Wright	5258
7-2-82	Sam Durham	19496	12-3-82	Jane Lambert	20452
7-2-82	Randy Craft	15600	12-29-82	Jerry Harris	6600
7-2-82	Bob Wright	9246	12-29-82	Sam Durham	10875
7-2-82	Betty Jane Lambert	9021	12-29-82	Randy Craft	5200
7-2-82	Tommy Player	12375	12-29-82	Jane Lambert	5000
8-3-82	Jerry Harris	99305	12-29-82	Bob Wright	3300
8-3-82	Sam Durham	22217	12-29-82	Gary Brown	2300
8-3-82	Randy Craft	25806			
8-3-82	Bob Wright	14298			
8-3-82	Betty Jane Lambert	8990			
8-30-82	Jerry Harris	100000			
9-2-82	Jerry Harris	90322			
9-2-82	Sam Durham	24480			
9-2-82	Randy Craft	27782			
9-2-82	Bob Wright	14705			
9-2-82	Jane Lambert	12815			
10-5-82	Jerry Harris	91242			
10-5-82	Sam Durham	27436			
10-5-82	Bobby Wright	11092			
10-5-82	Randy Craft	22064			
10-5-82	Jane Lambert	18793			
11-4-82	Jerry Harris	88507			
11-4-82	Sam Durham	25938			
11-4-82	Randy Craft	15109			

NAME Robin's Ladies Wear, Inc.
 ADDRESS 2184 W. EVANS ST.
 Florence, S.C. 29501

MUR 2071

DATE	DEBIT	DATE	CREDIT	
1-2-80	Lynn Hartnett	1265 21	4-1-80 Jane Squires	65 79
1-2-80	Jewell Cannon	7778	4-1-80 Muffie Tuthill	55 41
1-2-80	Vicki Hanton	15376	4-1-80 MARY Tallon	17 44
1-2-80	Terri Calcutt	16133	4-1-80 Susan Humphries	11 92
1-2-80	Jane Squires	13299	5-1-80 Lynn Hartnett	605 00
1-2-80	Muffie Tuthill	11363	5-1-80 Lynn Hartnett	67 54
1-2-80	Debbie Owen	9301	5-1-80 Terri Calcutt	117 19
1-2-80	Leigh Altman	5937	5-1-80 Leigh Billups	130 00
1-2-80	MARY Tallon	8478	5-1-80 Jewell Cannon	114 82
1-2-80	Susan Humphries	5817	5-1-80 Jane Squires	113 15
2-4-80	Lynn Hartnett	42857	5-1-80 Susan Humphries	19 87
2-4-80	Terri Calcutt	7416	5-1-80 Muffie Tuthill	90 62
2-4-80	Leigh Altman	9727	5-1-80 MARY Tallon	68 79
2-4-80	Jewell Cannon	5422	5-1-80 Geri Lesanto	322
2-4-80	Jane Squires	4662	6-2-80 Terri Calcutt	107 49
2-4-80	Muffie Tuthill	3124	6-2-80 Lynn Hartnett	675 12
2-4-80	Susan Humphries	569	6-2-80 Leigh Hartnett	841
2-4-80	MARY Tallon	2600	6-2-80 Jewell Cannon	8000
3-4-80	Lynn Hartnett	34720	6-2-80 Geri Lesando	68 67
3-4-80	Terri Calcutt	6650	6-2-80 Muffie Tuthill	60 70
3-4-80	Leigh Billups	7210	6-2-80 Fran Calcutt	5838
3-8-80	Jewell Cannon	3877	6-2-80 MARY Tallon	79 52
3-8-80	Jane Squires	4798	6-2-80 Susan Humphries	39 80
3-8-80	Muffie Tuthill	2368	6-2-80 Jane Squires	14 07
3-8-80	MARY Tallon	1579	7-1-80 Lynn Hartnett	472 78
3-8-80	Susan Humphries	1063	7-1-80 Terri Calcutt	73 82
4-1-80	Lynn Hartnett	50836	7-1-80 Leigh Hartnett	48 60
4-1-80	Terri Calcutt	9027	7-1-80 Camilla Jones	81 03
4-1-80	Leigh Billups	10500	7-1-80 Geri Lesando	17 93
4-1-80	Jewell Cannon	5715	7-1-80 Jewell Cannon	23 81

EXHIBIT

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Robin's Ladies Wear, Inc.

ADDRESS 2184 W. EVANS St.
Florence, S.C. 29501

(2)

7-1-80	Muffie Tuthill	625	11-3-80	Vera Gregg	4060
7-1-80	Fran Calcutt	2324	11-3-80	Jewell Cannon	5782
7-1-80	Susan Humphries	3528	11-3-80	Jane Squires	7591
7-1-80	Mary Tallon	1851	11-3-80	Fran Calcutt	6103
8-1-80	Lynn Hartnett	53098	11-3-80	Susan Humphries	1756
8-1-80	Mary Tallon	7209	11-3-80	Mary Tallon	8648
8-1-80	Susan Humphries	2734	12-1-80	Lynn Hartnett	19434
8-1-80	Jane Squires	3143	12-1-80	Terri Calcutt	11344
8-1-80	Camilla Jones	8659	12-1-80	Jewell Cannon	7172
8-1-80	Terri Calcutt	5880	12-1-80	Jane Squires	8262
8-1-80	Fran Calcutt	8120	12-1-80	Fran Calcutt	8061
8-1-80	Leigh Hartnett	8603	12-1-80	Nancy McKay	6074
9-2-80	Lynn Hartnett	43319	12-1-80	Mary Tallon	9036
9-2-80	Terri Calcutt	8322	12-1-80	Susan Humphries	2882
9-2-80	Vera Gregg	2197	12-1-80	Harriet Moseley	217
9-2-80	Jane Squires	6929	1-2-81	Lynn Hartnett	143415
9-2-80	Fran Calcutt	6385	1-2-81	Lynn Hartnett	15345
9-2-80	Camilla Jones	2793	1-2-81	Terri Calcutt	26872
9-2-80	Susan Humphries	2443	1-2-81	Jewell Cannon	19666
9-2-80	Mary Tallon	5243	1-2-81	Jane Squires	21788
10-1-80	Lynn Hartnett	56705	1-2-81	Nancy McKay	17475
10-1-80	Terri Calcutt	9310	1-2-81	Fran Calcutt	24760
10-1-80	Vera Gregg	9100	1-2-81	Harriet Moseley	13505
10-1-80	Jewell Cannon	4821	1-2-81	Susan Humphries	8859
10-1-80	Jane Squires	5734	1-2-81	JAN GAUSE	1640
10-1-80	Fran Calcutt	5207	1-2-81	Mary Tallon	16751
10-1-80	Susan Humphries	2059	1-2-81	Camilla Jones	9074
10-1-80	Mary Tallon	6196	2-3-81	Lynn Hartnett	46954
11-3-80	Lynn Hartnett	63118	2-3-81	Terri Calcutt	9843
11-3-80	Terri Calcutt	12299	2-3-81	Jewell Cannon	3790

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Robin's Ladies Wear, Inc.
 ADDRESS 2184 W. Evans St.
 Florence, S.C. 29501

2-3-81	Jane Squires	7163	5-1-81	Fran Calcutt	2022
2-3-81	Fran Calcutt	5764	5-1-81	Susan Humphries	3227
2-3-81	Allicyn Fleek	2601	5-1-81	Allicyn Fleek	12224
2-3-81	Nancy Mc Kay	1096	6-1-81	Lynn Hartnett	59993
2-3-81	Susan Humphries	1298	6-1-81	Terri Calcutt	10705
2-3-81	Mary Tallon	2243	6-1-81	Jane Squires	7803
3-2-81	Lynn Hartnett	39032	6-1-81	Nancy Tuthill	5711
3-2-81	Terri Calcutt	7780	6-1-81	Allicyn Fleek	7191
3-2-81	Jane Squires	6131	6-1-81	Joy Ingram	7032
3-2-81	Jewell Cannon	4226	6-1-81	Susan Humphries	3010
3-2-81	Fran Calcutt	1231	6-1-81	Mary Tallon	2920
3-2-81	Allicyn Fleek	3632	7-1-81	Lynn Hartnett	51647
3-2-81	Susan Humphries	873	7-1-81	Terri Calcutt	9306
3-2-81	Mary Tallon	2567	7-1-81	Jane Squires	3604
4-1-81	Terri Calcutt	12562	7-1-81	Nancy Tuthill	7978
4-1-81	Lynn Hartnett	53389	7-1-81	Allicyn Fleek	3316
4-1-81	Jane Squires	7948	7-1-81	Joy Ingram	5729
4-1-81	Jewell Cannon	4376	7-1-81	Brenda Ridenhour	7165
4-1-81	Allicyn Fleek	6039	7-1-81	Susan Humphries	719
4-1-81	Mary Tallon	3068	7-1-81	Mary Tallon	930
4-1-81	Joy Ingram	5785	8-3-81	Lynn Hartnett	50228
4-1-81	Susan Humphries	466	8-3-81	Terri Calcutt	10728
4-1-81	Fran Calcutt	333	8-3-81	Jane Squires	1684
5-1-81	Nancy Tuthill	725	8-3-81	Nancy Tuthill	5318
5-1-81	Jewell Cannon	10622	8-3-81	Allicyn Fleek	5511
5-1-81	Joy Ingram	9390	8-3-81	Joy Ingram	6164
5-1-81	Terri Calcutt	23648	8-3-81	Brenda Ridenhour	9693
5-1-81	Lynn Hartnett	83415	8-3-81	Susan Humphries	603
5-1-81	MARY TALLON	8439	8-3-81	Mary Tallon	1690
5-1-81	Jane Squires	12413	8-13-81	Lynn Hartnett	136323

(9)

Robin's Ladies Wear, Inc.
 2184 W. Evans St.
 Florence, S.C. 29501

(4)

9-1-81	Lynn Hartnett	47146	12-2-81	Allicyn Fleck	5356
9-1-81	Terri Calcutt	7220	12-2-81	Joy Ingram	1218
9-1-81	Jane Squires	2793	12-2-81	Rochelle Banks	5429
9-1-81	Nancy Tutthill	7514	12-2-81	Barbara Governor	9619
9-1-81	Allicyn Fleck	7120	12-2-81	Carol Tripp	3120
9-1-81	Joy Ingram	4967	12-2-81	Susan Humphries	1650
9-1-81	Brenda Ridenhour	1347	1-2-82	Lynn Hartnett	159404
9-1-81	Susan Humphries	688	1-2-82	Diane Wellington	24804
10-1-81	Lynn Hartnett	70725	1-2-82	Nancy Tutthill	22298
10-1-81	Terri Calcutt	7883	1-2-82	Rochelle Banks	26033
10-1-81	Jane Squires	4782	1-2-82	Allicyn Fleck	15771
10-1-81	Nancy Tutthill	15693	1-2-82	Jane Squires	1933
10-1-81	Allicyn Fleck	4940	1-4-82	Barbara Governor	16483
10-1-81	Joy Ingram	4244	1-4-82	Carol Tripp	10638
10-1-81	Rochelle Banks	10890	1-4-82	Susan Humphries	5610
10-1-81	Barbara Governor	6110	1-4-82	Mary Tallo	1948
10-1-81	Susan Humphries	1258	2-1-82	Lynn Hartnett	33498
11-2-81	Lynn Hartnett	64692	2-1-82	Diane Wellington	5874
11-2-81	Jane Squires	2999	2-1-82	Nancy Tutthill	7611
11-2-81	Nancy Tutthill	12425	2-1-82	Allicyn Fleck	3734
11-2-81	Allicyn Fleck	4733	2-1-82	Barbara Governor	3063
11-2-81	Joy Ingram	6046	2-1-82	Carol Tripp	2644
11-2-81	Rochelle Banks	10713	2-1-82	Susan Humphries	1075
11-2-81	Barbara Governor	11272	2-1-82	April Britt	1577
11-2-81	Mary Tallo	1720	3-1-82	Lynn Hartnett	39709
11-2-81	Susan Humphries	882	3-1-82	Barbara Governor	3095
12-2-81	Lynn Hartnett	63174	3-1-82	Carol Tripp	2354
12-2-81	Diane Wellington	10104	3-1-82	April Britt	3209
12-2-81	Jane Squires	1741	4-1-82	Diane Wellington	19257
12-2-81	Nancy Tutthill	10535	4-1-82	Nancy Tutthill	16377

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 Robin's Ladies Wear, Inc.
 2184 W. Evans St.
 Florence, S.C. 29501

(5)

4-1-82	Allicyn Fleck	5607	8-2-82	Nancy Tuthill	11461
4-1-82	Barbara Governor	4544	8-2-82	Allicyn Fleck	7196
4-1-82	April Britt	5403	8-2-82	Barbara Governor	10576
4-1-82	Carol Tripp	5747	8-2-82	Carol Tripp	7275
4-1-82	Lynn Hartnett	72642	8-10-82	Lynn Hartnett	138386
5-3-82	Lynn Hartnett	69426	8-30-82	Lynn Hartnett	50000
5-3-82	Lynn Hartnett	4060	9-1-82	Lynn Hartnett	57218
5-3-82	Nancy Tuthill	18199	9-1-82	Diane Wellington	5885
5-3-82	Allicyn Fleck	12227	9-8-82	Kathy Wilcox	1775
5-3-82	Barbara Governor	6528	9-8-82	Carol Tripp	7144
5-3-82	Carol Tripp	6515	9-8-82	Barbara Governor	8753
5-3-82	April Britt	10260	9-8-82	Allicyn Fleck	10283
5-3-82	Diane Wellington	17382	9-8-82	Nancy Tuthill	10185
5-4-82	Lynn Hartnett	150000	10-1-82	Lynn Hartnett	68028
6-1-82	April Britt	3443	10-1-82	Nancy Tuthill	13474
6-1-82	Lynn Hartnett	61122	10-1-82	Allicyn Fleck	6667
6-1-82	Diane Wellington	15627	10-1-82	Barbara Governor	8286
6-1-82	Nancy Tuthill	11626	10-1-82	Carol Tripp	11941
6-1-82	Allicyn Fleck	5227	10-1-82	Kathy Wilcox	6196
6-1-82	Barbara Governor	8731	10-1-82	Glenda Harrison	8459
6-1-82	Carol Tripp	3902	11-1-82	Lynn Hartnett	65000
7-1-82	Lynn Hartnett	43819	11-1-82	Nancy Tuthill	12405
7-1-82	Nancy Tuthill	7727	11-1-82	Allicyn Fleck	9205
7-1-82	Allicyn Fleck	5726	11-1-82	Carol Tripp	7428
7-1-82	Barbara Governor	7786	11-1-82	Kathy Wilcox	5940
7-1-82	Carol Tripp	4153	11-1-82	Barbara Governor	6934
7-1-82	April Britt	421	11-1-82	Glenda Harrison	8758
8-2-82	Lynn Hartnett	57476	12-1-82	Lynn Hartnett	64946
8-2-82	Diane Wellington	10684	12-1-82	Nancy Tuthill	12050
			12-1-82	Allicyn Fleck	3640

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Robin's Ladies Wear, Inc.

(6)

12-1-82 Carol Tripp	10609
12-1-82 Barbara Governor	8106
12-1-82 Kathy Wilcox	8090
12-1-82 Glenda Harrison	5706
12-1-82 Fran Calcutt	4990

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 Robin's of Anderson, Inc.
 ADDRESS 2718 N. MAIN Street
 Anderson, SC. 29621

MUR 2071

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EXHIBIT
 #5 FEC
 Welch 2012

1-3-80	John Tyler	28600	6-4-80	Carroll Hart	7998
1-3-80	Phil Harrison	31700	7-7-80	Phil Harrison	37945
1-3-80	Carroll Hart	1000	7-7-80	Raleigh Heard	10490
1-3-80	David Kay	2400	7-7-80	Chris Williams	3247
1-7-80	John Tyler	114474	7-7-80	Carroll Hart	10406
1-7-80	Phil Harrison	56881	7-7-80	Mark Christopher	458
1-7-80	Charles Tatham	5669	8-6-80	Carroll Hart	9698
1-7-80	Carroll Hart	9939	8-6-80	Raleigh Heard	10609
2-7-80	John Tyler	43200	8-6-80	Phil Harrison	30785
2-7-80	Phil Harrison	15809	9-4-80	Phil Harrison	67197
2-7-80	Carroll Hart	2668	9-4-80	Raleigh Heard	13000
2-7-80	Chris Williams	12671	9-4-80	Carroll Hart	4545
3-5-80	Chris Williams	8671	9-4-80	Raymond Hickman	14630
3-5-80	Phil Harrison	13902	9-4-80	Randy Mc Dougald	10859
3-5-80	John Tyler	30674	9-4-80	Gregg Alexander	11625
4-4-80	Phil Harrison	21700	10-3-80	Randy Mc Dougald	1768
4-4-80	John Tyler	43428	10-3-80	Ray Hickman	3732
4-4-80	Chris Williams	12922	10-3-80	Gregg Alexander	5223
5-6-80	Phil Harrison	25714	10-3-80	Raleigh Heard	6681
5-6-80	Chris Williams	13461	10-3-80	Phil Harrison	22687
5-6-80	Raleigh Heard	2354	11-5-80	Phil Harrison	51481
5-6-80	Tim Mc Elveen	2182	11-5-80	Phil Harrison	4800
5-21-80	Phil Harrison	6880	11-5-80	Gregg Alexander	17945
5-21-80	Chris Williams	6800	11-5-80	Randy Mc Dougald	7753
5-21-80	Raleigh Heard	2240	11-5-80	Raymond Hickman	10423
5-21-80	Carroll Hart	800	11-5-80	Raleigh Heard	17063
5-21-80	Tim Mc Elveen	240	12-2-80	Phil Harrison	67850
6-4-80	Phil Harrison	58576	12-2-80	Raleigh Heard	15981
6-4-80	Raleigh Heard	14869	12-2-80	Raymond Hickman	14580
6-4-80	Chris Williams	16869	12-2-80	Randy Mc Dougald	4358

Robin's of Anderson, Inc.
 2718 N. Main St.
 Anderson, S.C. 29621

12-2-80	Gregg Alexander	15498	4-22-81	Raleigh Heard	2800
12-30-80	Phil Harrison	11600	4-22-81	Ray Hickman	3440
12-30-80	Raleigh Heard	22400	4-22-81	Randy M ^c Dougald	300
12-30-80	Ray Hickman	13200	4-22-81	Barry Hicks	3840
12-30-80	Randy M ^c Dougald	3800	5-5-81	Barry Hicks	21669
12-30-80	Gregg Alexander	11900	5-5-81	Raleigh Heard	2279
12-30-80	Franny Russell	800	5-5-81	Phil Harrison	53965
12-30-80	Carroll Hart	400	5-5-81	Ray Hickman	14190
1-5-81	Phil Harrison	122034	5-5-81	Randy M ^c Dougald	668
1-5-81	Raleigh Heard	27636	5-15-81	Phil Harrison	18308
1-5-81	Ray Hickman	21185	5-26-81	Mark Lawson	50000
1-5-81	Randy M ^c Dougald	10213	6-2-81	Mark Lawson	11408
1-5-81	Gregg Alexander	14919	6-2-81	Barry Hicks	17324
1-5-81	Franny Russell	6679	6-2-81	Raleigh Heard	6329
1-5-81	Carroll Hart	4761	6-2-81	Mark Christopher	6202
2-3-81	Phil Harrison	51432	6-2-81	Ray Hickman	7071
2-3-81	Raleigh Heard	15005	6-3-81	Raleigh Heard	10000
2-3-81	Ray Hickman	12049	7-2-81	Mark Lawson	45256
2-3-81	Randy M ^c Dougald	8738	7-2-81	Raleigh Heard	13457
2-3-81	Franny Russell	1195	7-2-81	Pam Campbell	399
2-3-81	Carroll Hart	1076	7-2-81	Barry Hicks	4457
3-4-81	Phil Harrison	55141	7-2-81	Mark Christopher	8389
3-4-81	Raleigh Heard	19859	7-2-81	Franny Russell	165
3-4-81	Ray Hickman	13456	8-4-81	Mark Lawson	39744
3-4-81	Randy M ^c Dougald	5867	8-4-81	Raleigh Heard	7778
4-3-81	Phil Harrison	42307	8-4-81	Pam Campbell	8813
4-3-81	Raleigh Heard	16078	8-4-81	Barry Hicks	8696
4-3-81	Randy M ^c Dougald	2919	8-4-81	Sandra Cooley	6812
4-3-81	Ray Hickman	9646	8-4-81	Mark Christopher	604
4-22-81	Phil Harrison	4735			

Robins of Anderson, Inc.
 2713 N. MAIN ST
 Anderson, S.C. 29621

9-8-81	Mark Lawson	339 24	1-6-82	Randy McDougal	91 00
9-8-81	Raleigh Heard	7867	2-2-82	Mark Lawson	40840
9-8-81	Pam Campbell	11830	2-2-82	Pam Campbell	5091
9-8-81	Barry Hicks	463	2-2-82	Barry Hicks	11895
9-8-81	Sandra Cooley	5010	2-2-82	Sandra Cooley	8381
10-2-81	Mark Lawson	62345	2-2-82	Randy McDougal	8844
10-2-81	Raleigh Heard	14827	3-2-82	Mark Lawson	48268
10-2-81	Pam Campbell	21115	3-2-82	Barry Hicks	10755
10-2-81	Barry Hicks	11784	3-2-82	Sandra Cooley	13309
10-2-81	Sandra Cooley	6559	3-2-82	Randy McDougal	12069
11-4-81	Mark Lawson	53576	4-5-82	Mark Lawson	51017
11-4-81	Raleigh Heard	2786	4-5-82	Barry Hicks	1740
11-4-81	Pam Cooley	20893	4-5-82	Randy McDougal	9651
11-4-81	Barry Hicks	13507	4-5-82	Sandra Cooley	13773
11-4-81	Sandra Cooley	6978	4-12-82	Mark Lawson	150000
12-3-81	Mark Lawson	50008	5-5-82	Mark Lawson	53995
12-3-81	Pam Campbell	13923	5-5-82	Barry Hicks	21272
12-3-81	Barry Hicks	10914	5-5-82	Sandra Cooley	12633
12-3-81	Sandra Cooley	12455	5-5-82	Randy McDougal	9718
12-3-81	Mark Christopher	744	6-3-82	Mark Lawson	47320
1-5-82	Mark Lawson	131401	6-3-82	Barry Hicks	18626
1-5-82	Pam Campbell	29587	6-3-82	Sandra Cooley	12074
1-5-82	Sandra Cooley	27696	6-3-82	Randy McDougal	9049
1-5-82	Barry Hicks	38054	6-23-82	Mark Lawson	3400
1-5-82	Randy McDougal	14767	6-23-82	Sandra Cooley	4100
1-6-82	Mark Lawson	7200	6-23-82	Barry Hicks	8625
1-6-82	Pam Campbell	11500	6-23-82	Randy McDougal	3900
1-6-82	Barry Hicks	15500	7-1-82	Mark Lawson	33200
1-6-82	Sandra Cooley	10300	7-1-82	Barry Hicks	11298

Robin's of Anderson, Inc.
218 N. Main St.
Anderson, S.C. 29621

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7-7-82	Randy M ^c Dougald	6840	12-28-82	Tim M ^c Elveen	6600
7-7-82	Mark Christopher	677	12-28-82	Sandra Cooley	8625
7-7-82	Sandra Cooley	6512	12-28-82	Lyles Castles	4100
8-4-82	Mark Lawson	43745	12-28-82	Framy Russell	4300
8-4-82	Barry Hicks	14681	12-28-82	Kyle Smith	2100
8-4-82	Randy M ^c Dougald	8254			
8-4-82	Mark Christopher	12358			
9-3-82	Mark Lawson	48403			
9-3-82	Barry Hicks	6973			
9-3-82	Randy M ^c Dougald	12271			
9-3-82	Sandra Cooley	16064			
9-3-82	Lyles Castles	237			
9-3-82	Mark Christopher	4429			
10-4-82	Mark Lawson	45000			
10-5-82	Mark Lawson	65442			
10-5-82	Randy M ^c Dougald	23396			
10-5-82	Lyles Castles	10751			
10-5-82	Sandra Cooley	13585			
11-3-82	Tim M ^c Elveen	47315			
11-4-82	Randy M ^c Dougald	16380			
11-4-82	Sandra Cooley	13975			
11-4-82	Lyles Castles	4299			
11-18-82	Randy M ^c Dougald	38000			
12-3-82	Tim M ^c Elveen	56669			
12-3-82	Randy M ^c Dougald	12152			
12-3-82	Sandra Cooley	19501			
12-3-82	Lyles Castles	8964			
12-3-82	Framy Russell	1485			

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 NAME Robin's of Anderson, Inc.
 ADDRESS 2718 N. MAIN Street
 Anderson, SC. 29621

MUR 2071

DATE	NAME	AMOUNT	DATE	NAME	AMOUNT
1-3-80	John Tyler	28600	6-4-80	Carroll Hart	7998
1-3-80	Phil Harrison	31700	7-7-80	Phil Harrison	37945
1-3-80	Carroll Hart	1000	7-7-80	Raleigh Heard	10490
1-3-80	David Kay	2400	7-7-80	Chris Williams	3247
1-7-80	John Tyler	114474	7-7-80	Carroll Hart	10406
1-7-80	Phil Harrison	56881	7-7-80	Mark Christopher	458
1-7-80	Charles Tatham	5669	8-6-80	Carroll Hart	9698
1-7-80	Carroll Hart	9939	8-6-80	Raleigh Heard	10609
2-7-80	John Tyler	43200	8-6-80	Phil Harrison	30785
2-7-80	Phil Harrison	15809	9-4-80	Phil Harrison	67197
2-7-80	Carroll Hart	2668	9-4-80	Raleigh Heard	13000
2-7-80	Chris Williams	12671	9-4-80	Carroll Hart	4545
3-5-80	Chris Williams	8671	9-4-80	Raymond Hickman	14630
3-5-80	Phil Harrison	13902	9-4-80	Randy McDougald	10859
3-5-80	John Tyler	30674	9-4-80	Gregg Alexander	11625
4-4-80	Phil Harrison	21700	10-3-80	Randy McDougald	1768
4-4-80	John Tyler	43428	10-3-80	Ray Hickman	3732
4-4-80	Chris Williams	12922	10-3-80	Gregg Alexander	5223
5-6-80	Phil Harrison	25714	10-3-80	Raleigh Heard	6681
5-6-80	Chris Williams	13461	10-3-80	Phil Harrison	22687
5-6-80	Raleigh Heard	2354	11-5-80	Phil Harrison	51481
5-6-80	Tim McElveen	2182	11-5-80	Phil Harrison	4800
5-21-80	Phil Harrison	6880	11-5-80	Gregg Alexander	17945
5-21-80	Chris Williams	6800	11-5-80	Randy McDougald	7753
5-21-80	Raleigh Heard	2240	11-5-80	Raymond Hickman	10423
5-21-80	Carroll Hart	800	11-5-80	Raleigh Heard	17063
5-21-80	Tim McElveen	240	12-2-80	Phil Harrison	67850
6-4-80	Phil Harrison	58576	12-2-80	Raleigh Heard	15981
6-4-80	Raleigh Heard	14869	12-2-80	Raymond Hickman	14580
6-4-80	Chris Williams	16869	12-2-80	Randy McDougald	4358

EXHIBIT

#5 FEE
 Welch 2012

Robin's of Anderson, Inc.
 2718 N. Main St.
 Anderson, S.C. 29621

12-2-80	Gregg Alexander	15498	4-22-81	Raleigh Heard	2800
12-30-80	Phil Harrison	11600	4-22-81	Ray Hickman	3440
12-30-80	Raleigh Heard	22400	4-22-81	Randy Mc Dougald	300
12-30-80	Ray Hickman	13200	4-22-81	Barry Hicks	3840
12-30-80	Randy Mc Dougald	3800	5-5-81	Barry Hicks	21669
12-30-80	Gregg Alexander	11900	5-5-81	Raleigh Heard	2279
12-30-80	Fanny Russell	800	5-5-81	Phil Harrison	53965
12-30-80	Carroll Hart	400	5-5-81	Ray Hickman	14190
1-5-81	Phil Harrison	122034	5-5-81	Randy Mc Dougald	668
1-5-81	Raleigh Heard	27636	5-15-81	Phil Harrison	18308
1-5-81	Ray Hickman	21185	5-26-81	Mark Lawson	50000
1-5-81	Randy Mc Dougald	10213	6-2-81	Mark Lawson	11408
1-5-81	Gregg Alexander	14919	6-2-81	Barry Hicks	17324
1-5-81	Fanny Russell	6679	6-2-81	Raleigh Heard	6329
1-5-81	Carroll Hart	4761	6-2-81	Mark Christopher	6202
2-3-81	Phil Harrison	51432	6-2-81	Ray Hickman	7071
2-3-81	Raleigh Heard	15005	6-3-81	Raleigh Heard	10000
2-3-81	Ray Hickman	12049	7-2-81	Mark Lawson	45256
2-3-81	Randy Mc Dougald	8738	7-2-81	Raleigh Heard	13457
2-3-81	Fanny Russell	1195	7-2-81	Pam Campbell	399
2-3-81	Carroll Hart	1076	7-2-81	Barry Hicks	9457
3-4-81	Phil Harrison	55141	7-2-81	Mark Christopher	8389
3-4-81	Raleigh Heard	19859	7-2-81	Fanny Russell	169
3-4-81	Ray Hickman	13456	8-4-81	Mark Lawson	39744
3-4-81	Randy Mc Dougald	5867	8-4-81	Raleigh Heard	7778
4-3-81	Phil Harrison	42307	8-4-81	Pam Campbell	8813
4-3-81	Raleigh Heard	16078	8-4-81	Barry Hicks	8696
4-3-81	Randy Mc Dougald	2919	8-4-81	Sandra Cooley	6812
4-3-81	Ray Hickman	9646	8-4-81	Mark Christopher	604
4-22-81	Phil Harrison	4735			

104 Robins of Anderson, Inc.
 2718 N. MAIN St
 Anderson, S.C. 29621

9-8-81	Mark Lawson	339 24	1-6-82	Randy Mc Dougald	81 00
9-8-81	Raleigh Heard	7867	2-2-82	Mark Lawson	40840
9-8-81	Pam Campbell	11030	2-2-82	Pam Campbell	5091
9-8-81	Barry Hicks	463	2-2-82	Barry Hicks	11895
9-8-81	Sandra Cooley	5010	2-2-82	Sandra Cooley	8381
10-2-81	Mark Lawson	62345	2-2-82	Randy Mc Dougald	8844
10-2-81	Raleigh Heard	14827	3-2-82	Mark Lawson	48268
10-2-81	Pam Campbell	21115	3-2-82	Barry Hicks	10755
10-2-81	Barry Hicks	11784	3-2-82	Sandra Cooley	13309
10-2-81	Sandra Cooley	6559	3-2-82	Randy Mc Dougald	12069
11-4-81	Mark Lawson	53576	4-5-82	Mark Lawson	51017
11-4-81	Raleigh Heard	2786	4-5-82	Barry Hicks	1740
11-4-81	Pam Cooley	20893	4-5-82	Randy Mc Dougald	9651
11-4-81	Barry Hicks	13507	4-5-82	Sandra Cooley	13713
11-4-81	Sandra Cooley	6978	4-12-82	Mark Lawson	150000
12-3-81	Mark Lawson	50008	5-5-82	Mark Lawson	53995
12-3-81	Pam Campbell	13923	5-5-82	Barry Hicks	21272
12-3-81	Barry Hicks	10914	5-5-82	Sandra Cooley	12633
12-3-81	Sandra Cooley	12455	5-5-82	Randy Mc Dougald	9718
12-3-81	Mark Christopher	744	6-3-82	Mark Lawson	47320
1-5-82	Mark Lawson	131401	6-3-82	Barry Hicks	18626
1-5-82	Pam Campbell	29587	6-3-82	Sandra Cooley	12074
1-5-82	Sandra Cooley	27696	6-3-82	Randy Mc Dougald	9049
1-5-82	Barry Hicks	38054	6-23-82	Mark Lawson	3400
1-5-82	Randy Mc Dougald	14767	6-23-82	Sandra Cooley	4100
1-6-82	Mark Lawson	7200	6-23-82	Barry Hicks	8625
1-6-82	Pam Campbell	11500	6-23-82	Randy Mc Dougald	3900
1-6-82	Barry Hicks	15500	7-1-82	Mark Lawson	33200
1-6-82	Sandra Cooley	10300	7-1-82	Barry Hicks	11298

Robin's of Anderson, Inc.
 2118 N. Main St.
 Anderson, S.C. 29621

(4)

7-7-82	Randy M ^c Dougald	6840	12-28-82	Tia M ^c Elveen	6600
7-7-82	Mark Christopher	677	12-28-82	Sandra Cooley	8625
7-7-82	Sandra Cooley	6512	12-28-82	Lyles Castles	4100
8-4-82	Mark Lawson	43745	12-28-82	Franny Russell	4300
8-4-82	Barry Hicks	14681	12-28-82	Kyle Smith	2100
8-4-82	Randy M ^c Dougal	8254			
8-4-82	Mark Christopher	12358			
9-3-82	Mark Lawson	48403			
9-3-82	Barry Hicks	12973			
9-3-82	Randy M ^c Dougald	12271			
9-3-82	Sandra Cooley	16064			
9-3-82	Lyles Castles	237			
9-3-82	Mark Christopher	4429			
10-4-82	Mark Lawson	45000			
10-5-82	Mark Lawson	65442			
10-5-82	Randy M ^c Dougal	23396			
10-5-82	Lyles Castles	10751			
10-5-82	Sandra Cooley	13585			
11-3-82	Tim M ^c Elveen	47315			
11-4-82	Randy M ^c Dougald	16380			
11-4-82	Sandra Cooley	13975			
11-4-82	Lyles Castles	4299			
11-18-82	Randy M ^c Dougald	38000			
12-3-82	Tim M ^c Elveen	56669			
12-3-82	Randy M ^c Dougald	12152			
12-3-82	Sandra Cooley	19501			
12-3-82	Lyles Castles	8964			
12-3-82	Franny Russell	1485			

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Robin's of Dentonville, Inc.
 7359 Two Notch Road
 Columbia, SC 29204

MUR 2011

1-2-80	Mike Bauknight	200.00	5-6-80	Mike Bauknight	40531
1-2-80	Tony Meadows	246.00	5-6-80	Bobby Welch	105160
1-2-80	Steven Zobel	127.00	5-6-80	Myles Weinberg	24867
1-2-80	Geoff Gabriel	7000	5-6-80	Geoff Gabriel	21105
1-2-80	Staffy Crowley	130.00	5-6-80	Steve Zobel	6481
1-4-80	Bobby Welch	436.00	5-6-80	Tim Hunter	7368
1-7-80	Mike Bauknight	1308.00	5-21-80	Bobby Welch	6080
1-7-80	Tony Meadows	47658	5-21-80	Mike Bauknight	12000
1-7-80	Steve Zobel	35537	5-21-80	Myles Weinberg	10300
1-7-80	Geoff Gabriel	31796	5-21-80	Geoff Gabriel	9400
1-7-80	Staffy Crowley	33071	5-21-80	Tim Hunter	3120
2-6-80	Bobby Welch	15586	5-21-80	Steve Zobel	1920
2-7-80	Mike Bauknight	46759	6-4-80	Bobby Welch	47322
2-7-80	Tony Meadows	180.00	6-4-80	Mike Bauknight	41900
2-7-80	Steve Zobel	13418	6-4-80	Myles Weinberg	20431
2-7-80	Geoff Gabriel	22456	6-4-80	Geoff Gabriel	21912
2-7-80	Tim Hunter	376	6-4-80	Tim Hunter	13203
3-5-80	Mike Bauknight	45200	6-8-80	Myles Weinberg	12177
3-5-80	Tony Meadows	14833	7-3-80	Bobby Welch	70833
3-5-80	Steve Zobel	11320	7-3-80	Mike Bauknight	21885
3-5-80	Geoff Gabriel	18966	7-3-80	Geoff Gabriel	13943
3-5-80	Tim Hunter	6921	7-3-80	Tim Hunter	10632
3-5-80	Bobby Welch	15000	7-3-80	Steve Zobel	8065
4-3-80	Myles Weinberg	5565	8-5-80	Bobby Welch	50544
4-3-80	Tony Meadows	6778	8-5-80	Mike Bauknight	15656
4-3-80	Tim Hunter	1700	8-5-80	Tim Hunter	7638
4-3-80	Geoff Gabriel	11754	8-5-80	Geoff Gabriel	11905
4-3-80	Steve Zobel	6482	8-5-80	Steve Zobel	9583
4-3-80	Bobby Welch	11586			
4-3-80	Mike Bauknight	34758			

EXHIBIT

#6 FEC
 Welch com

Robin's of Dentonville, Inc.
 1359 Two Notch Road
 Columbia, S.C. 29204

9-4-80	Bobby Welch	47517	12-2-80	Bobby Welch	83520
9-4-80	Cam Kreps	429	12-2-80	Mike Bauknight	20325
9-4-80	Steve Zobel	4167	12-2-80	Jimmy Gillis	4491
9-4-80	Tim McElveen	1259	12-2-80	Steve Zobel	15044
9-4-80	Tim Hunter	9668	12-2-80	Allen Stewart	8494
9-4-80	Geoff Gabriel	12477	12-2-80	Warren Merck	2868
9-5-80	Mike Bauknight	14307	12-2-80	Ray Derrick	13111
10-2-80	Bobby Welch	66037	12-2-80	Geoff Gabriel	4299
10-2-80	Mike Bauknight	22354	12-30-80	Bobby Welch	7800
10-2-80	Cam Kreps	10422	12-30-80	Mike Bauknight	10700
10-2-80	Steve Zobel	4968	12-30-80	Stephen Zobel	9100
10-2-80	Dexter Truax	926	12-30-80	Allen Stewart	6900
10-2-80	Warren Merck	6880	12-30-80	Ray Derrick	10200
10-2-80	Ray Derrick	3771	12-30-80	Geoff Gabriel	3400
11-4-80	Steve Zobel	2897	12-30-80	John Hodge	3400
11-4-80	Jimmy Gillis	4901	12-30-80	Warren Merck	500
11-4-80	Cam Kreps	1255	12-30-80	James Gillis	1100
11-4-80	Mike Bauknight	21906	1-5-81	Bobby Welch	180113
11-4-80	Bobby Welch	74423	1-5-81	Mike Bauknight	32643
11-4-80	Warren Merck	10874	1-5-81	Steve Zobel	22892
11-4-80	Geoff Gabriel	1379	1-5-81	Allen Stewart	27839
11-4-80	Geoff Gabriel	344	1-5-81	Ray Derrick	32866
11-4-80	Bobby Welch	4515	1-5-81	Geoff Gabriel	17126
11-4-80	Warren Merck	2718	1-5-81	John Hodge	20306
11-4-80	Ray Derrick	3287	2-3-81	Bobby Welch	64669
11-4-80	Jimmy Gillis	1225	2-3-81	Mike Bauknight	15456
11-4-80	Mike Bauknight	5476	2-3-81	Geoff Gabriel	657
11-4-80	Cam Kreps	313	2-3-81	Steve Zobel	10287
11-4-80	Steve Zobel	724	2-3-81	Allen Stewart	11258
11-4-80	Ray Derrick	13149	2-3-81	Ray Derrick	10124

Robin's of Dentonville, Inc.
 7359 Two Notch Road
 Columbia, SC 29204

(3)

2-3-81	John Hodge	8012	6-2-81	Tony Meadows	10091
3-3-81	Bobby Welch	80869	7-2-81	Bobby Welch	58000
3-3-81	Mike Banknight	20194	7-2-81	Tony Meadows	20819
3-3-81	Steve Zobel	17339	7-2-81	Steve Zobel	11729
3-3-81	Allen Stewart	10380	7-2-81	Allen Stewart	14836
3-3-81	Ray Derrick	9925	7-2-81	Ray Derrick	9961
3-3-81	John Hodge	12394	8-4-81	Bobby Welch	61309
4-2-81	Bobby Welch	75083	8-4-81	Tony Meadows	21281
4-2-81	Mike Banknight	22147	8-4-81	Steve Zobel	12222
4-2-81	Steve Zobel	10843	8-4-81	Allen Stewart	10174
4-2-81	Allen Stewart	12258	8-4-81	Ray Derrick	17169
4-2-81	John Hodge	6594	9-3-81	Bobby Welch	50482
4-3-81	Ray Derrick	14634	9-3-81	Tony Meadows	18638
4-22-81	Bobby Welch	2960	9-3-81	Steve Zobel	17970
4-22-81	Mike Banknight	3840	9-3-81	Allen Stewart	13372
4-22-81	Tony Meadows	3465	9-3-81	Ray Derrick	4338
4-22-81	Steve Zobel	5680	10-2-81	Bobby Welch	85461
4-22-81	Allen Stewart	3680	10-2-81	Tony Meadows	20170
4-22-81	Ray Derrick	3920	10-2-81	Dennis Letts	14004
5-5-81	Bobby Welch	98702	10-2-81	Steve Zobel	19187
5-5-81	Tony Meadows	24647	10-2-81	Allen Stewart	10601
5-5-81	Mike Banknight	8629	10-2-81	Ray Derrick	5117
5-5-81	Steve Zobel	22161	10-2-81	Laine Dunbar	9260
5-5-81	Allen Stewart	21210	10-2-81	Margaret Balk	9981
5-5-81	Ray Derrick	12714	11-4-81	Bobby Welch	92636
6-1-81	Bobby Welch	77452	11-4-81	Tony Meadows	18392
6-1-81	Tony Meadows	20193	11-4-81	Dennis Letts	12800
6-1-81	Steve Zobel	17591	11-4-81	Steve Zobel	17989
6-1-81	Allen Stewart	18513	11-4-81	Allen Stewart	14799
6-1-81	Ray Derrick	10666	11-4-81	Ray Derrick	7636

2 1 5 4 Q Robins of 5 Dentonville, Inc.
 7359 Two Notch Road
 Columbia, S.C. 29204

(4)

11-4-81	ELAINE Dunbar	7869	3-1-82	Bobby Welch	78538
11-4-81	Margaret Belk	12970	3-1-82	Margaret Belk	14773
12-2-81	Bobby Welch	96742	3-1-82	Tony Meadows	5531
12-2-81	Tony Meadows	22504	3-1-82	Dennis Letts	19843
12-2-81	Dennis Letts	16738	3-1-82	Allen Stewart	17126
12-2-81	Steve Zobel	12601	3-1-82	Pati Melton	11388
12-2-81	Allen Stewart	12713	4-5-82	Bobby Welch	83343
12-2-81	Ray Derrick	11808	4-5-82	Margaret Belk	21187
12-2-81	Laine Dunbar	1211	4-5-82	Dennis Letts	17380
12-2-81	Margaret Belk	16372	4-5-82	Allen Stewart	13676
12-29-81	Bobby Welch	6400	4-5-82	Ray Derrick	6078
12-29-81	Tony Meadows	11700	4-5-82	Pat Melton	11570
12-29-81	Dennis Letts	10600	4-12-82	Bobby Welch	150000
12-29-81	Allen Stewart	10800	5-3-82	Bobby Welch	90288
12-29-81	Ray Derrick	14500	5-3-82	Margaret Belk	16237
12-29-81	Margaret Belk	10000	5-3-82	Ray Derrick	23634
1-5-82	Bobby Welch	205986	5-3-82	Dennis Letts	16000
1-5-82	Tony Meadows	46555	5-3-82	Allen Stewart	12138
1-5-82	Dennis Letts	36398	5-3-82	Pati Melton	7960
1-5-82	Allen Stewart	34647	6-3-82	Bobby Welch	94440
1-5-82	Ray Derrick	43753	6-3-82	Margaret Belk	19326
1-5-82	Margaret Belk	33934	6-3-82	Ray Derrick	27453
2-2-82	Bobby Welch	75068	6-3-82	Dennis Letts	18284
2-2-82	Tony Meadows	27778	6-3-82	Allen Stewart	18816
2-2-82	Dennis Letts	12890	6-22-82	Bobby Welch	3300
2-2-82	Margaret Belk	13516	6-22-82	Margaret Belk	7500
2-2-82	Allen Stewart	11639	6-22-82	Dennis Letts	5500
2-2-82	Ray Derrick	7989	6-22-82	Ray Derrick	12750
2-2-82	Patti Melton	1850	6-22-82	Allen Stewart	9125

Robin's of Dentville
7359 Two Notch Rd.
Columbia, S.C. 29204

(5)

7-2-82	Bobby Welch	63306	12-2-82	James Neal	11086
7-2-82	Margaret Belk	13742	12-29-82	Bobby Welch	8000
7-2-82	Ray Derrick	19403	12-29-82	Margaret Belk	7200
7-2-82	Allen Stewart	17102	12-29-82	Ray Derrick	8375
8-2-82	Bobby Welch	94785	12-29-82	Bobby Guider	11625
8-2-82	Margaret Belk	21261	12-29-82	James Neal	6100
8-2-82	Ray Derrick	30552			
8-2-82	S. P. Neal	22198			
9-2-82	Bobby Welch	77909			
9-2-82	Margaret Belk	22013			
9-2-82	Ray Derrick	20250			
9-2-82	James Neal	21600			
9-2-82	Allen Stuart	5701			
10-4-82	Bobby Welch	90500			
10-4-82	Ray Derrick	26865			
10-4-82	Margaret Belk	18305			
10-4-82	Bobby Guider	2395			
10-4-82	James Neal	13005			
10-4-82	Allen Stewart	16137			
10-15-82	Allen Stewart	3302			
11-3-82	Bobby Welch	85257			
11-3-82	Margaret Belk	12442			
11-3-82	Ray Derrick	22145			
11-3-82	Bobby Guider	23922			
11-3-82	James Neal	9488			
12-2-82	Bobby Welch	100613			
12-2-82	Margaret Belk	14106			
12-2-82	Ray Derrick	28281			
12-2-82	Bobby Guider	30578			

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 Le Master's, Inc.
 9. Magnolia Mall
 Florence, S.C. 29501

MUR 2071

3-6-80	Briley Altman	1675	8-1-80	Briley Altman	3554
3-6-80	Brian Speas	1339	8-1-80	Woody Lynch	13839
3-6-80	Jim O'Conner	3451	9-3-80	Staffy Crowley	65047
3-6-80	Bob Ellen	1718	9-3-80	Woody Lynch	6560
3-6-80	Stafford Crowley	15200	9-3-80	Briley Altman	3861
4-3-80	Stafford Crowley	53142	9-3-80	Brian Speas	4776
4-3-80	Bob Ellen	5934	9-3-80	Johnny Gasque	3889
4-3-80	Jim O'Conner	13460	10-2-80	Stafford Crowley	70983
4-3-80	Brian Speas	7073	10-2-80	Ken Elmore	3927
4-3-80	Briley Altman	4091	10-2-80	Harold	6555
5-6-80	Bob Ellen	9291	10-2-80	John Gasque	2493
5-6-80	Jim O'Conner	12405	10-2-80	Scott Goodkowsky	1650
5-6-80	Staffy Crowley	57827	10-2-80	Woody Lynch	710
5-6-80	Brian Speas	3769	10-2-80	Candi Harris	1889
5-6-80	Briley Altman	5822	11-4-80	Candi Harris	1475
6-3-80	Bob Ellen	10759	11-4-80	Scott Goodkowsky	3809
6-3-80	Jim O'Conner	12240	11-4-80	Harold Miles	3336
6-3-80	Brian Speas	6043	11-4-80	Ken Elmore	8433
6-3-80	Briley Altman	4004	11-4-80	Stafford Crowley	86967
6-3-80	Marvin Lynch	4236	11-4-80	Woody Lynch	685
6-5-80	Staffy Crowley	67406	11-4-80	Karen Hewitt	849
6-5-80	Staffy Crowley	20000	12-2-80	Stafford Crowley	99190
7-4-80	Briley Altman	695	12-2-80	Ken Elmore	10092
7-4-80	Staffy Crowley	63611	12-2-80	Harold Miles	6120
7-4-80	Bob Ellen	9042	12-2-80	Scott Goodkowsky	1092
7-4-80	Woody Lynch	8338	12-2-80	Karen Hewitt	4027
7-4-80	Brian Speas	9454	12-2-80	Woody Lynch	4820
8-1-80	Staffy Crowley	80939	12-31-80	Ken Elmore	19584
8-1-80	Bob Ellen	3728	1-6-81	Norwood Turner	38956
8-1-80	Brian Speas	6494	1-6-81	Harold Miles	24178

EXHIBIT

#7 FEL
 Welch

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 LeMasters, Inc.
 Magnolia Mall
 Florence, S.C. 29501

1-6-81	Karen Hewitt	11259	5-5-81	Milton Miles	3160
1-6-81	Woody Lynch	16686	5-5-81	Karen Hewitt	2192
1-6-81	Briley Altman	12422	6-3-81	Staffy Crowley	80114
1-6-81	Brian Speas	7179	6-3-81	Norwood Turner	13598
1-6-81	Johnny Gasque	4358	6-3-81	Dennis Abbott	8145
1-7-81	Staffy Crowley	248598	6-5-81	Milton Miles	2813
2-4-81	Staffy Crowley	94276	6-5-81	Karen Hewitt	3040
2-4-81	Norwood Turner	12389	6-3-81	Craig Cutter	14814
2-4-81	Harold Miles	10512	7-2-81	Staffy Crowley	95628
2-4-81	Karen Hewitt	3433	7-2-81	Norwood Turner	14710
2-4-81	Briley Altman	2465	7-2-81	Craig Cutter	15057
2-4-81	Woody Lynch	19292	7-2-81	Dennis Abbott	11707
3-3-81	Stafford Crowley	47402	7-2-81	Milton Miles	5085
3-3-81	Norwood Turner	10349	7-2-81	Karen Hewitt	3069
3-3-81	Harold Miles	2986	8-4-81	Stafford Crowley	85060
3-3-81	Karen Hewitt	1580	8-4-81	Norwood Turner	13300
3-3-81	Woody Lynch	4650	8-4-81	Craig Cutter	10780
3-3-81	Dennis Abbott	4148	8-4-81	Dennis Abbott	8473
4-2-81	Staffy Crowley	78558	8-4-81	Milton Miles	8715
4-2-81	Norwood Turner	16024	8-4-81	Karen Hewitt	4539
4-2-81	Milton Miles	4244	9-1-81	Staffy Crowley	56608
4-2-81	Karen Hewitt	3962	9-1-81	Norwood Turner	12457
4-2-81	Craig Cutter	1344	9-1-81	Dennis Abbott	11266
4-2-81	Woody Lynch	2006	9-1-81	Milton Miles	6321
4-2-81	Dennis Abbott	7571	9-1-81	Karen Hewitt	1115
4-2-81	Briley Altman	157	10-2-81	Norwood Turner	5223
5-1-81	Norwood Turner	23952	10-2-81	Dennis Abbott	10238
5-5-81	Staffy Crowley	111827	10-2-81	Candi Altman	6504
5-5-81	Craig Cutter	17591	10-2-81	Erwin Carrowan	4741
5-5-81	Dennis Abbott	9349	10-5-81	Staffy Crowley	54688

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 LeMasters, Inc.
 Magnolia Mall
 Florence, S.C. 29501

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11-5-81	Staffy Crowley	78385	3-2-82	Milton Miles	2620
11-5-81	Dennis Abbott	14782	3-2-82	Donnie Lloyd	8900
11-5-81	Harold Miles	7015	3-2-82	Bob Geiger	3065
11-5-81	Candi Altman	4258	4-2-82	Billy Gamble	36224
11-5-81	Buddy Carrowan	6207	4-2-82	Mike Daniel	5890
12-2-81	Stafford Crowley	134478	4-2-82	Dennis Abbott	10687
12-2-81	Dennis Abbott	20596	4-2-82	Milton Miles	3116
12-2-81	Karen Hewitt	1363	4-2-82	Donnie Lloyd	8339
12-2-81	Harold Miles	17769	4-2-82	Bob Geiger	2974
12-2-81	Candi Altman	12575	4-4-82	Martin Redd	50000
12-2-81	Buddy Carrowan	12042	5-4-82	Briley Altman	4223
1-5-82	Billy Gamble	152070	5-4-82	Martin Redd	22149
1-5-82	Dennis Abbott	25185	5-4-82	Dennis Abbott	9195
1-5-82	Michael Daniel	22655	5-4-82	Mike Daniel	3736
1-5-82	Milton Miles	23217	5-4-82	Milton Miles	7116
1-5-82	Candi Altman	18945	5-4-82	Dennis Lloyd	10078
1-5-82	Buddy Carrowan	16191	6-3-82	Martin Redd	53809
1-5-82	Karen Hewitt	6403	6-3-82	Dennis Abbott	15278
1-5-82	Staffy Crowley	152070	6-3-82	Mike Daniels	3908
2-2-82	Billy Gamble	53851	6-3-82	Milton Miles	4800
2-2-82	Dennis Abbott	10647	6-3-82	Donnie Lloyd	9900
2-2-82	Mike Daniel	8031	6-3-82	Briley Altman	2954
2-2-82	Milton Miles	3760	7-1-82	Martin Redd	63604
2-2-82	Buddy Carrowan	9679	7-1-82	Dennis Abbott	13823
2-2-82	Karen Hewitt	4502	7-1-82	Mike Daniel	348
2-2-82	Don Lloyd	1609	7-1-82	Donnie Lloyd	11431
2-2-82	Bob Geiger	917	7-1-82	Milton Miles	4849
3-2-82	Billy Gamble	39391	7-1-82	Dusty Grainger	13668
3-2-82	Dennis Abbott	9036	8-2-82	Martin Redd	73435
3-2-82	Michael Daniel	3812	8-2-82	Dennis Abbott	14315

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Magnolia Mall
Florence, S.C. 29501

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8-2-82	Dusty Grainger	19583
8-2-82	Milton Miles	7481
8-2-82	Donnie Lloyd	4007
9-2-82	Martin Redd	51455
9-2-82	Dennis Abbott	12852
9-2-82	Dusty Grainger	15144
9-2-82	Milton Miles	8744
10-1-82	Martin Redd	51932
10-1-82	Milton Miles	2615
10-1-82	Dennis Abbott	17448
10-1-82	Dusty Grainger	11122
10-1-82	Joe O'Conner	9286
10-1-82	Darrin Thomas	359
11-4-82	Martin Redd	60838
11-4-82	Dennis Abbott	12858
11-4-82	Dusty Grainger	13967
11-4-82	Joe O'Conner	11289
11-4-82	Milton Miles	2785
11-4-82	Darrin Thomas	4661
12-2-82	Martin Redd	78039
12-2-82	Dennis Abbott	16420
12-2-82	Dusty Grainger	19973
12-2-82	Joe O'Conner	11834
12-2-82	Milton Miles	3506
12-2-82	Darrin Thomas	4793

EXHIBIT

#9 FEC
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Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 22, 1982

Dear

I have been in touch with most of you by phone recently soliciting contributions for Robin's campaign for United States Congress. A few of you I haven't been able to reach yet and others I hated to call because our stores might not be doing business with your company at this time.

I want to thank each of you that sent a contribution very much. There were some very generous contributions-- one for a thousand dollars and four for five hundred dollars or more. This type campaign is very expensive-- and probably the greatest undertaking ever in Robin's life. We desperately need money and need it now.

After a little thought-provoking rhetoric, if you feel compelled to make your first contribution or an additional one, please accept my heart-felt thanks. The ROBIN'S organization has never been a demanding one. We have never demanded lavish or frequent meals or entertainment as some customers do. We have never demanded free clothes for ourselves or our families as some customers do. We haven't sold our business to the highest bidder as some customers do. We haven't made anyone do any excess traveling to our different locations just to be more costly as some customers do. We've never solved our over-buying by refusing shipments as some customers do. We have tried to make working with our organization as easy as possible. We don't even actually work with some of you due to territory lines yet you still get credit for the orders.

We have been doing business with some of you for as long as eleven years and others for as little as a season or two. You may not have been our salesman for the entire time that we have done

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

business with your company. ROBIN'S and Robin may have played a big part in your success. Please think about it.

Please go to your sales managers, your company presidents, and your company principals and request strongly a generous contribution to Robin's campaign. Please dig as deep as possible in your pocket, your checkbook, your savings account, your bankcard, or your bank itself and show Robin what he has meant and means to you.

Remember that all checks must be personal and that \$1000.00 is the maximum total contribution including what you may have already given. Please make checks to "Tallon for Congress" and send to above.

I'm not asking for a contribution in support of any issues or political party---but for a man who has played an important part in my life and the lives of many others.

Thank you so much for your generous and prompt contribution.

Yours Truly,

Bobby Welch, President
Tallon Sales Co.

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EXHIBIT

#9 FEC
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Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 27, 1982

Rather than beating around the bush, I'll get right to the point. I need your help. I'm trying to raise campaign funds for Robin Tallon (owner of Robin's) who is running for U.S. Congress from the sixth district of South Carolina.

Having known and worked for Robin for many years, I really feel that he will be the kind of Congressman that we need. I'm not pushing any issues or party affiliation and although he's not running from your district, I believe that your help will result in having the best Congressman ever elected from the sixth district.

I'm asking you as a customer and a friend to help me do something that I strongly believe in. If you feel you can help, please send your personal check (for \$25, \$50, \$100 or whatever you like) made out to "Tallon for Congress" in the enclosed envelope.

Thank you very much for your help.

Yours truly,

Bobby Welch

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#10 FEC
Welch 2/22

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 1, 1982

To all Employees of Robin's, Robin's Ladies' Shop, LeMasters, and Tallon Sales Company:

About a month ago I sent a letter to about sixty of you asking for contributions for Robin Tallon's campaign for United States Congress. I would very much like to thank each of you that sent in a contribution. I really feel that each of us should make a contribution if for no other reason than the fact that we owe our jobs to Robin. I also feel that each of you should ask your family members that receive a discount on their purchases for a contribution. I feel very strongly on both these counts.

There is less than one week before election day so there is not a moment to delay. Robin sees every contribution that comes in, so let's let him know that his employees are behind him and that their families appreciate the break on their purchases.

Thanks to all those employees who have given of their time and tireless efforts to help Robin. I hope most of you realize that the possibility is very, very strong that Robin will win. In fact, I should have said it looks very probable. Let's all get behind him.

Don't delay. Make those contributions now. Make those calls today.

Thank you again.

Sincerely,

Bobby Welch
Bobby Welch

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*Managers:
Please show to
all employees immediately!*

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#11 FEC
Welch 2/22

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 9, 1982

Dear

As you may have heard, Robin led the ticket in his race for the Democratic nomination to Congress from the sixth district of South Carolina---but he is in a runoff! The results are as follows:

Robin Tallon	35,687	47.1%
Hicks Harwell	19,501	25.7%
John Brasington	12,666	16.7%
Charles McGill	7,948	10.0%

A candidate must get 50% of the total votes cast to win on the first ballot. We almost did what they say can't be done!

I want to thank each of you that were able to contribute to Robin's campaign very much. I'm sure it makes you feel good to know you were able to help Robin with something that means so much to him.

As I said before, we are in a runoff. Robin's opponent is an experienced politician who is going to be tough to beat. We need your financial help again in order to win. If you've already given, may I ask for a little more (or a lot more if you can). If you haven't, may I plead for your help. The runoff is less than two weeks away (June 22) so you can sense the urgency.

Before you put this letter down, please consider a contribution. Issues and parties aside, please consider it a contribution to something Robin has worked so hard for, something that I really believe in, and something that we need at once.

I'll thank you in advance since I'm sure we can count on you to realize we're in this for keeps.

Please send personal checks or cash to Cameron at the following address: Tallon Sales Company
P.O. Box 3867
Florence, S.C. 29502

Thank you again for your much needed help.

Sincerely,

Bobby Welch

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
)
Gary H. Slavens, et al.,)
)

DEPOSITION OF MARK EDWARD LAWSON

Deposition of Mark Edward Lawson, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 10:43 a.m., on Wednesday, December 9, 1987, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

APPEARANCES: Thomas J. Whitehead, Esquire,
 and Phillip L. Wise, Esquire,
 Assistant General Counsel,
 Federal Election Commission,
 Washington, D.C.

Jack W. Lawson, Esquire,
Attorney for Deponent.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P O BOX 51 • IRMO, S C 29063

(803) 781-1400

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STIPULATIONS

The reading and signing of the deposition
by the deponent is reserved.

I N D E X

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Direct Examination by Mr. Whitehead-----	3
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Recross Examination by Mr. Lawson-----	27
Redirect Examination by Mr. Whitehead-----	28
Signature of Deponent-----	31
Certificate of Notary Public-----	32

EXHIBITS

(There are no exhibits to the deposition.)

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WHEREUPON,

MARK EDWARD LAWSON, HAVING BEEN DULY SWORN AND CAUTIONED TO SPEAK THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH, TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Could you give me your full name and spell it for the reporter, please?

A Mark Edward Lawson, L-a-w-s-o-n.

Q And your address, please?

A 350 Fair Forest Way, Apartment 7207, Greenville, South Carolina, 29607.

Q And your home phone number?

A Area Code 803-288-9339.

Q Are you currently employed?

A Yes, I am.

Q Who are you employed by?

A United States Tobacco.

Q Where is that located, please?

A Greenwich, Connecticut.

Q Do you work in Greenwich, Connecticut, or do you work in South Carolina?

A I have a division office in my home.

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Q Would you explain that?

A I cover -- or my division encompasses an area of Northwest South Carolina and Western North Carolina, and I've got four sales representatives who report to my office that form the division.

Q And your business address is the same as your home address. Is that it?

A My business address is P.O. Box 1104, Mauldin, South Carolina, 29662.

Q Does your business phone differ from your home phone?

A No.

Q You are represented by an attorney here this morning.

MR. WHITEHEAD: Would the attorney please give his name and address for the record?

MR. LAWSON: It's Jack W. Lawson, Jr., Post Office Box 309, Florence, South Carolina, 29503.

MR. WHITEHEAD: Are you related to the deponent?

MR. LAWSON: Brother.

MR. WHITEHEAD: Brother of the deponent.

(Off the record.)

Q Mr. Lawson, I'm going to ask questions, and if at any time you don't understand a question, please let me know that fact so that I can rephrase it and you will understand it, but I will assume that when you

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2 give an answer to the question you have understood
3 the question.

4 A I can confer any time, can't I?

5 Q Conferences can be held, yes. Did you review any
6 documents in preparation for this deposition?

7 A No, sir.

8 Q Were you able to turn up any documents pursuant to
9 the subpoena?

10 A No, sir.

11 Q And you are here pursuant to subpoena of the Federal
12 Election Commission. Is that right?

13 A Well, I wouldn't have been here if I wasn't supposed
14 to be, that's for sure.

15 Q Have you discussed this deposition with anyone except
16 your brother, who is also your lawyer, prior to today's
17 testimony?

18 A No.

19 Q How long have you held your present position?

20 A I've been with U.S. Tobacco for four years or four
21 and a half years, and I've been a Division Manager
22 for two and a half years.

23 Q Prior to that where did you work?

24 A Robin's Men's Store.

25 Q Which one of the Robin's Men's Stores are we discussing?

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A I worked at the one in Columbia on Diamond Lane, and I managed the one in Anderson, South Carolina.

Q And that was Robin's Men's Store in Anderson, South Carolina?

A Right.

Q When did you work in the Columbia men's store? Do you recall?

A I worked on and off during Christmas when I was in school and during the summertime when I'd come home from school. I guess it started maybe in '76, and then I got a management job -- I can't remember exactly -- '80 or '81, something like that. I can't remember.

Q And this was in Anderson, South Carolina?

A This was in Anderson, right.

Q Who did you work for in Columbia?

A Ronnie Tuten. He was the manager of the store.

Q Speli that for me if you will.

A T-u-t-e-n, Ronnie Tuten.

Q Where did you go to school, Mr. Lawson?

A College of Charleston.

Q Is that the name of the college?

A It's the College of Charleston.

Q Were you employed by Robin's Men's Store in Anderson,

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South Carolina, in 1982?

A Yes, I guess so. I can't remember.

Q Well, we have records that indicate that you were---

A Okay. Well, then I was then.

Q ---employed back in 1981 and 1982. Was your employment as Manager of the Anderson, South Carolina, Robin's Store a fulltime employment?

A Yes, sir.

Q As distinguished from the part-time employment you did at the Columbia store?

A Yes, sir.

Q Who did you report to?

A Bobby Welch was the--- He was like general manager at the time.

Q Where was he located? Do you recall?

A He was in--- There was another store in Columbia. He was at the Dentsville store.

Q Dentsville?

A Right.

Q Did he make periodic trips over to Anderson, South Carolina?

A Sometimes he did. We usually would get together for meetings or whatever to buy or whatever during the course of the year, and we would have meetings then.

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2 Q Were you in telephone contact with Mr. Welch?

3 A Oh, every week, sure.

4 Q Every week?

5 A On Mondays.

6 Q Back in 1981-82--- Did you work for Robin's Men's
7 Store in Anderson, South Carolina, after 1982?

8 I'm trying to get the chronology because you went
9 to work---

10 A I can't remember. I guess I did because I think I
11 left in August, '82. I got hired by U.S. Tobacco
12 in August of '83, and I've been there four and a half
13 years.

14 Q So there was a year period in which you weren't
15 employed. Is that it?

16 A Right, yes, looking.

17 Q What were the reason for leaving Robin's?

18 A I just didn't think I had a future with the company,
19 and I was looking for something a little more stable
20 and -- not stable in terms of the company but stable
21 for myself, and my dad had been sick. He had a stroke,
22 and I wanted to get home and be close to him.

23 Q Can you tell me how you were paid back in 1981-82
24 by the Robin's Men's Store? Were you paid on a salary
25 basis?

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A Salary plus commission.

Q Could you explain that? What was your salary?

A I think it was around Two Fifty or Two Seventy-Five a week and then two percent--- The commission which was paid every month was a commission figure of two percent on the gross sales of that month -- of that prior month.

Q Did you receive bonuses as Manager of the Anderson store?

A At times.

Q What were those bonuses based on?

A Performance, I imagine.

Q Was there any written or oral criteria or did anybody tell you what the basis was for the bonuses?

A Well, we had goals, and if you reached your goals you would get a bonus, and, just like any business, I guess, that's a goal-oriented company, we worked the same way.

Q Did you get regular, periodic bonuses, such as Christmas bonuses?

A No, because generally the performance of the store wouldn't merit the bonus, and it was a performance type bonus system.

Q In April of 1982, according to the records we have

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received from the company itself, on April the 12th of 1982 you received a Fifteen Hundred Dollar bonus from Robin's of Anderson. Do you recall that particular bonus?

A Sure. Fifteen Hundred Dollars, I recall that all of the time.

Q Did you ever receive a bonus of that magnitude prior to that time or after that -- well, prior to that time? That's two questions.

A No, I didn't. I had never received one that high prior to that time, and the bonus was--- I think I had left in August of '82, and so I wouldn't have been eligible for a third quarter bonus.

Q On April 14 of 1982 records that we have in our possession indicate that you contributed A Thousand Dollars to the Tallon for Congress Committee. Was there any connection between the bonus that was paid, the Fifteen Hundred, and the Thousand Dollars?

A No, not at all. I think we were all -- we had all basically grew up with Robin, and it was like a family. We felt extremely close, and we wanted him to win the election. All of us did. We felt it would give a certain amount of esteem to the business and in the long run would help all of us.

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2 Q Did you write out a check for A Thousand Dollars to
3 Mr. Tallon or did you endorse over the check from
4 Robin?

5 A I can't---

6 MR. LAWSON: If you don't remember, just say
7 you don't remember.

8 A I just don't remember.

9 Q Did Mr. Robert Welch ever suggest to you that part
10 of your April bonus be used to cover a contribution
11 to the Tallon Committee?

12 A No, he never suggested it to us. I mean, it was---

13 Q Did he ever discuss it with you?

14 A No.

15 Q He never came to you and said anything about the
16 Tallon for Congress Committee's funds and need of
17 funds?

18 A No. That was a--- Our relationship--- My relation-
19 ship with Bobby was strictly clothing business, and
20 even though I was interested in politics just as an
21 outside observer, I realized what my position was
22 working in the store, and my position wasn't to worry
23 about politics; it was to worry about selling clothes.

24 Q We've had some testimony here today that indicates
25 that Mr. Welch talked to managers of the various

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2 Robin's department stores and suggested that there
3 might be some contributions to---

4 A He may have discussed it with me, but I don't recall
5 it. I mean, I don't remember a conversation where
6 he would have said that kind of -- made that kind of
7 statement.

8 Q Isn't it a fact that you somehow thought that you
9 endorsed your bonus check over to the Tallon for
10 Congress Committee?

11 A I'm not sure I understand the question.

12 Q Prior to this deposition it was indicated to us that
13 you have no records of anything pertaining to the
14 contribution to the Tallon for Congress Committee
15 but that your recollection was that you took the
16 bonus check and endorsed the back of it and sent it
17 over.

18 A Well, that's how I recall it. That would probably
19 have been the most expeditious way to do it, I guess,
20 but I don't remember exactly how I would have done it
21 or how I did it. Like I say, we wanted him to win
22 and I wanted to help him out any way I could.

23 Q So you can't recall any discussions had with Mr. Welch
24 in connection with the campaign contribution?

25 A Well, not that specifically. I talked with Bobby

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2 every week, and I don't know. That's a long time
3 ago. I don't remember any directives or specific
4 instructions or anything concerning that.

5 Q Anything that urged you to make a contribution?
6 Anything said by him that urged you to make a con-
7 tribution to---

8 A No. Like I say, I had just finished college and I
9 wanted to get something on my own. My dad had helped
10 some of our family get some jobs and helped them,
11 which all fathers do, and at that time I felt like
12 Robin had given me a chance and it was something
13 that was important to me, and I felt like if I
14 could help him in any small way this would be a way
15 to do it.

16 Q How did you determine the amount that you would give
17 to Mr. Tallon's campaign?

18 A Well, I just--- I mean, how do you ever determine?
19 I came to that figure, and it was a figure I could
20 live with economically, and so I did it.

21 Q Did anybody explain to you that you could give up to
22 A Thousand Dollars legally to Mr. Tallon's campaign?

23 A No. I mean, I--- No. I mean, no one had told me
24 that. I mean, it wasn't a--- It wasn't a forethought
25 type deal. It was just something that I wanted to do.

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2 I mean, I had made no -- I didn't make any -- I didn't
3 sit down and think what I could or could not do. I
4 just--- I could live with that figure.

5 Q Did anybody suggest a figure of A Thousand Dollars
6 to you?

7 A No, sir.

8 Q You never discussed it with anyone else connected
9 with any of the Robin's organizations? Ms. Hartnett
10 or Mr. Welch or---

11 A No, sir. First of all, I didn't know if anybody else
12 had gotten bonuses. I was kind of happy for our store
13 and I didn't want to rub it in or seem like I was
14 bragging or anything.

15 Q We took the testimony of Mr. Odom, who was the
16 Treasurer of the Tallon for Congress Committee back
17 in 1982 when these contributions were made. I asked
18 him questions in connection with whether or not he
19 had heard that there were Thousand Dollar bonuses
20 paid to employees in Tallon's men's stores which in
21 turn found their way into the Committee and indeed
22 were in the receipt books. After some testimony---

23 MR. WHITEHEAD: And I'll show it to you, Mr.
24 Lawson.

25 Q ---he said that sometime in '84 he heard from Mr.

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2 Jack Lawson, who was sharing space with him, that
3 Jack had told him, that is Mr. Odom, that Mark had
4 been, quote, "declared a bonus and then told to give
5 it to the Tallon campaign." Are you familiar with a
6 conversation with your brother in that regard?

7 A I wasn't there. I don't know what kind of conversation
8 they had. I don't think I ever discussed it with you,
9 did I, Jack?

10 MR. LAWSON: Not that I recall, but in 1984 I
11 didn't share space with Glenn Odom.

12 Q "He and I were sharing some office space," that was
13 his testimony.

14 MR LAWSON: I moved my office from his office
15 in 1981. We weren't even sharing space in '84.
16 I moved to my present location in '81.

17 Q So you don't recall telling your brother Jack that a
18 bonus had been declared and that it was to go to the
19 Tallon campaign.

20 A No. I may have told him that I got a bonus and I was
21 going to give some money to Robin, but I don't think
22 I ever discussed even how much I was going to give
23 or how much the bonus was. But, I mean, that could
24 have been over Sunday dinner at Mom and Daddy's.
25 I mean, we talk about everything over there. So it

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wasn't---

MR. LAWSON: In '84 you didn't work there anyway.

A No.

Q Well, I think the testimony indicates that it was in '84 that Odom had the conversation with Jack in which the so-called, quote, "declared a bonus" statement was made. So it's your testimony that you had no discussions whatsoever with Mr. Welch in connection with this---

A No, not with what you're talking about, I guess.

Q ---with the Thousand Dollar contribution or the Fifteen Hundred Dollar bonus.

A No, sir, I didn't. No, sir.

Q You had no conversations with him at all.

A No, sir, about that.

Q About that. And it's your testimony that no one ever discussed A Thousand Dollars as an appropriate contribution to the campaign.

A That's correct.

Q Not Mr. Welch.

A Not anybody.

Q Mr. Tallon? Did you talk to Mr. Tallon at all in connection with this?

A Never. The only time I'd see--- Well, the only time

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2 I think that I saw Robin was we had had a management
3 seminar here in town and we would all come down every
4 Tuesday to go through that, and Robin was in on that
5 seminar, and occasionally after the seminar we would
6 talk business, but it was strictly store business.
7 It wasn't any politics involved.

8 Q Do you know Cameron Minshew?

9 A Yes. That's Robin's sister, I believe.

10 Q Did she ever discuss--- Do you recall that she was
11 connected with the Campaign Committee in 1982?

12 A I didn't--- I figured she was probably helping Robin
13 as much as she could.

14 Q Did you ever work at the campaign headquarters?

15 A No, sir.

16 Q Did you do any work at all for the campaign?

17 A Well, I drove down to a party one night, but that
18 wasn't a lot of work.

19 Q You didn't stuff any envelopes or make phone calls?

20 A No.

21 Q Nothing of that nature?

22 A No, sir.

23 Q Did Ms. Minshew ever mention the contribution to the
24 campaign?

25 A Cameron and I did not--- Cameron and I did not have

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2 that type of relationship either. It was--- My
3 relationship with Robin's, Inc., was strictly with
4 Bobby Welch and the fact that I knew the people who
5 worked for Robin in the different stores and stuff,
6 but my direct supervisor was Bobby, and any conver-
7 sations I had concerning business, which is what it
8 was, were directed with Bobby. Occasionally I'd
9 call Cameron and ask her if I could buy something
10 because I think she kept all of the business things
11 there in Florence.

12 Q How about Lynn Harnett? Did you discuss anything in
13 connection with the contribution with Lynn Harnett?

14 A No, not at all. I knew her husband, Robert, and I
15 would talk to Robert only if I needed to get something
16 transferred from the Florence store to my store,
17 something that we were out of, but Lynn and my
18 relationship was strictly friendly, never any business.

19 Q And, again, you have no recollection of anything that
20 Mr. Welch may have said to you.

21 A Not at all.

22 Q Was it your idea, your idea only, to come up with
23 the Thousand Dollar contribution on the 14th of April
24 of 1982?

25 A Well, it was. I mean, I figured it would help, and

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2 I had the money and didn't really need it. Well,
3 I mean, not that I couldn't have used it, but,
4 I mean, just like I said before, we felt like -- or
5 I felt like that there would be a certain amount of
6 prestige involved with our stores, just like the
7 ones here in Columbia, like Lourie's. Senator
8 Lourie, doesn't he have something to do with those,
9 Jack? But it's a well-thought-of men's store here in
10 town, and I was just trying to do anything that I
11 could to--- Like I say, I guess it was a little bit
12 selfish on my part to think that in the long run maybe
13 it would help me out financially.

14 Q Would you have given a Thousand Dollar contribution
15 on the 14th of April if you had not received the
16 Fifteen Hundred Dollar bonus on the 12th of April?

17 A I don't know if I would have or not. I'd have probably
18 given something. I'd have given whatever I could.

19 Q What do you think that might have been?

20 A I don't know. It depends on what my tax liability was
21 on the 12th of April or whatever Daddy had figured out
22 I owed the Federal Government or whatever. But I'm
23 sure I would have given something.

24 Q Why April the 14th? Why not earlier? Why not later?
25 Why not earlier, for example?

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2 A I don't know.

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Q Why not May?

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A Why not January? I don't know.

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Q But there was no connection between the Fifteen
6 Hundred Dollar bonus and the Thousand Dollar contri-
7 bution that you made.

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7

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A Absolutely not.

9

Q Had you been approached for a contribution to the
10 campaign before this?

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11

A Never.

12

Q Did you give a contribution to the campaign after
13 this?

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14

A I don't think I did, no, sir.

15

Q How about the campaign in 1984?

16

A No, sir.

17

Q How about the campaign in 1986?

18

A No, sir. I mean, at the time I was working for
19 Robin. In '84 I was not working for Robin. In
20 '86 I wasn't working for Robin. So, like I said,
21 I think the contribution that I gave had some selfish
22 things on my part where, just like I said, I thought
23 that it may help our business in the long run -- or
24 my particular business in the long run.

24

25

Q And you have no recollection of a conversation with

1
2 your brother where you told him that you had been
3 declared a bonus and told to give it to the Tallon
4 campaign.

5 A I may have told Jack I got a bonus and that I was
6 going to give Robin -- I was going to make a donation
7 to the campaign, but I don't think -- I'm sure I
8 would never have told him that somebody sent me a
9 bonus and told me to send it back. That's not a
10 bonus.

11 Q Did anyone ever tell you during that period, March-
12 April of 1982, that the campaign was in need of
13 contributions?

14 A No, sir. Like I say, we never had any conversations
15 about politics. We wanted Robin to win, but any
16 conversations that I had with anybody that was employed
17 with Robin's, Inc., was strictly business. I mean,
18 it was clothing business, and we realized that,
19 whether Robin won or lost, we were still going to be
20 in the clothing business. So that was the bottom
21 line as far as any recollection that I would have
22 as far as conversations with anybody would have been
23 about the clothing business and about my business in
24 general -- or in particular.

25 Q Is it your testimony then that you never received any

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2 phone call or had a personal conversation with Mr.
3 Welch in which a campaign contribution of A Thousand
4 Dollars was discussed?

5 A That's correct that that never happened.

6 Q Do you know Jimmy Brown?

7 A Jimmy Brown? I don't believe so. Who is he? Should
8 I know him.

9 Q He's out of Florence, and he is a friend of Mr.
10 Tallon's and worked some with the campaign. Are you
11 familiar with the term seed money?

12 MR. LAWSON: That's using the term loosely, I
13 think at this point. Friend, I'm talking about.

14 Q Are you familiar with the term seed money?

15 A No, sir.

16 Q You don't know what that means?

17 A No, sir.

18 Q In starting up a business, have you ever heard the
19 term seed money?

20 A In starting up a business, I would assume that seed
21 money would be the money that you need to have to get
22 the business operational.

23 Q Did you ever hear the term seed money used in connection
24 with Mr. Tallon's campaign in 1982?

25 A No, sir. I had never heard seed money until five

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minutes ago.

Q Let's take a five or ten-minute break.

(Break.)

CROSS EXAMINATION BY

MR. LAWSON:

Q During the break we had a conversation. Is that correct?

A Yes.

Q Concerning any conversations that you may have had with Bobby Welch concerning campaign contributions?

A Yes.

Q Do you know of any particular instances where Bobby Welch contacted you concerning campaign contributions?

A No.

Q Is it possible that you were contacted concerning campaign contributions?

A It's possible. I just don't remember. I don't recall whether or not that ever came up or not.

Q So it's possible that Bobby Welch may have mentioned to you the fact that contributions were needed or necessary or expected, one way or the other?

A It's possible. I just don't remember.

REDIRECT EXAMINATION BY

MR. WHITEHEAD:

1
2 Q This question may have been asked, but let me ask
3 it again. Why in April of 1982 when you received
4 the bonus of Fifteen Hundred did you not give the
5 whole Fifteen Hundred to the campaign?

6 A Well, I didn't figure I could--- I didn't want to
7 give the entire bonus, and I felt like I could give
8 that amount and be comfortable with it.

9 Q Did you ever receive a bonus during your employ
10 with Robin's of Anderson, South Carolina---

11 A Did I ever---

12 Q Wait. Did you ever receive a bonus of such magnitude?
13 I may have asked that question, but let's ask it
14 again. Fifteen Hundred Dollars.

15 A No, sir.

16 Q Was it unusual for you to receive a bonus of Fifteen
17 Hundred Dollars in the two years that you worked with
18 them?

19 A Based on the size of the store that I worked at, I
20 would say that that was unusual because, like I said,
21 none had ever come before of that size.

22 Q Were you surprised when you received a bonus of
23 Fifteen Hundred Dollars?

24 A Yes, I'd say I was surprised because I didn't have
25 the total information available as to performance of

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1
2 the store. So the information that I had based on
3 the store that I worked was purely inventory type
4 deal, and I had sales figures available, but I didn't
5 have expense things that were considered whenever
6 they were giving bonuses.

7 Q But wasn't it normal practice for you to receive a
8 bonus in amounts that were not even amounts, such
9 as Fifteen Hundred Dollars, but rather odd amounts
10 that would go to pennies?

11 A The bonuses were based on the profit that that parti-
12 cular store showed, and it was a percentage figure
13 of that profit figure. So I guess, if I understand
14 your question correctly, sometimes they would work
15 out in even amounts and sometimes they wouldn't.

16 Q Well, the records that we have--- Strike the question.
17 Did you make any other contribution--- I may have
18 asked this. Let me ask it again. Did you make any
19 other contribution to the Tallon for Congress campaign
20 in that year, in 1982?

21 A No, sir.

22 Q You didn't make one, say, in October?

23 A No, sir.

24 Q Do you recall how you got your contribution to the
25 Campaign Committee in 1982? Was it by mail delivery or

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did somebody pick it up?

A I think I mailed it probably.

Q From Anderson?

A Yes, sir.

Q No one came down to Anderson or up to Anderson and picked up the check.

A No, sir, not that I recall. I'm pretty sure I mailed it.

Q And so you have no recollection of anybody urging you to make this contribution.

A No, sir.

Q After a Fifteen Hundred Dollar bonus on April 12 of 1982, you made a Thousand Dollar contribution to the campaign on April 14th. Is that correct?

A Yes, sir. I guess it was because I had it at that time. I had the money to contribute. So I guess that's why I did it then.

Q And you have no recollection of anybody by phone or in person urging you to make a contribution.

A No, sir, I don't recall.

Q I don't have any further questions at this time.

MR. LAWSON: I might could ask a couple that may clear a couple of things up.

MR. WHITEHEAD: Go ahead.

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REXCROSS EXAMINATION BY

MR. LAWSON:

Q Did you know that you could not contribute more than
A Thousand Dollars?

A I figured you could contribute whatever you wanted to.

Q Do you think it's possible you may have had a conver-
sation with someone such as your father or myself
as to what the legal contribution may have been?

A Possibly.

Q The bonus that was paid, were taxes withheld from
that bonus?

A I don't remember.

Q Would you have declared that as income?

A The bonus?

Q Yes.

A I'm sure it would have been claimed as income, wouldn't
it? I don't know.

Q Isn't it possible that you had a discussion with some-
one concerning how much you could give as a legal
contribution?

A Perhaps.

MR. WHITEHEAD: Well, anything is possible. I
think I asked him that question several ways
till Sunday and he said he didn't have any

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recollection of anybody discussing the legal limits or anything like that.

MR. LAWSON: The reason I say that is I tend to remember some conversation with my father over some Sunday dinner---

MR. WHITEHEAD: He doesn't.

MR. LAWSON: ---concerning contributions.

I think what you were asking was relating to someone from the Committee or someone from Robin's asking, but I thought maybe if he recalled having talked with his father--- Our father does taxes and worked with the South Carolina Tax Commission for thirty-five years.

MR. WHITEHEAD: Let me ask him that question.

REDIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Do you have any recollection of bringing the subject up with either your brother or your father?

A I may have. I just don't know if I did or not. We're talking about a long time ago.

Q I know, but the fact is that the law doesn't allow you to give over A Thousand Dollars to one campaign, the primary campaign in this instance. Yet you gave but One Thousand Dollars out of a Fifteen Hundred Dollar

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2 contribution. That's what we both are kind of driving
3 at. You even say you think that you could have given
4 as much as you wanted to. Where did you get the in-
5 formation?

6 A I'm sure I asked -- I would have probably asked Dad
7 or something. He was doing my finances for me, and
8 I told him I wanted to give something, and maybe he
9 said, "You can't give over this amount. It's against
10 the law to give over this amount."

11 Q It's a possibility, but you have no recollection of
12 that.

13 A No. In fact, Daddy probably knew, and he probably
14 said that, but I don't remember.

15 Q I don't have any further questions. I don't want to
16 close this deposition. I don't think we're going to do
17 it again, but for me to do it again I'd have to go
18 to the Commission and get another subpoena, and
19 usually that's just a time-consuming process. But
20 I don't think that it would be long before we're
21 able to do that.

22 MR. WHITEHEAD: Okay? Is that all right with
23 you?

24 MR. LAWSON: That we'll do another one?

25 MR. WHITEHEAD: No, I doubt it. I'm just leaving

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it open for the time-being.

DEPOSITION RECESSED.

(Signing reserved.)

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2 who shall retain the said deposition in his possession
3 and become custodian thereof until such time as it shall
4 be needed at trial.

5 I do further certify that I am not of counsel or
6 attorney for any of the parties to the said action nor
7 in any way interested in the event of the said cause.

8 IN WITNESS WHEREOF, I have hereunto set my hand and
9 official seal this 17th day of December, 1987.

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13 *Eric B. Gore*

14 Eric B. Gore

15 Notary Public for South Carolina

16 My Commission expires: 3/11/97.
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
)
Gary H. Slavens, et al.,)
)

DEPOSITION OF LYNN A. HARTNETT

Deposition of Lynn A. Hartnett, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 10:08 a.m., on Wednesday, December 9, 1987, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

APPEARANCES: Thomas J. Whitehead, Esquire,
 and Phillip L. Wise, Esquire,
 Assistant General Counsel,
 Federal Election Commission,
 Washington, D.C.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO, S.C. 29063

(803) 781-1400

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NOTION CONTENT

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STIPULATIONS

The reading and signing of the deposition by the deponent was waived by the deponent and counsel for the respective parties.

I N D E X

	Page
Direct Examination by Mr. Whitehead-----	3
Certificate of Notary Public-----	24

EXHIBITS

FEC Exhibit #1-----	5
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SF 404 PENNAD/CHRY MURPHY 47802 21040383608

WHEREUPON,

LYNN A. HARTNETT, HAVING BEEN DULY SWORN AND CAUTIONED TO SPEAK THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH, TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Would you give your name and spell it for the reporter, please?

A Yes. Lynn, L-y-n-n, middle initial A., Hartnett, H-a-r-t-n-e-t-t.

Q And your address, ma'am?

A 3706 Gentry, G-e-n-t-r-y, Drive in Florence, South Carolina.

Q And your home phone number?

A 669-8917.

Q Area Code is 803?

A Yes.

Q Could you give me the Zip Code, please?

A 29501.

Q Are you employed?

A Yes, I am.

Q Where are you employed?

A Robin's Ladies' Shop.

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Q Where is that located, please?

A In Florence.

Q What's the address?

A 2184 West Evans Street.

Q And the Zip Code?

A 29501.

Q And the phone number there?

A 665-1990, Area Code 803.

Q And you're not represented by an attorney here today.

A No, I'm not.

Q I'm going to point out to you that when I ask a question, if you do not understand the question, please so indicate to me so that I can rephrase it so that you do understand it.

A Yes.

Q If you answer the question, it is assumed, of course, that you did understand my question.

A Okay.

Q Do you understand that?

A I think I do.

Q Did you review any documents in preparation for this particular deposition?

A No, I did not. I do have receipts for contributions I made.

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Q Could we have those?

A Certainly.

Q That will be fine.

A This was just for the year of 1982. I didn't bring anything--- One of these receipts does not have Tallon for Congress on it, and I think that was the girl's mistake that wrote the receipt for it. I think it's the top one.

Q Okay.

MR. WHITEHEAD: We'll mark this for identification as FEC Exhibit 1.

FEC EXHIBIT #1 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

A May I ask a question?

Q Yes, ma'am.

A What am I in violation of? I don't really understand.

Q Let's go off the record.

(Off the record.)

Q Ms. Hartnett, my explanation to you of the reason for this hearing, is that sufficient for your needs?

A Yes, it is.

Q Thank you. Did you happen to look at any checks that pertained to the 1982 campaign?

A No, I did not.

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REPRODUCTION MURKIN
JUL 4 1982
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Q Do you have any checks?

A Well, I don't think I do. My bank statements go back five years and then my husband I destroy what is left. We did have these receipts with our tax returns, and that's how I---

Q I see. The receipts for the campaign contributions.

A Right.

Q Did you discuss this deposition with anyone prior to today? For example, your husband?

A Yes, my husband. I did.

Q Could you tell me what the discussion was about between you and your husband?

A Just generalities. It was really not pertaining to what I did. He just told me not to worry and just go and tell the truth and I wouldn't have to worry about anything. So that was all.

Q How long have you been employed by Robin's Ladies' Wear?

A Ten and a half years.

Q What is your position?

A I'm the Manager of the Ladies' Shop.

Q How many people work for you?

A At present there are five on the payroll, including myself.

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Q So there are four sales ladies?

A Yes.

Q Are they all ladies?

A All ladies, I hope.

Q Does your husband Robert--- He works for---

A He did up until September. He has just recently changed jobs. He worked there for nine years.

Q For whom?

A For Mr. Minshew in the men's shop, Robin's Men's Shop.

Q Where is he currently employed?

A WPDE Television Station. He's in marketing and advertising.

Q That is the Florence station?

A Yes.

Q And you've worked for the ladies' shop for nine years.

A Ten and a half.

Q Ten and a half, I'm sorry. Who is the owner of Robin's Ladies' Wear, Inc., to your knowledge?

A Robin Tallon.

Q Are there any other owners?

A I believe his mother may be a partial owner, Mary Tallon. She was in the past. I don't know if that has been changed. I wouldn't have any knowledge of

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that.

Q Are you paid by salary?

A I'm paid by salary and commissions and bonuses.

Q Can you explain the distinction between the three?

A Well, my salary is a weekly salary. It's like a draw, I guess you could say. And then I'm paid commissions and bonuses depending on the volume that's taken in within the month, quarter, and yearly sales.

Q What is the percentage?

A Well, it's not a set percentage. Sometimes I get three-quarters of a percent if we go over a certain amount. If we do, I get a half or one and a half percent. Sometimes my commissions are two percent, sometimes one percent. I don't make the decisions as to what it is.

Q Who does make those decisions?

A I think it's a corporate decision with Bobby Welch, Cameron Minshew, and I don't know if Robin has anything to do with it or not. Probably not now. But I think they discuss what percentages are paid out at what times of year they are paid out.

Q And what do you mean by bonus?

A If I do a certain amount of volume in a month, an increase of a month, they'll pay me a bonus. If I go

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out there and really get the business in and work hard, in addition to my salary and my commissions they'll give me an additional bonus.

Q So there are three kinds of levels by which you're paid.

A Yes.

Q What is the salary weekly?

A I can tell you what I clear. I clear Two Hundred and Forty Dollars a week. I think I make Three Hundred and Fifty Dollars a week salary.

Q Gross salary.

A Yes.

Q And you clear Two Hundred and Forty as net.

A Right, net.

Q Then there is a commission on sales.

A Right, depending on the volume.

Q And that's based on the volume of the sales.

A Right.

Q And then there is a bonus.

A And that is depending on what I've done for that period of time. It may not be a month. It may be four months; it may be six months. But other than Manager, I'm also the buyer and everything. I do all of it, and I guess this is kind of a way of them saying thank you.

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Q Do they set goals for increases of sales over a previous year?

A Yes, they do.

Q And are you paid bonuses on that? Is that one form?

A Sometimes we are. If it's a big increase we're paid.

Q Is that usually set in advance?

A Yes. As a matter of fact, I usually set the goals myself. I'll look over the previous year and set the goals.

Q Does the bonus extend to each of the four people who work for you?

A No. It's for managers only, but, there again, I pay -- well, the store pays commissions for sales, and sometimes there are Christmas bonuses given out and things like that.

Q So there are such things as Christmas bonuses.

A Not per se. They don't call it a Christmas bonus, but once in a while if an employee has done an outstanding job there will be a Christmas -- a little bit of extra money put in their pay pouch.

Q As FEC Exhibit 1, which is a photocopy of a receipt from the Tallon for Congress Committee dated May 4, 1982, you gave to the campaign some One Thousand Dollars in contributions. Is that correct?

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A That is right.

Q Could you tell us where the money came from which allowed you to--- Let me ask you what your average yearly salary is.

A It will vary, volume and bonuses, anywhere from Twenty-Eight Thousand a year to Thirty-Four Thousand a year.

Q Going back to that period in time, May the 4th, 1982, do you recall the source of the funds for that contribution?

A I don't, to be honest. I don't remember exactly why that was paid for me, but A Thousand Dollars was not the amount that I received. It was more than that.

Q You received from---

A From my corporation.

Q According to the records that we have from Robin's Ladies' Wear, Inc., on May the 4th of 1982 you were paid Fifteen Hundred Dollars as a bonus.

A Right. It was either one of my commissions or one of my quarterly bonuses.

Q Did you ever receive a quarterly bonus in that amount, Fifteen Hundred?

A It probably wasn't the same amount because I never have the same amount of business for any set period

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REC'D AND INDEXED
MAY 13 1982
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2 of time. I know it's confusing. I don't understand
3 it sometimes myself.

4 Q Well, most of the records that we have in our
5 possession indicate that what you received by way
6 of salary--- Well, actually not salary. This not
7 cover salary but bonuses and commissions.

8 A Right.

9 Q ---had been in odd amounts.

10 A Yes.

11 Q That is, amounts that net out in cents, in pennies,
12 whereas the only even dollar amount--- I take that
13 back. In November you got a Six Hundred and Fifty
14 Dollar even amount. But you received a Fifteen
15 Hundred Dollar check from Robin's Ladies' Wear, Inc.,
16 on May the 4th, 1982, and on May the 4th of 1982
17 there was A Thousand Dollars contributed to the Tallon
18 for Congress Committee. Was the Fifteen Hundred Dollars
19 utilized for the Thousand Dollar contribution?

20 A Of course, it was. I mean, that went into my bank
21 account, and part of that money would have had to
22 come out of the Fifteen Hundred Dollars, but I was not
23 under duress. They did not---

24 Q Well, was it suggested to you that---

25 A Suggested was not the term.

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Q What term was used?

A I knew that the campaign was underway and that funds were being solicited from the community, and the managers thought it might be a good idea to help out, and Robin pays us pretty well. Retail is not that easy, and his managers are looked after, and A Thousand Dollars wasn't at this time--- I had no children. We were married, and we lived well. It was not too much for me to give.

Q Did Mr. Welch mention to you in any way that---

A I didn't have to give it, no.

Q What did he suggest to you?

A He just told me that the others had talked about doing it and would I like to contribute, and he didn't give me an amount. That was my decision how much, if I wanted to do it, if I didn't want to do it.

Q When he said the others had discussed it, who were the others?

A Well, I guess the other managers at that time, and I can't name them all now.

Q Did you have discussions with those other managers?

A No. No, I didn't talk to anyone.

Q Only with Mr. Welch?

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A Only with Bobby, Mr. Welch.

Q Do you recall what he said?

A No, I really don't. I just remember that he said he was going to give "x" amount -- I don't know how much he gave -- and in that year if I thought I had any extra money, if I could give, please do, and that was the amount of the discussion. If I had not been able--- If I really needed the money, I wouldn't have given it.

Q Would you have been able to give A Thousand Dollars absent getting the Fifteen Hundred Dollar bonus check?

A I probably would have been able to, yes.

Q Probably. You had no definite knowledge of your checking account balance at that time?

A No, I really don't. Robert and I have never really been in financial trouble until we had our baby. We have a baby that's six months old, and now things are tight, but back then, no. We did what we wanted to do with our money and lived well.

Q Do you recall when the campaign got underway back then?

A Vaguely. I don't get involved with the political part of the business very much at all.

Q Did you visit campaign headquarters at all during the year of 1982?

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A I really don't remember. I did attend some fundraisers. Well, the whole time Robert and I both have attended fundraisers that we contributed to.

Q Did your husband contribute also?

A He has, yes, several times.

Q When Mr. Welch suggested to you that---

A No, don't say suggested. He just gave me the information that the others may give money and that if I could, please do.

Q And this was on the very same day that he gave you a check for Fifteen Hundred Dollars.

A Maybe he knew I had it and had it to give then, and so he wanted to make the---

Q But this was not an unusual check.

A No. I hope to have another one in a couple of weeks, probably even more than that amount. The Fifteen Hundred Dollar check was not unusual. I can't remember totals, but if you'll look back, there are some for Nine Hundred Dollars, Fourteen Hundred Dollars in the past. Ten years, I can't remember.

Q Do you recall how you delivered this particular contribution to the Tallon for Congress Committee?

A No, I don't. Sue Bass, she was working there. I don't. I probably took it up there myself.

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Q Do you recall where the campaign headquarters was located? If I told you West Evans, would that refresh your recollection?

A It was in an old house. I believe this was the time it was in an old house. I don't know the address. I could tell you exactly where the house is, but I don't know.

Q Was it close to the store?

A Not far. Maybe five or six blocks.

Q And it's your recollection that you walked over and---

A No. I would have driven.

Q You drove over and dropped the check off.

A Yes.

Q Did you take any other checks with you that day?

A No.

Q Going back into the April-May period of 1982, did anybody ever mention to you that the campaign was in need of funds?

A They wouldn't have said anything to me. I'm not that close with the political situation over there.

Q Do you recall ever hearing the term mentioned that the campaign needed seed money?

A No. I've never heard that term.

Q Did you take any active part in the campaign?

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A I conducted telephone banks. I collected contributions at a fundraiser at one point -- or name tags I think I wrote out. Stuffed envelopes, that type thing.

Q This was in 1982?

A I think so.

Q Did you do it again in 1984?

A I'm sure I did. I try to--- Things that I can do at the store and---

Q And in 1986 also?

A I'm sure I did.

(Off the record.)

Q Do you know Mr. Tallon well?

A Not extremely well.

Q Do you know him socially?

A Not in the last eight years, no.

Q No?

A No.

Q Why is that?

A Because when he began his political career he really left Florence and I don't see him.

Q Prior to that did you see him?

A He was involved with the stores then, and he would come to store functions, store parties, that type of thing, and I would see him. But the only time I see

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him now is at fundraisers or that type of thing.

Q Do you know an individual by the name of Jimmy Brown?

A I've met him.

Q Where have you met him?

A I met him when he was on the campaign staff.

Q When was this?

A Back, I believe, in--- Was it in '82, that election?

My memory is not that good.

Q Well, that's all right. That's a long time ago.

A Yes.

Q Did you ever discuss the campaign with Mr. Brown?

A We didn't -- have never discussed anything. I just knew Mr. Brown, and I knew his wife. She shopped in the store a few times during that period.

Q Have you seen Mr. Brown since the '82 campaign?

A No.

Q Going back to the conversations held by and between the store managers, could you tell me a little bit about that, in connection with the Thousand Dollar contribution?

A I didn't--- I did not speak to any of the other managers about it. I just spoke with Mr. Welch, and he indicated that some of them would give money, and he didn't tell me how much or when or anything.

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Q Who were the names he mentioned?

A He didn't mention names. He just said "the others."

Q Meaning to your knowledge---

A Managers.

Q ---store managers?

A Yes.

Q Not store employees other than managers.

A Well, I didn't take it meaning that, but I don't know what conversations he had with the other employees. It did not go through me. I did not---

Q Did he have this conversation with you in person?

A No. I believe it was on the telephone, I believe.

Q But he called you.

A Now, that I don't remember. I don't remember if he called me or we were talking about store business or some other matter. I don't recall that because we did talk back then. Now that he's with Lemaster's we don't have the occasion to talk as much, but we were on the phone four and five times a week about different matters. I don't remember that.

Q To your knowledge, what's his role with Lemaster's at the present time?

A He's the Manager of Lemaster's at Myrtle Beach as far as I know.

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Q Do you have any connection with that at all, Lemaster's and Robin's Ladies' Wear, at the present time?

A Only that Robin Tallon owns both, that's all.

Q Is Mr. Welch in charge of--- Well, first of all, let's start with 1982. Was Mr. Welch in charge of all of the Robin's and Lemaster's operations?

A I don't think he was then. At some point in time Robin resigned as president of the company and Bobby took over, but I don't know when that was.

Q Even while Mr. Tallon was the president of the companies, what was Mr. Welch's role at that point?

A He was Manager of I believe then one of the Columbia stores, and he had been with Robin the longest. Mr. Harris, Jerry Harris, I think worked for Robin about the same amount of time, but Bobby kind of knew the ropes better than anyone else, and he was like our ringleader, I guess, so to speak.

Q So he took over the general manager's role?

A I don't know when. I don't remember the year that he did that, but he did become general manager at some point in time.

Q Replacing Mr. Tallon.

A Yes, but I don't think it was in 1982. I think it was in later years.

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Q 1983 perhaps?

A Or even later than that. I really don't remember.

Q Have you contributed to the--- Did I ask this question? I'm not sure. Have you contributed to Mr. Tallon's campaign in 1984?

A I know I did. I have contributed--- I didn't look up receipts, but I have contributed with every campaign.

Q How much did you contribute in 1984?

A I don't know.

Q Was it the Thousand as it was in 1982?

A No, I don't think it was, but I can't give you a total now. I don't know.

Q How about in 1986, which is closer in time?

A I really don't remember.

Q Was it as much as A Thousand?

A Not in one lump check, but maybe possibly a total. I just don't know.

Q So you've contributed to him in each of his campaigns, the '82, '84, and '86 campaigns.

A Yes, and also when he--- Well, that was the House of Representatives in '82.

Q Yes.

A Okay.

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MR. WHITEHEAD: Have you got any questions, Phil?

MR. WISE: No, I don't have anything.

Q Okay, Ms. Hartnett. I'm not going to close this deposition. I'm going to hold it open for an unlimited time period. You have the right to see what the reporter puts down in print and make corrections.

A All right.

Q Minor corrections, not changing an entire answer.

A All right.

Q Or you can waive signature, which means nothing more than you just allow him to go ahead and type it up and attest to the fact that he took the deposition and did all of that. But I would leave that up to you. If you want to waive signature, it's fine. If you want to wait and---

A Waiting, is that today?

Q No, no, you won't get it today. No. He's got to take it back and---

A I would rather read it before I---

Q All right, let's hold off on that.

A Okay.

Q Okay, thank you.

(Off the record.)

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A Okay. Well, I wouldn't change anything I've said.
If most people waive it, that will be all right.

DEPOSITION RECESSED.

(Signing waived.)

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Commission, 999 E Street, N.W., Washington, D.C., 20463,
who shall retain the said deposition in his possession and
become custodian thereof until such time as it shall be
needed at trial.

I do further certify that I am not of counsel or
attorney for any of the parties to the said action nor in
any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and
official seal this 16th day of December, 1987.

Eric B. Gore
Eric B. Gore

Notary Public for South Carolina
My Commission expires: 3/11/97.

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CASH RECEIPT Date 9-15-1982 031855

Received From Robert E. Hartnett

Address 1150 Pinckney Ave
Florence, S.C. 29501 Dollars \$ 20.00

For Twenty & 00/100

ACCOUNT		HOW PAID	
AMT OF ACCOUNT		CASH	
AMT PAID		CHECK	<input checked="" type="checkbox"/>
BALANCE DUE		MONEY ORDER	

By PC
C Collins

CASH RECEIPT Date May 4 1982 93800

Received From Lizan Hartnett

Address 1150 Pinckney Ave
Florence Dollars \$ 1000.00

For Donation for Congress

ACCOUNT		HOW PAID	
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AMT PAID		CHECK	<input checked="" type="checkbox"/>
BALANCE DUE		MONEY ORDER	

By Lizan Bass

EXHIBIT
#1 FEC
EBM

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
)
Gary H. Slavens, et al.,)
)

DEPOSITION OF JAMES AUSTIN BROWN, JR.

Deposition of James Austin Brown, Jr., taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 3:17 p.m., on Thursday, December 10, 1987, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

APPEARANCES:

Thomas H. Whitehead, Esquire, and
Phillip L. Wise, Esquire,
Assistant General Counsel,
Federal Election Commission,
Washington, D.C.

Rodney C. Jernigan, Esquire,
Attorney for Deponent.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P O BOX 51 • IRMO, SC 29063

(803) 781-1400

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STIPULATIONS

The reading and signing of the deposition
by the deponent is reserved.

I N D E X

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Direct Examination by Mr. Whitehead-----	3
Cross Examination by Mr. Jernigan-----	35
Signature of Deponent-----	38
Certificate of Notary Public-----	39

EXHIBITS

(There are no exhibits to the deposition.)

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WHEREUPON,

JAMES AUSTIN BROWN, JR., HAVING BEEN DULY
SWORN AND CAUTIONED TO SPEAK THE TRUTH,
THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH,
TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WHITEHEAD:

Q Could you state your name and spell your last name
for the court reporter, please?

A Okay. The name as you have it there or my actual name?

Q Your full name.

A James Austin Brown, Jr., nickname Jimmy, B-r-o-w-n.

Q Your home address?

A Home address, 702 McKiethen Road, Florence, South
Carolina, 29501.

Q Your home phone?

A 803-665-9449.

Q What is your occupation?

A I'm a consultant. I'm a management consultant.

Q Say that again. I'm sorry.

A A management consultant.

Q What is your business address and phone number?

A 181 East Evans Street, Suite 207, Florence, South
Carolina, 29501. Phone Number, 803-667-1836.

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Q And you're represented here by your attorney.

MR. WHITEHEAD: I'd ask the attorney to identify himself.

MR. JERNIGAN: My name is Rodney C. Jernigan, Jr., and I'm an attorney from Florence, South Carolina.

Q Let me first start off by saying that I'm going to ask questions of you. If you don't understand any of the questions, please ask me to rephrase them so that you do understand.

A Sure.

Q If you do answer the question, I'm assuming that you understood the question as posed. Do you understand that?

A Sure.

Q Have you been in a deposition at any point before?

A No, sir, I haven't. This is new to me, and I'm a little nervous about it, to be honest with you.

Q Well, everybody is when they're having a deposition taken. Did you review any documents in preparation for this deposition?

A We did two things. I reviewed the statement that we sent you that you had to furnish me with a copy of, and I researched, trying to locate some cancelled

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2 checks of donations I had made to the Tallon Campaign,
3 I found out through FEC reports how much I had donated
4 and all, but I was unable to locate the cancelled
5 checks, and the bank was going to charge like Fifteen
6 Dollars an hour for me to research me, and, frankly,
7 unless it was an absolute emergency, I didn't want
8 to pay them to do that.

9 Q Well, we have the records from the FEC. We don't
10 have to really concern ourselves with---

11 A The FEC report is accurate.

12 MR. JERNIGAN: I believe I had indicated that
13 I believe to Mr. Wise that we would assist you
14 in getting those checks but we weren't going to
15 pay Fifteen Dollars an hour to the bank to try
16 to find them.

17 A But the FEC reports are accurate to my knowledge of
18 all the money I gave to the campaign. They were
19 accurate.

20 Q With the exception of Counsel, did you discuss this
21 deposition with anyone prior to today?

22 A This deposition? No, sir.

23 MR. WHITEHEAD: Let me start off with a state-
24 ment for the record since it's of some concern
25 to the witness. Mr. Brown's name came to my

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2 attention during the course of this investigation
3 of MUR 2071 through Mr. Gary Slavens. Mr.
4 Brown's name was given to me by Mr. Slavens as
5 someone who could confirm some of the information
6 that Mr. Slavens himself had provided. That was
7 the reason for my contacting Mr. Brown. Mr.
8 Brown did not contact me originally. Is that
9 sufficient for your needs?

10 MR. JERNIGAN: Yes, sir, and that any contacts
11 he had with your agency was following either a
12 conversation with you or request from you for
13 information.

14 MR. WHITEHEAD: Absolutely. There was nothing
15 that didn't come as a result of Mr. Slavens
16 telling me to contact Mr. Brown.

17 A Thank you.

18 MR. JERNIGAN: Thank you, sir.

19 A Thank you very much.

20 Q Are you here on a subpoena today?

21 A Yes, sir, I am.

22 Q Do you know Representative Robin Tallon of the Sixth
23 Congressional District of South Carolina?

24 A Yes, sir, I do.

25 Q How long have you known him?

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A I've known him for seven or eight years. I met him back when he first ran for the State House of Representatives in, oh, '81, '82, '80, somewhere in that timeframe. I think it was 1980, as a matter of fact. I believe it was 1980 that I met him.

Q How did you happen to meet Mr. Tallon?

A We had several mutual friends, and I'm not really sure. We just sort of got to know each other over a period of time. I think Gary Slavens was one of those mutual friends, if I'm not mistaken, and I met him at that time, and he became involved in politics at that time when he ran for the State House, and I just saw him around and got to know him pretty well.

Q Did you assist him in his campaign for the State House?

A No, sir, I did not.

Q Was it the State Senate or House of Representatives?

A State House. No, sir, I did not.

Q Would you describe your relationship with him as social?

A Yes, sir. Yes, sir, I think that's probably a fair assessment of it.

Q Have you engaged in any business activity with Congressman Tallon?

A No, sir, I have not.

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Q Have you ever been employed at any of Mr. Tallon's various men's stores?

A No, sir, I have not.

Q Have you ever done any business for Mr. Tallon through his men's stores and ladies' stores, business dealings of any kind?

A I may have shopped there years ago. As a matter of fact, I still currently shop at LeMasters at the Florence Mall.

Q So it's only as a customer?

A As a customer, but I never see him in those dealings.

Q In 1982 were you employed by the Tallon Campaign Committee?

A No, sir.

Q Did you work for the campaign as a volunteer?

A Yes, sir, I did.

Q What did you do as a volunteer for the Tallon for Congress Campaign Committee?

A Well, that's a good question. We--- Like a jack-of-all trades, you know. If we needed to have an organizational meeting in a county, we would go in and talk to different people in the county and try to set up an organization there and build it. I rode around with Robin frequently during the campaign.

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2 Q So when you use "we," you mean Robin Tallon and your-
3 self. Is that it?
4 A Or other people, his campaign manager or---
5 Q Who would that have been at that time?
6 A Cam Chesson would have been the guy's name, and
7 another guy named Russ Rosen.
8 Q Chesson is spelled C-h-e-s-s-o-n?
9 A That's right. He's from Virginia.
10 Q Did you serve as a volunteer on any regular basis;
11 that is, regular in the sense of hours and days?
12 A No. No, no, no. On an as-needed basis, and more
13 and more frequently toward the time of the election.
14 Q Do you recall when you first started as a volunteer
15 with the Committee?
16 A Yes, I do.
17 Q When was that?
18 A April 1st, 1982, because that was the day that Robin
19 announced, and he had no formal staff, and several of
20 us accompanied him around the district for him to make
21 his announcement for Congress.
22 Q Who were those several others besides yourself?
23 A There was a guy named Henry. I do not remember his
24 last name. He was sort of like a speechwriter, an
25 intellectual type. He did a lot of speechwriting.

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2 And I believe Jeff Lee was one of the individuals,
3 and I can't really remember the other. There were
4 four of us in the car, but I really can't remember
5 exactly who they were. We went to Myrtle Beach,
6 Dillon, and back to Florence that day, and that
7 was the day he officially became a candidate.

8 Q Did you play any role in urging him to run for Congress?

9 A Yes, sir, I did.

10 Q Could you explain?

11 A That's a long story. We had a problem in the district.
12 We had a Republican. Well, that's not the problem.
13 We had a Republican Congressman, and there was some
14 concern around Democratic Party circles as to who
15 the potential Democratic nominee could be. Robin had
16 already decided that he wasn't going to run, but then
17 reapportionment redrew his House districts into a
18 district where he would have run against another
19 incumbent House member in the State House, and the
20 other opponent, Mr. Harwell, who was going to run
21 in the Congressional campaign, was having some
22 difficulty of his own, and we went to Robin and asked
23 him to reassess it, myself, Jeff Lee, several of us,
24 and he reluctantly did so. And then in March he made
25 it clear that he planned to become a candidate.

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Q But he officially announced on April 1st of 1982?

A April 1st, yes.

Q And you were with him?

A I was with him when he announced, yes, sir.

Q Throughout the Congressional district and in the various counties?

A Yes, sir.

Q How many counties is that district composed of? Do you know offhand?

A Nine and a half.

Q Nine and a half counties, okay. Do you know Cameron Minshew?

A Yes, sir, I do.

Q How long have you known her?

A About eight years.

Q She's the sister of Robin Tallon. Is that correct?

A Yes, sir, that's correct.

Q Was she one of the individuals who accompanied her brother around the district when he announced?

A No, sir, she did not. She stayed at the men's store and ran that. She ran the Tallon Sales part, which are the rear offices of the men's store. She primarily concerned herself with that. She and her husband made it pretty clear that they would do what was asked of

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2 them but their primary concern was the business.

3 Q Did she ever serve in an official capacity for the
4 Campaign Committee?

5 A No, sir, she did not, not that I know of, but I never
6 saw an organizational chart or anything like that.
7 But to my knowledge she was not. I don't even
8 remember who was chairman of the Committee at this
9 particular point in time.

10 Q Where was campaign headquarters located?

11 A It was on--- It was on Evans Street, right there
12 where Tel-Man Corporation is now. Do you know where
13 I'm talking about?

14 (Off the record.)

15 A It's on Evans Street, right there where--- Do you
16 know where Century 21 used to be and they moved and
17 there's a street and a vacant lot and that house,
18 that brown house there? I don't know the exact
19 address, but it was on West Evans Street.

20 Q It was located in a house?

21 A In a house, yes, sir.

22 Q Was that the campaign headquarters throughout the
23 campaign to your knowledge? Did it ever move? I
24 guess that's what I'm asking.

25 A To my knowledge it never moved that year.

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Q You state that you served on a volunteer basis for the campaign. How often did you---

A I was probably in and out of there every day, every other day, something like that.

Q Okay, every day, every other day. How much time on an average?

A Probably ten or fifteen hours a week. I never really stayed long. But near the election it was considerably more time than that.

Q Do you know an individual by the name of Sue Bass?

A Yes, sir. She was the bookkeeper for the Tallon Re-Election Committee at that point during the campaign, and then there was later a switch. She moved or something.

Q When you say the Tallon Re-Election Committee, do you mean Tallon for Congress Committee?

A Yes, Tallon for Congress Committee because he wasn't elected then. I'm sorry. Yes, that's right. Yes, sir. I'm sorry.

Q Did you see Cameron Minshew at headquarters on many occasions when you would go there?

A Yes, sir, she dropped in and out. Yes, sir, she did. She dropped in and out from time-to-time.

Q Would you say that she was there as much as you or

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less than you?

A Less than me. I'd say less than me, but she was there when she was needed.

Q Five or ten hours a week, that kind of thing?

A Probably at the most, yes, sir.

Q How about Sue Bass? Was she there on a fulltime basis?

A She was--- I'll be honest with you. She was there. I don't know really know much. I don't really remember how often Sue was there, but she was in and out a good bit or she was there when I was there. But I don't know what kind of hours she was keeping or anything like that. I don't know.

Q What type of duties did you have as a volunteer? I think I might have asked that question, but I'm not clear on the answer.

A If there was going to be an event in Marion, like a barbecue or something in Marion, for example, we would -- I would assist in making phone calls over there and getting people to attend, whether it be selling barbecue tickets or just getting a crowd together. We'd make some phone calls, whether it be phone banks or just calls to individuals that we knew that lived throughout the district, asking them,

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1 "Please vote for Robin or assist us in some way."

2
3 And I attended a lot of functions and tried to generate
4 crowds of people to attend those functions who were
5 supportive of Robin, the best I can remember.

6 Q Do you have any other individuals that you could tell
7 us who did similar duties as volunteers then?

8 Well, let me ask some names.

9 A I don't know. It's been so long, I probably---

10 Q Sure. I understand we're talking about 1982. Do you
11 know Robert Welch or Bobby Welch?

12 A Yes, sir, I do.

13 Q How long have you known him?

14 A I met him during that period of time, during the
15 campaign. He was a manager or president or something
16 with Robin's Stores.

17 Q He was connected with the stores?

18 A And a very pleasant individual, yes. I remember him.

19 Q Did he serve as a volunteer with you on the campaign?

20 A He did do a lot of volunteer work from time-to-time.

21 I remember seeing him down there, particularly at
22 night and particularly the couple of nights before
23 the election. He was down there, real active, putting
24 signs up and that type of thing. He was real enthusiastic
25 about it. But I do remember Bobby.

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Q Did you know him prior to 1982?

A No, sir, I did not.

Q To your knowledge, was he paid as a campaign worker or was he a volunteer also?

A I'm pretty sure Bobby was a volunteer. His boss was running for Congress, and so I guess he was. He was enthused about it.

Q Do you know Lynn Hartnett?

A Yes, sir. She's a lady that works in Robin's Ladies' Shop. I never saw Lynn involved in the campaign at all.

Q How long have you known her?

A I've probably known her for ten years or so.

Q So you knew her prior to the campaign?

A I knew she and her husband prior to that. I went to school with her husband.

Q So you know her husband, Robert Hartnett.

A I've known Robert since '75, something like that.

Q Where did you go to school, by the way?

A Francis Marion College there in Florence.

Q Were you born and brought up in Florence?

A I was born and raised in Marion, which is about twenty miles away. So it wasn't that far.

A Was Robert Harnett connected in any way with the 1982 Tallon Campaign Committee?

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2 A No, sir. He and Lynn may have attended some functions,
3 like some cookouts or something like that, but I never
4 saw either one of them to my knowledge at the campaign
5 office.

6 Q Do you know Jerry Harris?

7 A Yes, sir, I do.

8 Q How long have you known him?

9 A I've probably known Jerry longer than--- I've probably
10 know him since about '73 or '74. I met him down at
11 Myrtle Beach through some mutual friends, and I've
12 known him a good while.

13 Q Was he connected in any way to your knowledge with
14 the Campaign Committee?

15 A Not that I know of. I don't ever remember seeing
16 Jerry in the office up there.

17 Q Do you know his wife, Jane Harris?

18 A I've met her before, yes, sir, but I wouldn't know
19 her if she walked in.

20 Q So you've never seen her at the 1982 Tallon Campaign
21 Committee headquarters?

22 A Not that I recall, no, sir.

23 Q How about Roland or Butch Minshew? Do you know him?

24 A Yes, sir. That's Robin's brother-in-law, and in-
25 frequently you would see him in the campaign office.

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2 Not as much as you would say his wife, but you would
3 Butch in there from time-to-time. The biggest thing
4 I remember--- Butch's biggest involvement was the
5 night before the election he supervised putting the
6 campaign signs up around the polling places and that
7 type of thing.

8 Q How long have you known him?

9 A About seven years, eight years, something like that.

10 Q Since the campaign?

11 A Since the campaign, yes, sir. I met most of these
12 people during the course of the campaign.

13 Q How about Mark Lawson? Do you know Mark Lawson?

14 A No, sir. Until I read his name in the State newspaper
15 article, I had never heard of the gentleman.

16 Q Did the Tallon Campaign Committee only maintain the
17 one location or did they have others?

18 A There's a possibility that they may have opened
19 satellite offices up in places like Kingstree or
20 Myrtle Beach. I never visited those places, and I'm
21 not positive they did, but it seems like I do vaguely
22 recall some discussion about some satellite offices.
23 But I'm not positive.

24 Q Congressman Tallon announced on April 1st of 1982.

25 Were you familiar in any way with the financial condition

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2 of the Committee in and around that period of time,
3 late March/early April?

4 A Yes, sir. There was a need to raise some money.
5 I mean, in the situation where any candidate announces
6 for something like that the first time, there was a
7 major effort undertaken to raise money and get commit-
8 ments for money.

9 Q Were you in on the discussions? Who did you have
10 discussions with about that?

11 A Well, sir, I wasn't involved in any of the discussions.
12 I guess the campaign finances people were, but it was
13 just generally known that if we knew anybody who would
14 be willing to donate or something like that, how about
15 give them a call or give their name to Robin and he
16 would call them, that type of thing, which we tried
17 to do in some cases.

18 Q Do you recall having a telephone conversation with me
19 on May the 21st, 1982, which I initiated by calling
20 you?

21 A Yes, sir, I do. I do, and we discussed this, and we
22 discussed---

23 MR. JERNIGAN: Excuse me. You said 1982?

24 Q I'm sorry, 1986. I'm sorry, 1986.

25 A Yes, sir, I do recall that. I'm confused, too, with

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2 all of the dates.

3 Q All right, I'll rephrase the question. We'll strike
4 the question. Do you recall having a telephone conver-
5 sation with me on May the 21st, 1986, while I was in
6 Columbia, South Carolina, a telephone conversation
7 which I initiated by calling you?

8 A Yes, sir, I do remember you calling, and I returned
9 your call.

10 Q Do you recall the substance of that conversation?

11 A Yes, sir, I do. Do you want me to elaborate?

12 Q Do you recall telling me that in early April, 1982,
13 when so-called seed money -- that's s-e-e-d --
14 was needed for the campaign that there were One
15 Thousand Dollar bonuses paid to employees of Tallon's
16 Men's Stores which were in turn converted into
17 contributions for the campaign?

18 A Yes, sir, we did discuss that, and I did not have
19 any direct knowledge of it. I never witnessed it.

20 Q Do you recall telling me that the following people
21 were those who were given the bonuses? And I'm
22 going to refer to seven people. I'll name them off.
23 Robert "Bobby" Welch; Robert Harnett; Lynn Harnett;
24 Jerry Harris; Jane Harris; Roland Minshew; and Mark
25 Lawson.

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2 A Well, I don't know about Mark Lawson because I never
3 knew him until I read his name in the paper. To be
4 honest with you, I'm not positive. A lot of the
5 names were bounced off of me by Mr. Slavens, and he
6 said that these were the people that did it, and I
7 may have repeated to you the people that he said.
8 I never spoke to any of those individuals about doing
9 that, and I never saw the checks. Now, that's not to
10 say that it wasn't done. I just did not witness it.

11 Q Did you not relate to me that these bonuses were openly
12 discussed at the campaign headquarters?

13 A Yes, sir, and there was a discussion about it, yes,
14 sir, there was. It was not a meeting. It was just
15 a discussion which I was not consulted on or anything
16 like that. I just happened to overhear it, like
17 we were in this room and people came in and they dis-
18 cussed it.

19 Q Do you recall telling me that two of the individuals
20 who were involved in that discussion were Sue Bass and
21 Cameron Minshew?

22 A They were two of the individuals in the room at that
23 time, yes, sir.

24 Q Can you tell me what the substance of the conversation
25 was in that room with Sue Bass in attendance and Cameron

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2 course of that conversation considered this to be
3 illegal, that is bonuses to employees to---

4 A No. No one in the room at the time related it. I
5 never heard it discussed. I didn't know it was illegal.
6 I don't think anybody there was aware that it was
7 potentially a violation. It was only subsequent to
8 that when other people brought it to my attention
9 and pointed it out to me that this was a violation
10 and I had some knowledge of it and that I had better
11 tell you that I did.

12 Q So what you related to me is what you actually over-
13 heard.

14 A That's what actually I overheard, yes, sir. That is
15 accurate as to what I overheard.

16 Q Do you have any date that that might have occurred?
17 We're talking about early April, aren't we?

18 A It was in early April. No, sir, I can't---

19 Q First week in April perhaps?

20 A I'd say in the first fifteen or twenty days of April,
21 but that's about as specific as I can be. I really
22 think it was about the first week of April, but I'd
23 hate to say something that wasn't accurate.

24 Q But Sue Bass and Cameron Minshew definitely were
25 involved in these conversations.

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A To the best of my recollection, yes, sir. Like I said,
3 it was a long time ago, but seems like I remember---

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Q Was Bobby Welch involved in these conversations?

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6

A I don't remember him being in the office at the time.
I don't remember him being in the office at the time,
7 no, sir, but he could have been. I just do not
8 remember seeing him in there.

7

8

9

Q How about Robert Hartnett?

10

A No, sir.

11

Q Lynn Hartnett?

12

A No, sir.

13

Q Jerry Harris?

14

A No, sir.

15

Q Jane Harris?

16

A No, sir.

17

Q Roland Minshew?

18

A No, sir.

19

Q So is it your testimony then that these names that I
20 mentioned as having been given the bonuses came to your
21 attention in some other way than the conversation you
22 overheard in the campaign headquarters?

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A It's hard for me to answer. It could have been a
24 combination of the two. To be honest with you, there's
25 been a lot of back-and-forth on this thing, threats

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2 made, "So-and-so is going to go tell so-and-so," and
3 this type of thing, and I was in the middle of it.
4 In other words, I had--- For example, we'll use
5 Mr. Slavens as an example. He was telling me that
6 this and that were true, and the other side was
7 saying, no, this and that and the other were true,
8 and it's hard for me to distinguish. To the best of
9 my knowledge, I was sitting there and there was dis-
10 cussion about bonuses and contributions from employees
11 to the campaign. I don't know which ones did it.
12 I think I made mention to you in that conversation
13 the only way I'd know that for sure would be to look at
14 the FEC report and see who gave on the FEC report
15 because I had no knowledge of the checks back and
16 forth. But it's hard for me to say who contributed
17 and who didn't. I can only say as to who was in
18 the -- I'm pretty sure who was in the office that day.

19 Q Who was in the office?

20 A Well, that it was Cameron and Sue.

21 Q Anyone else?

22 A Not that I can recall. And there were other people
23 in the room, but they were in and out. A campaign
24 office is sort of a busy place, a lot of traffic, and
25 I think I was sitting over there reading the newspaper.

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2 to tell you the truth, and it was a good place to go
3 read the paper. They've got four or five subscriptions
4 in there, and you can kind of flip through it.
5 Nobody ever turned to me and said, "What do you think
6 of this idea?," or anything like that. I wasn't
7 consulted on it at all.

8 Q Was the conversation between Sue Bass and Cameron
9 Minsheu in which the so-called bonuses --- the
10 bonuses for contributions, if I can characterize it
11 that way, discussion was had?

12 A To the best of my recollection, it was, but there's
13 a possibility that I could have misconstrued what I
14 heard, and I would like to be fair about the thing
15 and give everybody the benefit of the doubt. I know
16 what I thought I heard, but I could have been mistaken.
17 That's a possibility.

18 Q But you're fairly clear that they were talking about
19 bonuses?

20 A They were talking about that and they were talking
21 about---

22 Q Let me finish my question. They were talking about
23 bonuses and bonuses being used as contributions.

24 A Well, yes, sir. Yes, sir. I mean, I didn't hear
25 them say, "We're going to do A, B, C, and D," but it

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2 was like, "The employees are getting bonuses, and
3 we will be getting those contributions," something
4 to that effect. Then over the years I've had people
5 clarify to me what the meaning of that was.

6 Q You mentioned threats. What were these threats?

7 A There's a running dispute between Gary Slavens and
8 Robin Tallon. Gary was hired as a staff person for
9 Tallon when he went to Washington. It turned into a
10 very negative, ugly situation. Robin called me up
11 one day and he said, "I'm firing the guy," and so
12 on. And so when Gary came home Gary was very bitter.
13 He was embarrassed. He had been humiliated, and I
14 could understand a little bit of how he felt. He
15 had given up a Presidential appointment to come home
16 to work on Robin's campaign, and I felt like if he
17 and Robin had a problem potentially there may have
18 been a better way to handle it than that. But he
19 came home and he was very bitter. He made threats
20 to Robin. Robin made them back to him. And it went
21 on for a couple of years, and I suppose somewhere in
22 there is where you gentlemen became involved in it.
23 Gary alleged all types of illegal activity, which you
24 and I discussed in our conversation, and I told you
25 the only knowledge I had of it was what I knew from

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2 Gary.

3 Q Aside from what you've testified to.

4 A Aside from what I've testified to here, yes. And I
5 just want to be cautious in that I don't want Gary's
6 opinion of what was done or Robin's opinion of what
7 was done to color my comments. I feel like that I
8 was there and that was discussed, and, like I told
9 you, whether it was ever done or not I have no know-
10 ledge.

11 Q Were there any threats made to you?

12 A Well, I was threatened with civil action by individuals,
13 and I don't know who. Nobody ever said names. Is
14 it okay to say that?

15 MR. JERNIGAN: Yes.

16 A I was threatened with civil action because they said
17 that I was -- that I filed all of these charges and
18 brought all of this on them and I wasn't telling the
19 truth about it and they were going to take civil action
20 against me for getting the FEC on top of them like
21 this and all, and that's not an altogether pleasant
22 experience.

23 Q Who threatened civil action?

24 A How did we find out that?

25 MR. JERNIGAN: I was contacted by--- Well, there

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2 was a newspaper article, and in the newspaper
3 article and subsequent to that I received a
4 phone call from Congressman Tallon, who in-
5 dicated to me that there were certain individuals,
6 never identified, threatening Mr. Brown with a
7 lawsuit, and at that point in time I intervened
8 and essentially related to him to relate to those
9 individuals that we were not involved in this
10 investigation from a direct standpoint, more
11 of an indirect. The newspaper article alluded
12 and then several people speculated that Mr. Brown
13 was the one accusing them of a lot more activity
14 than we've even discussed here today.

15 (Off the record.)

16 A I think Robin related to Rod that, as the subject for
17 their anger, I think they thought I was the source of
18 the leak, and I would be the last person to leak some-
19 thing like that with my name involved in it. I had
20 as much to lose as they did from the publicity. I
21 just didn't need it.

22 Q During the course of the telephone conversation with
23 me you made mention of rumors that were going around
24 that money was going into Tallon's campaign in a cash
25 form but that you had no direct knowledge of any cash

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going into the campaign.

A That's correct.

Q I specifically mentioned the name of G.B. Stokes.

A Yes, sir. I had no knowledge of that.

Q There was one other incident that I related to you in connection with cash that you saw in a briefcase in Congressman Tallon's van. Do you recall that incident as you related it to me?

A Yes, sir, I recall the incident. I'm not exactly positive what I related to you. We were at the Sun News one day. Robin sent me to the van to get a photograph to give the Sun News. I opened a briefcase. There was some cash in it. I simply got the--- I think I got the picture out and closed the briefcase. I don't have any idea how much money was in it.

Q Did you ever inquire about that money?

A No, sir, I never asked him about it because it really wasn't any of my business. It was in a little bank bag in there, and I couldn't tell you the amount. It could have been A Hundred Dollars or it could have been Two Thousand. I have no idea.

Q It could have been for any particular use also, couldn't it?

A Yes, sir, I guess it could have been. I don't know.

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1 I didn't ask him about it because I didn't---

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3 Q He could have used it things other than the campaign.
4 He runs a business.

5 A That's right. He could have had it for expense money
6 while he was on the road because they traveled and
7 stayed overnight a lot. So that could have been what
8 it was for. I don't know.

9 Q I think it was you that used the term--- And if it
10 wasn't, please correct me, but I think you used the
11 term "seed money" when we were talking.

12 A Yes, sir, I did. It's just an old political term for
13 money to start a campaign with. One of the first
14 things you do when you become a candidate, you've got
15 to find your seed money, that money to carry you for
16 the first thirty days or so until you can generate
17 enough politicity and momentum to raise money on your
18 own.

19 Q Was that term used in conversations about the bonuses
20 and the contributions?

21 A To be honest with you, I don't know. I don't know
22 if that's a term I assigned to it or if it's one that
23 I heard used. It's probably just--- It's probably
24 just the term I assigned to it. They may have been
25 talking about trying to generate some money and all and

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2 I put the connotation of seed money on it because
3 that's what it is. In political terms, that's what
4 it would be.

5 Q So it may have been you that assigned the term to---

6 A Seed money, yes, sir.

7 Q ---the contributions.

8 A Yes, sir, it may have been. I don't remember. Now,
9 I apologize for that. Some of this stuff is five or
10 six or seven years ago and it's difficult to remember
11 everything that happened.

12 Q I understand.

13 A Some of it wasn't all that pleasant and some of it
14 I'd like to forget.

15 Q In discussing the bonuses in the conversation you
16 overheard at least with Sue Bass and Cameron Minshew---
17 But you can't relate the names of nay others.

18 A I don't know.

19 Q Was any dollar amount for the bonuses mentioned?

20 A Let me answer it this way. The dollar amount of
21 A Thousand Dollars was mentioned. I can't say
22 categorically if it was mentioned there or subsequently
23 that Mr. Slavens enlightened me on the fact that it
24 was A Thousand Dollars. I'm not positive where I got
25 that figure, but I got it from one of those two

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2 sources, and it could have been there or it could have
3 been Gary. I'm not positive.

4 Q When you say A Thousand, you mean the Thousand that
5 would be given as bonuses?

6 A Yes, sir. Yes, sir.

7 Q We're not talking about the Thousand as being given
8 as contributions but the Thousand as being given as
9 bonuses at least.

10 A Yes, sir.

11 Q I'm trying to distinguish the two.

12 A Yes, sir, I understand. Yes, sir. Yes, sir.

13 Q Were any of the stores owned by Mr. Tallon mentioned
14 as being the source for the bonuses?

15 A No, sir, not the---

16 Q Not a particular store.

17 A Not a particular store, no, sir.

18 (Break.)

19 Q I think I may have asked this question, but let me
20 put it to you again. Is it your testimony that the
21 conversation which involved bonuses and contributions
22 took place at the same time?

23 A Yes, sir.

24 Q So that one was mentioned in conjunction with the other?

25 A Yes, sir. Yes, sir.

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Q And it would be bonuses from the various men's stores which would be paid to use as contributions into the campaign. Is that correct?

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A That's what I thought I understood.

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Q And your understanding then was that you heard this at least with two participants, that is Cameron Minsheu and Sue Bass. There may have been others.

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A There may have been others, but that was my recollection of what I thought I heard. Subsequent to that I have been told that I misunderstood what was said.

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Q Who told you you misunderstood?

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A Well, it's been in the media.

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Q Has anybody called you directly and said you misunderstood the conversation?

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A None of the individuals involved here, no, sir. It's hard for me to recall. The thing has been talked about quite a bit in Florence, the situation, and the gist of it was several people who had some knowledge of it said, "Jimmy, we think you just misunderstood what was said."

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Q But that's about all they said though?

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A That's right. That's all, yes, sir. There was nothing other than that.

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Q I don't have anything that I want to ask further.

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2 I don't want to close the deposition yet since the
3 investigation is not closed.

4 MR. WISE: Mr. Jernigan, do you have any cross?

5 MR. JERNIGAN: I just want to ask a couple.

6 CROSS EXAMINATION BY

7 MR. JERNIGAN:

8 Q Mr. Brown, you had indicated to me a few minutes ago
9 when we took a break that you had been provided an
10 affidavit earlier -- well, you had provided an affidavit
11 which you have signed and sent in.

12 A Yes, sir.

13 Q Were you given another affidavit prior to that that
14 had specific names of the individuals getting A
15 Thousand Dollars?

16 A That was done per our phone conversation, and---

17 MR. WHITEHEAD: No. Let me clarify that. You
18 didn't get an affidavit per our phone conver-
19 sation.

20 A I got a statement or something in the mail.

21 MR. WHITEHEAD: Did you get something from Mr.
22 Tobey?

23 A I'll be honest with you. Mr. Jerigan and I---
24 I got something in the mail from Mr. Tobey to sign
25 or something, and it reflected basically what you

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2 said there in our phone conversations, and Mr.
3 Jernigan--- I went to see Mr. Jernigan, and I wasn't
4 as clear on--- We don't have a copy of it either,
5 to be honest with you.

6 Q I believe that affidavit or statement had specific
7 names, and we made some other changes that were not
8 direct knowledge of Mr. Brown and Mr. Brown wasn't
9 comfortable in signing an affidavit under oath of
10 having direct knowledge of those individuals
11 receiving---

12 MR. WHITEHEAD: But he's under oath today, of
13 course.

14 MR. JERNIGAN: Right. But he was under oath
15 at that time, too, and they asked him to swear
16 to an affidavit.

17 MR. WHITEHEAD: Could it have been that Mr.
18 Tobey sent you a proposed statement which you
19 decided was not---

20 A Yes, I think that's what it was.

21 MR. JERNIGAN: We just wanted to clarify that.

22 MR. WHITEHEAD: So eventually what ended up was
23 the affidavit that you submitted to us.

24 A Yes, sir, which is what we have here, and it's hard
25 for me to recall firsthand. I want to be sure that

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2 I recall the names of the people, which it's hard for
3 me to do firsthand because I don't want anyone else
4 to sort of color my thinking on the thing. But I
5 think, as we talked in our phone conversation, I
6 didn't know whether this was ever done, and nobody
7 mentioned that it was a violation of any statute or
8 anything like that until years afterwards.

9 MR. WHITEHEAD: My memorandum to the file truly
10 reflects what our phone conversation was, but
11 it's pretty much what I was telling you for
12 the record.

13 A Yes, sir, essentially. Yes, sir.

14 MR. WHITEHEAD: As I say, I'm going to hold the
15 deposition open so that we won't have to go back
16 and get another subpoena is really what it amounts
17 to. Do you want to waive or do you want him to
18 see it?

19 MR. JERNIGAN: I think we need to see that
20 deposition and sign it. Usually I'll waive
21 it, but I think we need to read this one.

22 DEPOSITION RECESSED.

23 (Signing reserved.)
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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

I have read the foregoing transcript of my deposition,
so given at the time and place aforementioned, and the
foregoing thirty-seven (37) typewritten pages represent a
true, accurate, and complete transcription of my testimony
so given, and I do hereby subscribe to the same. I have/
have not submtited a change sheet regarding this deposition.

James Austin Brown, Jr.

Date: _____

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2 custodian thereof until such time as it shall be needed at
3 trial.

4 I do further certify that I am not of counsel or
5 attorney for any of the parties to the said action nor in
6 any way interested in the event of the said cause.

7 IN WITNESS WHEREOF, I have hereunto set my hand and
8 official seal this 17th day of December, 1987.

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13 *Eric B. Gore*

Eric B. Gore

14 Notary Public for South Carolina

15 My Commission expires: 3/11/97.
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OF THE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:) MUR 2071
Gary H. Slavens, et al.,)
_____)

DEPOSITION OF JANE FORD HARRIS

Deposition of Jane Ford Harris, taken before Eric B. Gore, a Notary Public in and for the State of South Carolina, commencing at the hour of 12:12 p.m., on Thursday, December 10, 1987, at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to Notice of Taking Deposition and Subpoena Duces Tecum.

APPEARANCES: Thomas J. Whitehead, Esquire,
and Phillip L. Wise, Esquire,
Assistant General Counsel,
Federal Election Commission,
Washington, D.C.

Eric B. Gore, Reporter.

ANNETTE B. GORE

COURT REPORTER

P. O. BOX 51 • IRMO, S.C. 29063

(803) 781-1400

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STIPULATIONS

The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

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SF 400 DEPOSITARY MUNGU 1040385673

WHEREUPON,

JANE FORD HARRIS, HAVING BEEN DULY SWORN AND CAUTIONED TO SPEAK THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH, TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WISE:

Q Preliminarily, I'll ask you could you just give us your full name and spell your last name for the reporter, please?

A Jane Ford Harris, H-a-r-r-i-s.

Q Could you give me your home address or your street address and your mailing address?

A Post Office Box 4217, and our street address is 25th Avenue North, Riverside Subdivision, North Myrtle Beach, South Carolina.

Q Thank you. Could you give us your home telephone number and Area Code, please?

A 803-249-2159.

Q Are you employed at the present time?

A Yes, sir.

Q Who are you employed by?

A Property Master, Incorporated.

Q Do you have their street address, business address?

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A Our mailing address is Post Office Box 187, North Myrtle Beach, South Carolina, 29597.

Q Business telephone phone and Area Code?

A 803-249-7388.

Q Are you here this morning because of a subpoena you received from the Federal Election Commission?

A Yes, sir.

Q When you make responses for the reporter, you know you have to verbalize and don't shake your head because he can't understand a shake of the head.

A Okay.

Q Are you represented by an attorney here this morning?

A No.

Q Have you ever been involved in a deposition before?

A No, sir.

Q Well, I'll explain a few things to you about a deposition here. What's going to happen is I'm going to ask you a series of questions. If at any time you don't understand a question, just let me know that and I'll rephrase the question or either repeat the question so that you can understand. Do you understand that?

A Yes.

Q And if you do not tell me you do not understand a question I've posed, I'll take for granted the answer

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you give is in answer to that question.

A Okay.

Q Before coming here today did you discuss this deposition with anybody?

A Just my husband.

Q With anybody else?

A No. No, sir.

Q Have you discussed any of the nature of these proceedings with anybody at all?

A No, sir.

MR. WISE: Right now I'd like to get this marked as FEC Exhibit Number 1.

FEC EXHIBIT #1 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

MR. WISE: And let me get this marked as FEC Exhibit Number 2, please, along with that.

FEC EXHIBIT #2 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

Q What we have here is FEC Exhibit Number 1. Could you explain what this is a photostatic copy of?

A It's a contribution that my husband and I made to Robin Tallon's campaign.

Q In what form? What is there?

A It's a check for Five Hundred Dollars.

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Q What is the date on the check?

A April 13th, 1982.

Q Whose signature is on the check?

A My signature, Jane F. Harris.

Q On FEC Exhibit Number 1, your contribution to the Tallon for Congress Committee on April 13th, 1982, did anybody suggest that you make the contribution?

A Just my husband and I. We talked about it.

Q Anyone else?

A No, sir.

Q In '82 did you in any way at all work for the Tallon for Congress Committee?

A No, sir. I've never worked for them.

Q Did you solicit any funds or contributions for his campaign at all?

A No, sir.

Q Where did you get the money for this contribution here? It's a large contribution.

A Well, I'm assuming--- It's been five years ago, but my husband, he gets -- they get bonuses periodically for incentive programs. They have contests. Like at that time he had like five or six stores in operation, and the one who would sell the most of suits or whatever kind of promotional they were having, they could

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2 get a bonus for it. Or it could have been a year-
3 end type thing. They get a year-end profit sharing.
4 I don't know exactly where that money came from. I
5 have no idea of knowing. But we had just decided
6 if we could afford it that we would contribute to his
7 campaign.

8 Q You said it possibly could have come from a bonus.
9 Was there any kind of condition that if your husband
10 received a bonus that you would give a Five Hundred
11 Dollar contribution to the campaign?

12 A Not to my knowledge, no, sir. I don't know of
13 anything about it.

14 Q Do you know Mr. Bobby Welch?

15 A Yes, sir.

16 Q Did he in any way suggest that you make any contributions
17 to the Tallon for Congress Committee?

18 A No, sir.

19 Q You have ever talked to him about Congressman Tallon's
20 campaign at all?

21 A No, I never have.

22 Q No political discussions?

23 A Well, not--- Just in general, but not about contri-
24 butions.

25 Q Right now I'm going to show you what has been marked

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A I really don't know. My husband, he said he was contacted by--- I don't know who contacted him actually. I don't know too much about it, but he just said that they were asking questions and we needed to sign a document.

Q Did you have any assistance in responding back to the Chairman of the Federal Election Commission?

A No, I did not.

Q That FEC Exhibit Number 2 you have there, who prepared this for you?

A I really couldn't say. My husband just brought it to me. That's all I know.

Q So you didn't type it or write it at all?

A No, I did not. I had nothing to do with it. He brought it to me and explained---

Q And had you sign it?

A Yes.

Q Did you travel to where Mrs. Minshew was to sign this in front of her?

A No, I didn't.

Q She is the notary on here.

A Right.

Q And you didn't sign it in front of her?

A No, I did not.

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2 Q Have you discussed this document with her at all?

3 A Only what she and my husband had discussed.

4 Q You did talk to her personally?

5 A Yes, on the phone. She called me and told me that she
6 would be sending this to me for my signature.

7 Q "She" who?

8 A Cameron Minshew.

9 Q Cameron Minshew said she would send this document to
10 you for your signature?

11 A Right.

12 Q And that's FEC Exhibit Number 2?

13 A Right. I just discussed it with her on the phone.

14 Q Was the Notary's signature on the document when you
15 received it?

16 A I could not tell you that.

17 Q But you know that you did not sign it in front of the
18 Notary.

19 A I do know that, yes.

20 Q And you in no way helped draft this document.

21 A No. All I did was sign it and that's it.

22 Q Again to this response, FEC Exhibit Number 2, did you
23 receive any correspondence from the Federal Election
24 Commission at that time personally?

25 A I really can't remember. I don't know. It's possible.

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2 I just don't remember. My husband, he would have
3 gotten it and--- If we had gotten anything, he
4 probably would have handled it. I just don't know.

5 MR. WISE: I want to get this marked as FEC
6 Exhibit 3.

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FEC EXHIBIT #3 WAS MARKED FOR
PURPOSES OF IDENTIFICATION.

9 Q Mrs. Harris, I'm going to show you what has been
10 marked as FEC Exhibit Number 3. You don't have to
11 read it. Just look at it, read it to yourself, and
12 then tell me what it is. Have you ever received that
13 document before?

14 A I'm sure we probably did receive it. I don't remember
15 ever reading it because my husband, the mail went
16 directly--- At that time he was employed at Robin's
17 Men's Shop, and the mail went directly to the store,
18 and if he opened it he probably got one the same day
19 and he probably just told me about it.

20 Q This document here from the FEC was dated November 21st.
21 Did y'all discuss this with Mrs. Minshew at all?

22 A No, not really. I think my husband talked to them
23 about it when we got this, asked them---

24 Q I'm going to show you what is FEC Exhibit Number 3
25 again. She didn't discuss it in the context of FEC

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Exhibit Number 2?

A Well, she discussed it with my husband, and that was fine with me, whatever he agreed with.

Q Could you again tell me based on what you remember what she told you on the telephone at the time concerning---

A Just that she was going to be sending this letter to try to clarify the situation and that I needed to sign it.

Q What situation was that?

A Well, I guess concerning that letter.

Q That's all she said? She didn't get into details of what---

A Not really. Like I say, I wasn't involved in it. I did not work at Robin's. I wasn't employed there. So she discussed most of it with him. I really know very little about it.

Q Thank you.

(Off the record.)

Q What I'm going to tell you again now is some more information about the deposition process here. Now I'm going to give you the option that when this is all typed up and the reporter is finished with it I'm going to give you the option then to--- Would you

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2 like to see this and read it and sign it or would
3 you waive signing?

4 A I'll just waive it.

5 Q Thank you. And I also am going to give you a witness
6 fee check and mileage for coming up here today.

7 A Okay.

8 Q Right now the deposition is still open. We're not
9 closing it at this time. We're just going to end
10 today, but at some other future date we might call
11 you back again.

12 A Okay.

13 Q But it's very, very doubtful.

14 A Okay. All right.

15 DEPOSITION RECESSED.

16 (Signing waived.)
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2 STATE OF SOUTH CAROLINA)
3 COUNTY OF RICHLAND) CERTIFICATE

4 This is to certify that the foregoing is the deposition
5 of Jane Ford Harris, taken before me, Eric B. Gore, a
6 Notary Public in and for the State of South Carolina, duly
7 commissioned and qualified as such, commencing at the hour
8 of 12:12 p.m., on Thursday, December 10, 1987, at the U.S.
9 Attorney's Office, 1100 Laurel Street, Columbia, South
10 Carolina, pursuant to Notice of Taking Deposition and
11 Subpoena Duces Tecum.

12 I do further certify taht the said witness was first
13 duly sworn by me and cautioned to speak the whole truth;
14 that she was examined as per the foregoing; that notes
15 were taken by me of the questions propounded and the answers
16 given; and that the foregoing thirteen (13) typewritten
17 pages represent a true, accurate, and complete transcription
18 of said testimony to the best of my skill and ability.

19 I do further certify that the reading and signing of
20 the deposition by the deponent was waived by the deponent
21 and counsel for the respective parties.

22 I do further certify that I have sealed up and delivered
23 the original of said deposition to Phillip L. Wise,
24 Esquire, Assistant General Counsel, Federal Election
25 Commission, 999 E Street, N.W., Washington, D.C., who shall

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retain the said deposition in his possession and become
custodian thereof until such time as it shall be needed at
trial.

I do further certify that I am not of counsel or
attorney for any of the parties to the said action nor in
any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and
official seal this 17th day of December, 1987.

Eric B. Gore

Eric B. Gore

Notary Public for South Carolina

My Commission expires: 3/11/97.

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EXHIBIT

#1 FEC
Mrs. Harris EOA

JERRY OR JANE F. HARRIS

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2006 HIGHWAY 17
NORTH MYRTLE BEACH, S.C. 29582

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PAY TO THE
ORDER OF

John F. Harris

\$ 500.00

John F. Harris

DOLLARS

(C) NIB

The Conway National Bank
Myrtle Beach, S.C. 29577

John F. Harris

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Jane Harris
2006 Highway 17
North Myrtle Beach, S. C. 29582

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DEC 19 14:33

AGENCY

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

EXHIBIT

RE: MUR 2071

#2 FEC
Mrs. Harris

Dear Ms. Aiken:

My name is Jane Harris. I have never been employed at Robin's of Florence, Inc. or LeMasters, Inc. I have never received any bonus from these corporations.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,

Jane Harris
Jane Harris

Sworn to before me
December 8, 1986

Carson Della Minter
Notary Republic

My Commission Expires February 2, 1987

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#3 FEC
Mrs. Harris

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Jane Harris
2006 Highway 17
N. Myrtle Beach, SC 29582

RE: MUR 2071

Dear Ms. Harris:

On November 12, 1986, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441f, a provision 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. 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 fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

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STIPULATIONS

The reading and signing of the deposition by the deponent is waived by the deponent and counsel for the respective parties.

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-COTTON CONTENT

WHEREUPON,

JEFFREY LUCIUS HARRIS, HAVING BEEN DULY
SWORN AND CAUTIONED TO SPEAK THE TRUTH,
THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH,
TESTIFIED AND DEPOSED AS FOLLOWS:

DIRECT EXAMINATION BY

MR. WISE:

Q For the record, could you give us your full name
and spell the last name for us, please?

A Jeffrey Lucius Harris, H-a-r-r-i-s.

Q Could you give me your home address?

A Street address?

Q Yes, street address would be better and also mailing
address if it's different.

A Well, mailing address is Post Office Box 4217, North
Myrtle Beach.

Q And your street address?

A Twenty-Fifth Avenue North, Riverside.

Q Your home phone number, including Area Code.

A 803-249-2159.

Q Are you employed right now?

A Yes.

Q Who are you employed by?

A I just went to work with Quadrant, Incorporated.

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Q Do you know their address also?

A Yes. Highway 17. I'm not sure of the address.

Q What kind of business are they in?

A Property management.

Q Do you have their business phone number?

A 803-272-5300.

Q What is your occupation with them?

A Property management.

Q Are you represented here today by an attorney?

A No.

Q Are you here because of a subpoena from the Federal Election Commission?

A Right.

Q Have you ever been involved with a deposition before?

A No, sir.

Q What I'm going to do is I'll explain it a little bit for you here. I'm going to ask you a series of questions. At any time if you don't understand a question that I pose to you, please interrupt me, and I'll either rephrase it or I'll make it a little clearer for you. Do you understand that?

A Yes.

Q If you don't ask me to rephrase a question or make it clearer for you, I'll just take it for granted that

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your response to that question is the answer to that question.

A Sure.

Q Have you discussed this matter with anybody before coming here today?

A My wife. She's here, too.

Q What did you discuss about it?

A Nothing. I mean, you know, nothing to discuss.

Q Have you discussed it with a lawyer?

A No.

Q Were you ever employed by any of the Robin's Stores?

A Yes, sir.

Q Which one was that?

A I worked in Florence and the one in North Myrtle Beach.

Q When did you work for the one in Florence?

A Back in late '60s to 1976.

Q What was your occupation there? What did you do for them?

A I was a salesman in Florence.

Q And the next store you worked for?

A North Myrtle Beach.

Q When was that?

A 1976 through 1986.

Q How were you paid there? On what basis?

A Weekly, monthly, yearly, bonuses. Quite often we had

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contests. We had incentive programs, any number of things. We always had something to keep our salespeople motivated, and we were all involved in it. If the store did good, they were compensated and the manager was compensated also.

Q What was your position with the North Myrtle Beach store?

A I was Manager.

Q You were the manager.

A Yes.

Q You mentioned bonuses. Any criteria for the bonuses?

A No. Like I say, we got like monthly bonuses or percentages. We got--- Certain parts of the year if the store was doing so much above what it was supposed to do, we got bonuses. At the year's end we got bonuses. We had suit sales. The people would get--- Our salespeople would get--- Like suits, they got them for certain amounts, sport coats they got for certain amounts, and then if we met the goals I got that plus I'd get more. Just crazy. There was no certain criteria for the amount of money that we got.

Q What about a salary basis? You said you got paid weekly, monthly.

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A Like monthly we got a commission on our sales, and then at year end we got commission there. "X" number of dollars if we were above a certain goal, we got money.

Q You mentioned a percentage. What was the percentage?

A Different things. There was no set thing.

Q Let's go down on commission. How much was the percentage there?

A As the years went by it increased. Like I say, when I first started I was like on a--- God, I don't remember. Maybe a one percent. I can't remember that far back. And then it built up. I think sometimes I got a two percent commission and sometimes I got more.

Q And your weekly salary back in '82, can you remember what that was? This was when you were Manager at the Robin's of North Myrtle Beach Store.

A God! Five to Seven Hundred, somewhere in there.

Q That was weekly?

A Yes.

Q You said you also---

A i mean that's just based out over the year. I can't remember. I'm just trying to think like what my income tax was for that year. That was when--- In

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'81, '82, '83, the stores were doing good, but I can't remember now. I don't even remember what I was making in '86. I've been gone a year.

Q As the manager of the store, how many employees did you have at that time?

A In '82?

Q Yes, in '82.

A I can't remember. Like I say, I've had as many as four or five and as few as two.

Q Was that a rather large store, the one in North Myrtle Beach?

A It's about four thousand square feet.

Q You also mentioned bonuses and contests. In '82 do you remember what kind of bonuses you were receiving? You said the store was doing well.

A I can't remember, Phil. I know it's according to the time of the year. If it was season's end we would have big promotions. At Christmas we had big promotions. If the store was doing good, if we worked, they paid us good. If we made them money, they made us money.

Q Were the bonuses given at a set time?

A No. No.

Q Quarterly? Monthly?

A No. Our commission we would get every month, but the

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2 bonuses--- If we needed to do a ton of business, we'd
3 mail out mailers and get "X" number of dollars.

4 Q What I want to get specifically to right now is in
5 '82 there was a Fifteen Hundred Dollar bonus that you
6 received on April the 12th. Do you remember that bonus?

7 A The only reason I remember it is because I went back
8 and I was trying to remember. Evidently we had some
9 money, me and my wife, because we gave a contribution
10 in April when I found those checks. The only reason
11 I found them, I went back through my income tax forms.

12 Q This Fifteen Hundred Dollar bonus that I'm talking
13 about is a rather substantial bonus there.

14 A I've had bonuses for Two Thousand and more. There
15 was no set monies. I can't remember, like I say.

16 Q Were they always in this '82 time scheme or throughout
17 your working period for Robin's of North Myrtle Beach?

18 A What, bonuses?

19 Q Yes.

20 A I had them since '76.

21 Q This Fifteen Hundred Dollars that you received in '82,
22 was it one of the largest up to that point?

23 A Phil, I can't remember. I don't have--- Like I say,
24 that's five years ago.

25 Q We also noticed that on April 12th you received this

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Q Why did you make such a large contribution to the Tallon for Congress Committee at that time?

A I'd worked for the man all of my life. We grew up together. He was running for something I felt was worthwhile.

Q How many years was that that you had worked for him? I know you gave me the dates that you started but---

A I was working for Robin back in Dillon in 1963. He opened a store there, and I was working part-time, trying to get through school. We grew up together, backdoor neighbors. I've known him all of my life. I just felt we had the extra money and I gave it to him.

Q Did you talk to anyone about making a contribution at that time to Tallon?

A I talked to my wife. She made one, too.

Q Did anybody else try to convince you or suggest that you make such a contribution at the time?

A No, sir.

Q What about Mr. Robert Welch? Do you know him?

A Bobby? Yes, I know Bobby.

Q Did you receive any kind of correspondence or information from him to request any contribution from you at all?

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CONTENT

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A That money was paid from Tallon Sales Company. It was my money.

Q What else did you do with the bonus besides making a contribution? Did you contribute at any other time later than this during '82?

A Yes. I made a contribution in August, August the 10th.

Q Which check is that that you're talking about?

A The one for Nine Hundred.

Q On April the 13th you made the check out for Five Hundred Dollars to the Tallon Campaign. If you hadn't received the Fifteen Hundred Dollar bonus, would you still possibly have made a contribution to the campaign anyway?

A Yes. I don't know if it would have been for that much. It might not have been on April the 13th. We get money in. If we've got extra money--- It was like evidently I had some extra money on 8/10, somewhere in that neighborhood.

Q I'm going to refer to FEC Exhibit Number 1 again, the last check there dated August the 10th, 1982, for Nine Hundred Dollars. Did anybody discuss this contribution with you?

A (Nods in the negative.)

Q You have to mention things verbally because he can't

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2 take down a shake of the head. Well, I'll go back
3 to the question again. This check dated August 10th,
4 1982, for Nine Hundred Dollars, were you in any way
5 persuaded to make this contribution?

6 A No.

7 Q Was it a totally voluntary act?

8 A Yes.

9 Q You said this was a totally voluntary act. Did you
10 advise anybody that you were making this kind of
11 contribution besides your wife?

12 A No. That's our money and our business. I just felt
13 like if I had the money, like I say, he's been good
14 all of my life and I was trying to help him. I think
15 that was probably before the regular election, August,
16 before the November election.

17 Q I'll ask you again. Maybe I've asked you this question
18 already. Again, you said you know Mr. Bobby Welch.

19 A Yes.

20 Q Again I'll ask you this. You didn't receive any
21 kind of information, a letter, a telephone conver-
22 sation, nothing at all from Mr. Welch trying to convince
23 you to make a contribution to the Tallon Campaign in
24 '82?

25 A No, I did not. Bobby did not coerce me or force me to

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A I don't remember, Phil. Like I say, I remember the letter.

Q Did you get any assistance from Mrs. Cameron Tallon Minshew?

A No.

Q What is her position? Do you know who she is and what she does?

A She's Robin's sister. She works with Tallon Sales Company in Florence, the head office. I don't know if it's the head office now or not.

Q In your response which we had marked as FEC Exhibit Number 2 you had a list of two bonuses that you received in April of '82.

A Yes.

Q What's the figures that we have there?

A Eight Hundred and Thirty Dollars and Fifteen Hundred Dollars.

Q Where did you get those figures from?

A They were bonuses. Evidently the store was doing good or we had a contest.

Q Did you have it documented anywhere so you could just pull it out and say, "Well, this is what I received in April of '82," or did someone assist you in finding those figures?

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2 A I'm sure I most probably had to go back to Florence.
3 I can't remember. Like I say, we go so many checks,
4 bonus checks. Evidently they were two bonus checks.
5 That's all I know.

6 Q Did Mrs. Minshew help you in any way draft this response
7 back to us?

8 A I can't remember. I don't remember. I know she
9 notarized it for me, but I don't know whether she
10 helped my wife or if we both did it. I don't
11 know. To get the figures, I can't remember.

12 Q On the checks again which are marked FEC Exhibit
13 Number 1, how did you deliver them to campaign head-
14 quarters? Did you mail them or which way did they
15 get there?

16 A I most probably mailed them. Like I say, I was work-
17 ing in Myrtle Beach. I don't know whether I took them
18 or I--- I don't know. Most probably mailed them. I'm
19 not sure.

20 Q On the checks--- The one specifically I'm talking
21 about, the one in April of 1982 for Five Hundred
22 Dollars, was written on the 13th of April of 1982,
23 and it was received in Florence at the Tallon campaign
24 headquarters the next day, on the 14th.

25 A I don't know. After they got an office down there I

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a hundred dollar plate, you gave a hundred dollars. Just like that Fifty there, I'm sure that had to be most probably a supper we had.

Q Going back to the 1982 campaign for Robin Tallon, did you ever go to campaign headquarters at all?

A I've most probably been in and out. I don't know if I was there that year or what.

Q Did you do any work for the campaign at all?

A Yes.

Q What did you do?

A Put up posters and things during the election.

Q Did you solicit any funds?

A I went out and asked people, yes, to make contributions. I got a contribution from my parents.

Q Was that voluntary or were you paid to do that?

A It was voluntary.

Q When you were ever at campaign headquarters--- I'm going to give you a term. Do you know the term seed money?

A I don't know what you're talking about.

Q You've never heard that used at all in connection with the campaign?

A No. Like I say, I ran the business. That was Robin. Robin was running for Congress. The store was the

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store.

Q Did you ever receive any information back in '82 that the campaign was in financial difficulty?

A No. No, sir.

Q What's your relationship with Robin Tallon?

A He's my best friend. I think he was my best man at my wedding. We've just been friends all of our lives. We grew up together, went to school together, and he asked me to come to work for him and I did. I'm sorry I'm not working for him now.

Q Did you feel back in '82 if you didn't make these contributions to the campaign that you would lose your job?

A No, definitely not. Like I say, he's never asked me to do anything.

(Break.)

MR. WISE: There are four documents I'd like to mark as FEC exhibits. First I'll give you this one that's two pages.

FEC EXHIBIT #3 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

(Off the record.)

FEC EXHIBITS #4, #5, AND #6 WERE MARKED FOR PURPOSES OF

40383706

IDENTIFICATION.

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3 Q I'm going to go back and show you what has been
4 marked as FEC Exhibit Number 1, which was a list
5 of checks that you showed me for contributions.
6 Shortly after receiving the Fifteen Hundred Dollar
7 bonus back on April the 12th of 1982 you made a
8 Five Hundred Dollar contribution to Tallon for
9 Congress Committee.

10 A Right.

11 Q Did anybody tell you that the basis for receiving
12 this Fifteen Hundred Dollar bonus was so that you
13 could make a contribution to the Tallon for Congress
14 Committee?

15 A No.

16 Q Did anybody in any way say that it would be reimbursing
17 you for a contribution?

18 A No.

19 Q On the same FEC Exhibit Number 1 you have a check
20 dated August the 10th, 1982, for Nine Hundred Dollars.
21 Shortly before you made that contribution did you
22 receive--- Excuse me. Shortly after you made that
23 contribution you received A Thousand Dollar bonus on
24 August the 30th of 1982. Was that bonus to cover
25 this check?

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1
2 been marked as FEC Exhibit Number 3. This is basically
3 a letter, an unsigned letter, with a signature block
4 for Bobby Welch, President of Tallon Sales Company.

5 A Right.

6 Q After looking at this document, have you ever
7 received such a document? Take your time and read it.
8 Do you remember receiving a document like this?

9 A I've never received one.

10 Q Not at all from Mr. Welch?

11 A No.

12 Q Not this letter nor any telephone conversation?

13 A No. I imagine that was sent to people that we did
14 business with. It looks like it was sent to individual
15 salespeople.

16 Q If you had not received the Fifteen Hundred Dollar
17 bonus back in April of 1982, could you have afforded
18 to make the Five Hundred Dollar contribution at the
19 time?

20 A I don't remember. I don't know what my status was.
21 That was one of my better years. I most probably
22 could have.

23 Q You said that you discussed making contributions with
24 your wife.

25 A Right.

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Q Did she make a contribution also?

A Yes.

Q How much was hers?

A Five Hundred. I think, like the letter said, A Thousand is the maximum you can give, and we split it, thinking--- Somebody -- I don't know remember who it was -- said something about tax deductions as the reason.

Q How did you know in '82 that A Thousand was all you could give?

A I was told that evidently.

Q By whom?

A I don't remember. I don't know. I'm just saying that evidently I knew.

Q I notice that this check here to Tallon Campaign, the one for Five Hundred Dollars dated April the 13th of 1982, is signature blocked in your name. You said your wife gave a contribution also?

A Yes.

Q Was it from the joint account here?

A She's got a copy of the check.

Q Does she have her own account?

A No. It's joint.

Q Any reason that she made hers as a separate contribution?

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2 A Like I said, we thought we could get a bigger tax
3 deduction, two people individually. That's what we
4 were told, I think. That would be the only reason.

5 Q Did you file a joint tax return or separate tax
6 returns?

7 A I don't know what we did back then. I can't remember.
8 Probably joint. Somebody just said, "Each one of
9 you can take more money off." I'm not sure.

10 Q I think that I may have made a mistake here. Did I
11 say this check was made to the Tallon Sales Company?
12 It was made out to the Tallon for Congress Committee.
13 That was the check of April 13th of 1982. I'd like
14 to correct the record there. I'm going to show you
15 what has been marked as FEC Exhibit Number 4. If you
16 would read this and see if you've ever received a
17 copy of this letter or seen a copy of it anywhere.

18 A Yes, I received this.

19 Q You did receive this?

20 A Yes.

21 Q From Mr. Welch?

22 A Yes. I think I did. It says, "To all Managers."
23 Evidently I must have. I don't have a copy of it.
24 I would imagine I would have gotten something like
25 that.

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Q And you still say that he didn't ask you or suggest in any way for you to make a contribution to the Tallon for Congress Committee in 1982?

A He didn't say, "Jerry, make a contribution." He said--- He's never said do that. I did it on my own accord, and that's when I told you while ago about going out and asking other people. I had already done that.

Q You said he never said, "Jerry, make a contribution."

A Right.

Q What did he say?

A He just said, "Are you going to make a contribution?" I don't remember, Phil, exactly what words. I mean, I made a contribution. He didn't come up and say, like you said earlier, was my job on the line. No. I was never forced to do anything. I did everything on my own accord.

Q Did he ever tell you he was going to make a contribution?

A I can't remember. I don't know.

Q Did he ever mention the amount of any contribution that he made?

A No, not that I can remember.

Q When you talked about a contribution at all, was it

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Q Do you ever remember seeing this?

A I might have. I don't remember it, no. I don't remember seeing anything with people's names on it like that that I can remember. I don't know. I don't remember.

Q I know this may not be addressed to you, but this is FEC Exhibit Number 6, and it's another letter, signature block of Mr. Welch, unsigned.

A Phil, I don't remember it, no. I doubt it. The only time if I got any of the letters, it was most probably that one that was addressed to the managers, but I can't remember it.

Q You said you also helped solicit funds for the campaign back in '82 on a volunteer basis?

A Yes, my friends.

Q Did you do correspondence like this also?

A No.

Q How was your basic solicitation?

A I'd just call people and say, "How about make a contribution to Robin?"

Q And these people were basically who?

A Friends. No certain person. Anybody that I just felt like I could ask. A lot of people I wouldn't ask. I mean like my parents, just good friends, good

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customers, somebody that appreciated Robin.

Q And, again, it's still your testimony that you never heard of the words seed money?

A No, sir. I don't even know what you're talking about, no.

Q Or startup money?

A No, sir.

MR. WISE: Do you have anything?

MR. WHITEHEAD: Not offhand. I think the questions that I've given to you have been answered.

Q What I'd like to know from you now is that this is a deposition and I'll give you the option now whether you would like to see this document and sign it or would you just waive signing?

A I'll waive signing. I mean, I've done nothing wrong.

Q Well, at this time I'm not going to close the deposition but will end it at this point today. I'd also like the record to reflect that I'm going to give you a check for a witness fee for coming here and mileage. Thank you.

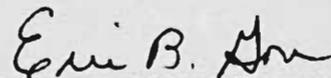
DEPOSITION RECESSED.

(Signing waived.)

1
2 retain the said deposition in his possession and become
3 custodian thereof until such time as it shall be needed
4 at trial.

5 I do further certify that I am not of counsel or
6 attorney for any of the parties to the said action nor
7 in any way interested in the event of the said cause.

8 IN WITNESS WHEREOF, I have hereunto set my hand and
9 official seal this 17th day of December, 1987.

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Eric B. Gore

14 Notary Public for South Carolina

15 My Commission expires: 3/11/97.

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EXHIBIT

#1 FEC
Harris EBM

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JERRY OR JANE F. HARRIS 2733
 ROBIN'S MEN SHOP
 2006 HIGHWAY 17
 NORTH MYRTLE BEACH, S.C. 29582 10/8 1982 67-231
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 PAY TO THE ORDER OF *Galt In Conquer* \$ 50⁰⁰
 Fifty & ⁰⁰/₁₀₀ DOLLARS
 (C)N(B)
 The Conway National Bank
 Myrtle Beach, S.C. 29577
 MEMO: *Jerry Harris*
 ⑆053202318⑆0323002336⑆06 2733 ⑆0000005000⑆

JERRY OR JANE F. HARRIS 2387
 ROBIN'S MEN SHOP
 2006 HIGHWAY 17
 NORTH MYRTLE BEACH, S.C. 29582 7/12 1982 67-231
 532
 PAY TO THE ORDER OF *Galt In Conquer* \$ 50⁰⁰
 Fifty & ⁰⁰/₁₀₀ DOLLARS
 (C)N(B)
 The Conway National Bank
 Myrtle Beach, S.C. 29577
 MEMO: *Jerry Harris*
 ⑆053202318⑆0323002336⑆06 2387 ⑆0000005000⑆

JERRY OR JANE F. HARRIS 2619
 ROBIN'S MEN SHOP
 2006 HIGHWAY 17
 NORTH MYRTLE BEACH, S.C. 29582 11/5 1982 67-231
 532
 PAY TO THE ORDER OF *Galt In Conquer* \$ 100⁰⁰
 One Hundred & ⁰⁰/₁₀₀ DOLLARS
 (C)N(B)
 The Conway National Bank
 Myrtle Beach S.C. 29577
 MEMO: *Jerry Harris*
 ⑆053202318⑆0323002336⑆06 2619 ⑆00000090000⑆

FOR DEPOSIT ONLY
TALLOTT FOR CONGRESS
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FOR DEPOSIT ONLY
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EXHIBIT

#2 FEC
Harris EDM

Jerry Harris
2006 Highway 17
North Myrtle Beach, S. C. 29587

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December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

My name is Jerry Harris. I was not an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. I was and still am employed by Robin's of North Myrtle Beach, Inc.

In April 1982, I was paid two bonuses totaling \$2,330.00 (\$830.00 and \$1,500.00). All FICA, federal and state taxes were deducted from these amounts and these were included on my W-2 form at the end of the year.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,

Jerry Harris

Jerry Harris

Sworn to before me
December 8, 1986

Camera Saller Minkler

Notary Republic

My Commission Expires February 2, 1987

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

EXHIBIT

#3 FEC
Harris EAR

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 22, 1982

Dear

I have been in touch with most of you by phone recently soliciting contributions for Robin's campaign for United States Congress. A few of you I haven't been able to reach yet and others I hated to call because our stores might not be doing business with your company at this time.

I want to thank each of you that sent a contribution very much. There were some very generous contributions-- one for a thousand dollars and four for five hundred dollars or more. This type campaign is very expensive-- and probably the greatest undertaking ever in Robin's life. We desperately need money and need it now.

After a little thought-provoking rhetoric, if you feel compelled to make your first contribution or an additional one, please accept my heart-felt thanks. The ROBIN'S organization has never been a demanding one. We have never demanded lavish or frequent meals or entertainment as some customers do. We have never demanded free clothes for ourselves or our families as some customers do. We haven't sold our business to the highest bidder as some customers do. We haven't made anyone do any excess traveling to our different locations just to be more costly as some customers do. We've never solved our over-buying by refusing shipments as some customers do. We have tried to make working with our organization as easy as possible. We don't even actually work with some of you due to territory lines yet you still get credit for the orders.

We have been doing business with some of you for as long as eleven years and others for as little as a season or two. You may not have been our salesman for the entire time that we have done

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

business with your company. ROBIN'S and Robin may have played a big part in your success. Please think about it.

Please go to your sales managers, your company presidents, and your company principals and request strongly a generous contribution to Robin's campaign. Please dig as deep as possible in your pocket, your checkbook, your savings account, your bankcard, or your bank itself and show Robin what he has meant and means to you.

Remember that all checks must be personal and that \$1000.00 is the maximum total contribution including what you may have already given. Please make checks to "Tallon for Congress" and send to above.

I'm not asking for a contribution in support of any issues or political party---but for a man who has played an important part in my life and the lives of many others.

Thank you so much for your generous and prompt contribution.

Yours Truly,

Bobby Welch, President
Tallon Sales Co.

EXHIBIT

#4 FEC
Harris EOL

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 1, 1982

To all Employees of Robin's, Robin's Ladies' Shop, LeMasters, and Tallon Sales Company:

About a month ago I sent a letter to about sixty of you asking for contributions for Robin Tallon's campaign for United States Congress. I would very much like to thank each of you that sent in a contribution. I really feel that each of us should make a contribution if for no other reason than the fact that we owe our jobs to Robin. I also feel that each of you should ask your family members that receive a discount on their purchases for a contribution. I feel very strongly on both these counts.

There is less than one week before election day so there is not a moment to delay. Robin sees every contribution that comes in, so let's let him know that his employees are behind him and that their families appreciate the break on their purchases.

Thanks to all those employees who have given of their time and tireless efforts to help Robin. I hope most of you realize that the possibility is very, very strong that Robin will win. In fact, I should have said it looks very probable. Let's all get behind him.

Don't delay. Make those contributions now. Make those calls today.

Thank you again.

Sincerely,

Bobby Welch

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*Managers:
I want them to
see employees immediately!*

EXHIBIT

#5 FEC
Harris EAR

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 9, 1982

Dear

As you may have heard, Robin led the ticket in his race for the Democratic nomination to Congress from the sixth district of South Carolina---but he is in a runoff! The results are as follows:

Robin Tallon	35,687	47.1%
Hicks Harwell	19,501	25.7%
John Brasington	12,666	16.7%
Charles McGill	7,948	10.0%

A candidate must get 50% of the total votes cast to win on the first ballot. We almost did what they say can't be done!

I want to thank each of you that were able to contribute to Robin's campaign very much. I'm sure it makes you feel good to know you were able to help Robin with something that means so much to him.

As I said before, we are in a runoff. Robin's opponent is an experienced politician who is going to be tough to beat. We need your financial help again in order to win. If you've already given, may I ask for a little more (or a lot more if you can). If you haven't, may I plead for your help. The runoff is less than two weeks away (June 22) so you can sense the urgency.

Before you put this letter down, please consider a contribution. Issues and parties aside, please consider it a contribution to something Robin has worked so hard for, something that I really believe in, and something that we need at once.

I'll thank you in advance since I'm sure we can count on you to realize we're in this for keeps.

Please send personal checks or cash to Cameron at the following address: Tallon Sales Company
P.O. Box 3867
Florence, S.C. 29502

Thank you again for your much needed help.

Sincerely,

Bobby Welch

EXHIBIT

#6 FEC
Harris EAM

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 27, 1982

Rather than beating around the bush, I'll get right to the point. I need your help. I'm trying to raise campaign funds for Robin Tallon (owner of Robin's) who is running for U.S. Congress from the sixth district of South Carolina.

Having known and worked for Robin for many years, I really feel that he will be the kind of Congressman that we need. I'm not pushing any issues or party affiliation and although he's not running from your district, I believe that your help will result in having the best Congressman ever elected from the sixth district.

I'm asking you as a customer and a friend to help me do something that I strongly believe in. If you feel you can help, please send your personal check (for \$25, \$50, \$100 or whatever you like) made out to "Tallon for Congress" in the enclosed envelope.

Thank you very much for your help.

Yours truly,

Bobby Welch

John



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 19, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dwight F. Drake, Esquire
Nelson, Mullins, Grier, &
Scarborough
Keenan Building - 3rd Floor
1310 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Representative Robin Tallon

Dear Mr. Drake:

On August 23, 1985, your client was notified that the Commission found reason to believe that he had violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.4(c)(2). An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to appear and give sworn testimony on January 28, 1988, and provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

Pursuant to 11 CFR 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 21 cents per mile. Your client will be given a check for the witness fee and mileage at the time of the deposition.

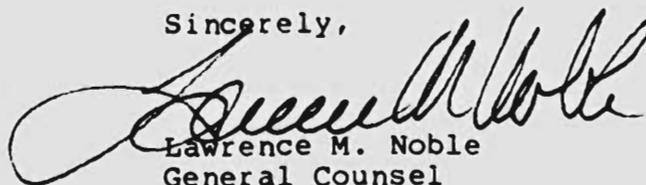
Please confirm the scheduled appearance with Phillip L. Wise, the attorney assigned to this matter, within two days of your receipt of this notification.

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Dwight F. Drake, Esquire
Page Two

If you have any questions, please direct them to Mr. Wise at
(202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

Enclosure
Subpoena & Order

21 J 40 J 5 5 / 2 5

**UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION**

**SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO APPEAR FOR DEPOSITION**

TO: The Honorable Robin Tallon

RE: MUR 2071

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), Robin Tallon is hereby ordered to produce for inspection and copying all documents and materials listed below that are in his possession or control. Production is to be made at the Office of the Federal Election Commission, General Counsel's Office, 6th floor, at 999 E Street, N.W., Washington, D.C. 20463 at 9:00 a.m. On January 21, 1988. In addition, Robin Tallon is hereby ordered to appear for deposition by representatives of the Commission at 10:00 a.m. on January 28, 1988 in the same location.

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

1. The term "documents and materials" shall mean, unless otherwise indicated, the original, all copies, and drafts of writing of any kind, printed, audio, visual or electronic materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda, and any other documentation of telephone conversations and conferences), calendar and diary

91040363726

entries, contracts, data, agendas, articles, visual aids, printouts, account statements, billing forms, receipts, checks and other negotiable paper, credit card slips, records and compilations in the possession or control of Robin Tallon. Designated "documents and materials" shall be taken as including all attachments, enclosures, and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. All references to the Federal Election Commission ("FEC") shall mean the Federal Election Commission, its attorneys, auditors and other employees.

3. The term "concerning" with reference to subject or object shall mean mentioning, discussing or directly or indirectly regarding, referring or relative in any way to the subject or object.

4. The term "you" refers to Robin Tallon, in his capacity as agent, express or implied, of the Tallon for Congress Committee, as well as in his individual capacity.

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

- (a) a description of the subject matter;
- (b) the date of the document;
- (c) the name and title of the author;

21040365/47

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

5. For the purposes of this subpoena and order, the following requests apply only to documents and materials relating to the period from January 1, 1982, through December 31, 1982.

Please provide in their entirety the following:

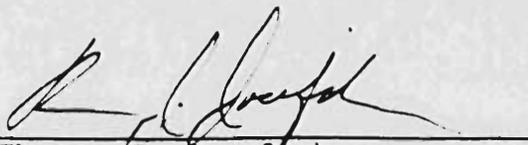
1. All documents and materials related to contributions and loans received by the Tallon for Congress Committee from the following individuals: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby, including, but not limited to, letters, memoranda, or other documents; bank records of contributions and loans received, including deposit slips, copies of checks, stop payments on checks, and credit card slips.

2. All documents and materials relating to contributions and/or loans solicited by you, directly or indirectly, on behalf of Robin Tallon as a candidate for the United States House of Representatives from the following individuals: Gary H. Slavens, Vicki Slavens, G. B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby.

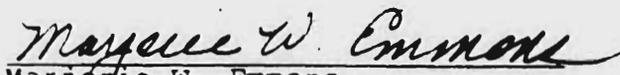
21040353/43

3. All telephone logs, telephone message slips, and other records of telephone calls made or received by you regarding the solicitation of contributions and/or loans by you on behalf of Robin Tallon as a candidate for the United States House of Representatives from the following individuals: Gary H. Slavens, Vicki Slavens, G.B. Stokes, Joe W. Pearce, Jr., and Ed Saleeby.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 999 E. Street, N.W., Washington, D.C., this *19th* day of *January*, 1988.


Thomas J. Josefiak
Chairman

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

21040355/29



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dwight F. Drake, Esquire
Nelson, Mullins, Grier, &
Scarborough
Keenan Building - 3rd Floor
1310 Lady Street
Post Office Box 11070
Columbia, SC 29211

Re: MUR 2071
Representative Robin Tallon

Dear Mr. Drake:

On August 23, 1985, your client was notified that the Commission found reason to believe that he had violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.4(c)(2). An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

On January 22, 1988, in a telephone conversation with a staff member from this Office you requested a copy of the initial reason to believe notification. This notification, plus an additional copy of the Subpoena and Order to your client, is enclosed herein.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosures
Notification
Factual and Legal Analysis
Subpoena & Order

21040563730

NELSON, MULLINS, GRIER & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR KEENAN BUILDING 1310 LADY STREET
POST OFFICE BOX 11070
COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE 799-2000
AREA CODE 803
TELECOPY 288-7800

MYRTLE BEACH OFFICES:
1700 NORTH OAK STREET PLAZA
1700 NORTH OAK STREET
POST OFFICE BOX 3039
MYRTLE BEACH, S. C. 29578-3039
TELEPHONE 448-1892
AREA CODE 803

DWIGHT F. DRAKE
DIRECT DIAL
18031 733-9420

5 SEP 6

September 3, 1985

T-24

05 SEP 6 P 1: 56

COMM. OF THE FEDERAL ELECTION COMMISSION

Ms. Joan D. Aikens
Vice Chairman
Federal Election Commission
Washington, DC 20463

RE: MUR 2071

Dear Ms. Aikens:

I am representing Congressman Robin Tallon of South Carolina's Sixth Congressional District in connection with the above referenced matter.

I understand from your letter of August 23, 1985, that the Federal Election Commission has determined that there is reason to believe that there have been violations of 2 U.S.C. §432(b)(1); 2 U.S.C. §441f; 2 U.S.C. §432(b)(3); and 11 C.F.R. §110.4(c)(2). As I understand it from your letter and the factual and legal analysis of your General Counsel which was enclosed with that letter, the basis for the finding of the Federal Election Commission is that a \$1,000.00 cash campaign contribution was deposited in a bank account of Mrs. Vicki Slavens and Mrs. Slavens in turn donated to the campaign of Congressman Tallon a check in the amount of \$1,000.00. Purportedly, the \$1,000.00 in cash was given to Congressman Tallon by Mr. G.B. Stokes. Congressman Tallon then supposedly delivered the cash to Mr. Gary Slavens who supposedly had the cash deposited in Mrs. Vicki Slavens' account.

The purpose of this letter is to inform you that such did not occur. The records of the campaign indicate that Mrs. Slavens did, in fact, contribute \$1,000.00 to the campaign but there was no factual basis to believe then, or now, that this contribution was not made in her own right.

Therefore, we respectfully request that the Commission determine that there is no reason to believe that a violation of the Federal Election Campaign Act occurred and that the matter under review be terminated.

Should you have any questions concerning this matter, please do not hesitate to contact me at the address indicated on the enclosed Statement of Designation of Counsel.

Sincerely,

Dwight F. Drake
Dwight F. Drake

plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jane Harris
P.O. Box 4217
North Myrtle Beach, S.C. 29597

RE: MUR 2071

Dear Ms. Harris:

On December 10, 1987 you appeared at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to a Notice of Taking Deposition and Subpoena Duces Tecum. At the conclusion of your testimony you were given a check for the witness fee, plus partial payment for the mileage. Enclosed herein is a check for the remainder of the mileage fee.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosure
Check (\$27.30)

40363733

1040363734

United States Treasury

15-51 W 020,791,597



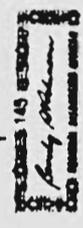
01 07 88 2 WASHINGTON, D.C.
141065 02 JANE HARRIS
F E C WASH DC

Check No.

3007 07009833
95350001

Pay to
the order of
JANE HARRIS

*****27*30



8AW024 WITNESS FEE

⑈ 30074 ⑈ ⑈000000518⑈ ⑈070098336⑈



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry Harris
P.O. Box 4217
North Myrtle Beach, S.C. 29597

RE: MUR 2071

Dear Mr. Harris:

On December 10, 1987 you appeared at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to a Notice of Taking Deposition and Subpoena Duces Tecum. At the conclusion of your testimony you were given a check for the witness fee, plus partial payment for the mileage. Enclosed herein is a check for the remainder of the mileage fee.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosure
Check (\$27.30)

40363735

plm

1 0 4 0 3 5 5 7 0 6

United States Treasury

15-51
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W 020,791,596



01 07 88 02 WASHINGTON, D.C.
141065 02 JERRY HARRIS
F E C WASH DC
JERRY HARRIS

Pay to
the order of



8AW024 WITNESS FEE

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plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 26, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert L. Welch
P.O. Box 618
North Myrtle Beach, S.C. 29597

RE: MUR 2071

Dear Mr. Welch:

On December 9, 1987 you appeared at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to a Notice of Taking Deposition and Subpoena Duces Tecum. At the conclusion of your testimony you were given a check for the witness fee, plus partial payment for the mileage. Enclosed herein is a check for the remainder of the mileage fee.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lois G. Lerner
Associate General Counsel

Enclosure
Check (\$27.30)

21040363/37

21 40 63 7 33

United States Treasury

161 W 020,791,598

Check No.



01 07 88
141065

2 WASHINGTON, D.C.

300Z-07009834

ROBERT WELCH

02 ROBERT WELCH

93350001

Pay to
the order of

ROBERT WELCH

F E C WASH DC

*****27.30



8AW024 WITNESS FEE

⑈ 30074 ⑈

⑆000000518⑆ 070098347⑈



QCC#6170

FEDERAL ELECTION COMMISSION

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING

1330 LADY STREET

POST OFFICE BOX 11070

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE 799-2000

AREA CODE 803

TELECOPY 256-7500

88 JAN 29 AM 10:15

OTHER OFFICES:

GREENVILLE, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA
SIMPSONVILLE, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

January 26, 1988

FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
88 JAN 29 PM 2:15

Mr. Philip L. Wise
Federal Election Commission
999 "E" Street, NW
Washington, DC 20463

RE: MUR 2071 - Representative Robin Tallon

Dear Mr. Wise:

As I informed you in our phone conversation on Thursday of last week, I had at that time received no communication from your office since August of 1985 in connection with the above referenced.

On Monday, January 26th, I did receive a letter from Mr. Lawrence M. Noble, General Counsel, and attached thereto was a subpoena for the production of documents and for Mr. Tallon to appear for a deposition.

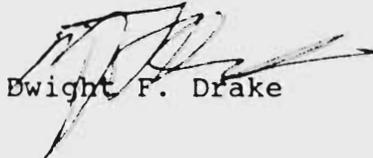
This subpoena requested certain documents to be produced by January 21st but, as indicated above, I did not receive the request until January 25th. Additionally, the subpoena requested the taking of a deposition from Mr. Tallon on January 28th.

As I told you on the phone, it will be impossible to comply with this request as Congressman Tallon and I have not been able to coordinate our schedules so that we may be responsive to your request.

Accordingly, I would request by this letter a continuance in which to respond to your subpoena and request for deposition until such time as I have had an opportunity to meet with my client and prepare to be responsive to your inquiry.

Please let me know your thoughts and I look forward to working with you in this matter.

Sincerely,


Dwight F. Drake

DFD/dce

600# 6322

RECEIVED
FEDERAL ELECTION COMMISSION

NELSON, MULLINS, RILEY & SCARBOROUGH
ATTORNEYS AND COUNSELORS AT LAW
THIRD FLOOR, KEENAN BUILDING
1330 LADY STREET
POST OFFICE BOX 11070
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE 799-2000
AREA CODE 803
TELECOPY 256-7800

88 FEB -5 AM 10:50

OTHER OFFICES:
GREENVILLE, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

February 2, 1988

88 FEB -5 PM 2:39

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

Philip Wise, Esquire
Office of General Counsel
Federal Election Commission
999 "E" Street, NW
Washington, DC 20463

RE: MUR 2071, Representative Robin Tallon

Dear Phil:

This will confirm our conversation today concerning your subpoena and request for deposition in connection with the above referenced.

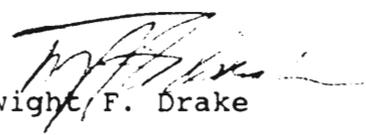
As I told you, the Treasurer of the Tallon for Congress Campaign, as well as the individual who was the Treasurer during 1982, who is the custodian of the records of the campaign, is being directed to produce all the documents you requested.

When these individuals have completed their review of the files and reviewed the documents you have requested, I will forward same to you immediately. As I told you, Congressman Tallon is eager to appear and have his deposition taken in this matter so as to resolve this matter with finality. As you know, he has, on more than one occasion, called the Federal Election Commission and requested that they expedite the determination in this matter as it has been pending for more than 2 years.

Also, as I think I indicated to you on the phone today, the documents you have requested have been previously requested and produced to your office.

Once we have concluded our review of the files, in order to be responsive to your request, I will call you and we will schedule a time immediately for the deposition of Congressman Tallon.

Sincerely,


Dwight F. Drake

DFD :dce

COCA-169
FEDERAL ELECTION COMMISSION
88 FEB 18 11:11 AM

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING

1330 LADY STREET

POST OFFICE BOX 11070

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE 799-2000

AREA CODE 803

TELECOPY 286-7500

OTHER OFFICES
GREENVILLE, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

February 15, 1988

Philip Wise, Esquire
Federal Election Commission
999 "E" Street, NW
Washington, DC 20463

RE: MUR 2071

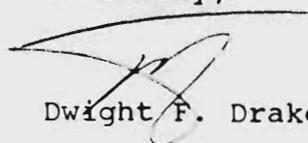
Dear Phil:

Enclosed please find copies of letters to Mr. Glenn Odom and Mr. Lamar Rabon requesting information which you had previously asked us to provide for you prior to the taking of Congressman Tallon's deposition.

These letters were mailed on February 2nd by Certified Mail and we are expecting responses shortly and will be in touch with you at that time so that we can schedule the deposition.

Look forward to seeing you soon.

Sincerely,



Dwight F. Drake

DFD/dce
Enclosures

cc: Marva Smalls

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
88 FEB 18 PM 12:30

10405741

Congress of the United States
House of Representatives
Washington, DC 20515

February 2, 1988

BY CERTIFIED MAIL

Attorney M. Glenn Odom
1457 Wisteria Drive
Florence, South Carolina 29501

Dear Glenn:

I am in the process of assembling information and documents relating to the financial involvement of several individuals in the 1982 Tallon for Congress Campaign. As treasurer for the campaign committee during that time, you would have had access to and knowledge of these documents if they existed.

Therefore, I am requesting your assistance in providing me with the following information of which you might have knowledge or might be in your possession:

1. All documents and materials related to contributions and loans received by the Tallon for Congress Committee from Gary H. Slavens, Vicki Slavens, G. B. Stokes, Joe W. Pearce, Jr. and Ed Saleeby, including, but not limited to, letters, memoranda, bank records of contributions and loans received, deposit slips, copies of checks, credit card slips, and any other documents in this regard for the period of January 1, 1982 through December 31, 1982;
2. All documents and materials relating to contributions and/or loans solicited by the Tallon for Congress Committee on behalf of my candidacy for the United States House of Representatives from the aforementioned individuals during the period of January 1, 1982 through December 31, 1982; and
3. All telephone logs, message slips, and other records of telephone calls made or received by any agent of the Tallon for Congress Committee regarding the solicitation of contributions and/or loans in my behalf from the aforementioned individuals during the period of January 1, 1982 through December 31, 1982.

Page 2

Glenn, your cooperation in this matter will be greatly appreciated. As I am working in certain time restraints, I hope you will respond to me at your earliest possible convenience. If you have any questions, please give me a call at (202) 225-3315.

Thanking you for your attention to this matter, I am

Sincerely,

Robin Tallon

RT/ms

21040560743

Congress of the United States
House of Representatives
Washington, DC 20515

February 2, 1988

BY CERTIFIED MAIL

Mr. Lamar Rabon
Post Office Box 12517
Florence, South Carolina 29504

Dear Lamar:

I have recently been subpoenaed by the Federal Election Commission to provide certain documents and information relating to the financial involvement of several individuals in the 1982 Tallon for Congress Campaign. As treasurer for the campaign committee now, you would have access to and knowledge of these documents if they exist.

Therefore, I am requesting your assistance in providing me with the following information of which you might have knowledge or might be in your possession:

1. All documents and materials related to contributions and loans received by the Tallon for Congress Committee from Gary H. Slavens, Vicki Slavens, G. B. Stokes, Joe W. Pearce, Jr. and Ed Saleeby, including, but not limited to, letters, memoranda, bank records of contributions and loans received, deposit slips, copies of checks, credit card slips, and any other documents in this regard for the period of January 1, 1982 through December 31, 1982;
2. All documents and materials relating to contributions and/or loans solicited by the Tallon for Congress Committee on behalf of my candidacy for the United States House of Representatives from the aforementioned individuals during the period of January 1, 1982 through December 31, 1982; and
3. All telephone logs, message slips, and other records of telephone calls made or received by any agent of the Tallon for Congress Committee regarding the solicitation of contributions and/or loans in my behalf from the aforementioned individuals during the period of January 1, 1982 through December 31, 1982.

Lamar, your cooperation in this matter will be greatly appreciated. As I am working in certain time restraints, I hope you will respond to me at your earliest possible convenience. If you have any questions, please give me a call at (202) 225-3315.

Thanking you for your attention to this matter, I am

Sincerely,

Robin Tallon

RT/ms

21040353/45

P 452 989 845
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. & Mrs. Glenn Colson	
Street and No. 1457 W. Steria Drive	
P.O., State and ZIP Code Florence, SC 29501	
Postage	\$22
Certified Fee	75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	70
Return Receipt Showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$167
Postmark	WASHINGTON, DC FEB 21 1988 USPO

PS Form 3800, Feb. 1982

P 452 988 826
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Lamar Robinson	
Street and No. P.O. Box 12517	
P.O., State and ZIP Code Florence, SC 29504	
Postage	\$22
Certified Fee	75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	70
Return Receipt Showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$167
Postmark	WASHINGTON, DC FEB 21 1988 USPO

PS Form 3800, Feb. 1982

1 3 4 0 3 6 3 7 4 6

CONFIDENTIAL

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 FEB 17 PM 4:48

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens, et al.) MUR 2071
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On August 13, 1985, the Commission found reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3). The Commission also found reason to believe that Vicki Slavens violated 2 U.S.C. §§ 432(b)(3) and 441f. On the same date, the Commission found reason to believe that G. B. Stokes violated 2 U.S.C. § 441g. In addition, the Commission found reason to believe that Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina) violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). On the same date, the Commission found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer violated 2 U.S.C. § 441f.

On March 18, 1986 the Commission authorized subpoenas and orders to Gary H. Slavens, Vicki Slavens, G.B. Stokes, Representative Robin Tallon, Michael Glenn Odom, and the Tallon for Congress Committee and Lamar Rabon, as treasurer.

During May 21-23, 1986, this Office deposed Gary H. Slavens, G.B. Stokes, and Michael Glenn Odom. The Tallon for Congress Committee (hereinafter "Committee"), and Lamar J. Rabon, as treasurer, produced documents in compliance with the subpoena directed to them.

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Vicki Slavens filed an affidavit with the Commission on September 10, 1986, stating that in 1982, she was married to Gary Slavens who asked her to make a \$1,000 contribution to the Committee. After she indicated uncertainty as to having the money, Gary Slavens said he would deposit \$1,000 into her account. Gary Slavens made the deposit and she then wrote a check for that amount to the Committee.

During his deposition, Gary Slavens indicated that we should contact a James A. ("Jimmy") Brown, Jr. who, according to Slavens, was aware of illegal practices in the Tallon campaign in 1982. Slavens declared that Brown could corroborate his allegations regarding cash contributions to the Tallon campaign. In a telephone conversation on May 21, 1986 with a staff member of this Office, Brown stated that he was a personal friend of Representative Tallon, and although he had never been an official or paid employee of the Committee he did help out at campaign headquarters. Brown stated that there were many rumors about cash contributions to the Tallon campaign. Brown further stated that he had no direct knowledge of any cash going into the campaign.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when "seed money" was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then allegedly contributed these funds to the Tallon campaign.

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Brown supplied the following names as having received these bonuses and having contributed them to the campaign: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, Jane Harris, Roland Minshew and Mark Lawson.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On August 6, 1986, this Office received a signed and sworn affidavit from Brown. The affidavit differed significantly from Brown's telephone statement. He claimed to have no independent recollection as to the individuals who made statements concerning bonuses, or who participated in the conversation. Further, Brown declared that he had no knowledge of who worked in Tallon's clothing stores or who may have received any bonuses.

As mentioned above, the Tallon for Congress Committee produced documents in response to subpoenas. Among those documents were receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown, made contributions early in the Tallon campaign, as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982.

1040053747

It is significant to note that five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five are virtually sequential, and the amounts are an even \$1000 except for the contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to create "seed money".

During his deposition, Michael Glenn Odom, the former treasurer of the Tallon for Congress Committee, stated that he became aware in 1984, of the allegations about the use of bonuses to reimburse employees for contributions to the 1982 campaign. Mr. Odom identified the following as being employees of the Tallon clothing stores during 1982: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, and Ronald Minshew.

As a result of this evidence, the Commission on November 12, 1986 found reason to believe that Robin's of Florence, Inc. and LeMasters, Inc. violated 2 U.S.C. § 441b(a) and 2 U.S.C. § 441f. The Commission also found reason to believe that Tallon for Congress Committee, and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441b(a), and reason to believe that Jane Harris, Jerry Harris, Lynn Hartnett, Mark Lawson, Roland Minshew and Robert (Bobby) Welch violated 2 U.S.C. § 441f.

On November 21, 1986 the above named parties were mailed notice of the Commission's findings. The notice letters to Mark

21040163700

Lawson, and Lynn Hartnett were unclaimed and returned to this Office.^{1/} The responses received from the others were all dated December 8, 1986, and contain the same basic response.

Although the answers indicate that each received bonuses well in excess of the contributions, i.e., bonuses of either \$2,330 or \$2,380, there was a lack of specific information surrounding the payment of the bonuses, such as whether these bonuses were given on a regular basis in April of each year or were paid only in April of 1982; what criteria were used to determine the amount of the bonuses and whether the recipients of the bonuses received any instructions or suggestions regarding contributing the bonuses to Tallon's campaign.

In light of the inconsistency between the phone conversation and subsequent affidavit of James A. ("Jimmy") Brown, Jr. regarding bonuses being used as "seed money", the similarity of the responses of the individual respondents and the inconclusive information as to the bonuses given by Robin's of Florence, Inc., and LeMasters, Inc., this Office recommended taking the depositions of James A. ("Jimmy") Brown, Jr., Jane Harris, Jerry Harris, Roland Minshew, Robert Welch, Lynn Hartnett, Mark Lawson, an officer from Robin's of Florence, Inc., and of LeMasters, Inc. In addition, as the respondents indicate that bonuses were received from corporations other than Robin's of Florence, Inc.

^{1/} After referring these two individuals to a tracing service, their current addresses were found. The letters to Lynn Hartnett and Mark Lawson were then remailed to them. Their responses were received, and contain the same basic response as the others.

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and LeMasters, Inc., it was necessary to take depositions of an officer of each of those corporations to resolve this matter.

On October 27, 1987 the Commission approved this Office's recommendation to take the requested depositions in Columbia, South Carolina. The depositions were taken on December 9 and 10, 1987. Roland Minshew, Lynn Hartnett, Mark Lawson, Robert Welch, Jerry Harris, Jane Harris, and James A. ("Jimmy") Brown, Jr. appeared as ordered and were deposed. The following is a summary of the testimony.

A. Roland Minshew (Manager Robin's of Florence, Inc.)

In summary, Mr. Minshew testified that he did not know specifically what the April, 1982, \$1,500.00 bonus was based on. He stated that frequently money was received by employees, by way of bonuses, contests, commissions, and the like. He indicated that Robert Welch determined the amount to be paid for the bonuses and commissions. In addition, Mr. Minshew stated that it was Robert Welch who suggested that he make a contribution to the campaign; however, he stated that he did not feel coerced, forced, or threatened to make such a contribution. Mr. Minshew testified that it was his wife, Cameron Tallon Minshew, who was authorized to draw checks on the corporate account, and she issued the \$1,500.00 bonus check to him.

He stated that he was in no way required to use his bonus as a contribution. He testified the contribution was made because Robin Tallon is his brother-in-law, and he would do anything to

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help him. Mr. Minshew also stated he was not familiar with the term "seed money."

B. Lynn Hartnett (Manager Robin's Ladies Shop, Inc.)

Mrs. Hartnett testified that she was not given the \$1,500.00 bonus on the condition that she make a contribution. In addition, she stated that she talked about the contribution with Robert Welch. However, in her opinion, he did not suggest, coerce, or require that she contribute to the campaign. The contribution was solely her voluntary act, she said.

Mrs. Hartnett thought the \$1,500.00 bonus may have been based on business activity such as a contest or commission; however she was unsure. She alleged that she made the contribution because she could afford the \$1,000.00 in 1982.

Mrs. Hartnett claimed no knowledge of the committee's financial condition as of April, 1982, and no knowledge of the term "seed money."

C. Mark Lawson (Former Employee - Manager Robin's of Anderson Inc.)

Mr. Lawson thought the \$1,500.00 bonus was unusual because it was the most he had ever received. He said that he did not know what the bonus was based on because the store he managed did not generate much business.

Mr. Lawson indicated his contribution was totally voluntary; and he did not discuss it with anyone. He testified that he made the contribution because of his personal and business ties to

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Mr. Tallon. He believed that if Mr. Tallon won this would generate more business for the store, thereby helping him increase his income.

He testified that he had never heard the term "seed money." He had no recollection of ever discussing a contribution with Robert Welch.

D. Robert Welch (Manager, LeMasters, Inc.)

Pursuant to the several subpoenas directed to the corporations, Mr. Welch, who was the president of all Robin's stores in 1982, furnished compiled information on the payment of bonuses by the various Robin's stores in 1982. The documents were compiled by Cameron Tallon Minshew who is the bookkeeper for the Tallon Sales Company, Inc., and who had the necessary documents to satisfy the Commission's request for documents.

According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers in 1982 he claimed no recollection on what such bonuses were based.

Mr. Welch stated that he suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he told

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the managers that a contribution would be helpful to Mr. Tallon. He claimed that the contribution was not forced, and that he never said it would be reimbursed in any way. Mr. Welch indicated that he solicited contributions from employees, customers and friends on a volunteer basis. These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees. In addition he alleged he never knew the financial condition of the campaign committee during 1982.

During his deposition, Mr. Welch furnished four solicitation letters used to acquire funds for Congressman Tallon's congressional campaign. (Attachment 1-1(d)).^{2/} These letters indicate that Mr. Welch was very active in fundraising for the campaign. The letter dated June 1, 1982. was directed to employees of the various stores, and gives evidence that some contributions were made by the employees as a result of actions by Mr. Welch.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00

^{2/} Each of the solicitation letters are direct appeals for contributions to Tallon's campaign. None, however, contain a disclaimer as required by 2 U.S.C. § 441d. It is the opinion of this Office that the Commission should not proceed on this violation at this stage of the investigation.

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contribution before the bonuses were declared, or after. Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

Mr. Welch stongly asserts that he was not directed to give any bonuses as reimbursements, either before or after the fact, for the contributions. In addition, he states that a requirement to give a contribution to the campaign in order to receive a bonus was never placed on any employee.

E. Jerry Harris (Former Manager - Robin's of N. Myrtle Beach, Inc.)

Mr. Harris testified that he has been a friend of Robin Tallon all his life, and that his various contributions were based on that friendship and nothing else. Mr. Harris contended that he did not know what the April 12, 1982, \$1,500.00 bonus was based on, however, he did not think it unusual because he has received bonuses larger than this in the past. Mr. Harris alleged that he received no instructions from anyone to make a contribution to the Tallon Campaign.

When asked whether he received any assistance in writing his December 8, 1986 response to the Commission, he stated that the response was solely his product. He also testified that he appeared personally and signed the document in front of Cameron Tallon Minshew, since she was a notary public.

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Mr. Harris alleged that he was not aware of the financial condition of the 1982 campaign committee in April 1982 or at any time, and has no knowledge of the term "seed money". In addition, he claimed no knowledge of any plan to declare bonuses with the requirement that contributions be made to the Tallon Campaign Committee.

F. Jane Harris

Mrs. Harris testified she was never employed by any of the Robin's stores. She thinks the \$500.00 contribution was made because her husband had received a substantial bonus in April of 1982. Mrs. Harris contended that she never received any knowledge as to the financial condition of the 1982 campaign.

Mrs. Harris stated that the December 8, 1986 response to the Commission was not written by her. She claimed that she received a telephone call from Cameron Tallon Minshew, in which Mrs. Minshew said she would be sending something for Mrs. Harris to sign. Mrs. Harris stated that she received the letter dated December 8, 1986, signed it and mailed it back to Mrs. Minshew. Mrs. Harris also stated that she never appeared in front of the notary, Cameron Tallon Minshew, but only signed what Mrs. Minshew mailed to her.

Mrs. Harris testified that her contribution was totally voluntary.

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G. James A. ("Jimmy") Brown, Jr.

Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses; the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning, Mr. Brown steadfastly maintained that the plan that was discussed, was that the employee bonuses were to be used as contributions. Mr. Brown stated he was familiar with politics and that due to the nature of the conversation he may have assigned the term "seed" money to the planned activity.

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H. Representative Robin M. Tallon, Jr.

The Commission had previously authorized a subpoena for the deposition of and production of documents by Congressman Tallon. Congressman Tallon was scheduled to be deposed on January 28, 1988. After several telephone conversations between a staff member of this Office and the attorney representing Congressman Tallon this Office received a letter on February 1, 1988 from Mr. Tallon's attorney requesting a continuance until such time as counsel could schedule a mutually acceptable date for the deposition of Mr. Tallon. To date, such date has not been agreed upon although it is hoped that the deposition will take place within February.

II. ANALYSIS

There is direct testimony by Mrs. Jane Harris that her December 8, 1986 response to the Commission's reason to believe finding was authored by Cameron Tallon Minshew, the sister of Robin Tallon who runs the Tallon Sales Company. As can be seen, her response is almost identical to those of Lynn Hartnett, Roland Minshew, Robert Welch, and Jerry Harris. In addition, Cameron Tallon Minshew notarized Jane Harris' response without seeing Mrs. Harris sign. Cameron Tallon Minshew also notarized many of the responses from the other respondents.

There is direct testimony from "Jimmy" Brown, that Cameron Tallon Minshew, and Sue Bass, the bookkeeper for the 1982 Tallon Campaign Committee, were involved in a conversation that bonuses

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would be declared and converted into contributions for the campaign. This conversation took place early in April of 1982.

There is testimony from Robert Welch that before any bonuses are declared he and Cameron Tallon Minshew discuss whether any should be given, the amount, and to whom. There is testimony from Roland Minshew that all bonuses checks are written by Cameron Tallon Minshew, who is authorized to draw checks from the corporate account. There is also evidence that the bonuses to all but one of the respondents were given on April 12, 1982, and that their contributions were received by the Tallon Campaign Committee, on April 14, 1982.

Because of Cameron Tallon Minshew's role at issue in the bonuses and the preparation of the "pat" responses to the Commission, as well as her involvement in the alleged conversation outlined by Mr. Brown, this Office believes it is necessary to depose her concerning the events. This Office also believes the deposition of Sue Bass would clarify what actually occurred regarding the alleged Minshew/Bass conversation concerning reimbursements. For those reasons, the Office of the General Counsel recommends that the Commission authorize the appropriate subpoenas and orders to Cameron Tallon Minshew and Sue Bass.

III. RECOMMENDATIONS

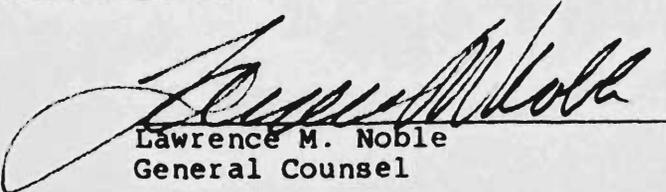
1. Authorize the attached subpoenas and orders to: Cameron Tallon Minshew and Sue Bass.

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2. Approve and send the attached letters.

Date

2/17/88


Lawrence M. Noble
General Counsel

Attachments

1. Solicitation letters
2. Subpoenas (2)
3. Letters (2)

Staff Person: Phillip L. Wise.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Gary H. Slavens, et al.

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MUR 2071

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 22, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2071:

1. Authorize the subpoenas and orders to: Cameron Tallon Minshew and Sue Bass, as recommended in the General Counsel's report signed February 17, 1988.
2. Approve and send the letters, as recommended in the General Counsel's report signed February 17, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

2/22/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	2-17-88,	4:45
Circulated on 48 hour tally basis:	Thurs.,	2-18-88,	11:00
Deadline for vote:	Mon.,	2-22-88,	11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 29, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Sue Bass
44 Chalmers Row
Florence, SC 29501

RE: MUR 2071

Dear Ms. Bass:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on March 9, 1988, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, and provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

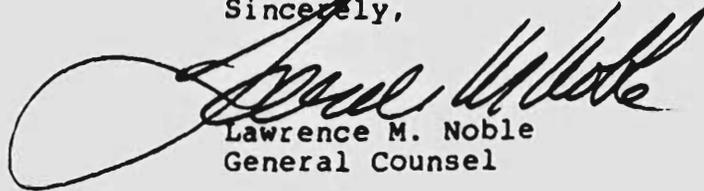
You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 21 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

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Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

SUBPOENA

To: Sue Bass
44 Chalmers Row
Florence, SC 29501

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding Representative Robin M. Tallon's 1982 Congressional Campaign. Notice is hereby given that the deposition is to be taken on March 9, 1988 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 2 o'clock p.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this 26th day of February, 1988.



Thomas J. Josefiak
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

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plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 29, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Cameron T. Minshew
120 Lake Wood Drive
Florence, SC 29501

RE: MUR 2071

Dear Ms. Minshew:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the attached subpoena, which requires you to appear and give sworn testimony on March 9, 1988, in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, and provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

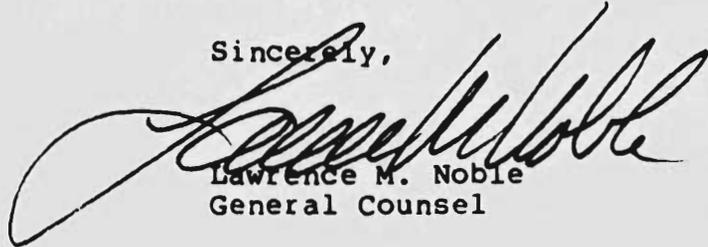
You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 21 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

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Please confirm your scheduled appearance with Phillip L. Wise, the attorney handling this matter on our toll free line (800/424-9530) within two days of your receipt of this notification.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Subpoena

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2071

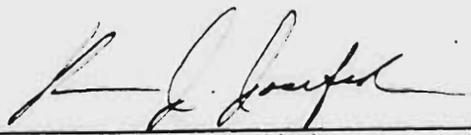
SUBPOENA

To: **Cameron T. Minshev**
120 Lake Wood Drive
Florence, South Carolina 29501

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to activity surrounding Representative Robin M. Tallon's 1982 Congressional Campaign. Notice is hereby given that the deposition is to be taken on March 9, 1988 in the Conference Room at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, beginning at 11 o'clock a.m. and continuing each day thereafter as necessary.

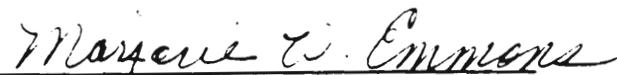
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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at Washington, D.C., this *26th* day of *February*, 1988.



Thomas J. Josefiak
Chairman

ATTEST:



Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 3, 1988

Dwight F. Drake, Esquire
Nelson, Mullins, Grier, &
Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

Re: MUR 2071
Representative Robin Tallon

Dear Mr. Drake:

On January 19, 1988, this Office mailed you the Commission authorized Subpoena for testimony and document production by your client, Congressman Robin Tallon. On January 22, 1988, in a telephone conversation with a staff member from this Office, you indicated that you would contact Congressman Tallon and schedule a mutually satisfactory date for his testimony. In a second telephone conversation between you and this Office on February 2, 1988, you again asserted that Congressman Tallon wanted to testify as soon as possible, and the date for such testimony would be forthcoming.

On February 3, 5, 8, and 18, 1988, this Office left messages with your secretary for you to return our calls so that we could discuss the narrowing of the document request in an effort to expedite the taking of Congressman Tallon's deposition. In the telephone call of February 18, 1988, this Office specifically left the message that the requested documents under the subpoena to your client are those relating to contributions and loans solicited or received directly or indirectly by Congressman Tallon individually or as an agent of the Committee.

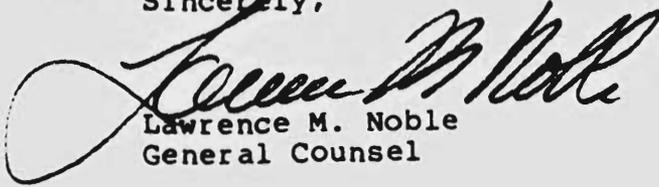
As yet, our calls to your Office have not been returned. Further, no dates have been furnished for the taking of the deposition. We now propose that this deposition be taken on March 18, 1988, to accommodate your Friday preference.

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Letter to Dwight F. Drake, Esquire
Page 2

If you have any questions, please contact Phillip L. Wise,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Cameron T. Minshew
120 Lake Wood Drive
Florence, SC 29501

RE: MUR 2071

Dear Ms. Minshew:

On March 15, 1988 you appeared at the U.S. Attorney's Office, 1100 Laurel Street, Columbia, South Carolina, pursuant to a Notice of Taking Deposition and Subpoena. At the conclusion of your testimony you were not given a check for the witness fee, and payment for the mileage. Enclosed herein is a check for such witness fee, plus payment for the mileage.

If you have any questions, please contact, Phillip L. Wise, the attorney assigned in this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By:

Lois G. Lerner
Associate General Counsel

Enclosure
Check (\$62.76)

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United States Treasury

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Pay to
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1988

MEMORANDUM

TO: Larry McCoy
Deputy Assistant Staff Director

FROM: Lawrence M. Noble
General Counsel *[Signature]*

SUBJECT: Witness Fee Check for Sue Bass

On March 15, 1988, staff members from this Office were in Columbia, South Carolina taking depositions. Sue Bass, one of the deponents, did not appear and is not entitled to a witness fee at this time. Accordingly, this Office is returning the attached check payable to Sue Bass for you to dispose of according to your established procedures in such matters.

Attachment
Check in the amount of \$62.76

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BEFORE THE
FEDERAL ELECTION COMMISSION

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In RE: :
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MUR 2071 :
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DEPOSITION OF ROBERT M. TALLON, JR.

Washington, D. C.

Friday, March 18, 1988

Deposition of ROBERT M. TALLON, JR., called for
examination pursuant to notice, at the Federal Election
Commission, 999 E Street, N.W., at 9:40 a.m. before BRENDA M.
SMONSKY, a Notary Public within and for the District of
Columbia, when were present on behalf of the respective parties:

LOUIS G. LERNER, ESQ.
PHILLIP WISE, ESQ.
THOMAS J. WHITEHEAD, ESQ.
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463
On behalf of the FEC.

DWIGHT F. DRAKE, ESQ.
Nelson, Mullins, Riley & Scarborough
1330 Lady Street
Third Floor, Keenan Building
Columbia, South Carolina 29211
On behalf of Congressman Tallon.

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C O N T E N T S

WITNESS

EXAMINATION

Robert M. Tallon, Jr.
by Ms. Lerner
by Mr. Drake
by Ms. Lerner

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E X H I B I T S

TALLON EXHIBITS

IDENTIFIED

Exhibits 1 thru 3
Exhibit 4

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19

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P R O C E E D I N G S

Whereupon,

ROBERT M. TALLON, JR.

was called as a witness and, having first been duly sworn,
was examined and testified as follows:

EXAMINATION

BY MS. LERNER:

Q Would you state your name for the record.

A Robert M. Tallon, Jr.

Q Congressman, you also go by?

A Robin.

Q Could you give us your address, please.

A 1444 Dorchester Road, Florence, South Carolina

29501.

Q You are presently the Congressman for the 6th

District of South Carolina?

A Yes, ma'am.

Q When were you elected to that office originally?

A November 1982.

Q What was your occupation before you were elected?

A I was a businessman, principally involved in
retail clothing stores and also some real estate and home

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1 building.

2 Q Are you still involved with the clothing stores
3 that you mentioned?

4 A I am interested, but not involved.

5 Q Can you explain what you mean by "interested"?

6 A I still have an interest in the business, a
7 financial interest in the business. I am in the process now
8 of trying to determine how not to have a financial interest
9 in the business.

10 Q Can you tell me how many clothing stores you had
11 an interest in in 1982 when you were first running?

12 A Let's see. One, two, three, four, five, six.
13 Six.

14 Q Could you give us the names of those stores,
15 please?

16 A Yes. Robin's of Greenville, Robin's of
17 Demtsville, Robin's of Columbia, Robin's of Florence, Robin's
18 Ladies' Wear, and LeMasters.

19 Q Are each of those stores incorporated?

20 A Yes, ma'am.

21 Q Is there an organization called the Tallon Sales
22 Company?

1 A Yes.

2 Q Could you explain to us what that is?

3 A Tallon Sales Company is a -- its function is to
4 provide management services for the corporations that I just
5 named that would have to do with monthly P&L statements.

6 Q Can you tell me what P&L is?

7 A Monthly profit and loss statements, paying
8 employees and also accounts payable. General office clerical
9 work, support for these other businesses. It is also -- I
10 guess this is technically right -- a holding company that
11 owns stock in these other businesses.

12 Q What would you say your connection with Tallon
13 Sales was in 1982 aside from the fact that Tallon Sales was
14 involved in this administrative activity for the stores you
15 mentioned?

16 A My personal connection?

17 Q Yes.

18 A From the time I was elected to the South Carolina
19 legislature in 1979, I just really was not personally
20 involved in policy-making decisions that related to Tallon
21 Sales Company or the other entities, the other stores.

22 Q Who were the people that were in charge of the

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1 day-to-day operations of Tallon Sales Company back in 1982?

2 Do you recall?

3 A Probably my sister. Of course, my sister.

4 Q Her name is?

5 A Cameron Minshew, and our general manager, Bobby
6 Welch.

7 Q Did either Mr. Welch or Ms. Minshew communicate
8 with you regarding what the day-to-day operations were or
9 decisionmaking processes were during that time?

10 A No, ma'am.

11 Q Did they ever run policy decisions by you for your
12 feelings?

13 A Well, no. I don't know that there were that many
14 policy decisions. The biggest thing I probably ever did was
15 look at these profit and loss statements at the end of every
16 month.

17 Q Were you involved at all in the decision-making
18 processes regarding the corporations during the period of
19 January 1982 through the election in which you were first
20 elected Congressman from the 6th District?

21 A No, ma'am.

22 Q Are you aware that the corporations that you

1 mentioned previously sometimes give bonuses to their
2 employees?

3 A Yes, ma'am.

4 Q What would be the basis for giving a bonus to an
5 employee?

6 A There was really no -- at least when I was running
7 the business, there was no specified policy. There was
8 certainly a bonus given for, I guess, percentage of the sales
9 each month. And then at other times, it was pretty much an
10 arbitrary decision. It may have had to do with the profit
11 that that particular store had.

12 Q Who would make those decisions?

13 A Prior to 1979, I think I would, possibly in
14 consultation with my sister, who is the bookkeeper, and
15 Bobby.

16 Q After 1979?

17 A I guess my sister and Bobby would probably do all
18 that. We made an agreement, a verbal agreement, in 1979,
19 when I wanted to get in politics, that I would stay out of
20 their hair and they would run the business and I would go
21 ahead and spend my time and energy and effort in the office
22 that I was elected to.

1 From that time hence, they have called the shots,
2 as far as the business is concerned.

3 Q When you say Bobby, just for the record, you are
4 referring to Bobby Welch?

5 A Bobby Welch.

6 Q Do you recall when you announced your candidacy
7 for Congress in 1982?

8 A Well, I think that I announced it in the fall of
9 '81, and then I believe by that November, I had some second
10 thoughts and decided that I would not run for Congress. But
11 by February of '82, I think I had reconsidered for various
12 reasons and announced that I would indeed be a candidate.

13 Q Do you recall when you actually started
14 fund-raising? Let me stake a step back. Do you recall when
15 you first organized a campaign committee?

16 A I honestly don't.

17 Q Can you give me an approximate time period?

18 A We had people that were interested in the campaign
19 on a sort of an informal basis. They were not organized.
20 Actually, they came to me in the fall of -- would that be
21 '81?

22 Q Yes.

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1 A In the fall of '81.

2 Q Would you say, then, that those people from the
3 fall of '81, when you first started thinking about this,
4 through the end of the campaign, that those people were
5 working for you, whether it would be formally or informally,
6 towards furthering your campaign?

7 A Yes.

8 Q Then you said approximately February '82 is when,
9 after thinking back and forth, you finally decided that you
10 were going to go ahead with the campaign?

11 A Right.

12 Q Did anyone -- excuse me a second.

13 (Pause.)

14 BY MS. LERNER:

15 Q Tell me about your involvement in the financing of
16 your campaign. You had these people that were generally
17 interested in helping you out. What was your involvement
18 with regard to finances for the campaign?

19 A I was not involved.

20 Q Were you consulted with regard to fund-raising
21 decisions?

22 A No, not really. We had a campaign manager.

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1 Q Who was that?

2 A Russ Rosen. Well, we had two. Cam Chessum was
3 first. He got sick and Russ Rosen came on board. Russ, I
4 believe it was Russ, involved -- I think his name was Randy
5 Wilhelm from here in Washington who helped us with
6 fund-raising, not only in Washington, but also came down to
7 the district. I don't know how many times. At least one
8 time that I can remember when I was present at a meeting.

9 Q Approximately what time frame are you talking
10 about there?

11 A This must have been -- it was in warm weather. It
12 must have been in April, April or May.

13 Q Are you aware of any fund-raising efforts that
14 took place between February and this April or May period you
15 are talking about?

16 A I honestly cannot remember. I am trying to
17 think. I just cannot -- I don't remember. I mean, the first
18 time that we had any kind of organized effort was when we got
19 a campaign manager who came in to take over the day-to-day
20 operations of the campaign. And with Mr. Wilhelm's help,
21 that was sort of the beginning of any kind of structured
22 campaign.

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1 Q Do you know if there were any contributions
2 accepted by your campaign prior to the time when the campaign
3 manager came in?

4 A I would think that there would have been. I'm
5 trying to think of when the campaign manager came in, but we
6 probably had at least the campaigning treasurer, and it is
7 very hard to remember back six or seven years.

8 Q I understand.

9 A Maybe if I had the FEC reports in front of me, it
10 might could help me a little bit. I just don't remember.

11 Q Maybe this will make it easier: You would say
12 probably your date on your FEC report of organization of your
13 committee probably would have been the date about when you
14 started receiving campaign contributions, whether it be an
15 organized effort or just contributions from individuals that
16 you knew; would that be a correct statement?

17 A I believe so. I think so.

18 Q I'm not trying to make you remember something you
19 can't remember. I am trying to get a little bit of
20 background here.

21 Q I have a copy of -- is this the first report?

22 MR. WHITEHEAD: I believe so.

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1 BY MS. LERNER:

2 Q I have a copy of the first report that you filed
3 -- excuse me one second.

4 (Pause.)

5 MS. LERNER: I was looking for the statement of
6 organization date, but we do not have it. It is on the
7 record.

8 BY MS. LERNER:

9 Q We have a copy of an FEC report that I will show
10 to your counsel which indicates that the statement of
11 organization listed the date of April 13, 1982, for the
12 startup of your campaign, which I assume is the date we are
13 talking about. This would be the formal start of it -- I'm
14 sorry. We do have a copy of the statement of organization.

15 That indicates that the campaign registered with
16 the commission on April 2, 1982; is that correct?

17 A Yes, ma'am.

18 Q Do you know a gentleman by the name of
19 G.B. Stokes?

20 A Yes, ma'am.

21 Q Who is Mr. Stokes?

22 A G.B. Stokes is a businessman in Florence who owns

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1 the Howard Johnson's motel and restaurant and I'm sure other
2 things, but I'm not sure what else.

3 Q Does Mr. Stokes have any relationship to any of
4 the Tallon corporations?

5 A No, ma'am.

6 Q Did Mr. Stokes play any part in your campaign?

7 A I remember having a meeting in Mr. Stokes' motel
8 with a group of people that we were trying to involve in the
9 campaign.

10 Q Do you remember approximately when that meeting
11 took place?

12 A Sometime -- I don't know. It was probably around
13 April or May.

14 Q Can you recall whether it was before or after you
15 registered a committee with the commission?

16 A No, I can't. But I would certainly think it was
17 afterwards.

18 Q Did Mr. Stokes ever approach you and indicate that
19 he would like to make a contribution to your campaign?

20 A No, ma'am.

21 Q Do you know whether Mr. Stokes ever made a
22 contribution to your campaign?

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1 Q How do you know Mr. Slavins?

2 A We were acquaintances before, prior to the time
3 that I ran for Congress. He helped me in the Congressional
4 campaign and later worked for me, after I was elected, for
5 about six months.

6 Q Did he have any involvement with any of your
7 corporations?

8 A No, ma'am.

9 Q What did he do for you in assisting with the
10 campaign?

11 A I really don't know, just anything that he and the
12 campaign manager could agree on, I guess. During that period
13 of time, my life was pretty much run by my campaign manager
14 and campaign schedule. There were other people around. But
15 for 16 hours a day, I was told what to do, where to go and
16 how to do it. It was -- I really did not keep up with
17 exactly what other people were doing.

18 Q Did you ever discuss the possibility of putting
19 cash contributions into your campaign with Mr. Slavins?

20 A No, ma'am.

21 Q Did you ever ask Mr. Slavins to take a cash
22 contribution and write your campaign a check?

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1 A No, ma'am; no, ma'am.

2 Q Did Mr. Slavins ever offer to put cash in his
3 account and write a check to the campaign?

4 A No, ma'am.

5 Q Do you know Mr. Slavins' ex-wife, Vicky?

6 A Yes, ma'am.

7 Q Did you ever discuss the possibility with
8 Mr. Slavins of his wife putting a contribution into her
9 account and writing a check to the campaign?

10 A No, ma'am.

11 Q What is your relationship with Mr. Slavins
12 presently?

13 A He -- it is up and down. Right now he calls me
14 occasionally on the telephone. He lives in Charleston. He
15 is remarried. We are speaking now.

16 Q There was a time when you were not speaking?

17 A Yes, ma'am.

18 Q Can you give me the basis for your falling out?

19 A We had a problem internally in our office when
20 Mr. Slavins came to work for us in Washington. It was just
21 something that couldn't be resolved. He left not under the
22 best circumstances.

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1 Q Approximately when was that?

2 A I believe that was in July after I took office in
3 January.

4 Q So, that would be '83?

5 A '83, right.

6 Q Getting back to Mr. Welch, was he involved in your
7 campaign fund-raising at all?

8 A Yes, ma'am.

9 Q What did Mr. Welch do with regard to your
10 fund-raising?

11 A I'm not sure.

12 Q Do you know whether he was involved in soliciting
13 funds for the campaign?

14 A Yes, ma'am, he was.

15 Q Are you aware of how he went about that?

16 A No, ma'am.

17 Q Did Mr. Welch or anyone else in your campaign ever
18 show you documents that Mr. Welch was going to send out to
19 solicit campaign contributions?

20 A No, ma'am.

21 Q I realize this was a long time ago. I will show
22 you some documents. I will ask you whether you have ever

1 seen them before. I have these premarked. Please look at
2 the document marked Exhibit 1. Take your time and read it
3 over.

4 (Tallon Exhibit 1 identified.)

5 THE WITNESS: I have never seen that.

6 MR. DRAKE: When you say "that," you mean Exhibit
7 1?

8 THE WITNESS: Yes.

9 BY MS. LERNER:

10 Q Please look at Exhibit 2.

11 (Tallon Exhibit 2 identified.)

12 THE WITNESS: I don't think I have ever seen
13 that.

14 BY MS. LERNER:

15 Q You are referring to Exhibit 2?

16 A Right.

17 Q Exhibit 3, please.

18 (Tallon Exhibit 3 identified.)

19 THE WITNESS: No, ma'am.

20 BY MS. LERNER:

21 Q You have never seen Exhibit 3 before?

22 A No.

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1 Q And finally, Exhibit 4.

2 (Tallon Exhibit 4 identified.)

3 THE WITNESS: No, ma'am.

4 BY MS. LERNER:

5 Q You have never seen Exhibit 4 before?

6 A No, ma'am.

7 Q Was it generally the custom of the campaign to
8 have you review solicitation materials before they went out?

9 A No, ma'am.

10 Q Who would have been the person to do that?

11 A I guess the campaign manager. Perhaps -- again,
12 I'm not sure -- Mr. Wilhelm, who was helping us raise money
13 may have made suggestions of that sort of thing. But I think
14 ultimately the campaign manager would have probably been the
15 one to consult with.

16 Q Now, going back to approximately February of 1982
17 when you made your final decision that you were going to run,
18 did you ever have a discussion with Ms. Minshew or Mr. Welch
19 concerning the possibility of soliciting the employees of the
20 Tallon corporations?

21 A No, ma'am.

22 Q Do you know whether they ever solicited the

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1 employees of the Tallon corporations for contributions to
2 your campaign?

3 A Yes, ma'am.

4 Q Did they?

5 A Yes, ma'am.

6 Q How do you know that?

7 A I don't know. Through the whole process, you just
8 somehow knew it. But I can't recall. One of these exhibits
9 is obviously asking for a contribution.

10 Q Did Ms. Minshew ever have a discussion with you
11 regarding the possibility of giving bonuses to the employees
12 at a certain point so that they would be able to make larger
13 contributions to your campaign?

14 A No, ma'am.

15 Q Did Mr. Welch ever discuss that possibility with
16 you?

17 A No, ma'am.

18 Q Did either Ms. Minshew or Mr. Welch ever indicate
19 to you that it might be profitable to solicit the employees
20 for contributions shortly after they received a bonus?

21 A No, ma'am.

22 Q Did they ever suggest it might be profitable to

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1 your campaign to make a solicitation to employees shortly
2 before a bonus was coming out?

3 A No, ma'am. They never asked me, period, about
4 asking employees for contributions.

5 Q Is there any particular time of the year or the
6 month when bonuses would generally be given to the employees?

7 A I don't know. You might understand something. I
8 didn't even know who was working in the stores at that time.
9 I couldn't even tell you who the personnel was. I was
10 totally disconnected, decoupled from the operations and what
11 was going on. I did want to look at the profit and loss
12 statements and the income tax returns.

13 But other than that, that was my involvement,
14 other than maybe cutting an ad out of the Washington Post if
15 I thought it would be of interest and mailing it to them,
16 that sort of thing. But just never to get involved with
17 policy, with personnel, with buying, with merchandising, with
18 payroll decisions, none of that.

19 Q Prior to the time the investigation regarding
20 these matters began, did you ever hear any rumors that
21 bonuses were being given to employees so that they could make
22 contributions to your campaign?

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1 A No, ma'am.

2 Q Do you know a woman by the name of Sue Bass?

3 A Yes, ma'am.

4 Q Who is Ms. Bass?

5 A Ms. Bass, when I was in the state legislature,
6 worked for Tallon Sales Company.

7 Q What was her position?

8 A I'm not sure. It seems to me -- I don't know.
9 She did clerical work.

10 Q Was Ms. Bass still working for the Tallon Sales
11 Company in 1982 when you were running for office?

12 A I don't remember. I know she moved. I think she
13 moved, she and her husband relocated. I just cannot remember
14 when she left.

15 Q Was Ms. Bass doing any work for the campaign that
16 you know of?

17 A Not that I know of. She used to help me with some
18 of my things when I was in the state legislature.

19 Q Let me give you a copy of a statement of
20 organization for your committee to look at again. I believe
21 if you look down about the middle of the page, you will see
22 that Ms. Bass is listed as the assistant treasurer of the

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1 campaign when the committee was organized.

2 Perhaps that will help you in thinking about when
3 Ms. Bass might have left town.

4 A Well, obviously she was there at that time that
5 this document was -- this was April of '82. But I cannot
6 remember when she was transferred and her husband was
7 transferred and they moved.

8 Q I have another document here to help refresh your
9 recollection. It is on Robin Tallon, Democrat for Congress
10 stationery dated June 25, 1982. It indicates that Sue Bass
11 is no longer the assistant treasurer for the campaign, signed
12 by Ms. Bass. So, the June 25 date appears to be when she was
13 no longer with the campaign.

14 A That must be right.

15 Q Was Ms. Bass involved in the fund-raising aspect
16 of the campaign, do you know?

17 A Not that I remember.

18 Q Does Ms. Bass have a relationship with your
19 sister, Ms. Minschew, that you are aware of?

20 A I'm sorry?

21 Q Are they friends, acquaintances?

22 A I thought Ms. Bass moved and left Florence. I

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1 don't know. They worked together and never had any problem
2 that I know of.

3 Q When did you first learn of the allegations that
4 bonuses had been given to employees of the Tallon
5 corporations so that they could contribute to the campaign,
6 approximately?

7 A I really do not remember, but I think it was prior
8 to the primary; the last primary election I had, which would
9 have been in June of '86. When I say "prior to it," some
10 months prior to it. I have no idea. I would just be
11 guessing if I said February.

12 Q Do you recall how you found that out?

13 A No.

14 Q Do you know a gentleman by the name of James Brown
15 who I believe is called Jimmy Brown?

16 A Yes, ma'am.

17 Q How do you know Mr. Brown?

18 A Mr. Brown was involved in the campaign in 1982. I
19 also know Jimmy on a casual basis.

20 Q What was Mr. Brown's involvement with the campaign
21 in 1982?

22 A To my knowledge, there was no official position.

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1 He was sort of like Gary. I don't know exactly what he did.

2 Q Would you call him a volunteer?

3 A A volunteer, yes.

4 Q How often would you say Mr. Brown on an average
5 was at campaign headquarters?

6 A I don't know, because I was very rarely there. I
7 would go two weeks without going to the campaign room.

8 Q Do you have a present relationship with Mr. Brown?

9 A Yes.

10 Q How would you describe that?

11 A He appears to be working on a volunteer basis for
12 a potential primary opponent that I have this time. So, it
13 is not as good as I would like for it to be.

14 Q Have you ever had a falling out with Mr. Brown?

15 A No, I don't believe I have.

16 Q Do you know a woman by the name of Lynn Hartnett?

17 A Yes, ma'am.

18 Q How do you know Ms. Hartnett?

19 A Ms. Hartnett is the manager of Robin's Ladies'
20 Wear in Florence, South Carolina.

21 Q How long have you known Ms. Hartnett?

22 A Around eight years.

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1 Q Do you recall when she first became the manager
2 for the store?

3 A No, I don't. I would say it was probably 1980,
4 maybe '79.

5 Q Did Ms. Hartnett have any connection with the
6 campaign?

7 A Not that I recall.

8 Q Do you know Robert Hartnett?

9 A Yes, ma'am.

10 Q Who is Robert Hartnett?

11 A Robert Hartnett is Lynn Hartnett's husband, and he
12 was employed by Robin's Mens' Wear store.

13 Q Did Mr. Hartnett have any connection with the
14 campaign?

15 A He is a good friend and maybe he helped, volunteer
16 work and that sort of thing. He had no official capacity
17 that I recall.

18 Q Do you know Jerry Harris?

19 A Yes, ma'am.

20 Q How long have you known Mr. Harris?

21 A I think I can tell you exactly. About 34 years.

22 Q Does Mr. Harris have any connection with the

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1 corporations that we mentioned?

2 A He does not now. He was the manager of Robin's of
3 North Myrtle Beach.

4 Q During the time period of 1982?

5 A Yes, ma'am.

6 Q Did Mr. Harris have any connection with the '82
7 Tallon campaign?

8 A His connection would have been the same as
9 Mr. Hartnett's. He was certainly interested and involved,
10 but no official capacity.

11 Q Did Mr. Harris ever indicate to you that he had
12 been solicited to contribute one of his bonuses to your
13 campaign?

14 A No, ma'am.

15 Q Did either Lynn Hartnett or Robert Hartnett ever
16 tell you that they had been solicited to contribute one of
17 their bonuses to your campaign?

18 A No, ma'am.

19 Q Did either Lynn Hartnett, Robert Hartnett or Jerry
20 Harris ever tell you that they had contributed one of their
21 bonuses to your campaign?

22 A No, ma'am.

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1 Q Who is Roland Minshew?

2 A He is my brother-in-law.

3 Q Does he have any connection with the Tallon
4 corporations?

5 A Yes, ma'am. He is the manager of Robin's of
6 Florence.

7 Q Did he have any connection with the '82 campaign?

8 A No official connection, no, ma'am.

9 Q Did Mr. Minshew ever tell you that he had been
10 solicited to give one of his bonuses as a contribution to
11 your campaign?

12 A No, ma'am.

13 Q Did he ever tell you that he had, in fact, given
14 one of his bonuses as a contribution to your campaign?

15 A No, ma'am.

16 Q Do you know a gentleman by the name of Mark
17 Lawson?

18 A Yes, ma'am.

19 Q How do you know Mr. Lawson?

20 A Mark was employed somewhere in the organization,
21 but I'm not sure.

22 Q You are referring to the Tallon corporation

2 1 0 4 0 3 3 0 2

1 Q Did you ever ask Lynn Hartnett to make a
2 contribution to your campaign?

3 A Not that I recall.

4 Q Did you ever ask Jerry Harris to make a
5 contribution to your campaign?

6 A Not that I recall.

7 Q Did you ever ask Roland Minshew to make a
8 contribution to your campaign?

9 A No, ma'am. And I say not that I can recall. May
10 I say something?

11 Q Sure.

12 A I don't know that you could ever find anybody that
13 I have asked to make a contribution. I just can't do that.
14 I mean anybody that has ever made a contribution --

15 Q If you bear with me, I might have to ask you about
16 a few other people simply to have it on the record.

17 Did anyone ever suggest to you that it might be
18 helpful to get money for the campaign by reimbursing
19 employees for their contributions?

20 A No, ma'am.

21 Q Do you know a gentleman by the name of Ed Saleby?

22 A Yes.

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1 Q Who is Mr. Saleby?

2 A He is a state senator from Darlington County.

3 Q Did you know Mr. Saleby in 1982?

4 A Yes, ma'am.

5 Q Are you aware whether Mr. Saleby made a
6 contribution to your campaign in 1982?

7 A I don't recall.

8 Q Do you know a gentleman by the name of Joe
9 Pearce?

10 A Yes, ma'am.

11 Q Who is Mr. Pearce?

12 A He is the current mayor of Florence. He was not
13 mayor then.

14 Q Are you aware Mr. Pearce made a contribution to
15 your campaign in 1982?

16 A No, ma'am.

17 Q Did it ever come to your attention that people had
18 offered contributions to your campaign that were over \$100 in
19 cash?

20 A No, ma'am.

21 Q Do you know a gentleman by the name of Jefferson
22 Lee?

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1 A Yes, ma'am.

2 Q Who is Mr. Lee?

3 A He is currently employed by me in the
4 Congressional office.

5 Q Did he work for your campaign in 1982?

6 A Yes.

7 Q Did Mr. Lee ever tell you that he had been offered
8 cash contributions over \$100 for your campaign?

9 A No, ma'am.

10 MS. LERNER: If I could ask you if we could take a
11 short break.

12 (Recess.)

13 BY MS. LERNER:

14 Q Congressman, did you speak to anyone aside from
15 your attorney about your testimony at this deposition?

16 A No, ma'am.

17 Q Did you speak to any of the other parties that
18 have been deposed about their testimony at their depositions?

19 A No, ma'am.

20 Q You have not spoken to your sister about her
21 testimony?

22 A No, ma'am. When was her testimony? Was that

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1 recently? I'm sorry. It doesn't matter. No, I have not
2 spoken with her.

3 Q When the commission notified you of the reason to
4 believe the findings in this matter, did any other
5 individuals contact you indicating the commission had given
6 them similar notices?

7 A Are you asking me when is it that I got this thing
8 for me to come testify?

9 Q No. I'm talking earlier on when the commission
10 first notified you that there might be a problem in this
11 matter. Did anyone else tell you, the commission has also
12 notified us that there might be a problem?

13 A Yes.

14 Q Do you recall who that was?

15 A It could have been -- it was probably somebody --
16 it was probably either Butch, Cameron or Bobby, and I
17 immediately told them I did not want to discuss it with them.

18 Q Did Ms. Minshew ever indicate to you that people
19 had contacted her regarding notices from the commission?

20 A No. I really don't think she did. I believe that
21 you are not supposed to discuss getting a notice with
22 anybody. And somehow that was my understanding.

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1 didn't know about. I really don't think I ever had a falling
2 out with him. I think that Jimmy thought that he should have
3 played a greater role in some of the decisions that were made
4 after I was elected. And that is something that I did not
5 recognize at the time. But in retrospect, I believe he was a
6 little disappointed that he had not been involved a little
7 bit with making some of the policy as far as staff and that
8 sort of thing after I was elected.

9 Q Did you ever tell Mr. Brown or a representative of
10 Mr. Brown that individuals involved in this matter might sue
11 him based on his statements that he made to the commission?

12 A No, ma'am, I did not. I have often wondered why a
13 citizen could come in here -- how a citizen can come in here
14 and if they make any kind of a statement or a false statement
15 to the Federal Election Commission and tie this process up
16 for six years or so, there seems to me that there should be
17 some way to keep that sort of thing from happening if, in
18 fact, the people know that what they are saying is not the
19 truth when they bring this matter to you. Obviously, it has
20 been some concern of mine for a long time. I would love to
21 see it resolved. What if it is resolved and I am found
22 faultless and everybody else is, I have to wonder about

1 people just coming in here and making any kind of allegation
2 and starting another process, not only with me, but with any
3 other elected official.

4 Q Do you know a gentleman by the name of Rod
5 Jernigan?

6 A No.

7 Q I believe he is Mr. Brown's attorney.

8 A He is.

9 Q Did you ever have a conversation with Mr. Jernigan
10 concerning this matter?

11 A Yes, ma'am.

12 Q What was the substance of that conversation?

13 A He called me and I returned his call. He said,
14 Robin, Jimmy is very, very upset about this whole matter that
15 Gary got him involved in, and Jimmy thinks that you are real
16 upset with him and this, that and the other.

17 I assured Mr. Jernigan that I just was not upset
18 with Jimmy and I didn't know what Jimmy's involvement was in
19 this whole thing and I would just be very happy when it was
20 resolved.

21 Q Was there any discussion at that time about the
22 possibility of a suit being filed regarding Mr. Brown's

1 statements?

2 A No, that was not mentioned by Mr. Jernigan.

3 Q How about by you?

4 A By me?

5 Q Yes.

6 A No.

7 MS. LERNER: I don't have any more questions. If
8 you have anything you would like to ask --

9 MR. DRAKE: I have no questions.

10 THE WITNESS: That last question -- we can't talk
11 off the record, can we or can't we?

12 MS. LERNER: We can, but I think we should finish
13 with on the record first. Actually, I think I might prefer
14 what you have to say on the record. Perhaps you want to
15 discuss it with counsel before you say it.

16 THE WITNESS: Could I?

17 MS. LERNER: Sure.

18 (Recess.)

19 MR. DRAKE: Mr. Tallon wants to make a short
20 statement.

21 THE WITNESS: I was trying to go back over the
22 conversation with Rod Jernigan and with Jimmy Brown, and I do

1 not remember either myself, Rod Jernigan or Jimmy Brown
2 mentioning anything about any lawsuit. I feel like that Rod
3 Jernigan was probably calling me because Rod is a friend of
4 Jimmy's and Jimmy was very emotionally distraught and the
5 only thing that Jimmy ever mentioned to me when we had a
6 conversation after my conversation with Mr. Jernigan was that
7 he hoped that he could have a relationship with Cameron and
8 Butch; that's my sister and my brother-in-law, and that
9 nobody was real mad with him. And again, he stressed that he
10 felt like -- well, he didn't know how he got involved in all
11 of this.

12 BY MS. LERNER:

13 Q Let me get clear now. You mentioned before that
14 he called you up at one point and said that he was sorry and
15 then we are talking about this conversation with regard to
16 Mr. Jernigan. Where did they fall in time? Do you recall?

17 A I think it was before Christmas this year when
18 Mr. Jernigan called me and before Christmas this past year
19 when I talked to Mr. Brown.

20 Q Meaning Mr. Jernigan called you this year and
21 Mr. Brown called you last year or are you talking about the
22 same time period?

1 A Around the same time, November or December, yes.

2 Q You don't recall whether Mr. Brown called you
3 first or Mr. Jernigan called you first?

4 A Mr. Jernigan called me first.

5 MS. LERNER: I believe that is it from our end of
6 it. If you have any questions --

7 MR. DRAKE: Just one question to clarify one
8 thing.

9 EXAMINATION

10 BY MR. DRAKE:

11 Q There was only one conversation with Mr. Jernigan?

12 A Yes.

13 Q There was only one conversation with Mr. Brown?

14 A I think I talked to him two times in the last
15 three or four years, and I have no idea when the other time
16 was. I really didn't know what he was talking about when he
17 called me the first time. That was several years ago. I
18 think he was alluding to this discussion of events that has
19 happened this morning. I wasn't sure exactly what he was
20 talking about and he was not specific.

21 Q When you say you are not sure, you are speaking of
22 a conversation that occurred several years ago?

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1 A Yes.

2 Q Subsequent to that, the only conversation you had
3 is one fairly recently; subsequent to a conversation you had
4 with his attorney, Mr. Jernigan, who called you?

5 A That is correct.

6 Q Did he ask you to speak with Mr. Brown?

7 A Dwight, I don't remember whether he asked me to
8 speak to him or whether I told him I would speak to him.

9 MR. DRAKE: I have no other questions.

10 EXAMINATION

11 BY MS. LERNER:

12 Q What is Mr. Brown's relationship with
13 Mr. Slavins? Do you know?

14 A Relationships with Mr. Slavins sort of come and
15 go, ebb and flow. At this point, I have no idea. There were
16 times when the two of them, I think, were quite close and
17 good friends. I -- that doesn't mean that they are today
18 because there is a --

19 Q Let's go back to two separate periods. In the
20 1982 February period, do you recall whether Mr. Slavins and
21 Mr. Brown were on good terms or bad terms?

22 A I mean, it can change in a day. But you know, for

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1 the most part, I guess they probably got along all right.
2 They had a -- if they had a common cause.

3 Q The second time period I am interested in is -- I
4 believe you said 1983 when you and Mr. Slavins had some
5 difficulties and Mr. Slavins was no longer working for you.
6 At that time period, do you know whether it was on again or
7 off again between him and Mr. Brown?

8 A I don't know that it has ever been off between he
9 and Mr. Brown. I have the distinct impression that Mr. Brown
10 is scared to death of Mr. Slavins.

11 Q What gives you that impression?

12 A He seems to be intimidated by him.

13 Q Is there anything specific that you could point
14 out that would give you that impression?

15 A The two times that I have talked to Mr. Brown, he
16 just seemed to be anxiety-ridden about his relationship with
17 Mr. Slavins.

18 MS. LERNER: Anything else?

19 MR. DRAKE: No.

20 MS. LERNER: Before we go off the record, I would
21 like to say that this is a Federal Election Commission reg
22 investigation pursuant to 437G, which is confidential and

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1 cannot be revealed until the commission's investigation has
2 been completed. Ordinarily, we give a witness a witness fee
3 for testifying. However, I know government employees don't
4 get them. I am not sure whether you do. I will check into
5 it.

6 MS. LERNER: Did you want to waive signature or
7 review the transcript?

8 MR. DRAKE: We will waive.

9 THE WITNESS: I am thinking of something. If
10 there is anything I have told you this morning that I am not
11 absolutely clear on -- it is my conversation with Rod
12 Jernigan and why he called me. I know I was in Washington
13 and I was really busy. You mentioned a number of times that
14 he mentioned to me about any lawsuit and I don't think he
15 did. I know I nerve -- I mean I never -- that is the only
16 thing in this whole conversation this morning that I am not
17 absolutely sure of. I'm not sure what I told you. But I
18 can't remember precisely if he mentioned anything about a
19 lawsuit. I think -- I believe he was just telling me that
20 his friend was very, very upset.

21 BY MS. LERNER:

22 Q Was it an angry conversation or a calm

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1 conversation?

2 A It was very calm.

3 MS. LERNER: Should you recall anything further
4 about that, let your attorney know and he can let us know.

5 (Whereupon, at 10:55 a.m., the deposition was
6 concluded.)

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CERTIFICATE OF NOTARY PUBLIC & REPORTER

I, BRENDA M. SMONSKEY, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken in shorthand and thereafter reduced to typewriting by me or under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

Brenda M. Smonskey
Notary Public in and for the
District of Columbia

My Commission Expires MARCH 31, 1991

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 22, 1982

Dear

I have been in touch with most of you by phone recently soliciting contributions for Robin's campaign for United States Congress. A few of you I haven't been able to reach yet and others I hated to call because our stores might not be doing business with your company at this time.

I want to thank each of you that sent a contribution very much. There were some very generous contributions-- one for a thousand dollars and four for five hundred dollars or more. This type campaign is very expensive-- and probably the greatest undertaking ever in Robin's life. We desperately need money and need it now.

After a little thought-provoking rhetoric, if you feel compelled to make your first contribution or an additional one, please accept my heart-felt thanks. The ROBIN'S organization has never been a demanding one. We have never demanded lavish or frequent meals or entertainment as some customers do. We have never demanded free clothes for ourselves or our families as some customers do. We haven't sold our business to the highest bidder as some customers do. We haven't made anyone do any excess traveling to our different locations just to be more costly as some customers do. We've never solved our over-buying by refusing shipments as some customers do. We have tried to make working with our organization as easy as possible. We don't even actually work with some of you due to territory lines yet you still get credit for the orders.

We have been doing business with some of you for as long as eleven years and others for as little as a season or two. You may not have been our salesman for the entire time that we have done

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

business with your company. ROBIN'S and Robin may have played a big part in your success. Please think about it.

Please go to your sales managers, your company presidents, and your company principals and request strongly a generous contribution to Robin's campaign. Please dig as deep as possible in your pocket, your checkbook, your savings account, your bankcard, or your bank itself and show Robin what he has meant and means to you.

Remember that all checks must be personal and that \$1000.00 is the maximum total contribution including what you may have already given. Please make checks to "Tallon for Congress" and send to above.

I'm not asking for a contribution in support of any issues or political party---but for a man who has played an important part in my life and the lives of many others.

Thank you so much for your generous and prompt contribution.

Yours Truly,

Bobby Welch, President
Tallon Sales Co.

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

April 27, 1982

Rather than beating around the bush, I'll get right to the point. I need your help. I'm trying to raise campaign funds for Robin Tallon (owner of Robin's) who is running for U.S. Congress from the sixth district of South Carolina.

Having known and worked for Robin for many years, I really feel that he will be the kind of Congressman that we need. I'm not pushing any issues or party affiliation and although he's not running from your district, I believe that your help will result in having the best Congressman ever elected from the sixth district.

I'm asking you as a customer and a friend to help me do something that I strongly believe in. If you feel you can help, please send your personal check (for \$25, \$50, \$100 or whatever you like) made out to "Tallon for Congress" in the enclosed envelope.

Thank you very much for your help.

Yours truly,

Bobby Welch

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 1, 1982

To all Employees of Robin's, Robin's Ladies' Shop, LeMasters, and Tallon Sales Company:

About a month ago I sent a letter to about sixty of you asking for contributions for Robin Tallon's campaign for United States Congress. I would very much like to thank each of you that sent in a contribution. I really feel that each of us should make a contribution if for no other reason than the fact that we owe our jobs to Robin. I also feel that each of you should ask your family members that receive a discount on their purchases for a contribution. I feel very strongly on both these counts.

There is less than one week before election day so there is not a moment to delay. Robin sees every contribution that comes in, so let's let him know that his employees are behind him and that their families appreciate the break on their purchases.

Thanks to all those employees who have given of their time and tireless efforts to help Robin. I hope most of you realize that the possibility is very, very strong that Robin will win. In fact, I should have said it looks very probable. Let's all get behind him.

Don't delay. Make those contributions now. Make those calls today.

Thank you again.

Sincerely,

Bobby Welch
Bobby Welch

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*Managers:
Please show to
all employees immediately!*

Robin's

Phone 788-2300
7359 Two Notch Rd.
Columbia, South Carolina 29204

June 9, 1982

Dear

As you may have heard, Robin led the ticket in his race for the Democratic nomination to Congress from the sixth district of South Carolina---but he is in a runoff! The results are as follows:

Robin Tallon	35,687	47.1%
Hicks Harwell	19,501	25.7%
John Brasington	12,666	16.7%
Charles McGill	7,948	10.0%

A candidate must get 50% of the total votes cast to win on the first ballot. We almost did what they say can't be done!

I want to thank each of you that were able to contribute to Robin's campaign very much. I'm sure it makes you feel good to know you were able to help Robin with something that means so much to him.

As I said before, we are in a runoff. Robin's opponent is an experienced politician who is going to be tough to beat. We need your financial help again in order to win. If you've already given, may I ask for a little more (or a lot more if you can). If you haven't, may I plead for your help. The runoff is less than two weeks away (June 22) so you can sense the urgency.

Before you put this letter down, please consider a contribution. Issues and parties aside, please consider it a contribution to something Robin has worked so hard for, something that I really believe in, and something that we need at once.

I'll thank you in advance since I'm sure we can count on you to realize we're in this for keeps.

Please send **personal** checks or cash to Cameron at the following address: Tallon Sales Company
P.O. Box 3867
Florence, S.C. 29502

Thank you again for your much needed help.

Sincerely,

Bobby Welch

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF:) MUR 2071
 Gary H. Slavens, et al.,) DEPOSITION OF
) MRS. CAMERON MINSHEW
 _____)

Deposition of Cameron Minshew, commencing at the hour of 10:50 a.m., on Tuesday, March 15, 1988, at the office of the United States Attorney, 1100 Laurel Street, Columbia, South Carolina, pursuant to Subpoena.

APPEARANCES: Thomas J. Whitehead, Assistant General Counsel, Federal Election Commission; and Philip L. Wise, Esquire, Attorney, Federal Election Commission.

 Eric B. Gore, Reporter.

ANNETTE B. GORE
 COURT REPORTER
 P. O. BOX 51 • IRMO, S.C. 29063
 (803) 781-1400

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The reading and signing of
the deposition by the deponent
was reserved by the deponent.

I N D E X

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WHEREUPON,

CAMERON MINSHEW, HAVING BEEN DULY SWORN
AND CAUTIONED TO SPEAK THE TRUTH, THE
WHOLE TRUTH, AND NOTHING BUT THE TRUTH,
TESTIFIED AND DEPOSED AS FOLLOWS:

EXAMINATION BY

MR. WISE:

Q First of all for the record could you give your name
and spell it for the Reporter, please?

A Cameron Minshew, C-a-m-e-r-o-n M-i-n-s-h-e-w.

Q And could you give us your full address including
Zip Code?

A 120 Lake Wood Drive, Florence, South Carolina, 29501.

Q Okay, and your telephone and area code, please?

A (803) 665-8578.

Q And are you employed, ma'am?

A Yes.

Q Would you give us your occupation?

A Bookkeeper and Secretary.

Q And who are you employed by?

A Tallon Sales Company.

Q And could you give that address also?

A 2180 West Evans Street, Florence, South Carolina.

Q And telephone number and area code?

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A (803) 662-9622.

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Q And are you here this morning because of a Subpoena you received from the Federal Election Commission?

4

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A Yes.

6

Q And are you represented by an attorney this morning?

7

A No.

8

Q Have you been involved with a deposition before?

9

A Yes.

10

Q So you do know a little bit about a deposition but anyway I'll still explain to you what's going to go on here this morning.

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A Okay.

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Q First of all I'm going to ask a series of questions to you and if at anytime you don't understand the question please let me know and I'll rephrase the question or repeat it so you can understand. Is that understood?

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A Yes.

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Q If you do not interrupt me and tell me you do not understand the question what I'll do is I'll assume that your answer is in response to that question.

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A Okay.

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Q Before you came here this morning did you review any documents in preparation?

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2 A This morning I went into my office and read copies
3 of letters that I had on my file.
4 Q Did you bring any of those letters with you?
5 A No.
6 Q And did you discuss this matter with anybody before
7 you came here this morning?
8 A No.
9 Q Those letters that you reviewed this morning, what
10 were they? What type of letters were they?
11 A They were copies of letters that I had typed for
12 our different Store Managers in response to their
13 subpoenas. I have copies of them on file in my
14 office.
15 Q Are you related to Congressman Robert Tallon?
16 A Yes, I'm his sister.
17 Q Did he ever go by any other name beside Robert? Is
18 Robert his name?
19 A Robert is his name but he's always been called Robin.
20 Q Okay, so Robert is his name. Do you know what
21 business he was involved in before he went to
22 Congress in '82?
23 A I sure do.
24 Q What was that?
25 A Men's retail clothing stores.

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Q Was he the owner?

A Yes.

Q What was his exact title with these clothing stores?

A Before 1982?

Q Yeah, right around 1982---before '82 then, before he went to Congress?

A Well, he did not actually work in any of the stores.

Q Did he have a title?

A He was---at that time I think he was Chairman of the Board of Directors.

Q Were you a Board member also?

A Yes.

Q Who else was on the Board?

A At that time I'm not real sure. I know my husband was.

Q Who is that?

A Roland G. Minsheu. I know Robert L. Welch was. I think Jerry Harris was. We've had a lot of changes in management since then and I'm not sure who else was included on the Board.

Q You say you are employed by the Tallon Sales Company, just what is the Tallon Sales Company?

A It's really like a holding company. It owns the stock in all of the stores and we---it's only an

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manager was. I don't know like Robins of Anderson,
I don't remember when we closed that store. It could
have been closed in '82. The last manager that we
had there was Mark Lawson.

Q Could you work down the rest of them and give us
the managers that you do remember?

A Yeah. In Greenville---oh, my goodness. I think
Mike Bouknight was the last manager.

MR. WHITEHEAD: How do you spell
that?

A B-o-u-k-n-i-g-h-t. What's the next one?

Q Columbia.

A Ronnie Tuten, T-u-t-e-n. Dentsville would have
been Bobby Welch. Florence is my husband, Roland
G. Minshew.

MR. WHITEHEAD: North Myrtle Beach?

A Jerry Harris. Lemasters in '82---

MR. WHITEHEAD: Ladies wear?

A Oh, Lynn Hartnett, H-a-r-t-n-e-t-t.

MR. WHITEHEAD: Lemasters?

A Martin Redd, R-e-d-d.

MR. WHITEHEAD: Robins at Wilmington?

A If that store was open it would have been Bob
McDonald. Is that all?

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2 Q At the Tallons Sales Company I think you said you
3 are a bookkeeper and secretary. Just what do your
4 duties entail? What do you do in---

5 A I do all of the bookkeeping work for the stores
6 including P & L statements, general ledger work,
7 accounts receivable, accounts payable, everything ---
8 the quarterly payroll taxes, everything except the
9 end of the year income tax return.

10 Q No paycheck and things of that sort?

11 A I don't do the paychecks. Another girl in the office
12 does, but I do the payroll on the computer, keep up
13 with it. It's done in that office.

14 Q You do keep tract of who is making what from the
15 stores?

16 A I don't keep tract of it, it is in that office.
17 Another girl handles that.

18 Q In your position back in '82---in any of your positions
19 on the Board of Directors or as secretary and
20 bookkeeper did you have anything to do with the
21 bonuses, were you in on that, on helping determine
22 bonuses?

23 A I could have been from time to time. I was not
24 necessarily always.

25 Q But did you ever?

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2 Q And what were they normally given for? What was the
3 bonus normally given for?

4 A Well, there were all kinds of different things. They
5 would base it on certain volumes or productivity, or
6 activity within the stores and they would run from
7 periods---sometimes they were a month, sometimes
8 they were three weeks, but never on a quarterly
9 basis. They were always paid much more often than
10 that.

11 Q Were the bonuses paid by check, cash or some other
12 form?

13 A Check.

14 Q Always checks?

15 A Always checks.

16 Q What about any kind of prizes and things of that
17 sort?

18 A No, always cash. Always a check.

19 Q And who was responsible for issuing those checks?

20 A They were issued out of my office. At that time I
21 had two girls working in there and any of the three
22 of us could have written them and did from time to
23 time.

24 Q And who had the final sign off authority on the
25 check as authorized to draw the money from the store

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account?

A Myself and Carol Meier, another girl that works in the office.

Q Back in 1982 the store managers at that time received, on April the 12th, Fifteen Hundred Dollar bonuses, were you aware of those?

A Yes.

Q Do you know what those bonuses were based on?

A No, I don't. I mean I can't tell you exactly what they were based on. That's a long time ago.

Q Did you all have any kind of policy set up for paying bonuses back then at all? Any kind of procedure?

A No, we didn't have anything written. From time to time they would come up with a contest for each store and it would be based on how many suits each of them sold or---They've always had monthly goals and if they reached their goal they get paid a certain amount which would vary from contest to contest. Then they'd get paid a bonus on their sales for the month. So there's no telling what they were doing at that time.

Q Okay, bonuses on sales, how do you differentiate between commissions and bonuses?

A That's the same thing.

REPRODUCTION OF ORIGINAL

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2 account?

3 A Myself and Carol Meier, another girl that works in
4 the office.

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19 certain amount which would vary from contest to
20 contest. Then they'd get paid a bonus on their
21 sales for the month. So there's no telling what
22 they were doing at that time.

23 Q Okay, bonuses on sales, how do you differentiate
24 between commissions and bonuses?

25 A That's the same thing.

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2 A I had forgotten that I was anything but he said that
3 I was some kind of assistant treasurer or secretary
4 which had to have been something that was just name
5 only because I never had anything to do with the
6 finance---I never even saw the checkbook. Never
7 received a contribution from anyone, never solicited
8 a contribution from anyone. So this had to be
9 something---and after he asked me about that I do
10 vaguely remember the campaign manager coming to me
11 one day and asking me if I would mind if he put my
12 name down in some capacity.

13 Q Who was the Campaign Manager at that time?

14 A His first name was Cameron also and his last name
15 was Chesnan.

16 Q Could you spell that for us?

17 A I'd be guessing.

18 Q Well, give us a guess?

19 A C-h-e-s-n-a-n. He was not there long and he was from
20 New Jersey or somewhere and I had not known him
21 before so---He got sick and had to leave the
22 campaign.

23 Q And who became manager here?

24 A I can't remember his name. He was this man's very
25 best friend. They had come down together to work on

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2 the campaign but this little fellow was doing something
3 else when Cam was the Campaign Manger. Then when
4 Cam had to leave this young man just stepped in and
5 finished the campaign for him. I can't remember his
6 name.

7 Q Was the Cam that you mentioned the first Champaign
8 Manager you remember?

9 A Yes.

10 Q He was the initial one?

11 A Yes.

12 Q How much time did you normally spend at campaign
13 headquarters back in '82?

14 A Me?

15 Q Yes.

16 A Every night.

17 Q About how long each night?

18 A From the time I left work until about ten o'clock.

19 Q And what was the time you normally left work?

20 A Around five or five-thirty.

21 Q Do you remember any other people that had official
22 positions with the campaign at the time?

23 A Cookie Miller.

24 Q What was her position?

25 A I don't really know what her title was. Cookie is

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2 all I know, Cookie Miller. I know she lives in
3 Myrtle Beach. Laura Phelt was a young lady from
4 Loris and she was in charge of the media. She is
5 on the Congressional Staff today in Washington.
6 And I don't really remember---there were just an
7 awful lot of volunteers.

8 Q What was the financial condition of the campaign
9 during 1982?

10 A It cost a lot of money. I mean it was costly.

11 Q Did you ever receive a notice that the campaign
12 needed financial support?

13 A Me?

14 Q Yes?

15 A No.

16 Q You never did discuss the financial conditions of
17 the campaign with anyone at all?

18 A I could have discussed it with Robin, the fact that
19 he had put so much of his personal money in it, and
20 that he was concerned.

21 Q Do you know a lady called Sue Bass?

22 A Yes, I do.

23 Q How do you know her? Can you explain?

24 A She worked for me in my office for a brief period
25 of time and then she was hired---I guess she was

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2 hired, I don't guess she was a volunteer, for the
3 campaign staff.

4 Q Do you know what her position was with the campaign
5 staff?

6 A I know that she handled the check book for them.
7 That's all I know. And she did that because she had
8 had experience with that in my office.

9 Q Do you currently keep contact with her? Is she still
10 in the locale?

11 A No, as a matter of fact her son came by my house a
12 couple of weeks ago to see my son. They moved to
13 Greenville and he told my son at that time that his
14 parents had divorced and that his mother had moved
15 on somewhere else and his father was still in
16 Greenville. I've not seen her since 1982. I think
17 they moved shortly after---maybe even before the
18 election they moved.

19 MR. WHITEHEAD: In '82?

20 A I think so. Her husband was with Daniel Construction
21 and he was transferred.

22 Q What was her husband's name?

23 A Jim, Jim Bass.

24 Q And you never knew what the address was in Greenville?

25 A No. They didn't move straight to Greenville, they

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moved to Arkansas or somewhere first. I think they ended up back in Greenville.

Q On your visits to the campaign headquarters in 1982 do you remember seeing Sue Bass there?

A Not very often because she was there during the day and I didn't come in until night so I didn't see her very often.

Q At campaign headquarters when you did see Sue Bass do you---her title ---you said that she did bookkeeping for them basically?

A Yes.

Q Was that a paid position or was she a volunteer?

A I don't have anyway of knowing for sure but I would assume it was paid.

Q Maybe I've asked you, were you paid or were you a volunteer?

A Oh, I was a volunteer.

Q You said you were a volunteer so the question is if the campaign did not pay you did the store pay you for being there, the Tallon Sales Company?

A No.

Q So your position with them had no connection with the store at all?

A Oh, no. My---the reason I was there was for Robin,

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1
2 to help him.

3 Q I think you said before that when Sue Bass went to
4 the campaign she had stopped working for the store?

5 A Yeah, she was no longer on our payroll.

6 Q While you worked at campaign headquarters do you
7 ever remember being in a conversation with Sue Bass
8 where you discussed the financial condition of the
9 campaign committee?

10 A Never.

11 Q Do you ever remember being in a conversation with Sue
12 Bass concerning that the store employees would be
13 given bonuses and the bonuses would be used as
14 contributions for the campaign?

15 A Never.

16 Q Have you ever overheard such a conversation?

17 A No.

18 Q You never heard it discussed anywhere?

19 A No.

20 Q Would it surprise you that we have testimony that
21 says that you and Sue Bass were involved in such a
22 conversation at campaign headquarters?

23 A It would.

24 Q Are you saying that the conversation did not occur
25 or you just don't remember that it may have occurred?

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A I don't think it occurred.

Q Okay, back to the bonuses again. On April the 12th, 1982, the store managers received a Fifteen Hundred Dollar bonus. Of those specific store managers, let's see, Robert Welch, he was the manager of Robins at Dentsville at that time?

A Yes.

Q And on April the 12th he received a Fifteen Hundred Dollar bonus. And then on April 14th he gave a Thousand Dollar contribution to the Tallon campaign committee. Were you aware of that?

A No.

Q And again Mark Lawson, Robins of Anderson, he received a Fifteen Hundred Dollar bonus on April the 12th, 1982. And again on the 14th of April, 1982, he gave a Thousand Dollar contribution to the Tallon for Congress Committee. Were you aware of that?

A No.

Q Okay, Roland Minshew, what store was he in?

A Florence.

Q On April the 12th, 1982, he received a Fifteen Hundred Dollar bonus and on April the 14th he gave a Thousand Dollar contribution to the Tallon for Congress Committee. And let's see who else---

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2 A I was aware of that one.

3 Q You were aware of that one?

4 A Yeah, that's my husband. I knew he was going to do
5 that.

6 Q Did you discuss this contribution with him?

7 A With my husband?

8 Q Yeah?

9 A Yes.

10 Q And you knew he was giving a Thousand Dollar contri-
11 bution?

12 A I knew he was. I knew there was a possibility the
13 other store managers were, but I never knew if they
14 did or not.

15 Q How did you know the other store managers may give
16 a Thousand Dollar contribution?

17 A How did I know it?

18 Q Yes?

19 A Because we discussed it.

20 Q All the store managers discussed it?

21 A No, Bobby Welch and my husband and I did.

22 Q Well, could you remember what that conversation was
23 about?

24 A No. I knew that Bobby had written them and asked
25 them for a contribution and he said that it was

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1 possible that they might make one. We all have,

2
3 Q Did he give the Thousand Dollars as the amount to
4 make it?

5 A No, he never mentioned an amount, just that he felt
6 that they might make a contribution to the campaign.
7 I never knew whether they even did or not. I was
8 so busy with the other part of it that that part of
9 it really I didn't have time to even think of.

10 Q Were you ever involved or did you ever hear a conver-
11 sation in which it said that we'll give you these
12 bonuses on the condition that you make a Thousand
13 Dollar contribution?

14 A No, that was never said, never discussed.

15 Q Was it ever suggested by anyone?

16 A No.

17 Q You never heard such a conversation?

18 A Never.

19 Q We have---we also have Lynn Hartnett in here. She
20 was with---I think the Ladies Shop?

21 A The Ladies Shop, yes.

22 Q And her bonus was given to her on May the 4th of 1982.

23 She received Fifteen Hundred Dollars on May the 4th

24 and the very same day she gave a Thousand Dollar

25 contribution to the Tallon for Congress Committee.

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Were you aware of that?

A No.

Q Do you know why her bonus was paid on the 4th and everybody else received theirs on the 12th?

A I don't. She could have been on a buying trip or something. I really don't know. She may not have been in town at that time in April. I really don't know.

Q You were never aware of the financial condition of the Tallon Committee during 1982 at all?

A I knew that they had spent a lot of money. I never knew how much money they had on hand or what was coming in. I had no way of knowing that, but I knew that Robin had invested a lot of his own personal money in the campaign.

Q Did---how much of his money---

A I don't know. I don't remember.

Q Did you ever hear a conversation or get involved in a conversation that said that we need an immediate source of money?

A No.

Q And there was---was there any conversation that said that the bonus would be used to reimburse people for the contribution that they made to the Tallon for

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Congress Committee?

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A No, they'd have been paid that bonus whether they made a contribution or not.

4

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Q Did it seem unusual to you that they received the bonus shortly before they made this contribution?

6

7

A No.

8

Q Do you think any of them would have been able to make this type of contribution without the bonus?

9

10

A I think they all could have. Our employees are paid well.

11

12

Q What do you mean by well?

13

A I think they---you've got a copy of what I sent you of what they are paid which did not include their salaries at all, and I think they're paid well.

14

15

They could have easily made a contribution anytime.

16

17

Q Do you think they would have made that contribution regardless?

18

19

A I don't know.

20

Q Do you think they would have made that contribution without the letters from Mr. Robin Welch that you've mentioned?

21

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A Some of them would have, some of them possibly would not have.

24

25

Q Did you get a chance to see any of those letters

1
2 Mr. Welch had mailed to the managers of the stores?

3 A I think he probably read them to me over the phone,
4 or one of them. I remember him reading one to me
5 over the phone asking me what I thought about it.

6 Q To your recollection did these letters seem like they
7 were telling these employees if they didn't make the
8 contribution that you would lose your employment with
9 Robin stores?

10 A No.

11 Q Do you know what the---have you ever heard the term
12 "Seed Money"?

13 A Seed Money?

14 Q Yes?

15 A No.

16 Q You've never heard that at the Tallon headquarters in
17 82?

18 A No.

19 Q What about "Start Up" money?

20 A No. I was really never involved in any of the
21 finances of that campaign.

22 MR. WISE: I want you to mark
23 this as FEC Exhibit #1 for
24 identification.

25 FEC EXHIBIT #1 WAS MARKED FOR

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PURPOSES OF IDENTIFICATION.

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3 Q I'm going to show you now what's been marked as FEC
4 Exhibit #1. Have you ever seen that document before?

5 A Yes, that's my signature.

6 Q Could you tell me what it is?

7 A It is a letter to Ms. Aiken in Washington from Bobby
8 Welch explaining his bonuses paid in April of '82.

9 Q Okay. Did you have any hand in drafting that response
10 from Mr. Welch?

11 A I don't know if I drafted this one or not. I could
12 have typed this one for him, but I think these are
13 probably his words.

14 Q Did you type any others?

15 A Yes.

16 Q Let's get to that one first. Did Mr. Welch appear
17 personally in front of you and sign that document?

18 A Yes, in Florence.

19 COURT REPORTER: That's yes?

20 A Yes. At that time he was in Florence once or twice
21 a week.

22 Q And the information as to bonuses how did he receive
23 this? Did he get this information from you?

24 A Yes, I had to look it up.

25 Q And you said these are his words, not your words?

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2 A I think Bobby drafted that letter and asked me to
3 type it for him. He could even have --- he could have
4 used---that's my typewriter that typed it but he
5 could have typed it. I think I may have typed it
6 for him. He's not much of a typist.

7 Q But that definitely is your signature?

8 A Yes, it is.

9 Q And he definitely appeared in front of you and signed
10 this?

11 A Yes, he did.

12 MR. WISE: Could you mark this
13 as FEC Exhibit #2?

14 FEC EXHIBIT #2 WAS MARKED FOR
15 PURPOSES OF IDENTIFICATION.

16 MR. WISE: You can keep track of
17 the numbers.

18 Q Okay, I'm going to show you what has been marked as
19 FEC Exhibit #2, and again can you tell me what this
20 document is?

21 A Okay, this is a letter---another letter from Bobby
22 to Ms. Aiken in Washington.

23 MR. WHITEHEAD: What's the date
24 on that?

25 A This one is December the 15th. This must be about a

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2 week later. He just---I think Bobby decided that
3 he'd be a little more thorough with his original
4 letter and offer a little more explanation.

5 Q Did he discuss his responses with you before he made
6 them?

7 A He had this letter drafted when he got there that
8 day and I did read it before it was typed. There again
9 I don't know if he typed it or I typed it, but one
10 of us did in my office. And I told him I thought it
11 sounded fine. No, he didn't discuss this with me
12 before he wrote it.

13 Q Again did he appear personally in front of you to
14 sign this?

15 A Yeah, he did. He was there at least twice a week then.

16 MR. WISE: I want you to mark this
17 FEC Exhibit #3.

18 FEC Exhibit #3 WAS MARKED FOR
19 PURPOSES OF IDENTIFICATION.

20 Q I'm going to show to you what's been marked as FEC
21 Exhibit #3, and again could you describe this docu-
22 ment, give me the date on it first if you don't mind?

23 A December the 8th. This is a letter from Jane Harris
24 to Ms. Aiken in Washington concerning the campaign
25 contribution that she had made. And I typed this

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letter.

Q You drafted---are those her words or are they yours?

A These are probably my words. She and her husband both were a little upset with this and asked me to look up the amounts of his bonuses for that period and I told him that I had answered for the company and helped Butch draft his letter, my husband, and so he wanted to know if I would write them something too, so I did.

Q Did you ever discuss that matter with her?

A Did I discuss it with Jane?

Q With Jane Harris?

A I don't think that we actually discussed it. I don't think we really talked about it. I mean there was nothing really to talk about. She wasn't even an employee. She was very upset over receiving such a letter when she was never an employee of the company.

Q And that is your signature on the bottom, isn't it, as Notary?

COURT REPORTER: That's yes?

A Yes, I'm sorry.

Q Did Ms. Jane Harris appear personally in front of you and sign this document?

A I don't know whether---well, yes, she did but I don't

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1
2 know whether we were in Florence or at the beach at
3 the time.

4 Q So you said that she appeared in front of you on
5 December the 8th, 1986, and signed this document?

6 A She did. But I was at the beach quite often during
7 that period and I don't know whether---I don't know
8 where we were when we signed it.

9 Q Would---we do have testimony that Ms. Harris did not
10 appear in front of you to sign that document?

11 A She did and her husband both.

12 MR. WHITEHEAD: She stated that
13 she mailed the document with her
14 signature on it or passed the
15 document over to you with her
16 signature on it.

17 A No, she and her husband both signed them.

18 MR. WHITEHEAD: In front of you?

19 A In front of me.

20 Q Because we do have her testimony under oath that she
21 never appeared in front of you and signed this
22 document?

23 A Well, I'm sorry she did. Now I did not discuss it
24 with her, but she did sign it in front of me.

25 MR. WISE: I want you to mark

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MR. WISE: (con't) this as FEC
Exhibit #4 for identification.

FEC EXHIBIT #4 WAS MARKED FOR
PURPOSES OF IDENTIFICATION.

Q I'm going to show you what has been marked as FEC
Exhibit #4, and have you ever seen that document?

A Yes.

Q And what is that document?

A Okay, this is my husband's response to Ms. Aiken's
letter.

Q And your husband's name again?

A Roland G. Minshew.

Q And what's the date on that document?

A December the 8th.

Q And did Mr. Minshew personally prepare that? Are they
your words or are they his words on the document?

A I don't really know. We probably worked on it
together. But that is his signature.

Q And this Notary here, do you know this Notary here?

A Yes, she works in the office.

Q And what does she do in the office?

A She handles paying the invoices mostly and she does
the payroll.

Q Did she work for you back in 1982 also?

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A She did.

Q And is she currently working for you now?

A Yes.

Q In the same position?

A Yes.

Q Did she have any position with the Tallon Campaign Committee back in 1982?

A No.

Q Did she do any work for them at all?

A She did some volunteer work on the phones at night with me. Not nearly as much as I did but she did help.

Q Did your husband personally appear in front of her and sign this document, to your knowledge?

A Well, they work in the same office together, I'm sure he probably did.

MR. WHITEHEAD: Why didn't you notarize that particular document when you had notarized the rest?

A I don't know. She's a Notary too.

Q Well, you said they work in the same office. Where is the Tallon Sales Company in---

A Our office is in the back of the store so he's in and out of our office you know.

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Q I was a little unclear about that.

A Yeah, all day long so I'm sure that she---that he signed it in her presence.

Q In location about how far is the Robins Ladies Shop, where is that from in location to you?

A It's right beside the men's store, It's an adjoining building. They have a large opening between the two. So the three, the Ladies Shop, Robins of Florence and Tallon Sales are really right there in one building.

MR. WISE: I want to mark this as FEC Exhibit I think #5 now.

FEC EXHIBIT #5 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

Q Again I'm going to show you what is FEC Exhibit #5, have you ever seen this document?

A Yes, this is a letter from Jerry Harris to Ms. Aiken in Washington.

Q What's the date on that letter?

A December the 8th, explaining his bonuses.

Q And did you---are they yours or are they Mr. Harris' words in there?

A I think these are probably my words also at his request because I certainly wouldn't have done it if he hadn't wanted me to.

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2 Q And did he appear personally in front of you and
3 sign this document?

4 A He did.

5 Q And this is your signature as Notary here?

6 A Yes.

7

MR. WISE: I'd like to have you
8 mark this as FEC Exhibit #6 for
9 identification.

10

FEC EXHIBIT #6 WAS MARKED FOR
11 PURPOSES OF IDENTIFICATION.

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Q I'm going to give you what has been marked as FEC
13 Exhibit #6, have you ever seen that document?

14

A I've seen a copy of it. This is Lynn Hartnett's
15 response dated August 17th---

16

MR. WHITEHEAD: 1987?

17

A ---'87, for Mr. Noble in Washington. I did not type
18 or write this.

19

Q Did Ms. Hartnett discuss the content of that document
20 with you at all?

21

A Yes.

22

Q What did she discuss about it?

23

A I believe I showed her a copy of my husband's response
24 and then I had nothing else to do with it. She wrote
25 the letter. And Ms. Meier did notarize it.

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Q And she did appear personally in front of Ms.---

A Well, there again they were---their offices adjoin so I'm sure she did.

Q And you didn't give her any other advise besides showing her a copy of your husband's document?

A No, I didn't see any reason to. She wasn't upset over this at all.

Q Did you give her the information as to how much she had received in bonuses in the timeframe?

A I did.

Q And how did you get that information, from what?

A I had to look it up in our payroll records.

MR. WISE: No more exhibits at this time. You can take a break for a second.

(Break.)

Q I'm going to read you what I'd like to mark as FEC Exhibit #7 this time.

MR. WISE: Seven for identification.

FEC EXHIBIT #7 WAS MARKED FOR PURPOSES OF IDENTIFICATION.

MR. WISE: It says the same thing, you may as well mark this as

MR. WISE: (con't) Exhibit #8.

FEC EXHIBIT #8 WAS MARKED

FOR PURPOSES OF IDENTIFICATION.

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5 Q Okay, I'm going to show you what has been marked as
6 FEC Exhibit #7, have you ever seen this?

7 A Yes.

8 Q Could you explain to me what it is?

9 A This is my reply to Ms. Aiken in Washington on
10 December the 8th on behalf of LeMasters, subpoena,
11 I guess it was a subpoena.

12 Q No, it was just a notification letter I believe.
13 And your response basically was---

14 A That none of the people in question were ever employed
15 by that corporation or paid a bonus from that corpora-
16 tion.

17 Q And this is your signature?

18 A Yes.

19 Q And this is the Notary that you appeared personally
20 in front of her and signed this document?

21 A Right, she's the other girl in my office.

22 Q Okay, and I'm going to show you what's been marked
23 as FEC Exhibit #8.

24 A Okay, this is my reply to Ms. Aiken on December the
25 8th, trying to answer the other questions in the

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document we received.

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Q On behalf of which store?

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A This is on behalf of all the Robin's stores.

5

Q And again does your signature appear on there?

6

A Yes, it does.

7

Q Is the Notary's signature there?

8

A Yes.

9

Q And did you appear personally in front of her and

10

sign it?

11

A Yes.

12

Q The question I have for you now is all of these

13

documents here except for the second response by

14

Mr. Welch which is dated the 17th of December, and

15

the one by Ms. Hartnett which is marked August the 7th

16

of 1987, all of them are dated on December the 8th,

17

and both notaries, you and Ms. Meier, are both located

18

in the same office?

19

A Yes.

20

Q And you say all of these people appeared in front

21

of either you or her?

22

A Yes.

23

Q Did you have some conference where all the people

24

were here at the same time or what?

25

A No.

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2 MR. WHITEHEAD: (con't) of December,
3 1986, right? Or was the date of
4 the 8th, with the exception of the
5 two we've mentioned, and all
6 notarized on the 8th? Then there's
7 some conflict as to Ms. Harris because
8 she may have signed this at the
9 beach as you say that it is possible
10 that she signed it at the beach.

11 A Yes.

12 MR. WHITEHEAD: December the 8th, I
13 doubt it would be at the beach, is
14 that correct?

15 A No, it could have been. It's only sixty miles.

16 Q Was Mr. Welch at the beach also?

17 A Mr. Welch in 1982?

18 MR. WHITEHEAD: No, this is 1986.

19 A Oh, 1986, yes, he was.

20 Q Because he signed his on the very same date.

21 A I think he was in Florence though that day.

22 MR. WHITEHEAD: Well, that's the
23 problem. This is the problem we
24 have here is that we've got people
25 scattered to the four winds it seems

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2 MR. WHITEHEAD: (con't) by way of
3 your testimony, yet everything
4 transpired on December the 8th.
5 The letters were typed and the
6 letters were notarized and signed.

7 A It could have very easily been done in one day. It's
8 only sixty miles down there.

9 MR. WHITEHEAD: Did you have anything
10 to do with the obtaining of the
11 signatures of each one of these
12 individuals who signed these letters?
13 Did you physically obtain them?
14 Go to them, asked them to sign these
15 or did they come to you and sign
16 these?

17 A Well, if I knew the answer to that I would know
18 whether the Harris' signed theirs, but I'm not sure
19 where they signed it. I don't know if I went to them
20 or they came to me. The others---

21 MR. WHITEHEAD: Is it possible
22 that these were not all signed on
23 December the 8th and notarized on
24 December the 8th?

25 A I would think they'd all be signed on December the 8th.

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2 Is there a date stamp when ya'll received them?

3 MR. WHITEHEAD: Well, it's not
4 so much the stamping on it, each
5 one of them has individually with
6 the exception of the two that we
7 mentioned, each one of them has
8 a December the 8th date, December
9 8, 1986 as both the date of the
10 letter and the date of the signa-
11 ture---not the date of the signa-
12 ture but the date of the Notary.
13 Now we're trying to determine
14 physically how this could be
15 possible. Did they all come to
16 the Robin's---to the Tallon Sales
17 Company offices and do this or
18 is it indeed possible that they
19 were at the beach? What was your
20 role? Did you go out and get
21 these signatures or did they come
22 to you?

23 A I do not know. The Harris' came through periodically.
24 Her parents live in Camden and when they're on their
25 way to Camden they always stop in Florence at the store.

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2 I don't know whether they would have stopped through
3 there or whether I would have made a trip down to the
4 beach to take them to them. I really don't remember.

5 MR. WHITEHEAD: Did you or anyone
6 else to your knowledge have a
7 discussion of these responses prior
8 to their being put together?

9 A I'm sure I would have discussed it with each one of
10 them when they contacted me to look up their payroll
11 information.

12 (Off the record.)

13 MR. WHITEHEAD: But then is it your
14 testimony that each of these
15 individuals contacted you to have
16 you prepare a letter to be sent
17 to the Federal Election Commission?

18 A They each contacted me. Now in the conversation ---
19 they contacted me first because they had to to ask me
20 to look up their payroll information, and in the conver-
21 sation it may have been decided that I would draft a
22 response. Whether they used it or not I mean that
23 would be up to them whether they wanted to retype it
24 or whatever. But I'm sure I wouldn't have volunteered
25 to do it.

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A Yes.

Q One way or the other---those notary---

A And it wouldn't have been real hard to do it.

Q Whose---to your knowledge whose idea was it to put these responses together to send to the Federal Election Commission?

A Well, it wasn't that it was anyone's idea, it was what was requested of each of them to do, or each of us to do. We didn't have any choice, the response had to be made.

MR. WHITEHEAD: Was it discussed as a group or was it discussed individually? Did each one call you and say, "Hey, I've got this"?

A Yes.

MR. WHITEHEAD: Each one called you is that it?

A Some of them were very upset over it. Some of them could have cared less.

MR. WHITEHEAD: Okay, and what transpired then? Who suggested what response should be put forward?

A Well, I think they all wanted to know what my husband planned to do and I told them he was going to respond

1
2 and explain what bonuses he was paid. And in the
3 conversation whether I volunteered to type a letter
4 for them or whether they asked me to, I knew that
5 none of them had typewriters. They have very small
6 store offices and we just don't have room for anything
7 they don't need. Normally all the letters and things
8 have been done out of that office so I don't---

9 MR. WHITEHEAD: Tallon Sales?

10 A Tallon Sales. I don't know whether I would have
11 offered to do it for them or whether they asked, but
12 in the conversation somehow I just ended up doing it.

13 Q So did you type it in front of them while they were
14 there waiting for you to type it or was it already
15 typed when they arrived?

16 A Well, there again I don't even know. I don't
17 remember whether the Harris' were there or at the
18 beach at the time. Bobby Welch would have been
19 right there. Like I said I think he even typed
20 his own. I don't think I typed his. He types.

21 Q Did you take your typewriter down to the beach with
22 you?

23 A No, I would have typed it before I left.

24 Q So did you bring the document down to them to the
25 beach or---

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2 A If that's where they signed it, yes.

3 MR. WHITEHEAD: Was it felt
4 necessary that all of these be
5 signed on the same day? Did
6 anybody make that decision?

7 A No.

8 MR. WHITEHEAD: Do you have a
9 recollection of driving to the
10 beach, sixty miles away, and from
11 the beach, sixty miles back?

12 A If I did I would have had another reason for going
13 that day. I would not have made a special trip to
14 get these signed. I had to go down there periodically
15 anyway. I was in each store as often as I could be
16 and I would not have made a special trip just to get
17 those signed on the same day the others were signed.
18 That would have---there would have been no reason to
19 do that.

20 MR. WHITEHEAD: And it's possible---

21 A It could have just happened that way, that I---

22 MR. WHITEHEAD: ---that they all
23 signed in the office, is it not?

24 A It certainly is. But I would never have made a
25 special trip just to get them signed on the same day

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the other ones were.

Q When they contacted you you testified they asked you what was your husband going to do. You said he's located in the same store or office with Mrs. Meier, is that the way you pronounce that name?

A Meier.

Q Well, how come he signed his on December the 8th also when he had all of these other days that he's located so close to her?

A Because that's the day it was typed.

Q Okay. And he had already responded by the time other people had contacted the store to ask what he was going to do?

A He had already responded. It may not have been in writing yet but he knew what he was going to do. He knew what he was going to say.

Q In the last few months or so have you discussed the nature of this matter with anybody at all?

A My husband.

Q Anyone else?

A No.

Q Have you discussed it with Congressman Tallon?

A No. I don't even see Congressman Tallon anymore.

Q Did he know you were coming here today or sometime

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to give a---

A I told his wife that I was coming up here when I got the letter last week. Whether she told him I don't know. And that's all I told her that I had to come up here and give a deposition.

Q And you had no discussion with her about the nature of your testimony?

A No. I don't think she even knows---no.

Q Were you getting ready to say something?

A I was just going to say we're in the process of selling our house and she's our real estate agent and she's been showing the house and I had to let her know I was going to be out of town. That's the only reason I told her because she had to know that I wasn't going to be here, be in town today.

MR. WHITEHEAD: You didn't --- just to be more specific "Did you discuss your testimony today with Congressman Tallon?" You said no to that question I believe?

A No.

MR. WHITEHEAD: Did you discuss it with Mr. Welch, Robert Welch?

A No. I don't even know if he knows I'm here. He

1
2 probably does because he's working in Florence now.

3 MR. WHITEHEAD: Did you discuss
4 it with either of the Harris'?

5 A No, I haven't seen them.

6 MR. WHITEHEAD: Did you discuss it
7 with Lynn Hartnett?

8 A No.

9 MR. WHITEHEAD: Did you discuss it
10 with Mark Lawson?

11 A No, I haven't seen him in years.

12 MR. WHITEHEAD: All right, let's
13 reverse the order. Did they
14 discuss their testimony with you,
15 anyone of those persons mentioned?

16 A My husband did.

17 MR. WHITEHEAD: That's Mr. Minshew,
18 your husband. You didn't discuss
19 Mr. Welch's testimony with him?

20 A No. I don't think I've seen---oh, I thought you said
21 Mr. Harris.

22 MR. WHITEHEAD: Did you know that
23 each of those persons were going
24 to testify?

25 A Yes, I did.

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MR. WHITEHEAD: And how did you happen to know that?

A Through phone calls and all. In December they were quite upset to have to be called out of the stores at that time of year. We were real, real busy and I think everybody got in touch with Bobby to see--- or Mr. Welch to see if he could call and get it postponed until some time in January when it would be a lot more convenient. And I knew that trying to get it postponed had taken place and I knew that they were not able to do that. So I did know that they all were coming up here.

Q Did they discuss the nature of their testimony with you, what was going to be said or---

A What was going to be said?

Q Yes, their testimony, what they basically were going to tell us here?

A Oh, no.

Q After?

A No.

MR. WHITEHEAD: No discussions whatsoever?

A Only with my husband, I discussed it with him.

Q And you haven't heard from them about testimony since

1
2 they left here in December?

3 A No.

4 Q Okay.

5 MR. WHITEHEAD: Let me ask a
6 couple of questions? You've
7 already testified but I just
8 want to clear it up a bit.

9 EXAMINATION BY

10 MR. WHITEHEAD:

11 Q I believe you testified that you had had nothing to
12 do with the contributions coming in and the expendi-
13 ture being made by the Committee, Tallon for Congress
14 in 1982?

15 A Correct.

16 Q Yours was only a door to door type of --- you worked
17 the telephones at night?

18 A I worked with all the volunteers.

19 Q What did you do with the volunteers, what was your
20 role?

21 A Well, we called everybody in the district which is
22 ten counties, made initial phone calls and rated
23 their responses, their feelings toward Robin and then
24 in the last few days of the campaign we had to call
25 all of those who were in favor of him or undecided

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2 we had to call them back. That was a monumental
3 task calling every registered voter. And then
4 handling the door to door in Florence County only.

5 Q What did the door to door activities consist of,
6 what did you do with the door to door---

7 A We got in a car two or three of us at a time and we'd
8 park at the end of the street and we literally walked
9 up and down the street leaving literature, talking
10 to people that we saw out on the street, and just
11 really trying to give him some name recognition.

12 Q Did you---was it---it is your testimony I believe that
13 you didn't solicit contributions from them?

14 A Never received a one.

15 Q Who was in charge of the contributions solicitation
16 team to your knowledge?

17 A I don't really know. I think it was more than one
18 person, there had to have been.

19 Q Who were those persons?

20 A I don't know. I had nothing to do with the financial part
21 of that campaign. That was all held in a back office
22 that I never even went in. Every time I was down
23 there the door was closed so --- it's a part of
24 the campaign that I never got involved in. I didn't
25 think as a family member that I should.

21 U 4 0 3 3 3 7 5

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2 Q So you had no idea or knowledge of what the financial
3 condition of the Committee was April---March, April
4 of 1982?

5 A No, I did know that Robin had put a lot of his
6 personal---I was more concerned with that. I didn't
7 know what condition that left the campaign in but I
8 knew that he had put a lot of his personal money in
9 it and that concerned me.

10 EXAMINATION BY

11 MR. WISE:

12 Q Did he ever indicate that he was in dire need of
13 additional monies to support the campaign?

14 A No, he never said that to me.

15 Q Did you ever receive any money personally for the
16 campaign in a contribution personally---

17 A No, I never received a contribution from anyone.

18 Q Do you know a Mr. G. B. Stokes? Mr. Stokes?

19 A G. B. Stokes? Does he have another name?

20 Q He runs the---

21 MR. WHITEHEAD: Howard-Johnsons

22 Hotel in Florence?

23 A I think I might know him, but I think he goes by
24 another name rather than initials.

25 MR. WHITEHEAD: How about Gary

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2 MR. WHITEHEAD: (con't) would have
3 converted into checks?

4 A No, and if he ever told me that I wouldn't have
5 believed him anyway.

6 Q Why not?

7 A I just don't like him and I don't trust him. I've
8 never had any conversation with him that I didn't
9 have to have.

10 Q Did you ever go on the campaign circuit with Congressman
11 Tallon?

12 A No. I had to work during the day so I could work down
13 at the campaign office at night. I never traveled
14 with him. My mother did.

15 MR. WISE: Do you have anything else,
16 Tom?

17 MR. WHITEHEAD: No.

18 Q We don't have anything else at this time but we're
19 not going to close the deposition, we're going to
20 keep it open and maybe we'll have to call you back
21 again. It's not a possibility of doing that but
22 we just keep this open to keep from having to go
23 through the process of getting another subpoena.

24 A Okay.

25 MR. WHITEHEAD: What we have to do

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2 MR. WHITEHEAD: (con't) unlike most
3 attorneys who are in private practice,
4 we have to go through a commission
5 to get the subpoena which entails
6 administrative detail, et cetera,
7 so we are leaving it open in the
8 event that we need any further
9 testimony. I don't think that---

10 A Okay.

11 Q And what I want to give you also is the option at this
12 time that you can sign this deposition once it's all
13 typed up or you can just waive signing and we can go
14 ahead and consider it without your signature. It's
15 up to you. What you'll be basically looking at to
16 see if there are any misspelled words and the typos,
17 that kind of changes. Now if you prefer not to do
18 that sort of thing, and just take for granted that
19 the Reporter is going to give us an accurate account
20 of what happened here, you can waive signing. If you
21 would like to see it he definitely can furnish you
22 a copy and you can see it and also sign it before ---

23 A I'd like to see it.

24 Q And you'd like to sign it, no problem. The Notary
25 will take care of that.

1
2 STATE OF SOUTH CAROLINA)
3 COUNTY OF RICHLAND) CERTIFICATE

4
5 This is to certify that the foregoing is the deposition
6 of Cameron Minshew, taken on behalf of the Federal Election
7 Commission before me, Eric B. Gore, a Notary Public in
8 and for the State of South Carolina, duly commissioned
9 and qualified as such, commencing at the hour of 10:50
10 a.m., on Tuesday, March 15, 1988, at the offices of the
11 United States Attorney, 1100 Laurel Street, Columbia, South
12 Carolina, pursuant to subpoena.

13 I do further certify that the said witness was first
14 duly sworn by me and cautioned to speak the whole truth;
15 that he was examined as per the foregoing; that notes were
16 taken by me of the questions propounded and the answers
17 given; and the the foregoing fifty-six (56) typewritten
18 pages represent a true, accurate, and complete transcription
19 of said testimony to the best of my skill and ability.

20 I do further certify that the reading and signing
21 of the deposition by the deponent was reserved.

22 I do further certify that I have sealed up and delivered
23 the original of said deposition to Philip L. Wise, Esquire,
24 Attorney, Federal Election Commission, 999 E. Street, N.W.,
25 Washington, D. C. 20463,
who shall retain the said deposition in his possession

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ERASABLE

- COTTON CONTENT -

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and become custodian thereof until such time as it shall be needed at trial.

I do further certify that I am not of counsel or attorney for any of the parties to the said action nor in any way interested in the event of the said cause.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 30th day of March, 1988.

Eric B. Gore
Eric B. Gore

Notary Public for South Carolina
My Commission expires: 3/11/97.

7104033332

EXHIBIT

#1 FEC EOR

DEC 15 10:57

Robert L. Welch
P. O. Box 618
N. Myrtle Beach, S. C.
29597

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

My name is Robert Welch. I was not an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. I was employed by Robin's of Dentsville, Inc. in April 1982.

I was paid two bonuses totaling \$2,330.00, one for \$830.00 and the other for \$1,500.00 in April 1982 by Robin's of Dentsville, Inc. All taxes; Federal, state, and social security, were deducted from these bonuses and these were included on my W2 form for that year.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$1,000.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely,


Robert L. Welch

Sworn to before me
December 8, 1986


Notary Republic

My Commission Expires February 2, 1987

DEC 15 10:06
COMMUNICATIONS DIVISION

0104033333

EXHIBIT

#2 FEC
EBA

Robert L. Welch
P. O. Box 618
N. Myrtle Beach, S. C.
29597

December 15, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

25 DEC 23 P 3:20
FEDERAL ELECTION COMMISSION
SECRETARY

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In follow-up to my individual reply to the allegations of wrongdoing on my part during Congressman Tallon's 1982 campaign, I would like to make you aware of two points which might clear this up.

First, as general manager of the stores, I want to let you know that bonuses are paid on a regular basis to our employees and have been long before Congressman Tallon ever decided to enter politics.

Secondly, I volunteered to serve as chairman of the out-of-district fund raising efforts during the 1982 campaign. I solicited contributions from employees of the Congressman's stores, from individuals with whom I did business, and from friends of both the Congressman and myself. I am quite proud of this and certainly did not have to resort to wrongdoing in order to accomplish my goals. I had all solicitations sent directly to me and dropped these by the campaign office on a regular basis.

I hope this will help to clear up this matter.

Sincerely,

Robert L. Welch
Robert L. Welch

Sworn to before me
December 15, 1986

Carissa Jalla Mirshak
Notary Republic

My Commission Expires February 2, 1987

EXHIBIT

#3 FEC
COM

Jane Harris
2006 Highway 17
North Myrtle Beach, S. C. 29582

DEC 22 11:49

DEC 19 11:33

FED
SECRETARY

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

My name is Jane Harris. I have never been employed at Robin's of Florence, Inc. or LeMasters, Inc. I have never received any bonus from these corporations.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,

Jane Harris
Jane Harris

Sworn to before me
December 8, 1986

Camelia Della Minda
Notary Republic

My Commission Expires February 2, 1987

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5 DEC 15 P 4: 57

Roland G. Minshew
120 Lakewood Drive
Florence, S. C. 29501

EXHIBIT

#4 FEC
EBA

DEC 15 P 3: 06

COPIES
FEDERAL
RESERVE

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

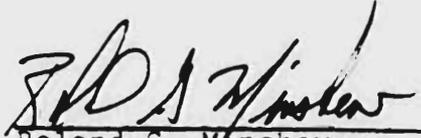
My name is Roland G. Minshew. I have been employed at Robin's of Florence, Inc. for sixteen years.

In April 1982, I was paid two bonuses totaling \$2,380.00, one for \$1,500.00 and one for \$880.00. All federal, state and social security taxes were deducted from these amounts and these were included on my end of the year W-2 form.

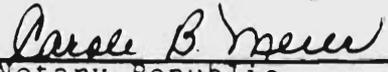
I did make a personal contribution to the Tallon for Congress campaign in the amount of \$1,000.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely,


Roland G. Minshew

Sworn to before me
December 8, 1986


Notary Republic

Notary Public, South Carolina State at Large
My Commission Expires May 19, 1991

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EXHIBIT

#5 FEC
EBM

Jerry Harris
2006 Highway 17
North Myrtle Beach, S. C.

629582

12-59

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

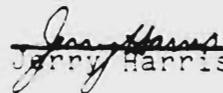
My name is Jerry Harris. I was not an employee of Robin's of Florence, Inc. or of LeMasters, Inc. during 1982. I was and still am employed by Robin's of North Myrtle Beach, Inc.

In April 1982, I was paid two bonuses totaling \$2,330.00 (\$830.00 and \$1,500.00). All FICA, federal and state taxes were deducted from these amounts and these were included on my W-2 form at the end of the year.

I did make a personal contribution to the Tallon for Congress campaign in the amount of \$500.00 in April 1982.

I hope this is sufficient to determine that no violations were made on my part.

Sincerely yours,


Jerry Harris

Sworn to before me
December 8, 1986


Notary Republic

My Commission Expires February 2, 1987

DEC 10 1986
FEDERAL ELECTION COMMISSION

REC'D

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Call # 2255

EXHIBIT

#7 FEC QAM

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NOV 15 1986



LeMasters

Traditionally Distinctive

MAGNOLIA MALL
FLORENCE, SOUTH CAROLINA 29501
(803) 667-0454

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

As bookkeeper and secretary of the above named corporation, I would like to say that no bonuses were paid to any of the persons mentioned in the legal analysis of your letter. These persons include: Roland G. Minshew, Jane Harris, Robert Welch, Jerry Harris, Mark Lawson and Lynn Hartnett. None of these people has ever been employed by LeMasters, Inc.

If I can be of further assistance, please contact me.

Sincerely yours,

Cameron T. Minshew
Cameron T. Minshew

Sworn to before me
December 8, 1986

Carole B. Meier
Notary Republic

Notary Public, South Carolina State at Large
My Commission Expires May 19, 1991

0104035302

Robin's

"Men's Quality Clothing"

TELEPHONE 689-4344

2031 WEST EVANS STREET

P. O. BOX 3887

FLORENCE, SOUTH CAROLINA 29502

EXHIBIT

#8 FEC
EBM

December 8, 1986

Ms. Jean D. Aiken, Chairman
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071

Dear Ms. Aiken:

As bookkeeper and secretary of the above named corporation, I would like to help clarify this allegation.

Roland G. Minshew is the only individual named in the legal analysis that is employed by Robin's of Florence, Inc. He was paid two bonuses in April 1982 totaling \$2380.00 of which all taxes were deducted.

Jane Harris has never been employed by any of our companies.

Robert Welch was employed by Robin's of Dentsville, Inc. in April 1982.

Jerry Harris was employed by Robin's of North Myrtle Beach, Inc. in April 1982.

Mark Lawson was employed by Robin's of Anderson, Inc. in April 1982.

Lynn Hartnett was employed by Robin's Ladies' Wear, Inc. in April 1982.

None of the above mentioned persons was paid a bonus by Robin's of Florence, Inc. or LeMasters, Inc. in April 1982, except Roland G. Minshew.

If I can be of further assistance in this matter, please contact me.

Sincerely yours,

Cameron T. Minshew
Cameron T. Minshew

Sworn to before me
December 8, 1986

Carole B. Meier
Notary Public

Notary Public, South Carolina State at Large
My Commission Expires May 12, 1991

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CONFIDENTIAL
FBI

BEFORE THE FEDERAL ELECTION COMMISSION

88 APR 22 AM 8:54

In the Matter of)
Gary H. Slavens, et al.)

MUR 2071

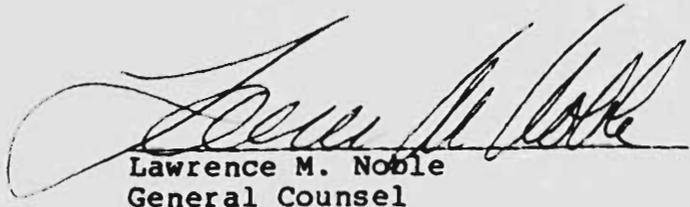
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GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Congressman Robin M. Tallon, Jr., based on the assessment of the information presently available.

Date

4/21/88


Lawrence M. Noble
General Counsel

Staff Person: Phillip L. Wise

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88 MAY 20 PM 3:54

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble 
General Counsel

SUBJECT: MUR #2071
Representative Robin Tallon

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 May 20, 1988. 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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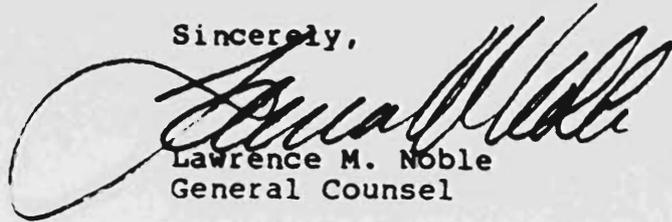
Letter to Dwight F. Drake, Esquire
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

21-4036374

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Robin M. Tallon, Jr.) MUR 2071
)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina) violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). On March 18, 1986, the Commission authorized a Subpoena and Order to Congressman Tallon. On March 18, 1988, Representative Tallon appeared at the Office of the General Counsel and was deposed pursuant to the Subpoena authorized by the Commission.

This matter arose as the result of information received from Gary H. Slavens who worked on Representative Tallon's principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984.^{1/} On May 22, 1986, this Office deposed Gary H. Slavens. In summary, Mr. Slavens testified that during the 1982 general election campaign, Congressman Tallon informed him that G.B. Stokes (a local businessman) had given Mr. Tallon a \$1,000.00 cash

^{1/} This matter arose as a referral from the Department of Justice in 1984. The investigation by the Justice Department failed to corroborate the allegations of irregularity made by Mr. Slavens.

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contribution. Mr. Slavens further asserted that Congressman Tallon inquired on how to get this money into the campaign fund. Mr. Slavens claimed that he informed Congressman Tallon that as he (Mr. Slavens) had already contributed the maximum amount, he would deposit the money into his wife's (Vicki Slavens) account and have her write a \$1,000.00 check to the Tallon Campaign. Mr. Slavens testified that Congressman Tallon physically delivered to him the one thousand dollars (ten one hundred dollar bills), which was deposited into Vicki Slavens' account. Vicki Slavens then wrote a \$1,000.00 check to the Tallon Campaign as directed by Mr. Slavens.

On May 22, 1986 Michael Glenn Odum, former treasurer for the 1982 Tallon Campaign Committee, appeared and was deposed. Mr. Odom testified that he had no knowledge of any cash contribution that G.B. Stokes allegedly gave to Congressman Tallon.

On May 23, 1986, G.B. Stokes appeared and was deposed by a staff member from this Office. Mr. Stokes testified, in part, that Congressman Tallon had asked him to donate to his campaign on several occasions; however, to the best of his knowledge he (Mr. Stokes) did not give Mr. Tallon a \$1,000.00 cash contribution, or any other contribution for the 1982 Tallon campaign. It should be noted that the reports on file with the Commission show no contribution from G.B. Stokes.

Vicki Slavens filed an affidavit with the Commission on September 10, 1986. Ms. Slavens stated that in 1982 Gary Slavens

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deposited \$1,000.00 into her account and she wrote a check for \$1,000.00 to the Tallon for Congress Committee and gave it to him. Ms. Slavens claimed that she did not know the source of the funds for her contribution.

When deposed on March 18, 1988, Congressman Tallon denied the allegations made by Gary H. Slavens. Congressman Tallon specifically denied that he had received any cash contribution from G.B. Stokes, or gave any cash to Mr. Slavens in order that Mr. Slavens could get the cash into the 1982 Tallon Campaign. Further, Congressman Tallon asserted that he never personally received any contributions.

II. ANALYSIS

2 U.S.C. § 432(b)(1) requires every person who receives a contribution for an authorized political committee within 10 days after receiving such contribution to forward such contribution to the treasurer.

The investigation uncovered no evidence that Representative Tallon received a contribution for the committee, therefore it appears there was no violation of 2 U.S.C. § 432(b)(1).

2 U.S.C. § 432(b)(3) requires that all funds of a political committee be segregated and not commingled with the personal funds of any individual.

No proof was discovered indicating that Representative Tallon possessed funds belonging to the committee or commingled such funds with the personal funds of any individual. In view of the foregoing there appears to be no violation of 2 U.S.C. § 432(b)(3).

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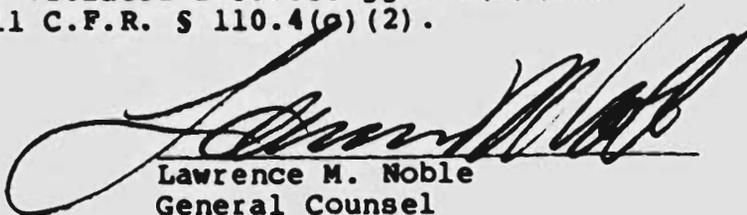
probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2).

III. GENERAL COUNSEL'S RECOMMENDATION

- 1. Find no probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2).

Date

5/17/81


 Lawrence M. Noble
 General Counsel

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FEDERAL ELECTION COMMISSION
88 JUN 29 PM 1:44

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens, et al.) MUR 2071
)

GENERAL COUNSEL'S REPORT

**JUL 12 1988
EXECUTIVE SESSION**

I. BACKGROUND

On August 13, 1985, the Commission found reason to believe that Representative Robin M. Tallon, Jr. (Democrat, 6th District of South Carolina) violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). On March 18, 1986, the Commission authorized a Subpoena and Order to Congressman Tallon. On March 18, 1988, Representative Tallon appeared at the Office of the General Counsel and was deposed pursuant to the Subpoena authorized by the Commission.

This matter arose as the result of information received from Gary H. Slavens who worked on Representative Tallon's principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984 when he contacted the Justice Department.^{1/} He alleged that there were several instances where cash contributions were made to the campaign, among these, the one involving G.B. Stokes.

^{1/} This matter was referred from the Department of Justice on March 18, 1985. The investigation by the Justice Department failed to corroborate the allegations of irregularity made by Mr. Slavens.

The allegation involving Mr. Stokes was the only one in which Mr. Slavens testified that Congressman Tallon was personally involved. On May 22, 1986, this Office deposed Gary H. Slavens. Mr. Slavens testified that during the 1982 general election campaign, Congressman Tallon informed him that G.B. Stokes (a local businessman) had given Mr. Tallon a \$1,000.00 cash contribution. Mr. Slavens further asserted that Congressman Tallon inquired on how to get this money into the campaign fund. Mr. Slavens claimed that he informed Congressman Tallon that as he (Mr. Slavens) had already contributed the maximum amount, he would deposit the money into his wife's (Vicki Slavens) account and have her write a \$1,000.00 check to the Tallon Campaign. Mr. Slavens testified that Congressman Tallon physically delivered to him the one thousand dollars (ten one hundred dollar bills), which was deposited into Vicki Slavens' account. Vicki Slavens then wrote a \$1,000.00 check to the Tallon Campaign as directed by Mr. Slavens.

On May 22, 1986 Michael Glenn Odum, former treasurer for the 1982 Tallon Campaign Committee, appeared and was deposed. Mr. Odom testified that he had no knowledge of any cash contribution that G.B. Stokes allegedly gave to Congressman Tallon.

On May 23, 1986, G.B. Stokes appeared and was deposed by a staff member from this Office. Mr. Stokes testified, in part, that Congressman Tallon had asked him to donate to his campaign on several occasions; however, to the best of his knowledge he

(Mr. Stokes) did not give Mr. Tallon a \$1,000.00 cash contribution, or any other contribution for the 1982 Tallon campaign. It should be noted that the reports on file with the Commission show no contribution from G.B. Stokes.

Vicki Slavens filed an affidavit with the Commission on September 10, 1986. Ms. Slavens stated that in 1982 Gary Slavens deposited \$1,000.00 into her account and she wrote a check for \$1,000.00 to the Tallon for Congress Committee and gave it to him. Ms. Slavens claimed that she did not know the source of the funds for her contribution.

When deposed on March 18, 1988, Congressman Tallon denied the allegations made by Gary H. Slavens. Congressman Tallon specifically denied that he had received any cash contribution from G.B. Stokes, or gave any cash to Mr. Slavens in order that Mr. Slavens could get the cash into the 1982 Tallon Campaign. Further, Congressman Tallon asserted that he never personally received any contributions.

II. ANALYSIS (See General Counsel's Brief signed May 19, 1988)

2 U.S.C. § 432(b)(1) requires every person who receives a contribution for an authorized political committee within 10 days after receiving such contribution to forward such contribution to the treasurer.

The investigation uncovered no evidence that Representative Tallon received a contribution for the committee, therefore it appears there was no violation of 2 U.S.C. § 432(b)(1).

2 U.S.C. § 432(b)(3) requires that all funds of a political committee be segregated and not commingled with the personal funds of any individual.

No proof was discovered indicating that Representative Tallon possessed funds belonging to the committee or commingled such funds with the personal funds of any individual. In view of the foregoing there appears to be no violation of 2 U.S.C. § 432(b)(3).

2 U.S.C. § 441f, inter alia, prohibits any person from making a contribution in the name of another person or knowingly accepting a contribution made by one person in the name of another person.

No evidence was revealed which corroborated any claim that Representative Tallon received a contribution from one contributor (G.B. Stokes) or assisted in the making of a contribution in the name of another (Vicki Slavens). In light of this, there appears to be no violation of 2 U.S.C. § 441f.

11 C.F.R. § 110.4(c)(2) requires a candidate or committee receiving a cash contribution in excess of \$100.00 to promptly return the excess amount over \$100.00 to the contributor.

There appears to be no violation of 11 C.F.R. § 110.4(c)(2) because there is no proof that Representative Tallon received any cash contributions.

There was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that G.B. Stokes gave Congressman Tallon \$1,000 in cash. G.B. Stokes testified that to the best of

his knowledge he did not give Congressman Tallon any contribution, cash or otherwise. Congressman Tallon specifically denied the allegations made by Mr. Slavens. In light of the facts that Slavens' allegations were made after he had a falling out with Congressman Tallon and was no longer employed in Congressman Tallon's Office and that other witnesses either denied or did not corroborate these allegations, the Office of the General Counsel recommends that the Commission find no probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2).

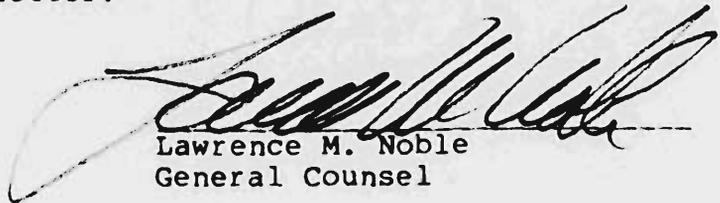
III. RECOMMENDATION

1. Find no probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2).
2. Close the file as it pertains to Representative Robin M. Tallon, Jr.
3. Approve the attached letter.

Date

6/29/88

Lawrence M. Noble
General Counsel



Attachments

1. Letter to Respondent

Staff Assigned: Phillip L. Wise

91040350904

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Gary H. Slavens, et al.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 12, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2071:

1. Find no probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2).
2. Close the file as it pertains to Representative Robin M. Tallon, Jr.
3. Approve the letter attached to the General Counsel's report dated June 29, 1988.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

7-13-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1988

Dwight F. Drake, Esquire
Nelson, Mullins, Grier, & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Representative Robin Tallon, Jr.

Dear Mr. Drake:

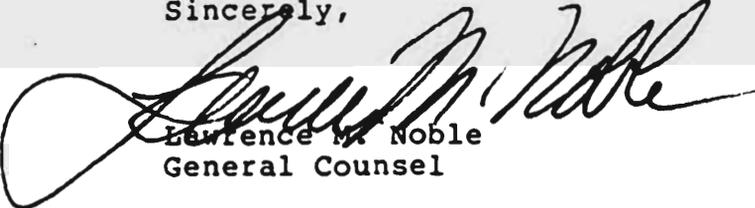
This is to advise you that on July 12, 1988, the Federal Election Commission found that there is no probable cause to believe your client, Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f and 11 C.F.R. § 110.4(c)(2). Accordingly, the file in this matter has been closed as it pertains to your client.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

88 JUL -8 PM 4:22

In the Matter of
Gary H. Slavens, et al.

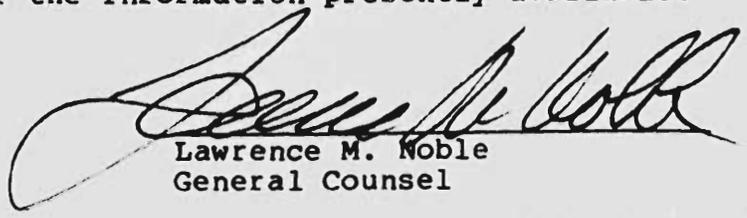
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) MUR 2071
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SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Joe W. Pearce, Jr., Ed Saleeby, G.B. Stokes, Jr., Jane Harris, and LeMasters, Inc., based on the assessment of the information presently available.

7/8/88
Date


Lawrence M. Noble
General Counsel

Staff Person: Phillip L. Wise

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88 JUL 15 PM 3:38



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LMN*
General Counsel

SUBJECT: MUR # 2071, Gary H. Slavens, et al.

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of the briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on July 15, 1988. Following receipt of the respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments

- 1-Briefs
- 2-Letters to respondents

Staff Person: Phillip L. Wise

71040565703



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 15, 1988

Vicki Slavens
864 Indian Drive
Florence, S.C. 29501

RE: MUR 2071
Vicki Slavens

Dear Ms. Slavens:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on August 13, 1985, found reason to believe that you violated 2 U.S.C. §§ 441f and 432(b)(3), and 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 no probable cause to believe that a 2 U.S.C. § 432(b)(3) violation has occurred and probable cause to believe that a 2 U.S.C. § 441f violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

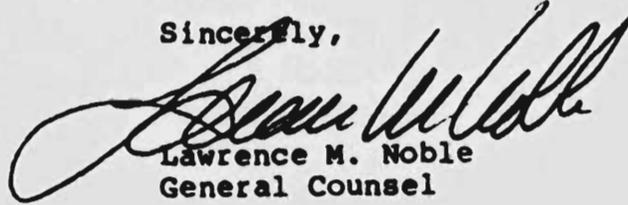
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Letter to Vicki Slavens
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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bills), which was deposited into Vicki Slavens' account. Vicki Slavens then wrote a \$1,000 check to the Tallon for Congress Committee as directed by Mr. Slavens.

On May 22, 1986 Michael Glenn Odum, former treasurer for the 1982 Tallon for Congress Committee, appeared and was deposed. Mr. Odom testified that he had no knowledge of any cash contribution that G.B. Stokes allegedly gave to Congressman Tallon.

On May 23, 1986, G.B. Stokes appeared and was deposed by a staff member from this Office. Mr. Stokes testified, in part, that Congressman Tallon had asked him to donate to his campaign on several occasions; however, to the best of his knowledge he (Mr. Stokes) did not give Mr. Tallon a \$1,000 cash contribution, or any other contribution for the 1982 Tallon Campaign. It should be noted that the reports on file with the Commission show no contribution from G.B. Stokes.

Vicki Slavens filed an affidavit with the Commission on September 10, 1986. Ms. Slavens stated that in 1982 Gary Slavens deposited \$1,000.00 into her account and she wrote a check for \$1,000.00 to the Tallon for Congress Committee and gave it to him. Ms. Slavens claimed that she did not know the source of the funds for her contribution.

When deposed on March 18, 1988, Congressman Tallon denied the allegations made by Gary H. Slavens. Congressman Tallon specifically denied that he had received any cash contribution

from G.B. Stokes, or gave any cash to Mr. Slavens to be put into the 1982 Tallon Campaign. Further, Congressman Tallon asserted that he never personally received any contributions.

II. ANALYSIS

Pursuant to 2 U.S.C. § 432(b)(3) all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual.

There was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that G.B. Stokes gave Congressman Tallon \$1,000.00 in cash which Congressman Tallon gave to Mr. Slavens. G.B. Stokes testified that to the best of his knowledge he did not give Congressman Tallon any contributions, cash or otherwise. Congressman Tallon specifically denied the allegations made by Mr. Slavens. In light of these facts, there appears to be no probable cause to believe there was a violation of 2 U.S.C. § 432(b)(3) by Vicki Slavens in that there is no showing that alleged committee funds (the \$1,000 cash contribution) were ever commingled with her personal funds.

Pursuant to 2 U.S.C. § 441f no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.

Gary Slavens testified that he deposited \$1,000.00 into Vicki Slavens' account to enable her to contribute that amount

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to the 1982 Tallon for Congress Committee, and Vicki Slavens by affidavit acknowledged the deposit and wrote a \$1,000.00 check to the Committee. Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that Vicki Slavens violated 2 U.S.C. § 441f for knowingly permitting her name to be used to effect a contribution in the name of another.

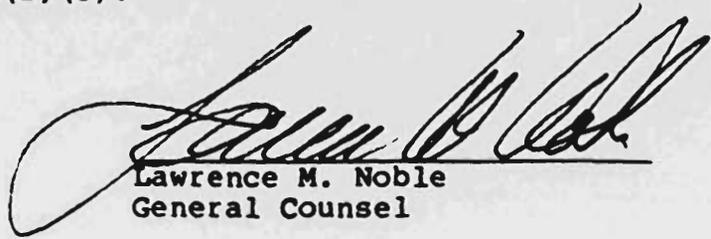
III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Vicki Slavens violated 2 U.S.C. § 441f.
2. Find no probable cause to believe that Vicki Slavens violated 2 U.S.C. § 432(b)(3).

Date

7/15/88

Lawrence M. Noble
General Counsel



71040360714



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 15, 1988

Gary H. Slavens
2924 West Palmetto Street
Florence, S.C. 29501

RE: MUR 2071
Gary H. Slavens

Dear Mr. Slavens:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on August 13, 1985, found reason to believe that you violated 2 U.S.C. § 432(b)(3), and 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 no probable cause to believe that a 2 U.S.C. § 432(b)(3) violation has occurred and probable cause to believe that a 2 U.S.C. § 441f violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

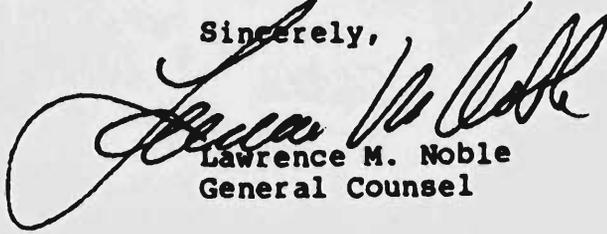
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Letter to Gary H. Slavens
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

21040360916

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Gary H. Slavens

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MUR 2071

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that Gary H. Slavens had violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with the personal funds of another individual. On March 18, 1986, the Commission authorized a Subpoena and Order to Mr. Slavens. On May 22, 1986, Mr. Slavens appeared and was deposed pursuant to the Subpoena authorized by the Commission.

In summary, Mr. Slavens testified that during the 1982 general election campaign, Congressman Robin M. Tallon, Jr. informed him that G.B. Stokes (a local businessman) had given Mr. Tallon a \$1,000.00 cash contribution. Mr. Slavens further asserted that Congressman Tallon inquired on how to get this money into the campaign fund. Mr. Slavens claimed that he informed Congressman Tallon that as he (Mr. Slavens) had already contributed the maximum amount, he would deposit the money into his wife's (Vicki Slavens) account and have her write a \$1,000.00 check to the Tallon Campaign. Mr. Slavens testified that Congressman Tallon physically delivered to him the one thousand dollars (ten one hundred dollar bills), which was deposited into Vicki Slavens' account. Vicki Slavens then wrote a \$1,000 check to the Tallon Campaign as directed by Mr. Slavens.

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On May 22, 1986 Michael Glenn Odum, former treasurer for the 1982 Tallon for Congress Committee, appeared and was deposed. Mr. Odom testified that he had no knowledge of any cash contribution that G.B. Stokes allegedly gave to Congressman Tallon.

On May 23, 1986, G.B. Stokes appeared and was deposed by a staff member from this Office. Mr. Stokes testified, in part, that Congressman Tallon had asked him to donate to his campaign on several occasions; however, to the best of his knowlege he (Mr. Stokes) did not give Mr. Tallon a \$1,000 cash contribution, or any other contribution for the 1982 Tallon Campaign. It should be noted that the reports on file with the Commission show no contribution from G.B. Stokes.

Vicki Slavens filed an affidavit with the Commission on September 10, 1986. Ms. Slavens stated that in 1982 Gary Slavens deposited \$1,000.00 into her account and she wrote a check for \$1,000.00 to the Tallon for Congress Committee and gave it to him. Ms. Slavens claimed that she did not know the source of the funds for her contribution.

When deposed on March 18, 1988, Congressman Tallon denied the allegations made by Gary H. Slavens. Congressman Tallon specifically denied that he had received any cash contribution from G.B. Stokes, or gave any cash to Mr. Slavens to be put into the 1982 Tallon Campaign. Further, Congressman Tallon asserted that he never personally received any contributions.

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II. ANALYSIS

Pursuant to 2 U.S.C. § 432(b)(3) all funds of a political committee shall be segregated from, and may not be commingled with, the personal funds of any individual.

There was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that G.B. Stokes gave Congressman Tallon \$1,000.00 in cash which Congressman Tallon gave to Mr. Slavens. G.B. Stokes testified that to the best of his knowledge he did not give Congressman Tallon any contributions, cash or otherwise. Congressman Tallon specifically denied the allegations made by Mr. Slavens. In light of these facts, there appears to be no probable cause to believe there was a violation of 2 U.S.C. § 432(b)(3) in that there is no showing that the alleged Committee funds (the \$1,000 cash contribution) were commingled with any personal funds of either Gary Slavens or his wife Vicki Slavens. Evidence was adduced which indicated that Gary Slavens made a contribution in the name of another (Vicki Slavens) in violation of 2 U.S.C. § 441f, which prohibits any person from making a contribution in the name of another.

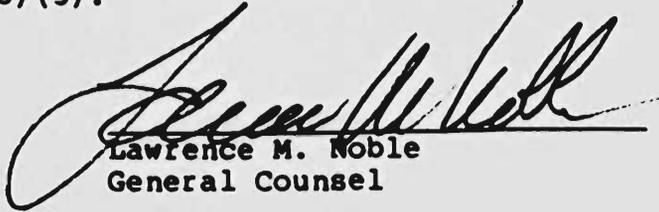
Gary Slavens testified that he deposited \$1,000.00 into Vicki Slavens' account to enable her to contribute that amount to the 1982 Tallon for Congress Committee, and Vicki Slavens by affidavit acknowledged the deposit and wrote a \$1,000.00 check to the Committee. Accordingly, the Office of the General Counsel recommends that the Commission find probable cause to believe that Gary H. Slavens, violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Gary H. Slavens violated 2 U.S.C. § 441f.
2. Find no probable cause to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3).

Date

7/15/89


Lawrence M. Noble
General Counsel

7104055720



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 SEP 30 AM 10:25

September 30, 1988

SENSITIVE

MEMORANDUM

TO: The Commission
FROM: Lawrence M. Noble *Amn (LA)*
General Counsel
SUBJECT: MUR # 2071, Gary H. Slavens, et al.

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of the briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe were mailed on September 30, 1988. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

- 1-Briefs
- 2-Letters to respondents

2140360922



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

G.B. Stokes, Jr.
100 Third Loop
Florence, South Carolina 29501

RE: MUR 2071
G.B. Stokes, Jr.

Dear Mr. Stokes:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on August 13, 1985, found reason to believe that you violated 2 U.S.C. § 441g, and 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 no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

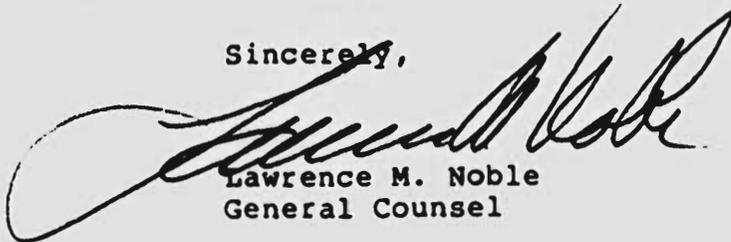
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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G.B. Stokes, Jr.
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

44-38861-404

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
G.B. Stokes) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that G.B. Stokes violated 2 U.S.C. § 441g. On March 18, 1986, the Commission authorized a Subpoena and Order to G.B. Stokes. On May 23, 1986, Mr. Stokes appeared and was deposed pursuant to the Subpoena authorized by the Commission.

This matter arose as the result of information received from Gary H. Slavens who worked on Representative Robin M. Tallon, Jr.'s (Democrat, 6th District of South Carolina) principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984. On May 22, 1986, this Office deposed Gary H. Slavens. In summary, Mr. Slavens testified that during the 1982 general election campaign, Congressman Tallon informed him that G.B. Stokes (a local businessman) had given Mr. Tallon a \$1,000 cash contribution.

On May 22, 1986 Michael Glenn Odum, former treasurer for the 1982 Tallon Campaign Committee, appeared and was deposed. Mr. Odom testified that he had no knowledge of any cash

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contribution that G.B. Stokes allegedly gave to Congressman Tallon.

On May 23, 1986, G.B. Stokes appeared and was deposed by a staff member from this Office. Mr. Stokes testified, in part, that Congressman Tallon had asked him to donate to his campaign on several occasions; however, to the best of his knowledge he (Mr. Stokes) did not give Mr. Tallon a \$1,000.00 cash contribution, or any other contribution for the 1982 Tallon campaign. It should be noted that the reports on file with the Commission show no contribution from G.B. Stokes.

When deposed on March 18, 1988, Congressman Tallon denied the allegations made by Gary H. Slavens. Congressman Tallon specifically denied that he had received any cash contribution from G.B. Stokes.

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II. ANALYSIS

Pursuant to 2 U.S.C. § 441g no person shall make contributions of currency of the United States or currency of any foreign country to or for the benefit of any candidate which, in the aggregate, exceed \$100.00, with respect to any campaign of such candidate for nomination for election, or for election, to Federal office.

There was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that G.B. Stokes gave Congressman Tallon \$1,000 in cash. G.B. Stokes testified that to the best of his knowledge he did not give Congressman Tallon any

contribution, cash or otherwise. Congressman Tallon specifically denied the allegations made by Mr. Slavens. In light of the facts that allegations were made after Mr. Slavens had a falling out with Congressman Tallon; that committee reports filed with the Commission do not show any contribution by G. B. Stokes; and that the witnesses failed to corroborate said allegations, the Office of the General Counsel recommends that the Commission find no probable cause to believe that G.B. Stokes, violated 2 U.S.C. § 441g.

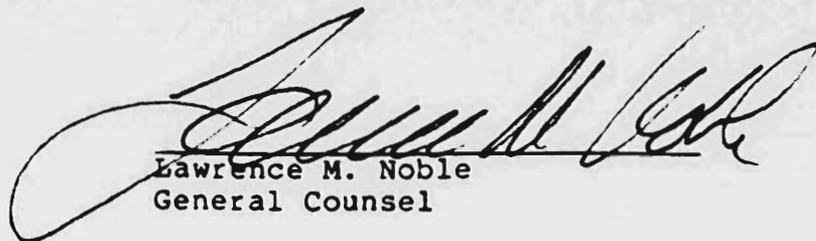
III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that G.B. Stokes, violated 2 U.S.C. §441g.

Date

9/29/88

Lawrence M. Noble
General Counsel



11040350927



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

Barbara Ohanesian
106 South Marlboro Street
P.O. Box 1373
Bennettsville, South Carolina 29512-1373

RE: MUR 2071
Joe W. Pearce, Jr.

Dear Ms. Ohanesian:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on August 13, 1985, found reason to believe that your client, Joe W. Pearce, Jr., violated 2 U.S.C. § 441g, and 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 no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is probable cause to believe a violation has occurred.

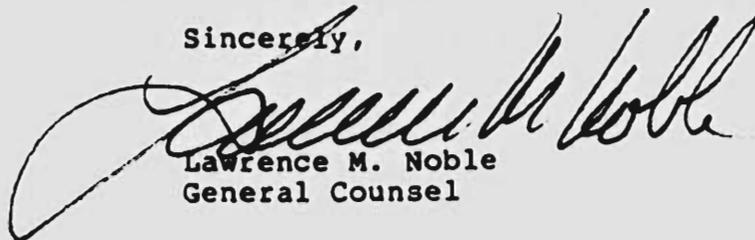
If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Barbara Ohanesian, Esquire
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

91040350723

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Joe W. Pearce, Jr.) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that Joe W. Pearce, Jr., the Mayor of Florence, S.C., violated 2 U.S.C. § 441g.

This matter arose as the result of information received from Gary H. Slavens who worked on Representative Robin M. Tallon, Jr.'s (Democrat, 6th District of South Carolina) principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984.

Mr. Slavens alleged that in 1982 Joe W. Pearce, Jr., made cash contributions aggregating either \$700 or \$1,500 to the Tallon for Congress Committee or agents thereof. Mr. Slavens purportedly advised Mr. Tallon that Mr. Pearce had made a cash contribution to the campaign, and according to Mr. Slavens, Congressman Tallon acknowledged said contribution.

In Mr. Pearce's sworn affidavit, dated August 29, 1985 he "denies making cash contributions aggregating either \$700.00 or \$1,500.00 to the Tallon for Congress Committee or agents thereof

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during Congressman Robin M. Tallon's campaign for congress in 1982." Mr. Pearce asserted that he made two contributions to the Tallon Committee in 1982, a check for \$100.00 dated April 6, 1982 and a \$10.00 contribution in September of 1982. In addition, when Congressman Tallon was deposed on March 18, 1988 he indicated he was unaware Mr. Pearce made a contribution to the 1982 campaign.

II. ANALYSIS

Pursuant to 2 U.S.C. § 441g no person shall make contributions of currency of the United States or currency of any foreign country to or for the benefit of any candidate which, in the aggregate, exceed \$100.00, with respect to any campaign of such candidate for nomination for election, or for election, to Federal office.

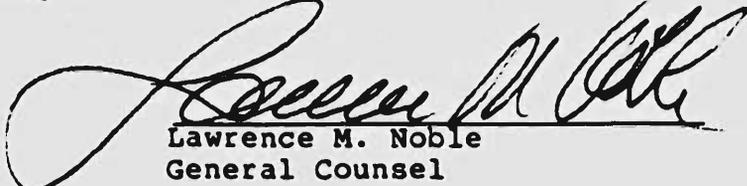
There was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that Joe W. Pearce, Jr., made cash contributions aggregating either \$700 or \$1,500 to the 1982 Tallon for Congress Committee or agents thereof. Congressman Tallon testified that he was not aware of any contributions by Mr. Pearce to his 1982 campaign. In light of the facts that the allegations were made after Mr. Slavens had a falling out with Congressman Tallon; that the investigation revealed only one \$10.00 cash contribution by Mr. Pearce; and that the witnesses failed to corroborate said allegations, the Office of the General Counsel recommends that the Commission find no probable cause to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g.

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III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that Joe W. Pearce, Jr., violated 2 U.S.C. § 441g.

9/29/88
Date


Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

Benny R. Greer, Esquire
100 St. John Street
P.O. Drawer 519
Darlington, S.C. 29532

RE: MUR 2071
Edward E. Saleeby

Dear Mr. Greer:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on August 13, 1985, found reason to believe that your client, Senator Edward E. Saleeby, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g, and 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 no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is probable cause to believe a violation has occurred.

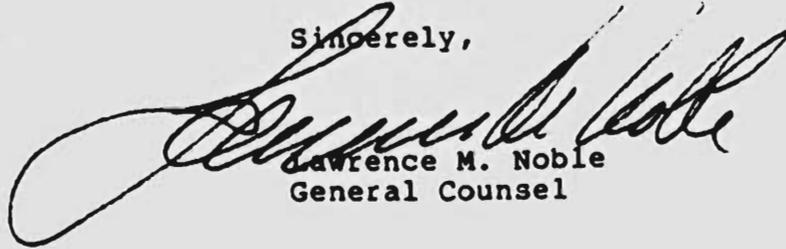
If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Benny R. Greer, Esquire
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

7 1 0 4 0 3 6 0 7 3 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Ed Saleeby) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that South Carolina State Senator Ed Saleeby (10th District), had violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

This matter arose as the result of information received from Gary H. Slavens who worked on Representative Robin M. Tallon, Jr.'s (Democrat, 6th District of South Carolina) principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984.

Mr. Slavens alleged that in 1982 Ed Saleeby made a cash contribution in the amount of \$1,300.00 or \$1,400.00 to the Tallon for Congress Committee or agents thereof. However, when deposed by this Office on May 22, 1986 Mr. Slavens testified that he never saw any contribution from Ed Saleeby to the Tallon Campaign.

When deposed on March 18, 1988 Congressman Tallon testified that he did not recall whether Mr. Saleeby made a contribution to his 1982 campaign.

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II. ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(1)(A) no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal Office which, in the aggregate, exceed \$1,000.

Pursuant to 2 U.S.C. § 441g no person shall make contributions of currency of the United States or currency of any foreign country to or for the benefit of any candidate which, in the aggregate, exceed \$100.00, with respect to any campaign of such candidate for nomination for election, or for election, to Federal office.

The investigation uncovered no evidence that Ed Saleeby made a cash contribution in the amount of \$1,300.00 or \$1,400.00, or any other amount. Therefore, it appears there was no violation of 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

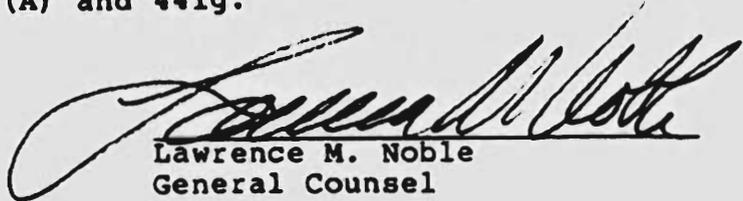
In light of the facts that there was no corroborating testimony, or evidence to support Gary H. Slavens' allegation that Ed Saleeby made a cash contribution in the amount of \$1,300.00 or \$1,400.00, or any other amount, to the 1982 Tallon for Congress Committee or agents thereof; that Mr. Slavens' allegation was made after a falling out with Congressman Tallon; that Mr. Slavens testified he never saw a contribution from Ed Saleeby; and that Congressman Tallon was not aware of any contribution by Mr. Saleeby, the Office of the Office of the General Counsel recommends that the Commission find no probable cause to believe that Ed Saleeby, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

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III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that Ed Saleeby, violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g.

Date 9/29/88


Lawrence M. Noble
General Counsel

71040553731



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

Robert L. Welch
LeMasters E-3
Briarcliffe Mall
Myrtle Beach, SC 29577

RE: MUR 2071
LeMasters, Inc.

Dear Mr. Welch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission, on November 12, 1986, found reason to believe that LeMasters, Inc. violated 2 U.S.C. §§ 441b and 441f and 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 no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 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 the 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 whether there is probable cause to believe a violation has occurred.

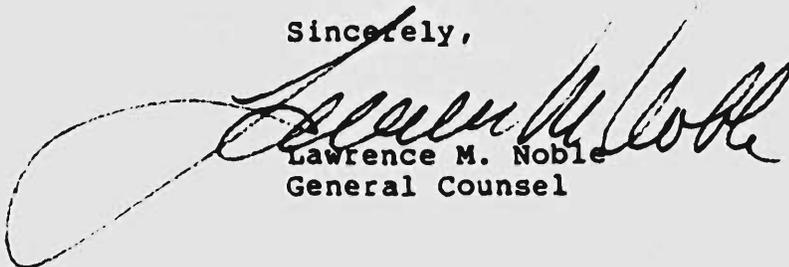
If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Robert L. Welch
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to handle this matter, at (202) 376-8200.

Sincerely,

A large, stylized handwritten signature in dark ink, appearing to read "Lawrence M. Noble". The signature is written over the typed name and title.

Lawrence M. Noble
General Counsel

Enclosure
Brief

7104050739

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
LeMasters, Inc.) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that LeMasters, Inc. violated 2 U.S.C. §§ 441b(a) and 441f. On October 27, 1987, the Commission authorized a Subpoena and Order to LeMasters, Inc.

The Office of the General Counsel had received information that during April, 1982, "bonuses" of \$1,000 each were paid to employees of LeMasters, Inc. and that these "bonuses" were then given as contributions by the employees to the 1982 Tallon for Congress Committee. The following employees allegedly received these bonuses: Robert (Bobby) Welch, Robert Hartnett, Lynn Hartnett, Jerry Harris, Jane Harris, Roland Minshew, and Mark Lawson.

Pursuant to the Subpoena directed to LeMasters, Inc., Robert Welch, who was the president of all Robin's stores in 1982, furnished compiled information on the payment of bonuses by the various Robin's stores, including LeMasters, Inc., in 1982. The documents indicated that none of the listed employees were employed by, or, received bonuses from LeMasters, Inc., in 1982.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, ("the Act") provides that it is unlawful for any corporation whatever to make a contribution in connection with a federal election.

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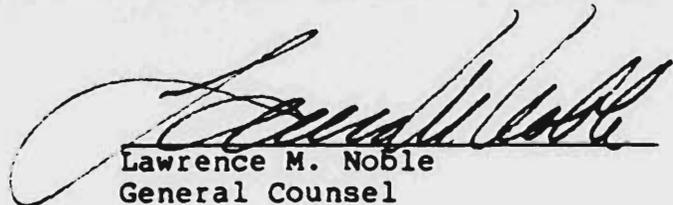
2 U.S.C. § 441b(a). The Act also provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed evidence that LeMasters, Inc. had not given bonuses to any employees, whose contribution to the Tallon for Congress Committee is questioned in this matter. Accordingly, the Office of the General Counsel recommends that the Commission find no probable cause to believe that LeMasters, Inc., violated 2 U.S.C. §§ 441b(a), and 441f.

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that LeMasters, Inc., violated 2 U.S.C. §§ 441b(a), and 441f.

9/29/88
Date


Lawrence M. Noble
General Counsel

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LAW OFFICES
OF
PORTER & McEACHIN
152 S. McQUEEN STREET
P.O. BOX 4337
FLORENCE, S. C. 29502-1337

HAIGH PORTER
D. MALLOY McEACHIN, JR

AREA CODE 803
665-7090

October 4, 1988

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 2071
G.B. Stokes, Jr.

Dear Mr. Noble:

Your letter of September 30, 1988, addressed to G. B. Stokes, Jr., concerning the above matter has been referred to my office. I believe your file will reflect that our office was designated as counsel by statement of designation dated September 3, 1985.

We have reviewed your letter and the General Counsel's brief with Mr. Stokes. We appreciate your advising us of General Counsel's recommendation.

In view of the contents of your letter of September 30, 1988, and the brief submitted by General Counsel, Mr. Stokes does not wish to file any further brief. We concur with the recommendation of the General Counsel. We would appreciate your keeping Mr. Stokes and the undersigned advised.

Yours very truly,



Haigh Porter

HP/bg

cc: Mr. G. B. Stokes, Jr.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

November 22, 1988

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LM*
General Counsel

SUBJECT: MUR # 2071, Gary H. Slavens, et al.

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 were mailed on November 22, 1988. 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

434303404



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1988

Lamar J. Rabon, Treasurer
Tallon for Congress Committee
1512 West Evans Street
Florence, S.C. 29501

RE: MUR 2071
Tallon for Congress
Committee and
Lamar J. Rabon, as
treasurer

Dear Mr. Rabon:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on August 13, 1985, the Federal Election Commission found reason to believe the Tallon for Congress Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), and 11 C.F.R. § 110.4(c)(2), and instituted an investigation in this matter. In addition, on November 12, 1986 the Commission found reason to believe that the Committee and you, as treasurer, violated 2 U.S.C. § 441b(a).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

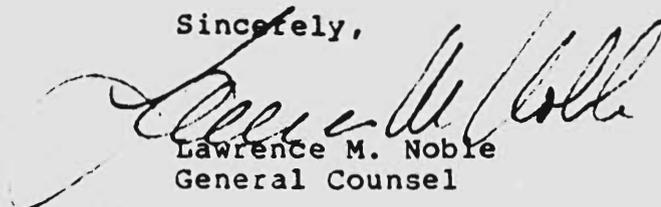
71040330744

Lamar J. Rabon, Treasurer
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

21040360945

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Tallon for Congress Committee and) MUR 2071
Lamar J. Rabon, as treasurer)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On August 13, 1985, the Commission found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting an excessive contribution from Ed Saleeby, and 11 C.F.R. § 110.4(c)(2) by receiving cash contributions from both Joe W. Pearce, Jr., and Ed Saleeby in excess of \$100.00 and not returning the excess over \$100.00 as required.

The above referenced matter arose as the result of information received from Gary H. Slavens who worked on U.S. Representative Robin M. Tallon, Jr.'s principal campaign committee during the 1982 campaign, and who later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon Campaign in approximately July of 1984.

During the investigation, this Office also received information that in April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Tallon, and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was

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supplied by James A. ("Jimmy") Brown, who did volunteer work for the Tallon for Congress Committee during 1982.

On March 18, 1986, the Commission authorized a subpoena to produce documents to the Tallon for Congress Committee. Pursuant to this subpoena the Tallon for Congress Committee produced its receipt books for the period March 12, 1982 to October 23, 1982. The receipt books showed that certain employees of the several stores owned by Congressman Tallon named by Mr. Brown did, in fact, each give \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982. Accordingly, on November 12, 1986 the Commission found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441b(a).

II. ANALYSIS

Pursuant to 2 U.S.C. § 441a(a)(1)(A) no person shall make contributions to any candidate and his authorized political committee with respect to any election for Federal office which, in the aggregate, exceed \$1,000.00. Furthermore, no candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of this section. 2 U.S.C. § 441a(f).

Pursuant to 2 U.S.C. § 441b(a) it is unlawful for any corporation to make a contribution or expenditure in connection with any federal election or for any political committee knowingly to accept or receive any contribution prohibited by this section.

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Pursuant to 11 C.F.R. § 110.4(c)(2) a candidate or committee receiving a cash contribution in excess of \$100.00 shall promptly return the amount over \$100.00 to the contributor.

Mr. Slavens' first allegation was that in 1982 Ed Saleeby made a cash contribution in the amount of \$1,300.00 or \$1,400.00 to the Tallon for Congress Committee or agents thereof. When deposed by the Office of the General Counsel on March 18, 1988 Congressman Tallon testified that he had no recollection of Mr. Saleeby making a contribution to his 1982 campaign.

Mr. Slavens also alleged that in 1982 Joe W. Pearce, Jr., made cash contributions aggregating either \$700.00 or \$1,500.00 to the Tallon for Congress Committee or agents thereof.

Mr. Slavens purportedly advised Mr. Tallon that Mr. Pearce had made a cash contribution to the campaign, and according to Mr. Slavens, Congressman Tallon acknowledged said contribution.

In Mr. Pearce's sworn affidavit, dated August 29, 1985, he "denies making cash contributions aggregating either \$700.00 or \$1,500.00 to the Tallon for Congress Committee or agents thereof during Congressman Robin M. Tallon's campaign for Congress in 1982." Mr. Pearce asserted that he made two contributions to the Tallon Committee in 1982, a check for \$100.00 dated April 6, 1982 and a \$10.00 contribution in September of 1982. In addition, when Congressman Tallon was deposed he indicated he was unaware that Mr. Pearce had made a contribution to the 1982 campaign.

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The investigation has uncovered no evidence that Ed Saleeby made an excessive contribution to the Tallon for Congress Committee. In addition, no evidence was discovered which indicated that either Joe W. Pearce, Jr., or Ed Saleeby made a cash contribution to the Tallon Committee. Accordingly, there appears to have been no violation of 2 U.S.C. § 441a(f), or 11 C.F.R. § 110.4(c)(2) by the Tallon for Congress Committee.

On December 9 and 10, 1987, depositions were taken of persons who were employees of the several stores owned by Congressman Tallon. These individuals allegedly received bonuses from the stores in April of 1982 which were to be used to make contributions to the Tallon for Congress Committee in April, 1982. Although the dates of the bonuses and the dates of the contributions seem to dovetail each other, the testimony of each of the employees was that the contributions were voluntary, and that the bonuses were not received with the condition that contributions be given to the campaign committee. Nothing by way of evidence contradicted the testimony. For example, a review of documents revealed that these employees had received various monthly bonuses throughout the years 1981 and 1982 for commission on sales, incentive programs and the like, not only in April of 1982 when the contributions were made.

Furthermore, no evidence has been revealed that indicates the Committee was connected with the giving of bonuses by the corporations, or was aware of any such bonuses; therefore, the acceptance of contributions from employees of said corporations does not appear to be in violation of 2 U.S.C. § 441b(a).

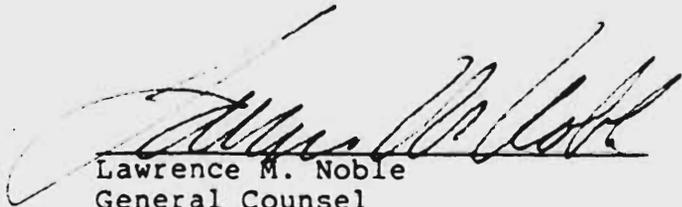
In light of the facts that Mr. Slavens' allegations were made after a falling out with Congressman Tallon; that Mr. Pearce denied making such cash contributions; that committee reports filed with the Commission do not show any of the illegal contributions; that Congressman Tallon was unaware of any contributions by Mr. Saleeby or Mr. Pearce, and that there is no corroborating testimony or evidence to support Gary H. Slavens' allegations that Ed Saleeby and Joe W. Pearce each made cash contributions to the 1982 Tallon for Congress Committee, the Office of the General Counsel recommends that the Commission find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441a(f), and 11 C.F.R. § 110.4(c)(2). Additionally, because no evidence has been uncovered which supports the allegation that the Committee accepted prohibited corporate contributions, the Office of the General Counsel also recommends that the Commission find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. §§ 441a(f) and 441b(a) and 11 C.F.R. § 110.4(c)(2).

Date

4/22/88


Lawrence M. Noble
General Counsel



U.S. Department of Justice

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Wm 2071

Washington, D.C. 20530

DEC 19 1988

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Lois G. Lerner

Dear Mr. Noble:

Re: Congressman Robin Tallon

We have received and reviewed material which you referred to us by letter dated November 29, 1988, concerning an alleged conduit contribution scheme involving the 1982 congressional campaign of Congressman Robin Tallon of South Carolina.

According to the enclosure to your correspondence, Congressman Tallon was the recipient of contributions made by a business he allegedly owned. The donations in question were allegedly reimbursed to employees, who in turn made \$1,000 gifts to Tallon's 1982 campaign.

If such a contribution scheme in fact occurred, it took place well beyond both the three-year limitations period applicable to Federal Election Campaign Act crimes under 2 U.S.C. § 455, and the five-year limitations period applicable to general federal fraud offenses under 18 U.S.C. § 3282. As such, there is no basis for us to initiate a criminal investigation into whatever may, or may not, have taken place in connection with Congressman Tallon's 1982 campaign.

We trust that this information will be responsive to your needs. To the extent that your referral to us was made under

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the provisions of 2 U.S.C. § 437g(a)(5)(C), please consider this to be our report of final disposition pursuant to 2 U.S.C. § 437g(c).

Sincerely,

Gerald E. McDowell
Chief, Public Integrity Section
Criminal Division

By:



Craig C. Donsanto
Director, Election Crimes Branch
Public Integrity Section
Criminal Division

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Washington, D.C. 20530

DEC 27 1988

Mr. R. H. Cunningham
7 Waccamaw Trail
Pawley's Island, South Carolina 29585

Dear Mr. Cunningham:

This will reply to your letter of December 5, 1988, concerning what you believe may be violations of the Federal Election Campaign Act (FECA) by South Carolina Congressman Robin Tallon.

The matters referred to in your correspondence involve alleged infractions of the FECA's quantitative limitations on certain types of political contributions. These activities appear to have taken place in 1982.

The law enforcement jurisdiction of the United States Department of Justice in matters of this kind is confined to FECA violations that are committed with intentional disregard or disrespect for the law, and which involve relatively large sums of money. Such aggravated FECA violations can theoretically present misdemeanors under the FECA's criminal sanction, Section 437g(d) of Title 2, United States Code.

We do not believe that the FECA violations alleged in your correspondence present criminal offenses that are potentially actionable under this narrow criminal penalty. Moreover, any violations that might theoretically be present here have long since been barred by the special three-year statute of limitations that applies to FECA crimes. As such, there is no basis for this Department to initiate a criminal investigation of these alleged FECA violations by Congressman Tallon's 1982 campaign.

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We appreciate your interest in this matter.

Sincerely,

Gerald E. McDowell
Chief, Public Integrity Section
Criminal Division

By:

Craig C. Donsanto
Director, Election Crimes Branch
Public Integrity Section
Criminal Division

cc: Lois G. Lerner ✓
Associate General Council
Federal Election Commission

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FEDERAL ELECTION COMMISSION RECEIVED

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

April 27, 1989

MEMORANDUM

TO: The Commission
FROM: Lawrence M. Noble
General Counsel
SUBJECT: MUR #2071

A handwritten signature in dark ink, appearing to be "L. M. Noble", written over the name in the "FROM" field.

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on April 27, 1989. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

- 1-Briefs
- 2-Letters to respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

April 27, 1989

Roland G. Minshew
120 Lake Wood Drive
Florence, SC 29501

RE: MUR 2071
Roland C. Minshew

Dear Mr. Minshew:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is probable cause to believe a violation has occurred.

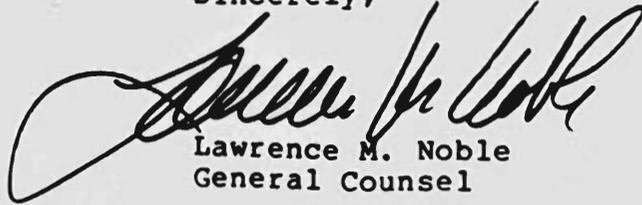
If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Roland G. Mignard questions, please contact Phillip L.
Page 2 Mignard to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

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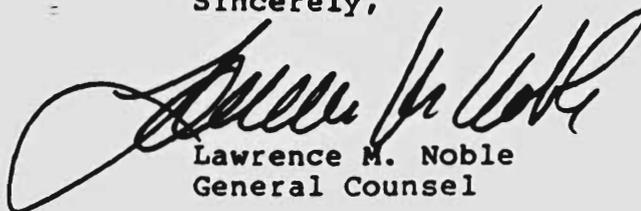
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Roland G. Minshew
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Roland Minshew) MUR 2071
)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Roland Minshew violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy) Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000.00 each were allegedly paid by Tallon or his corporations to employees of the clothing stores who then allegedly contributed these funds to the Tallon campaign. Brown

supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Roland Minshew.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who, according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of people. Mr. Brown said that two of the people involved in the

conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office, Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions from employees, customers and friends on a volunteer basis.

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These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after.

Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship and loyalty to Robin Tallon, and nothing more.

On December 9, 1987, Mr. Minshew appeared and was deposed pursuant to a subpoena issued by the Commission. Mr. Minshew testified that he did not know specifically what the April 12, 1982, \$1,500.00 bonus was based on. He stated that frequently money was received by employees by way of bonuses, contests, commissions, and the like. He indicated that Robert Welch determined the amount to be paid for the bonuses and commissions. In addition, Mr. Minshew stated that it was Robert Welch who suggested that he make a contribution to the campaign; however, he stated that he did not feel coerced, forced, or threatened to make such a contribution. Mr. Minshew testified that it was his wife, Cameron Tallon Minshew, who was authorized to draw checks on the corporate account, and she issued the \$1,500.00 bonus

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check to him. He asserted that he was in no way required to use his bonus as a contribution, and that the contribution was made because Robin Tallon is his brother-in-law, and he would do anything to help him.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500.00 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500.00 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500.00 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500.00 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500.00 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given. (Lynn Hartnett received her identical bonus on May 4, 1982.)

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson

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contributed \$1,000.00 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of these six contributions were received on the same day, April 14, 1982, the receipt numbers for the five were virtually sequential, and the amounts of each were an even \$1,000.00 except for the contributions by Jane Harris and Jerry Harris which were for \$500.00 each. These facts appear to substantiate Brown's statement that \$1,000.00 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another, and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Roland Minshew received \$1,500.00 bonuses on April 12, 1982. The investigation also revealed that these Robin's employees all made contributions to the Tallon for Congress Committee on April 14, 1982. Roland Minshew made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus.

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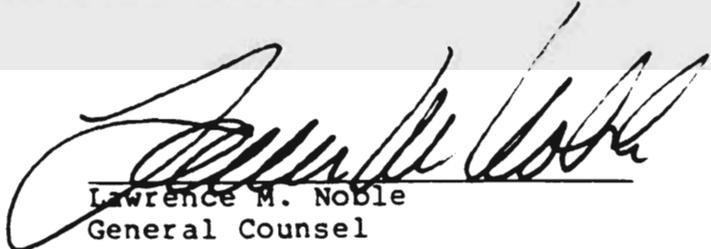
Despite Roland Minshew's denials that the bonus he received and his contribution to the Tallon campaign were linked, there is considerable evidence of a violation of 2 U.S.C. § 441f by Mr. Minshew. He, along with various other Robin's employees, received a \$1,500.00 bonus on April 12, 1982; that he, along with various other Robin's employees made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982; Jimmy Brown has testified under oath that he over-heard a conversation in which it was discussed that bonuses would be converted into contributions; Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500.00 bonuses to store managers, and informed the managers he had made a \$1,000.00 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts, the Office of the General Counsel recommends that the Commission find probable cause to believe that Roland Minshew violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Roland Minshew violated 2 U.S.C. § 441f.

Date

4/27/85


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 27, 1989

Jane Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jane Harris

Dear Mrs. Harris:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

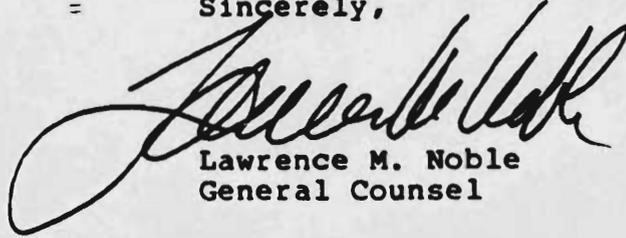
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Jane Harris
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

= Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

40360256

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Jane Harris)

) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Jane Harris violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000.00 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000.00 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then

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allegedly contributed these funds to the Tallon campaign. Brown supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Jane Harris.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of

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people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

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This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions

from employees, customers and friends on a volunteer basis. These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was hfs idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after. Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

When deposed on December 10, 1987 Jane Harris testified she was never employed by any of the Robin's stores. She thought her \$500.00 contribution was made because her husband (Jerry Harris) had received a substantial bonus in April of 1982, and each gave a \$500.00 contribution. Mrs. Harris contended she never received any knowledge as to the financial condition of the 1982 campaign, specifically in the period of April, 1982. Mrs. Harris testified that her contribution was totally voluntary.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500.00 bonus from Robin's of Florence, Inc. on April 12, 1982;

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that Jerry Harris (Jane Harris' husband) received a \$1,500.00 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500.00 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500.00 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500.00 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000.00 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five were virtually sequential, and the amounts were an even \$1,000.00 except for the contributions by Jane Harris and Jerry Harris which are for \$500.00 each. These facts appear to substantiate Brown's initial statements that \$1,000.00 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

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II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another, and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Jane Harris' husband, Jerry Harris, received \$1,500.00 bonuses on April 12, 1982. The investigation also revealed that these employees all made contributions of \$1,000.00 to the Tallon for Congress Committee on April 14, 1982. Jerry Harris made a \$500.00 contribution on April 14, 1982 to the Tallon for Congress Committee. Jane Harris made a \$500.00 contribution to the Tallon for Congress Committee on April 12, 1982, by a check dated April 13, 1982 drawn from a joint bank account with Jerry Harris.

The evidence is that Jane Harris' husband, Jerry, along with various other Robin's employees received a \$1,500.00 bonus on April 12, 1982; that Jane and Jerry Harris each made a \$500.00 contribution along with various Robin's employees who made \$1,000.00 contributions, to the Tallon for Congress Committee on April 14, 1982; Jimmy Brown has testified under oath that he had over-heard a conversation in which it was discussed that bonuses would be converted into contributions; Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500.00 bonuses to

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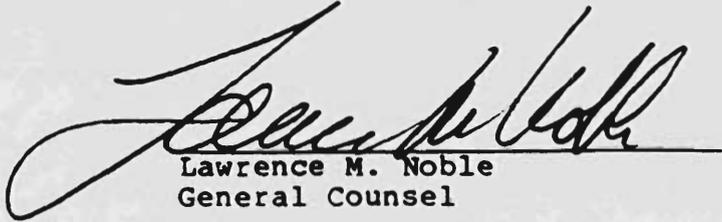
store managers, and informed the managers he had made a \$1,000.00 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts the Office of the General Counsel recommends that the Commission find probable cause to believe that Jane Harris violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Jane Harris violated 2 U.S.C. § 441f.

Date

4/27/89


Lawrence M. Noble
General Counsel

71040657/3



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

April 27, 1989

Jerry Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jerry Harris

Dear Mr. Harris:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is probable cause to believe a violation has occurred.

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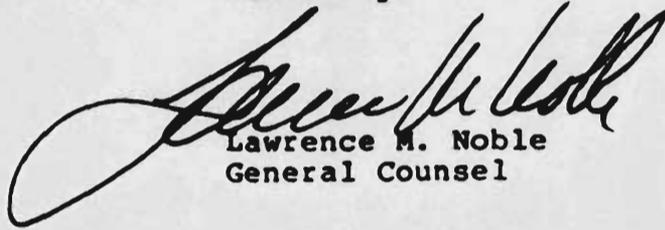
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Jerry Harris
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jerry Harris) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Jerry Harris violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then

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Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of

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people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office, Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

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This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions

from employees, customers and friends on a volunteer basis. These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after. Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

On December 10, 1987, Jerry Harris appeared and was deposed pursuant to the Subpoena authorized by the Commission. When Mr. Harris appeared for his deposition he furnished a copy of his check dated April 13, 1982 in the amount of \$500.00 made payable to Tallon for Congress. Mr. Harris testified that he has been a friend of Robin Tallon all his life, and that his contribution was based on that friendship and nothing else. Mr. Harris contended that he did not know what the April 12, 1982, \$1,500.00 bonus was based on, however, he did not think it unusual because he has received bonuses larger than this in the past. Mr. Harris alleged that he received no instructions from anyone to make a contribution to the Tallon Campaign.

Pursuant to the subpoena directed to the various stores

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owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five were virtually sequential, and the amounts were an even \$1000 except for the contributions

by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another, and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Jerry Harris received \$1,500 bonuses on April 12, 1982. The investigation also revealed that these Robin's employees all made contributions to the Tallon for Congress Committee on April 14, 1982. Jerry Harris made a \$500.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus.^{1/} In addition, Mr. Harris' check for the contribution was dated April 13, 1982, one day after he received his \$1,500 bonus.

Despite Jerry Harris' denials that the bonus he received and his contribution to the Tallon campaign were linked, there is evidence of a violation of 2 U.S.C. § 441f by Mr. Harris. He,

^{1/} Jerry Harris' wife Jane Harris, made a \$500.00 contribution to the Tallon Campaign on April 14, 1982, by a check dated April 13, 1982 drawn from a joint bank account with Mr. Harris.

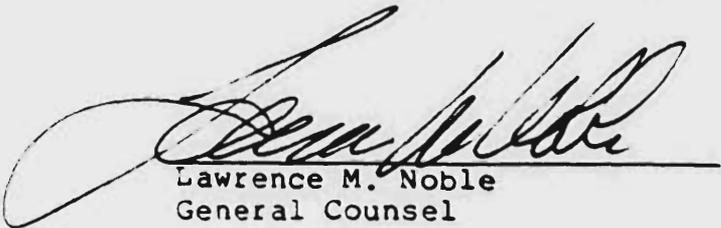
along with various other Robin's employees received a \$1,500 bonus on April 12, 1982; that he made a \$500.00 contribution, along with various other Robin's employees who made \$1,000 contributions to the Tallon for Congress Committee on April 14, 1982; Jimmy Brown has testified under oath that he over-heard a conversation in which it was discussed that bonuses would be converted into contributions; Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500 bonuses to store managers, and informed the managers he had made a \$1,000 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts the Office of the General Counsel recommends that the Commission find probable cause to believe that Jerry Harris violated 2 U.S.C. § 441f.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Jerry Harris violated 2 U.S.C. § 441f.

4036332
Date

4/27/89


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

April 27, 1989

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, S.C. 29503

RE: MUR 2071
Mark Lawson

Dear Mr. Lawson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that your client, Mark Lawson, violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

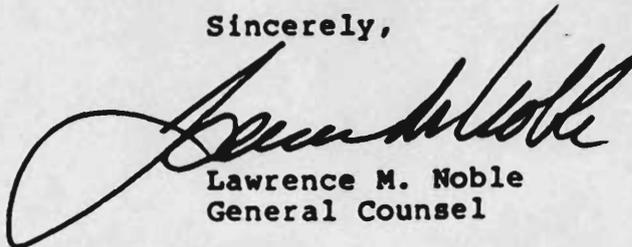
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Jack W. Lawson, Jr.
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

21040565904

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Mark Lawson) MUR 2071
)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Mark Lawson violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then

allegedly contributed these funds to the Tallon campaign. Brown supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Mark Lawson.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of people. Mr. Brown said that two of the people involved in the

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conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

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This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions from employees, customers and friends on a volunteer basis.

These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after. Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

On December 9, 1987, Mark Lawson appeared and was deposed pursuant to the Subpoena authorized by the Commission. Mr. Lawson testified that he did not know specifically what the April 12, 1982, \$1,500.00 bonus was based on. According to Mr. Lawson this \$1,500 bonus was unusual in that it was the most he had ever received, and the store he managed did not generate much business.

Mr. Lawson indicated his contribution was totally voluntary; and he did not discuss it with anyone. However, Mr. Lawson claimed to know nothing about contribution limits, and had no explanation as to why his contribution on April 14, 1982 was for exactly \$1,000, and not in a smaller or larger amount.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished

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compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five were virtually sequential, and the amounts were an even \$1000 except for the contributions by Jane Harris and Jerry Harris which are for \$500 each. These

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facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another, and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Mark Lawson received \$1,500 bonuses on April 12, 1982. The investigation also revealed that these Robin's employees all made contributions to the Tallon for Congress Committee on April 14, 1982. Mark Lawson made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus.

Despite Mark Lawson's denials that the bonus he received and his contribution to the Tallon campaign were linked, there is evidence of violation of 2 U.S.C. § 441f by Mr. Lawson. He, along with various other Robin's employees, received a \$1,500 bonus on April 12, 1982; that he, along with various other Robin's employees, made \$1,000 contributions to the Tallon for Congress Committee on April 14, 1982; Jimmy Brown has testified under oath that he had over-heard a conversation in which it was discussed that bonuses would be converted into contributions;

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that Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500 bonuses to store managers, and informed the managers he had made a \$1,000 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts the Office of the General Counsel recommends that the Commission find probable cause to believe that Mark Lawson violated 2 U.S.C. § 441f.

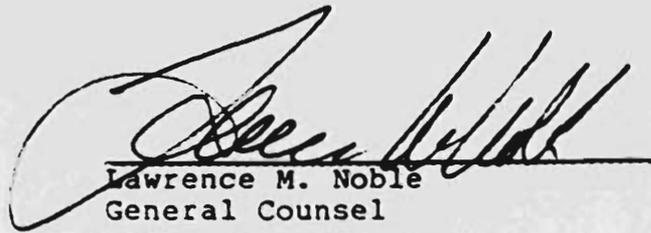
III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Mark Lawson violated 2 U.S.C. § 441f.

Date

4/27/89

Lawrence M. Noble
General Counsel



2104036071



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 27, 1989

Lynn Hartnett
2706 Gentry Drive
Florence, SC 29501

RE: MUR 2071
Lynn Hartnett

Dear Mrs. Hartnett:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

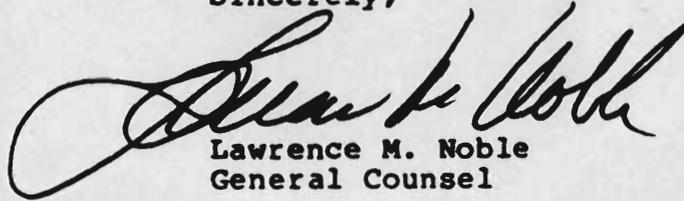
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Lynn Hartnett
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

7104036073

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Lynn A. Hartnett

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)
)

MUR 2071

GENERAL COUNSEL'S BRIEF =

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Lynn A. Hartnett violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or

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his corporations to employees of the clothing stores, who then allegedly contributed these funds to the Tallon campaign. Brown supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Lynn Hartnett.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of

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people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office, Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

21040065776
This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions

from employees, customers and friends on a volunteer basis. These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after.

Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

On December 9, 1987, Lynn A. Hartnett appeared and was deposed pursuant to the Subpoena authorized by the Commission. Mrs. Hartnett testified that she did not know specifically what the May 4, 1982, \$1,500.00 bonus was based on. She stated that frequently money was received by employees, by way of bonuses, contests, commissions, and the like.

Mrs. Hartnett testified that she was in no way required to use her bonus as a contribution. She stated that she talked about the contribution with Robert Welch; however, in her opinion, he did not suggest, coerce, or require that she contribute to the campaign. The contribution was solely her voluntary act, she said.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500 bonus from Robin's Ladies Wear, Inc. on May 4, 1982.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five are virtually sequential, and the amounts were an even \$1,000 except for the contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that

discussed that bonuses would be converted into contributions; that Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500 bonuses to store managers, and informed the managers he had made a \$1,000 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. (Lynn Hartnett received her bonus of May 4, 1982). In view of the foregoing facts the Office of the General Counsel recommends that the Commission find probable cause to believe that Lynn A. Hartnett violated 2 U.S.C. § 441f.

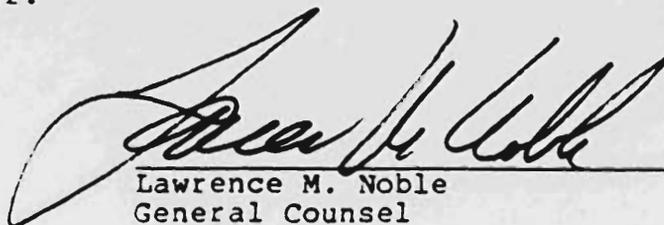
III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Lynn A. Hartnett violated 2 U.S.C. § 441f.

Date

4/27/89

Lawrence M. Noble
General Counsel



21040561000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 27, 1989

Robert L. Welch
P.O. Box 618
North Myrtle Beach, SC 29597

RE: MUR 2071
Robert L. Welch

Dear Mr. Welch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

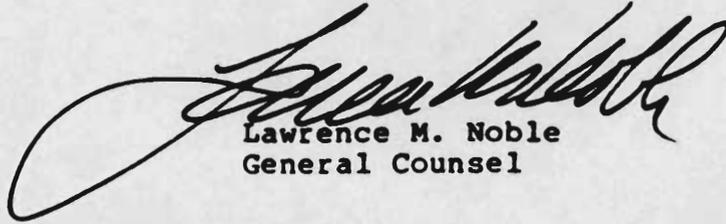
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Robert L. Welch
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

71540361002

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert Welch) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Robert Welch violated 2 U.S.C. § 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina. In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees of the clothing stores, who then

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allegedly contributed these funds to the Tallon campaign. Brown supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Robert (Bobby) Welch.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of people. Mr. Brown said that two of the people involved in the

440364004

conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office, Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

2104061000
This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated he had suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contributions were not forced, and that he never said they would be reimbursed in any way. Mr. Welch indicated that he solicited contributions from employees, customers and friends on a volunteer basis.

These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after. Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however, he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five are virtually sequential, and the amounts were an even \$1000 except for the contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another, and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Robert Welch received \$1,500 bonuses on April 12, 1982.

The investigation also revealed that these Robin's employees all made contributions to the Tallon for Congress Committee on April 14, 1982. Robert Welch made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus.

Despite Robert Welch's denials that the bonus he received and his contribution to the Tallon campaign were linked, there is evidence of a violation of 2 U.S.C. § 441f by Mr. Welch. He, along with various other Robin's employees, received a \$1,500.00 bonus on April 12, 1982; that he, along with various other Robin's employees made \$1,000 contributions to the Tallon for Congress Committee on April 14, 1982; Jimmy Brown has testified under oath that he had over-heard a conversation in which it was discussed that bonuses would be converted into contributions; Mr. Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500 bonuses to store managers, and informed them he had made a \$1,000 contribution; and that a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts the Office of the General Counsel recommends that the Commission find probable cause to believe that Robert Welch violated 2 U.S.C. § 441f.

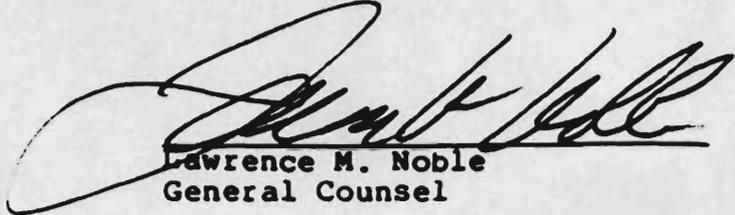
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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Robert Welch violated 2 U.S.C. § 441f.

Date

4/27/89


Lawrence M. Noble
General Counsel

21040364009



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 27, 1989

Robert L. Welch
LeMasters E-3
Briarcliffe Mall
North Myrtle Beach, SC 29597

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Welch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 12, 1986, the Federal Election Commission found reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f, and 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.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

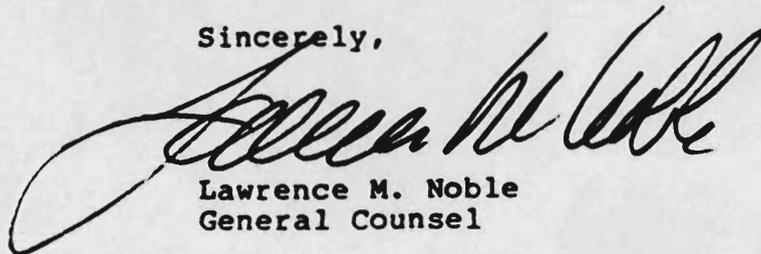
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

71040561010

Robert L. Welch
Page 2

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

Enclosure
Brief

21040364011

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Robin's of Florence, Inc.) MUR 2071
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 12, 1986, the Commission found reason to believe that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f.

This determination was based on information received by the Office of the General Counsel that during April, 1982, "bonuses" of \$1,000 each were paid to employees of stores owned by Congressman Robin Tallon, Jr., (Democrat, 6th District of South Carolina) and that these "bonuses" were then given as contributions by the employees to the Tallon for Congress Committee. This information was supplied by James A. ("Jimmy") Brown, Jr. who did volunteer work for the Tallon for Congress Committee during 1982, and who stated during a telephone conversation on May 21, 1986 with a staff member of this Office, that he was a personal friend of Representative Tallon. Although he had never been an official or paid employee of the Committee, he stated that he did help out at campaign headquarters.

Brown furnished the following information. Robin Tallon owns a number of clothing stores in South Carolina (including Robin's of Florence, Inc.). In early April, 1982, when money was needed for the Tallon campaign, bonuses of \$1,000 each were allegedly paid by Tallon or his corporations to employees

1040364012

of the clothing stores, who then allegedly contributed these funds to the Tallon campaign. Brown supplied the names of persons who received these bonuses and contributed them to the campaign; the names included that of Roland Minshew who was an employee of Robin's of Florence, Inc.

Brown stated that the bonuses were openly discussed at Tallon campaign headquarters by Sue Bass, the assistant treasurer, and Cameron Tallon Minshew (sister of Robin M. Tallon, Jr.), among others. He told the staff member that he would testify to this information either in deposition or in affidavit form.

On December 10, 1987 this Office deposed James A. ("Jimmy") Brown, Jr. Mr. Brown stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated that he knew Robin's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of

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people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses, in particular a plan whereby the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning by this Office, Mr. Brown steadfastly maintained that the plan that was discussed was that the employee bonuses were to be used as contributions.

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This Office deposed Robert L. ("Bobby") Welch, the president of all Robin's stores in 1982, on December 9, 1987. According to his testimony, Mr. Welch was instrumental in making major decisions about store policy in 1982 and considered all monies given the employees, except salary, to be bonuses even if given by way of commission or sales. He states that there is and has been no written policy as to when and if bonuses are to be paid. Periodically, there are contests and sales goals, from which employees received bonus amounts. As to the \$1,500.00 bonuses to store managers on April 12, 1982 he claimed no recollection of the basis for such bonuses.

Mr. Welch stated that he suggested that the employees make contributions to the 1982 Tallon Campaign. In addition, he said that he had told each manager that a contribution would be helpful to Mr. Tallon. He claimed that the contribution was not forced, and that he never said it would be reimbursed in any way. Mr. Welch indicated that he solicited contributions from

employees, customers and friends on a volunteer basis. These solicitations were performed by telephone, written letters, and in person. Mr. Welch contended it was his idea to solicit contributions from the employees.

Mr. Welch informed the managers who received the \$1,500.00 bonuses that he was contributing \$1,000.00, and would appreciate anything they could give. Mr. Welch indicated that he has no recollection as to whether he discussed the \$1,000.00 contribution before the bonuses were declared, or after.

Mr. Welch stated that he was aware the store managers gave \$1,000.00 contributions; however he believes that the contributions were based on friendship, and loyalty to Robin Tallon, and nothing more.

On December 9, 1987, Mr. Minshew appeared and was deposed pursuant to the Subpoena authorized by the Commission. Mr. Minshew testified that he did not know specifically what the April 12, 1982, \$1,500.00 bonus was based on. He stated that frequently money was received by employees of Robin's stores, by way of bonuses, contests, commissions, and the like. He indicated that Robert Welch determined the amount to be paid for the bonuses and commissions. In addition, Mr. Minshew stated that it was Robert Welch who suggested that he make a contribution to the campaign; however, he stated that he did not feel coerced, forced, or threatened to make such a contribution. Mr. Minshew testified that it was his wife, Cameron Tallon Minshew, who was authorized to draw checks on the corporate

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account, and she issued the \$1,500.00 bonus check to him. He asserted that he was in no way required to use his bonus as a contribution, and that the contribution was made because Robin Tallon is his brother-in-law, and he would do anything to help him.

Pursuant to the subpoena directed to the various stores owned by Congressman Tallon, Robert L. ("Bobby") Welch furnished compiled information of bonuses paid to employees in 1980, 1981 and 1982. The documents indicated that Roland Minshew received a \$1,500 bonus from Robin's of Florence, Inc. on April 12, 1982; that Jerry Harris received a \$1,500 bonus from Robin's of North Myrtle Beach, Inc. on April 12, 1982; that Robert Welch received a \$1,500 bonus from Robin's of Dentsville, Inc. on April 12, 1982; that Mark Lawson received a \$1,500 bonus from Robin's of Anderson, Inc. on April 12, 1982; and that Lynn Hartnett received a \$1,500 bonus from Robin's Ladies Wear, Inc. on May 4, 1982. A review of bonuses given to these employees from 1980 through 1982 shows that April 12, 1982 was the only date on which identical bonuses were given.

Pursuant to a subpoena authorized by the Commission on March 18, 1986, the Tallon for Congress Committee and Lamar J. Racon, as treasurer, produced documents which included receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch and Mark Lawson

contributed \$1,000 each, while Jane Harris and Jerry Harris each contributed \$500.00 on the same date; Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982. In addition, five of the six contributions were received on the same day, April 14, 1982, the receipt numbers for the five were virtually sequential, and the amounts were an even \$1,000 except for the contributions by Jane Harris and Jerry Harris which are for \$500 each. These facts appear to substantiate Brown's initial statements that \$1000 bonuses were paid to employees of the Tallon stores early in the campaign to be converted into contributions.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") provides that it is unlawful for any corporation whatever to make a contribution in connection with a federal election. 2 U.S.C. § 441b(a). The Act also provides that no person shall make a contribution in the name of another and no person shall knowingly permit his name to be used to effect a contribution by another person, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

The investigation revealed that various Robin's employees including Roland Minsnew received \$1,500 bonuses on April 12, 1982. The investigation also revealed that these Robin's employees all made contributions to the Tallon for Congress Committee on April 14, 1982. Roland Minsnew made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress

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Committee, two days after receiving his bonus from Robin's of Florence.

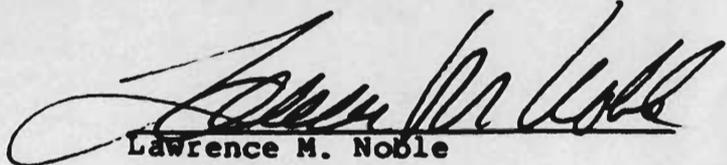
Despite Roland Minshew's denials that the bonus he received and his contribution to the Tallon campaign were linked, the evidence of violations of 2 U.S.C. § 441b(a), and 441f by Robin's of Florence, Inc., is that Roland Minshew who was employed by this company, along with various other Robin's employees received a \$1,500 bonus on April 12, 1982; that Roland Minshew, along with various other Robin's employees made \$1,000 contributions to the Tallon for Congress Committee on April 14, 1982; that Jimmy Brown testified under oath that he had over-heard a conversation in which it was discussed that bonuses would be converted into contributions; Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500 bonuses to store managers, and informed the managers he had made a \$1,000 contribution; and a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the foregoing facts, the Office of the General Counsel recommends that the Commission find probable cause to believe that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f.

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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f.

4/27/89
Date


Lawrence M. Noble
General Counsel

21040354019

OGC 2783

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

80 MAY 18 AM 8:44

Mr 2071

Robert L. Welch
P. O. Box 6992
Florence, S. C. 29502

May 15, 1989

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Noble:

As per my phone conversation of May 11, 1989 with Mr. Phillip Wise, I received your letter of April 27, 1989, on May 11, 1989. I intended to ask for an extension to prepare a responsive brief. I then realized I did not know what a responsive brief actually was so an extension would be fruitless.

I do hope this letter will suffice and be considered a responsive brief, an analysis by myself or my recommendations, to the Federal Election Commission.

As you know, I met you in Columbia, S. C. and, under oath, without benefit of an attorney, answered every question you asked, truthfully, yes truthfully. I provided you with every record you asked to see. I provided you with facts.

I assumed since I had done nothing wrong, that that was the end of all of this. I then received your letter of April 27, 1989. Let me assure you not only am I very upset, but I am furious. I honestly cannot believe the General Counsel's office has taken 503 days, after my deposition, to come to a conclusion but that you have come to the conclusion stated in your brief. Everything you have based your recommendations on is pure heresay. This heresay is provided mostly by Mr. Jimmy Brown. Are you aware of the fact that all this came to light shortly after a bitter encounter between Mr. Brown and Rep. Tallon. It is pretty common knowledge in this area that Mr. Brown blamed his defeat in a county council race on Rep. Tallon's failure to endorse and openly support him even though Rep. Tallon had two other close friends in the race. I personally feel all this has been an attempt to carry out some kind of vendetta by Mr. Brown or others through Mr. Brown.

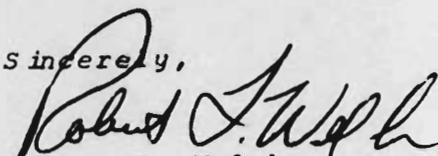
If this matter can not be cleared up in the near future, I will retain an attorney and seek relief and vindication through the courts. I will definitely have some recommendations about the General Counsel's office. I do intend to seek help through both my Congressman's and my Senator's offices immediately. There is no excuse for the foot-dragging and insinuations by and from the General Counsel's office.

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COMM-FED-11:55

Enclosed please find the three copies you request. Ten copies have been sent to the Secretary of the Commission.

Sincerely,



Robert L. Welch

cc: Secretary (Federal Election Commission)

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BCC#2807

FEDERAL ELECTION COMMISSION

JERRY HARRIS

POST OFFICE BOX 4217

89 MAY 19 AM 9:51

NORTH MYRTLE BEACH, SOUTH CAROLINA 29597

May 16, 1989

General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Sir:

REFERENCE: MUR 2071

I am receipt of your correspondence dated April 27, 1989. In answering, I will again reiterate what my thoughts are in this matter.

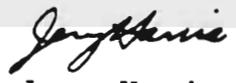
Yes, during 1982, as well as during all the years that I worked for Robin's I was paid bonuses for such things as contests, sales promotions, commissions, sales incentives, etc. It is hard to remember exactly how much, when or why each of these bonuses were paid. I am sure that all the necessary tax filings and subsequent taxes due were paid in accordance with all applicable laws.

You may be certain that any contributions which were made to Mr. Tallon's campaign were made of my own free will and strictly out of a desire to support a friend. I was never forced or coerced into making contributions to the campaign.

It is my opinion that what one does with one's own money is one's own business. Further, it is my opinion that no immoral or illegal act was committed in making such contributions.

I hope that this will finally settle this matter. If you should have any additional questions or concerns which require my response, please contact me at the letterhead address.

Sincerely,



Jerry Harris

JH/dy

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RECEIVED
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ADMINISTRATIVE DIVISION

89 MAY 19 AM 10:03

JANE F. HARRIS
POST OFFICE BOX 4217
NORTH MYRTLE BEACH, SOUTH CAROLINA 29597

May 15, 1989

General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Ref: MUR 2071

Dear Sir:

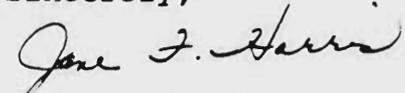
This is in response to your correspondence of April 27, 1989. As requested, I will again state my position concerning the above referenced issues.

As previously stated, I have never been employed by Tallon Sales Company or any of the Robin's stores. Further, I have never received any bonuses from Robin's Men Stores. During the years that my husband, Jerry Harris, was employed by Robin's of North Myrtle Beach, he received bonuses for miscellaneous contests, promotions, sales incentives, etc. Since my husband was employed there for over ten years, it is impossible to remember dates and amounts of said bonuses.

My husband and I both made contributions to Robin Tallon's campaign due to our loyalty and friendship to a life long friend.

If you should have any further questions, please contact me at the above address.

Sincerely,



Jane F. Harris

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May 16, 1989

CGC 2808

FEDERAL
Federal Election Commission

Washington, D C 20463

89 MAY 22 PM 2:48

Dear Mrs.

This is a response to your
information which I received on May 15th,
1989, regarding a "supposed" violation of
a Campaign Contribution. I believe my
Case number is MUR 2071

I am sorry that you do not accept
my explanation of what I know to be the
truth, but I do not know what else to
say except that I have never planned
or intended to violate a federal law or
any law and I never intend to

I gave a contribution in good faith
and was not asked for the money by the
candidate or anyone working for his
Campaign. My only intent was to help.

104051024

I feel that I am being investigated
unfairly' if you think all of this was
"planned" why are you not investigating the
"planners" I certainly had nothing to do
with anything unlawful.

I do know one thing - I will never
give money to a political organization
again! I don't think anyone in my
situation could have any respect or
faith in our government if you insist
that we have done anything wrong.

Lynn A. Hartnett

1040061025



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1989

Certified Mail
Return Receipt Requested

Roland G. Minshew
120 Lake Wood Drive
Florence, SC 29501

RE: MUR 2071
Roland G. Minshew

Dear Mr. Minshew:

By letter dated April 27, 1989 the Office of the General Counsel notified you the General Counsel was prepared to recommend that the Commission find probable cause to believe you violated 2 U.S.C. § 441f. Enclosed with that letter was a brief stating the position of the General Counsel on the legal and factual issues of the case.

That notification letter requested your response to the brief within 15 days of your receipt thereof. To date you have not responded to the brief. Unless we receive a response within 5 days, this Office will proceed with its abovementioned recommendation to the Commission.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble (7/2)
Lawrence M. Noble
General Counsel

21040364026



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1989

Certified Mail
Return Receipt Requested

Robert L. Welch
P.O. Box 3867
Florence, SC 29501

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Welch:

By letter dated April 27, 1989 the Office of the General Counsel notified you the General Counsel was prepared to recommend that the Commission find probable cause to believe Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f. Enclosed with that letter was a brief stating the position of the General Counsel on the legal and factual issues of the case.

That notification letter requested your response to the brief within 15 days of your receipt thereof. To date you have not responded to the brief. Unless we receive a response within 5 days, this Office will proceed with its abovementioned recommendation to the Commission.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble (LMN)

Lawrence M. Noble
General Counsel

21040561027



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1989

Certified Mail
Return Receipt Requested

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, SC 29503

RE: MUR 2071
Mark Lawson

Dear Mr. Lawson:

By letter dated April 27, 1989 the Office of the General Counsel notified you the General Counsel was prepared to recommend that the Commission find probable cause to believe your client, Mark Lawson, violated 2 U.S.C. § 441f. Enclosed with that letter was a brief stating the position of the General Counsel on the legal and factual issues of the case.

That notification letter requested your response to the brief within 15 days of your receipt thereof. To date you have not responded to the brief. Unless we receive a response within 5 days, this Office will proceed with its abovementioned recommendation to the Commission.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
General Counsel

21040561028

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING

1330 LADY STREET

POST OFFICE BOX 11070

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE 799-2000

AREA CODE 803

TELECOPY 803-7500

OTHER OFFICES:
GREENVILLE, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
89 JUN 16 PM 3:07

June 16, 1989

VIA TELECOPY

Phillip L. Wise, Esquire
Deputy General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2071 - Robin's of Florence, Inc.

Dear Mr. Wise:

I have just been retained to represent Robin's of Florence in the above referenced matter and am responding to Mr. Lawrence M. Noble's letter dated April 27th and received by Robin's of Florence on June 2, 1989.

Mr. Noble's letter states that within fifteen (15) days of receipt of notice, Robin's of Florence must file with the Secretary of the Commission a Brief and ten copies stating our position on the issues and replying to the Brief of the General Counsel, which was attached to the notice. The letter also provides that an extension of time in which to reply of up to twenty (20) days may be granted, if such request is made within five (5) days of the fifteen (15) day deadline. Since I have been so recently retained, I have not had an opportunity to sufficiently prepare a Brief for Robin's of Florence. Accordingly, I am respectfully requesting that a general extension of time be granted, not to exceed twenty (20) days, in which I will prepare a response to the General Counsel's Brief. I have called your office today to discuss this with you and talked with Ms. Janice Cobb who informed me that you were out of the office until Monday, June 19th. Ms. Cobb was kind enough to provide me with your telefax number through which I am forwarding this communication so that you will be able to review this request immediately on Monday.

If you are unable to grant the extension, I would appreciate your treating this correspondence as a Reply Brief with the understanding that I will be allowed to supplement this Reply Brief within twenty (20) days.

Phillip L. Wise, Esquire
June 16, 1989
Page 2

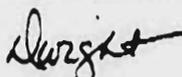
We would respectfully request that the General Counsel's office reverse its decision and make a finding of no probable cause for the following reasons:

- (1) The determination that there is probable cause to believe a violation has occurred is inconsistent with prior decisions of the General Counsel's office based on companion cases involving an identity of issues.
- (2) The decision to find that probable cause exists is arbitrary and capricious in that it is not only inconsistent with prior findings of the office, but is made on the basis of witnesses of questionable credibility and motivation.
- (3) That more than seven (7) years have elapsed since the facts, supposedly giving rise to the finding, allegedly occurred, thus denying our client due process and fundamental fairness.

For these and other reasons which we will provide if granted an extension, we urge the Office of General Counsel to review its position and make a recommendation to the Commission of no probable cause.

I look forward to working with you again and would appreciate your calling me at your earliest possible convenience on Monday.

Sincerely,



Dwight F. Drake

DFD/dce

cc: Bobby Welch

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 21, 1989

Dwight F. Drake, Esquire
Nelson, Mullins, Riley
& Scarborough
Third Floor, Keenan Building
1330 Lady Street
P.O. Box 11070
Columbia, South Carolina 29211

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Drake:

This is in response to your letter dated June 16, 1989, which we received on June 16, 1989, requesting an extension of 20 days to respond to the General Counsel's Brief. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 6, 1989.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", written in a cursive style.

Lawrence M. Noble
General Counsel

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NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING

1330 LADY STREET

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OTHER OFFICES:
GREENVILLE, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

June 29, 1989

VIA TELECOPY

Philip Wise, Esquire
Deputy General Counsel
Federal Election Commission
999 "E" Street, NW
Washington, DC 20463

RE: MUR 2071 - Robin's of Florence, Inc.

Dear Mr. Wise:

As you know, I have been retained to represent Robin's of Florence in the above referenced matter. Robin's of Florence must file a responsive Brief with the Secretary of the Commission by the close of business on July 6, 1989.

In order to sufficiently prepare a Brief for Robin's of Florence, I need to review the depositions of Roland Minshew, James A. Brown, Cameron Tallon Minshew and Robert L. Welch, taken on December 9 and 10, 1987, to which the General Counsel's Brief refers. Accordingly, I respectfully ask that the Federal Election Commission approve my request for copies of these depositions.

If the Federal Election Commission grants this request, I would appreciate your sending these depositions to me by Federal Express as quickly as possible. Please bill this to our Federal Express account number 0290-0600-8.

Your cooperation in this matter is greatly appreciated.

Sincerely,



Dwight F. Drake

DFD/dce

conversation between Sue Bass, assistant treasurer of the campaign, and Cameron Tallon Minshew, Robin Tallon's sister, who he claims discussed a plan whereby employee bonuses would be used as campaign contributions.

On December 9 and 10, 1987, five and one-half years after the violations allegedly occurred, depositions were taken of Jimmy Brown and employees of the different stores owned by Congressman Tallon. In this deposition, Brown described the conversation he supposedly overheard between Sue Bass and Cameron Tallon Minshew in 1982. Cameron Tallon Minshew, however, testified that the conversation as described by Mr. Brown had never taken place. Further contradicting Brown's statement is the testimony of Roland Minshew, employed by Robin's of Florence, Inc., and every other Robin's employee who testified,¹ who stated under oath that the campaign contributions were made voluntarily, and that the bonuses were not given with the condition that kick back contributions be given to the campaign. Roland Minshew also testified that although Robert Welch, president of all Robin's stores in 1982, suggested that Mr. Minshew make a campaign contribution, Mr. Minshew did not in any way feel coerced, forced, or threatened to make a contribution. Mr. Minshew explained that he made a contribution to the campaign because of his familial relationship with Robin Tallon.

¹Robert L. Welch, president of all Robin's stores in 1982; Mark Lawson, employed by Robin's of Anderson, Inc.; Lynn Hartnett, employed by Robin's Ladies Wear, Inc.; and Jerry Harris, employed by Robin's of North Myrtle Beach, Inc.

c. the General Counsel's recommendation deprives Robin's of Florence, Inc. of due process and fundamental fairness because more than seven years have elapsed since the event supposedly giving rise to recommendation allegedly occurred.

The General Counsel's recommendation is based primarily on the testimony of Jimmy Brown, who claims that he overheard Sue Bass and Cameron Tallon Minshew discuss a plan in which the managers of Robin's stores would receive bonuses which they would be required to donate to the Tallon for Congress Committee. This testimony, however, is directly contradicted by the sworn testimony of Cameron Minshew and each store manager who made the donations; Robert Welch, Roland Minshew, Mark Lawson, Lynn Hartnett and Jerry Harris. The General Counsel also failed to take into consideration the credibility and motivation of Brown. According to the sworn testimony of Congressman Tallon, Jimmy Brown may have been influenced by Gary Slavins, an individual who bore a grudge against Congressman Tallon. Deposition of Robert M. Tallon, Jr., at 34 (MUR 2071) (March 18, 1988). Since the General Counsel failed to consider Brown's credibility and motivation as a witness, the Federal Election Commission should make a finding of no probable cause because "[a] determination that an agency made a decision without considering a relevant factor leads to condemning the decision as 'arbitrary and capricious'." FEC v. Rose, 806 F.2d 1081, 1089 (D.C. Cir. 1986). Since Brown's testimony is a major part of the evidence used in

each of the employees was that the contributions were voluntary, and that the bonuses were not received with the condition that contributions be given to the campaign committee. Nothing by way of evidence contradicted the testimony. For example, a review of documents revealed that these employees had received various monthly bonuses throughout the years 1981 and 1982 for commission on sales, incentive programs and the like, not only in April of 1982 when the contributions were made.

General Counsel's Brief for the Federal Election Commission at 4, In the Matter of Tallon for Congress Committee and Lamar J. Rabon, as Treasurer, (MUR 2071), (Nov. 22, 1988) (emphasis added). Since the Commission's investigation uncovered the same facts in both cases, a finding of no probable cause in one instance dictates a finding of no probable cause in the second. The General Counsel's recommendation to find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer violated the Act, and his recommendation to find probable cause to believe that Robin's of Florence, Inc. violated the Act were based on the same set of facts. As such, the Federal Election Commission should find no probable cause to believe that Robin's violated the Act because "an agency's unjustifiably disparate treatment of two similarly situated parties works a violation of the arbitrary-and-capricious standard." FEC v. Rose, 806 F.2d at 1089 (citing Airmark Corp. v. FAA, 758 F.2d 685, 691-95 (D.C. Cir. 1985)).

Collateral estoppel also prevents the Commission from considering this issue because the Commission already decided the same issue in a previous case. Principles of collateral estoppel

have been held to apply to the decisions of administrative agencies. United States v. Utah Constr. & Mining Co., 384 U.S. 394 (1966). Because the Commission in the Tallon for Congress Committee matter acted in a judicial capacity and resolved the legal and factual issues properly before it, and because "both parties had a full and fair opportunity to argue their version of the facts...", Id. at 422, the Commission should not consider again the same set of facts.

Finally, the Commission should find no probable cause exists because Robin's of Florence, Inc.'s right to due process was violated by the eighty-four month delay between the supposed FECA violations and the General Counsel's recommendation. The 8th Circuit, in United States v. Barket, 530 F.2d 189 (8th Cir. 1976) stated the test for determining the prejudicial impact of such a delay: "Whether the delay 'has impaired the defendant's ability to defend himself.'" Id. at 193 (quoting United States v. Golden, 436 F.2d 941, 943 (8th Cir. 1971)). The campaign donations in question were made in April 1982. Not until November of 1986, fifty-five months later, did the Federal Election Commission find reason to believe that Robin's of Florence, Inc. violated the FECA. A total of eighty-four months elapsed before the General Counsel made its recommendations to the Federal Election Commission. Because the General Counsel's recommendation is based primarily on the testimony of a man who claims to have overheard a conversation that supposedly took place more than seven years ago, Robin's of Florence, Inc. would

indeed be prejudiced if the Federal Election Commission found probable cause and proceeded with this issue. In fact, the time lapse has prevented Robin's from locating potential witnesses who could provide evidence in support of dismissal of this motion. Accordingly, Robin's has already been denied due process and fundamental fairness and a finding of probable cause must be rendered.

IV. CONCLUSION

Based on the fact that Brown's hearsay is contradicted by the sworn testimony of Ms. Minshew and each store manager; that the prior decision of the General Counsel contradicts the present recommendation; that the lengthy delay in making this recommendation is prejudicial to Robin's of Florence, Inc., the Federal Election Commission should render a finding that there is no probable cause to believe that Robin's of Florence, Inc. violated any section of the FECA.

Respectfully submitted,

NELSON, MULLINS, RILEY & SCARBOROUGH

By: Dwight F. Drake

Dwight F. Drake
Post Office Box 11070
Columbia, South Carolina 29211
(803) 799-2000

Attorneys for Robin's of Florence, Inc.

Columbia, South Carolina

7/6, 1989.

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Roland G. Minshew
3244 John's Cove
Florence, S. C. 29501

July 14, 1989

Secretary of the Commission
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071
Roland G. Minshew

Dear Sir:

I received Mr. Noble's letter of April 27, 1989 and a copy of the General Counsel's brief on July 8, 1989.

Please consider the following to be my responsive brief

Congressman Robin Tallon is my brother-in-law. I have worked with him for 18 years, as manager of one of his men's clothing stores. For this entire period of time I have received bonuses and commissions, as often as 15 to 20 times per year. More than once, I have made a campaign contribution immediately after receiving a bonus, as I feel this is my money to do with as I please. Every contribution I have made to Congressman Tallon has been my decision entirely.

Never before have I felt such an invasion of privacy as what the Federal Election Commission is putting me through now. I feel that the length of time this investigation is taking is inexcusable.

I cannot help but wonder about the motives of your informant, James A. Brown, Jr. In 1986 Mr. Brown was working to help his old friend, John Jenerette, field enough support to seek election to regain his old congressional seat, which is held by Congressman Tallon. Since Congressman Tallon failed to publicly support Mr. Brown in a local council election, just prior to this time, I am sure Mr. Brown would have enjoyed discrediting Congressman Tallon.

I am sure you are already aware of all of this. Let me close by saying I do hope this can be settled soon and I hope you all realize what a misconception these charges have been.

Thank you for hearing me.

Sincerely yours,

Roland G. Minshew

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cc: Office of the General Counsel (3 copies)

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

EXECUTIVE SESSION

In the Matter of)

Gary H. Slavens, et al.)

MUR 2071)

OCT - 3 1989

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arose as the result of information received from Gary H. Slavens, who worked on Representative Robin M. Tallon, Jr.'s (Democrat, 6th District of South Carolina) principal campaign committee during the 1982 campaign, and later served as Special Assistant to Congressman Tallon from January 1983 until July 1983. Mr. Slavens left this position after a falling out with Congressman Tallon. He first revealed alleged irregularities in the 1982 Tallon campaign in approximately July of 1984.

Slavens alleged that, during the 1982 general election campaign, Tallon approached Slavens and advised him that G.B. Stokes (a local businessman) had given Tallon a \$1,000.00 cash contribution for his campaign. Tallon allegedly asked Slavens how to get this money into Tallon's campaign fund. Slavens claimed that he told Tallon that he (Slavens) could not make the contribution in his own name, because he had already given \$1,000.00 to Tallon's general election campaign fund. Slavens claimed that he deposited the \$1,000.00 in the checking account of his wife, Vicki Slavens, and then had her write a check for \$1,000.00 to the Tallon campaign committee.

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Slavens alleged that Joe W. Pearce, Jr., gave \$700.00 in cash to Jefferson M. Lee, III, who worked for Tallon during the 1982 campaign and currently serves as Tallon's Executive Assistant. Slavens purportedly advised Tallon that Pearce had made a cash contribution to the campaign, and Tallon, according to Slavens, replied that he was aware that Pearce had made the cash contribution.

Slavens further alleged that a member of Tallon's 1982 campaign committee (whose name Slavens could not remember) told Slavens that South Carolina State Senator Ed Saleeby made a cash contribution of \$1,300.00 or \$1,400.00 to Tallon's 1982 general election campaign.

Slavens claimed that Mark Stroman (who worked for Tallon from June 1982 until March 1983, serving as Legislative Assistant from January 1983 until his resignation) told Slavens that the Tallon campaign had received other cash contributions. According to Slavens, Stroman said that such contributions were received when the campaign was out "on the road." However, Stroman never discussed with Slavens the specific amount of the alleged cash contributions.

Finally, Slavens alleged that during Tallon's 1982 campaign Jefferson M. Lee, III advised Slavens that Lee had approached David Keller, C. Edward Floyd, and other individuals whose names Slavens could not recall and solicited cash contributions for Tallon's campaign. Slavens did not indicate the amounts of these cash contributions.

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On August 13, 1985, the Commission after opening a Matter Under Review (MUR) made the following reason to believe findings:

1. Found reason to believe that G.B. Stokes, Ed Saleeby, and Joe W. Pearce, Jr. violated 2 U.S.C. § 441g by making cash contributions to the Tallon campaign in excess of \$100.00;
2. Found reason to believe that Congressman Robin M. Tallon, Jr. violated 2 U.S.C. §§ 432(b)(1) by failing to forward contributions to committee within ten days, 432(b)(3) by failing to segregate funds of a political committee, 441f by causing contribution in the name of another, 11 C.F.R. § 110.4(c)(2) by receiving and not returning cash contribution in excess of \$100.00;
3. Found reason to believe that Gary H. Slavens violated 2 U.S.C. § 432(b)(3) by commingling the funds of a political committee with the personal funds of another individual;
4. Found reason to believe that Vicki Slavens violated 2 U.S.C. §§ 432(b)(3) by commingling funds of a political committee with her personal funds, and 441f by knowingly permitting her name to be used to effect a contribution in the name of another person;
5. Found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer violated 2 U.S.C. §§ 441a(f), and 441f, and 11 C.F.R. § 110.4(c)(2); and
6. Found reason to believe that Ed Saleeby violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution in excess of \$1,000.00 to the Tallon for Congress Committee.

Information developed investigating the above allegations resulted in new reason to believe findings in 1986. This information was that during April 1982, "bonuses" of \$1,000.00 each were paid to certain employees of stores owned by Congressman Robin Tallon, Jr., and that these "bonuses" were converted into contributions to the Tallon campaign. On November 12, 1986 the Commission found reason to believe that

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Robin's of Florence, Inc. and LeMasters, Inc. violated 2 U.S.C. § 441b(a), and 441f. The Commission also found reason to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer violated 2 U.S.C. § 441b(a), and reason to believe that Jane Harris, Jerry Harris, Lynn Hartnett, Mark Lawson, Roland Minshew, and Robert (Bobby) Welch violated 2 U.S.C. § 441f.

The investigation uncovered no evidence Congressman Tallon received a contribution in cash or any other form for the committee or possessed funds belonging to the committee. In addition, there was no corroborating testimony, or evidence to support any of Gary H. Slavens' allegations about wrongdoing by Congressman Tallon. Therefore, the Office of the General Counsel in both its brief and report recommended that the Commission find no probable cause to believe that Representative Robin M. Tallon, Jr., violated 2 U.S.C. §§ 432(b)(1), 432(b)(3), 441f, and 11 C.F.R. § 110.4(c)(2). On July 12, 1988, the Commission voted in favor of the foregoing recommendations, and closed the file as it pertains to Representative Robin M. Tallon, Jr.

II. ANALYSIS

A. Allegation of Cash Contributions

On March 18, 1986 the Commission authorized subpoenas and orders to Gary H. Slavens, Vicki Slavens, G.B. Stokes, Representative Robin M. Tallon, Jr., Michael Glenn Odom, and the Tallon for Congress Committee and Lamar Rabon, as treasurer. This Office deposed Gary H. Slavens, G.B. Stokes, Michael Glenn

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Odom, and Congressman Robin M. Tallon, Jr. The Tallon for Congress Committee and Lamar J. Rabon, as treasurer, produced documents in compliance with the subpoena directed to them. Vicki Slavens filed an affidavit with the Commission in lieu of being deposed.

On or about July 15, 1988, the Office of the General Counsel mailed briefs to Gary H. Slavens, and Vicki Slavens. No evidence was uncovered which corroborated Mr. Slavens' allegations of cash contributions to the Tallon campaign, however both Vicki and Gary Slavens acknowledged that Gary Slavens deposited \$1,000.00 into Vicki Slavens' account which she used, as instructed, to make a \$1,000.00 contribution to the 1982 Tallon for Congress Committee. In addition, the receipt books furnished by the Tallon Committee show that Vicki Slavens made a \$1,000.00 contribution on August 17, 1982. Therefore, the briefs, in addition to presenting the General Counsel's position on the legal and factual issues, also, informed Mr. Slavens and Ms. Slavens of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe that each had violated 2 U.S.C. § 441f, and no probable cause to believe they violated 2 U.S.C. § 432(b)(3).

On August 5, 1988 Vicki Slavens responded to the brief addressed to her. (Attachment 1). Ms. Slavens stated that Gary Slavens had asked her to make a \$1,000.00 contribution to Robin Tallon, and that Gary Slavens had deposited \$1,000.00 into her account. Ms. Slavens asserted that Mr. Slavens also made other deposits into her account which she used for normal expenses.

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Vicki Slavens insisted that she did not know the source of Gary Slavens' funds and believed he was transferring the money from his account to hers.

On or about August 5, 1988, Gary Slavens telephoned a staff member from this Office. Mr. Slavens stated that he had received the General Counsel's brief, and he inquired as to what was required of him. The staff member informed Mr. Slavens that a written response to the brief was desired. To date no such written response has been received from Mr. Slavens. Mr. Slavens, however, asserted that his ex-wife Vicki Slavens did nothing wrong in this matter.

On September 30, 1988 this Office mailed briefs to G.B. Stokes, Joe W. Pearce, Jr., and Edward E. "Ed" Saleeby. These briefs reviewed the factual and legal issues, and concluded there was no evidence of cash contributions. Accordingly, therein, this Office intended to recommend that the Commission find no probable cause to believe G.B. Stokes, Joe W. Pearce, Jr., and Edward E. Saleeby violated 2 U.S.C. § 441g, and find no probable cause to believe Edward E. Saleeby violated 2 U.S.C. § 441a(a)(1)(A). On October 4, 1988 counsel representing G.B. Stokes responded to the General Counsel's brief. (Attachment 2). Mr. Stokes' counsel concurred with the recommendations of the General Counsel. To date the respondents other than Mr. Stokes have not responded to the briefs pertaining to them.

On November 22, 1988, the Office of the General Counsel mailed a brief to the Tallon for Congress Committee and Lamar J. Rabon, as treasurer. This brief informed the Tallon Committee

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the General Counsel intended to recommend that the Commission find no probable cause to believe the committee and its treasurer violated 2 U.S.C. §§ 441a(f), 441b(a), and 11 C.F.R. § 110.4(c)(2). This brief did not make a specific recommendation with regard to the 2 U.S.C. § 441f violation, however facts were available to support a no probable cause recommendation, therefore this Office recommends that no further action be taken with regard to any violation of 2 U.S.C. § 441f as pertains to the Tallon for Congress Committee and Lamar J. Rabon, as treasurer.

In light of the above this Office recommends that the Commission find the following:

1. Probable cause to believe that Gary Slavens and Vicki Slavens violated 2 U.S.C. § 441f;
2. No probable cause to believe that Gary Slavens and Vicki Slavens violated 2 U.S.C. § 432(b)(3);
3. No probable cause to believe that G.B. Stokes, Joe W. Pearce, Jr., and Edward E. Saleeby violated 2 U.S.C. § 441g;
4. No probable cause to believe that Edward E. Saleeby violated 2 U.S.C. § 441a(a)(1)(A);
5. No probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), and 11 C.F.R. § 110.4(c)(2). Take no further action as to 2 U.S.C. § 441f.

B. Allegations of Contributions in the Name of Another

On October 27, 1987 the Commission authorized the sending of subpoenas and orders to Roland Minshew, Lynn Hartnett, Mark Lawson, Robert Welch, Jerry Harris, Jane Harris, James A. ("Jimmy") Brown, Jr., Robin's of Florence, Inc., LeMasters,

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Inc., Robin's of North Myrtle Beach, Inc., Robin's Ladies Wear, Inc., Robin's of Dentsville, Inc., and Robin's of Anderson, Inc. On February 22, 1988, the Commission authorized the sending of subpoenas and orders to Cameron Tallon Minshew and Sue Bass.

When deposed, on December 10, 1987, James A. ("Jimmy") Brown, Jr. stated that he has known Robin Tallon socially for seven or eight years. He testified that in early 1982 it was he who was instrumental in convincing Mr. Tallon to run for the Congressional seat he now holds.

Mr. Brown claimed that he would spend approximately ten to fifteen hours per week at campaign headquarters. In addition, he stated he knew Mr. Tallon's sister, Cameron Tallon Minshew, who according to Mr. Brown, runs the Tallon Sales Company. Mr. Brown indicated that Mrs. Minshew also spent approximately ten hours per week at campaign headquarters in 1982.

Mr. Brown stated that in April of 1982 there was a definite need to raise money for the Tallon Campaign, and that sometime during the first fifteen days of April, 1982 he was at campaign headquarters and overheard a conversation involving a group of people. Mr. Brown said that two of the people involved in the conversation were Sue Bass, the bookkeeper for the campaign committee, and Cameron Tallon Minshew. Mr. Brown said the discussion involved employee bonuses; the various stores would give bonuses and these bonuses would be converted into contributions for the campaign. Upon further questioning, Mr. Brown steadfastly maintained the plan discussed was that the employee bonuses were to be used as contributions.

As mentioned above, the Tallon for Congress Committee produced documents in response to subpoenas. Among those documents were receipt books covering the period March 12, 1982 to October 23, 1982. The receipt books show that certain individuals named by Mr. Brown made contributions early in the Tallon campaign as follows: on April 14, 1982, Roland G. Minshew, Robert Welch, and Mark Lawson contributed \$1,000.00 each, while Jerry Harris (a Robin's employee) and Jane Harris (his wife, not a Robin's employee) each contributed \$500.00 (the receipt numbers evidence these five contributions are virtually sequential); and Lynn Hartnett was shown to have contributed \$1,000.00 on May 4, 1982.

Pursuant to the subpoenas directed to the various stores owned by Congressman Tallon, Robert Welch, the president of all Robin's stores in 1982, furnished compiled information on bonuses paid to employees in 1980, 1981, and 1982. The documents indicated that on April 12, 1982, Roland Minshew, Jerry Harris, Robert Welch, and Mark Lawson each received a \$1,500.00 bonus, and that Lynn Hartnett received her \$1,500.00 bonus on May 4, 1982.

The documents provided by the various Robin's stores also show that the \$1,500.00 bonuses received on April 12, 1982 by Minshew, Welch, Harris, and Lawson; and the \$1,500.00 received by Lynn Hartnett on May 4, 1982 is the only time these employees received identical bonuses. In addition, the documents provided by the Tallon Committee show that Minshew, Welch, and Lawson each made \$1,000.00 contributions on April 14, 1982, which was

only two days after each received identical \$1,500.00 bonuses on April 12, 1982. Committee documents also show that Jerry Harris and Jane Harris each made \$500.00 contributions on April 14, 1982, which is only two days after Mr. Harris received his \$1,500.00 bonus on April 12, 1982. Finally, documents show that Lynn Hartnett received her \$1,500.00 bonus on May 4, 1982 and made a \$1,000.00 contribution to the Tallon campaign that same day.

Despite the denials under oath by the Robin's employees that the receiving of identical bonuses and the giving of identical contributions is linked, there is evidence to support the theory that the bonuses were to be converted into contributions.

On September 30, 1988, the Office of the General Counsel mailed a brief to LeMasters, Inc. This brief informed Robert Welch, who had appeared on behalf of LeMasters, Inc., that the investigation revealed LeMasters, Inc. had not given bonuses to any employees, whose contributions to the Tallon for Congress Committee is questioned in this matter. Accordingly, the Office of the General Counsel intended to recommend that the Commission find no probable cause to believe LeMasters, Inc., violated 2 U.S.C. §§ 441b(a), and 441f.

As previously mentioned above on November 22, 1988, this Office mailed a copy of the General Counsel's Brief to the Tallon for Congress Committee and Lamar J. Rabon, as treasurer. No evidence was revealed which indicated the Committee was connected with the giving of bonuses by the corporations, or was

aware of any such bonuses; therefore, the acceptance of contributions from the employees of said corporations does not appear to be in violation of 2 U.S.C § 441b(a).

On April 27, 1989, this Office mailed briefs to Roland G. Minsheu, Jane Harris, Jerry Harris, Mark Lawson, Lynn Hartnett, Robert L. Welch, and Robin's of Florence, Inc. These briefs reviewed the factual and legal issues, and concluded there was evidence to support the claimed act of converting bonuses into contributions. Accordingly, therein, the General Counsel intended to recommend that the Commission find probable cause to believe Roland G. Minsheu, Jane Harris, Jerry Harris, Mark Lawson, Lynn Hartnett, and Robert L. Welch violated 2 U.S.C. § 441f, and Robin's of Florence, Inc. violated 2 U.S.C. §§ 441f and 441b(a).

Roland G. Minsheu, Jane Harris, Jerry Harris, Robert L. Welch, and Lynn Hartnett each responded to the General Counsel's Briefs. (Attachments 3 through 7). Again, the responses of each of these respondents were that the contributions were voluntary and that the bonuses were not received with the condition that contributions be given to the Tallon campaign committee.

Mark Lawson to date has not responded to the brief nor the reminder notice mailed to his attorney, Jack W. Lawson, Jr. by certified mail, which was signed for on June 19, 1989.

Nevertheless, the Commission should note that when Mr. Lawson was deposed he stated that he did not know what the April 12, 1982, \$1,500.00 bonus was based on, that this bonus was unusual

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involved with the operation of these stores owned by him. Therefore, the Commission never considered Congressman Tallon in connection with the conversion of bonuses into contribution.

The most important fact supporting this Office recommending no probable cause to believe the Tallon for Congress Committee and Lamar J. Rabon, as treasurer were involved in the conversion of bonuses into contributions was that no evidence has been revealed indicating the Committee was connected with the giving of bonuses by the corporations, or was aware of any such bonuses.

There are numerous facts applicable to Robin's Of Florence, Inc., which were not present in the circumstances surrounding the Committee or Congressman Tallon, thereby resulting in a probable cause to believe recommendation by the Office of the General Counsel as pertains to Robin's Of Florence, Inc. Robin's Of Florence, Inc. was one of the corporations owned by Congressman Tallon. Roland Minshew, who was employed by this company, along with various other Robin's employees of other Robin's stores received a \$1,500.00 bonus on April 12, 1982. Roland Minshew, along with various other Robin's employees of other Robin's stores made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982. Jimmy Brown testified under oath he had over-heard a conversation in which it was discussed that bonuses would be converted into contributions. Robert Welch, the president of all Robin's stores in 1982, actively solicited the managers for contributions, authorized the \$1,500.00 bonuses to store managers, and informed the

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managers he had made a \$1,000.00 contribution. In addition, a review of the bonuses given to these employees from 1980 through 1982 reveals that April 12, 1982 was the only date on which identical bonuses were given. In view of the above facts, in this subsection, the Office of the General Counsel recommends that the Commission find probable cause to believe that Jane Harris, Jerry Harris, Roland G. Minshew, Mark Lawson, Lynn Hartnett, and Robert L. Welch violated 2 U.S.C. § 441f; and that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f. This Office also recommends that the Commission find no probable cause to believe that LeMasters, Inc. violated 2 U.S.C. §§ 441b(a) and 441f.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Find probable cause to believe that Gary H. Slavens, Vicki Slavens, Jerry Harris, Jane Harris, Roland G. Minshew,

Lynn Hartnett, Mark Lawson, and Robert L. Welch, violated 2 U.S.C. § 441f;

2. Find probable cause to believe that Robin's of Florence, Inc., violated 2 U.S.C. §§ 441b(a) and 441f;

3. Find no probable cause to believe that LeMasters, Inc., violated 2 U.S.C. §§ 441b(a) and 441f;

4. Find no probable cause to believe that Gary H. Slavens and Vicki Slavens violated 2 U.S.C. § 432(b)(3);

5. Find no probable cause to believe that G.B. Stokes, Joe W. Pearce, Jr., and Edward E. Saleeby violated 2 U.S.C. § 441g;

6. Find no probable cause to believe that Edward E. Saleeby violated 2 U.S.C. § 441a(a)(1)(A);

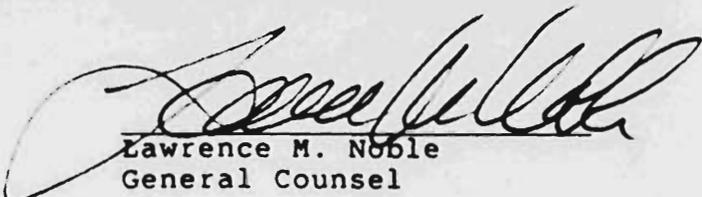
7. Find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), and 11 C.F.R. § 110.4(c)(2). Take no further action with regard to 2 U.S.C. § 441f; and

8. Close the file as pertains to LeMasters, Inc., G.B. Stokes, Joe W. Pearce, Jr., Edward E. Saleeby, and the Tallon for Congress Committee and Lamar J. Rabon, as treasurer.

9. Approve the attached conciliation agreements and letters.

Date

9/20/89


Lawrence M. Noble
General Counsel

Attachments:

1. V. Slavens' Response to Brief
2. Stokes' Response to Brief
3. Minshew's Response to Brief
4. Mr. Harris' Response to Brief
5. Ms. Harris' Response to Brief
6. Harnett's Response to Brief
7. Welch's Response to Brief
8. Robin's of Florences Response to Brief
9. Conciliation Agreements [9]
10. Letters [14]

Staff assigned: Phillip L. Wise

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Gary H. Slavens, et al.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 3, 1989, do hereby certify that the Commission took the following actions in MUR 2071:

1. Decided by a vote of 4-2 to find probable cause to believe that Gary H. Slavens, Vicki Slavens, Jerry Harris, Jane Harris, Roland G. Minshew, Lynn Hartnett, Mark Lawson, and Robert L. Welch violated 2 U.S.C. § 441f.

Commissioners Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

2. Decided by a vote of 4-2 to find probable cause to believe that Robin's of Florence, Inc. violated 2 U.S.C. §§ 441b(a) and 441f.

Commissioners Josefiak, McDoanld, McGarry, and Thomas voted affirmatively for the decision; Commissioners Aikens and Elliott dissented.

(continued)

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3. Decided by a vote of 6-0 to -

- a) Find no probable cause to believe that LeMasters, Inc. violated 2 U.S.C. §§ 441b(a) and 441f;
- b) Find no probable cause to believe that Gary H. Slavens and Vicki Slavens violated 2 U.S.C. § 432(b)(3);
- c) Find no probable cause to believe that G.B. Stokes, Joe W. Pearce, Jr., and Edward E. Saleeby violated 2 U.S.C. § 441g;
- d) Find no probable cause to believe that Edward E. Saleeby violated 2 U.S.C. § 441a(a)(1)(A);
- e) Find no probable cause to believe that the Tallon for Congress Committee and Lamar J. Rabon, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), and 11 C.F.R. 110.4(c)(2). Take no further action with regard to 2 U.S.C. § 441f;
- f) Close the file as it pertains to LeMasters, Inc., G.B. Stokes, Joe W. Pearce, Jr., Edward E. Saleeby, and the Tallon for Congress Committee and Lamar J. Rabon, as treasurer; and
- g) Approve the conciliation agreements and letters attached to the General Counsel's report dated September 20, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

Oct. 4, 1989

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

21040361009



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

October 6, 1989

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
Robert L. Welch

Dear Mr. Welch:

On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provisions of the Federal Election Campaign Act of 1971, as amended, in connection with an April 14, 1982 \$1,000.00 contribution to the Tallon for Congress Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

71040361000



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 6, 1989

Dwight F. Drake, Esquire
Nelson, Mullins, Riley & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Drake:

On October 3, 1989, the Federal Election Commission found that there is probable cause to believe your client, violated 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended, in connection with making a \$1,000.00 contribution to the 1982 Tallon for Congress Committee and knowingly making said contribution in the name of another person.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

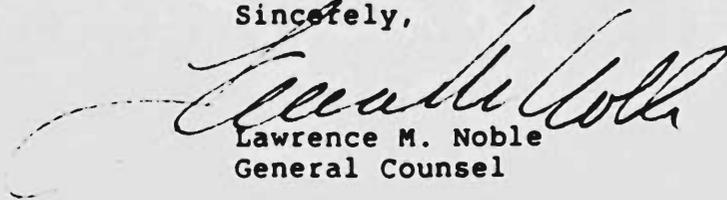
Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your client agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

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Dwight F. Drake, Esquire
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

21040354002



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Ms. Lynn Hartnett
2001 Laurie Circle
Florence, SC 29501

RE: MUR 2071

Dear Ms. Hartnett:

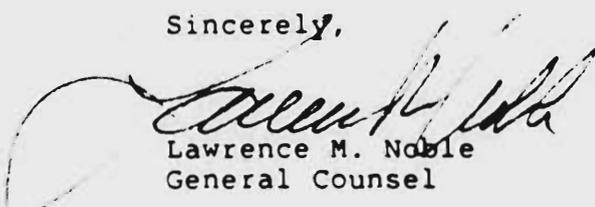
On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, provision of the Federal Election Campaign Act of 1971, as amended in connection with a May 4, 1982 \$1,000.00 contribution to the Tallon for Congress Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Jane Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jane Harris

Dear Ms. Harris:

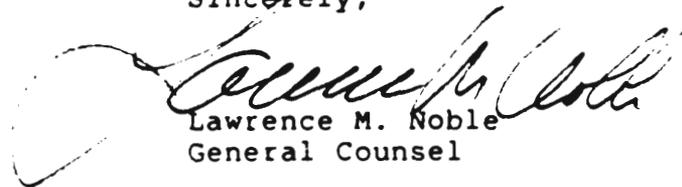
On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with an April 14, 1982 \$500.00 contribution to the Tallon for Congress Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

21040361000



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Jerry Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jerry Harris

Dear Mr. Harris:

On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with an April 14, 1982 \$500.00 contribution to the Tallon for Congress Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Roland G. Minshew
3244 John's Cove
Florence, SC 29501

RE: MUR 2071
Roland G. Minshew

Dear Mr. Minshew:

On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with an April 14, 1982 \$1,000.00 contribution to the Tallon for Congress Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

21040361057



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

October 6, 1989

Vicki Slavens
864 Indian Drive
Florence, SC 29501

RE: MUR 2071
Vicki Slavens

Dear Ms. Slavens:

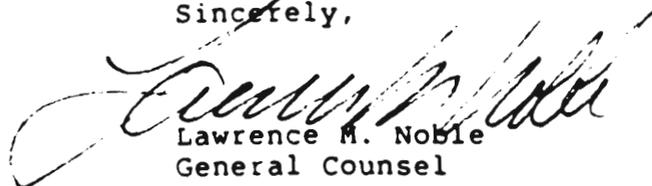
On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with knowingly permitting your name to be used to make a \$1,000.00 contribution to the 1982 Tallon for Congress Committee by Gary H. Slavens. On October 3, 1989, the Commission also found that there is no probable cause to believe you violated 2 U.S.C. § 432(b)(3).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Gary H. Slavens
2924 West Palmett Street
Florence, SC 29501

RE: MUR 2071
Gary H. Slavens

Dear Mr. Slavens:

On October 3, 1989, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with you depositing \$1,000.00 into the account of Vicki Slavens for her to make a \$1,000.00 contribution to the 1982 Tallon for Congress Committee in her name for you. On October 3, 1989 the Commission also found that there is no probable cause to believe you violated 2 U.S.C. § 432(b)(3).

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved 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 that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 6, 1989

Lamar J. Rabon, Treasurer
Tallon for Congress Committee
1512 West Evans Street
Florence, SC 29501

RE: MUR 2071
Tallon for Congress
Committee and Lamar J.
Rabon, as treasurer

Dear Mr. Rabon:

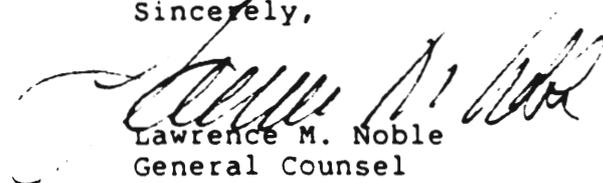
This is to advise you that on October 3, 1989, the Federal Election Commission found that there is no probable cause to believe the Tallon for Congress Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), and 11 C.F.R. § 110.4(c)(2). The Commission also decided to take no further action with regard to 2 U.S.C. § 441f. Accordingly, the file in this matter has been closed as it pertains to the Committee and you, as treasurer.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

21040364070



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Barbara Ohanesian
106 South Marlboro Street
P.O. Box 1373
Bennettsville, SC 29512-1373

RE: MUR 2071
Joe W. Pearce, Jr.

Dear Ms. Ohanesian:

This is to advise you that on October 3, 1989, the Federal Election Commission found that there is no probable cause to believe your client violated 2 U.S.C. § 441g. Accordingly, the file in this matter has been closed as it pertains to your client.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 6, 1989

Benny R. Greer, Esquire
100 st. John Street
P.O. Drawer 519
Darlington, SC 29532

RE: MUR 2017
Edward E. Saleeby

Dear Mr. Greer:

This is to advise you that on October 3, 1989, the Federal Election Commission found that there is no probable cause to believe your client violated 2 U.S.C. §§ 441a(a)(1)(A) and 441g. Accordingly, the file in this matter has been closed as it pertains to your client.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

4061072



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Robert L. Welch
LeMasters, Inc.
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
LeMasters, Inc.

Dear Mr. Welch:

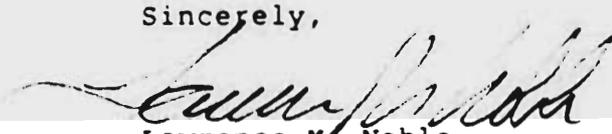
This is to advise you that on October 3, 1989, the Federal Election Commission found that there is no probable cause to believe LeMasters, Inc., violated 2 U.S.C. §§ 441b(a) and 441f. Accordingly, the file in this matter has been closed as it pertains to LeMasters, Inc.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Haigh Porter, Esquire
152 S. McQueen Street
P.O. Box 4337
Florence, South Carolina 29502-1337

RE: MUR 2071
G.B. Stokes, Jr.

Dear Mr. Porter:

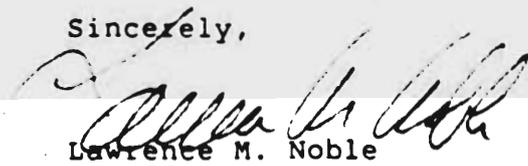
This is to advise you that on October 3, 1989, the Federal Election Commission found that there is no probable cause to believe your clients violated 2 U.S.C. § 441g. Accordingly, the file in this matter has been closed as it pertains to your client.

This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

91040351074



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jane Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jane Harris

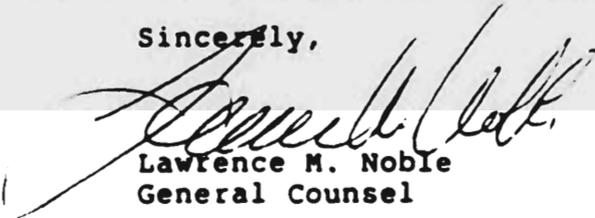
Dear Ms. Harris:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you, violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

01040051015



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
REGISTERED RECEIPT

Jerry Harris
P.O. Box 4217
North Myrtle Beach, SC 29597

RE: MUR 2071
Jerry Harris

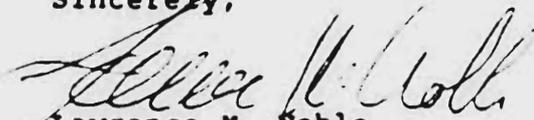
Dear Mr. Harris:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

71040561016



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vicki Slavens
864 Indian Drive
Florence, SC 29501

RE: MUR 2071
Vicki Slavens

Dear Ms. Slavens:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Lynn Hartnett
2001 Laurie Circle
Florence, SC 29501

RE: MUR 2071
Lynn Hartnett

Dear Ms. Hartnett:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you, violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

710403610/3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary H. Slavens
2924 West Palmett Street
Florence, SC 29501

RE: MUR 2071
Gary Slavens

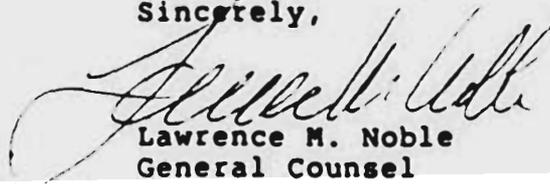
Dear Mr. Slavens:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

71040364079



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, SC 29503

RE: MUR 2071
Mark Lawson

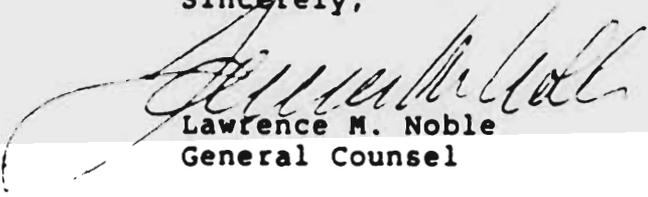
Dear Mr. Jack Lawson:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that your client, violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

71040361030



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
Robert L. Welch

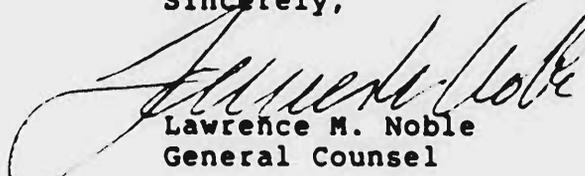
Dear Mr. Welch:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you, violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

21040354031



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
REGISTERED RECEIPT

Roland G. Minshew
3244 John's Cove
Florence, SC 29501

RE: MUR 2071
Roland G. Minshew

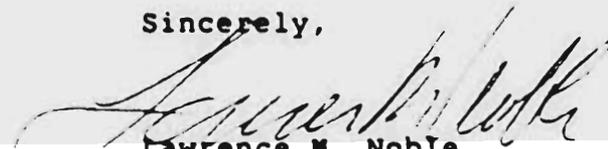
Dear Mr. Minshew:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

7104036+032



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dwight F. Drake, Esquire
Nelson, Mullins, Riley & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Robin's of Florence, Inc.

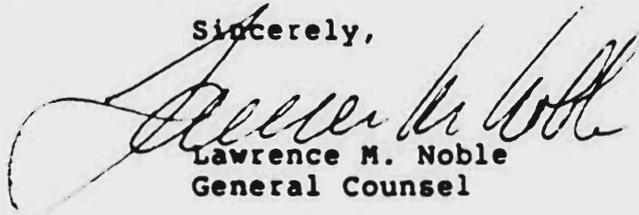
Dear Mr. Drake:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that your client, violated 2 U.S.C. §§ 441b(a) and 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you within 5 days of receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

21040364033

08C 4699

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING

1330 LADY STREET

POST OFFICE BOX 11070

COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-2000

TELECOPY (803) 256-7500

(803) 733-9499

OTHER OFFICES:

GREENVILLE, SOUTH CAROLINA

LEXINGTON, SOUTH CAROLINA

MYRTLE BEACH, SOUTH CAROLINA

Dwight F. Drake
(803) 733-9420

November 27, 1989

Mr. Lawrence M. Noble, General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2071
Robin's of Florence, Inc.

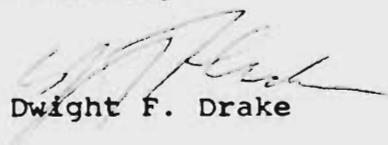
Dear Mr. Noble:

This is in response to your letter of October 6, 1989 and the proposed conciliation agreement forward to me along with that letter.

In order to conclude this matter, I would appreciate an extension of time in which to respond for an additional thirty days. I am scheduled to argue two matters in the South Carolina Supreme Court during the first week of December and my schedule is accordingly compressed.

I look forward to hearing from you soon and appreciate your consideration in this matter.

Sincerely,


Dwight F. Drake

DFD:jc

89 NOV 30 AM 9:20

DSC 1701

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 30 AM 9:19

Jack W. Lawson, Jr., P.A.
Attorney at Law

603 West Palmetto Street
Post Office Box 309
Florence, South Carolina 29503

Telephone: (803) 667-0585

November 28, 1989

Mr. Phillip L. Wise
Federal Election Commission
999 E Street Northwest
Washington, DC 20463

RE: MUR 2071
Mark Lawson

89 NOV 30 PM 1:41

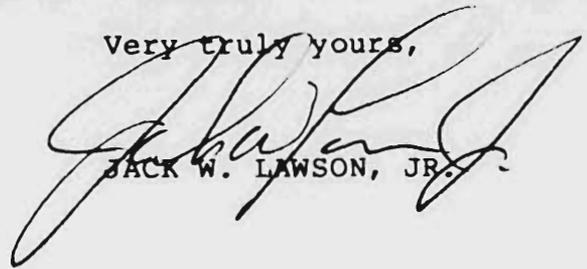
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

Dear Mr. Wise:

Pursuant to your conversation with my secretary, please accept this letter as my formal request for an extension of time to respond in relation to the above-captioned matter. I should be completed with the death penalty trial by December 18, 1989 and will be responding on that date.

Thanking you, and with kind regards, I remain

Very truly yours,



JACK W. LAWSON, JR.

JWLjr:pj

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OGC 4700

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 NOV 30 AM 9:21

Roland G. Minshe
3244 John's Cove
Florence, S. C. 29501

RE: MUR 2071

October 28, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE
GENERAL COUNSEL
89 NOV 30 PM 1:41

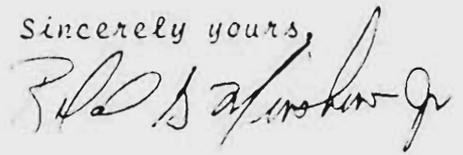
Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D. C. 20463

Dear Mr. Noble:

In reference to your letter dated November 22, 1989, which I received yesterday, concerning a conciliation agreement offered to me by the Commission in settlement of this matter, please note that I am requesting a 10 day extension.

Please note also that I am requesting that you let Mr. Robert L. Welch handle this matter for me from this point on. I believe he discussed this with Mr. Wise and was told that I should request this in writing.

Thank you for your cooperation in this matter.

Sincerely yours,


Roland G. Minshe

RGM/ctm

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06C4711

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

November 28, 1989

89 DEC -1 AM 10:30

Mr. Lawrence M. Noble
General Council
Federal Election Commission
Washington, D. C. 20643

MUR 2071

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

89 NOV 31 AM 11:09

Dear Mr. Noble,

I received your letter yesterday concerning a supposed violation of the federal election laws. As of this date mr. Robert L. Welch will be acting on my behalf. I would appreciate a ten (10) day extension on this matter. Please send copies of all correspondence to Mr. Welch as well to me from now on. I believe that you have his address.

Thank You,

Lynn A. Hartnett
Lynn A. Hartnett

21040364037

06 C4745

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

JANE F. HARRIS
P.O. BOX 4217
NORTH MYRTLE BEACH, SC 29597

89DEC-4 AM 9:29

November 28, 1989

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Mur 2071
Jane Harris

Dear Mr. Noble:

This is in response to your letter of November 22, 1989 concerning MUR 2071. I am requesting a ten day extension to a response to the above referenced letter.

Further, I am requesting that you accept my authorization to appoint Robert L. Welch as my representative to act on my behalf in reference to any further correspondence or transactions concerning #MUR 2071.

Sincerely,

Jane F. Harris
Jane F. Harris

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, D.C. 20541
89DEC-4 PM 2:37

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06C 4746

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

JERRY HARRIS
P.O. BOX 4217
NORTH MYRTLE BEACH, SC 29597

89DEC-4 AM 9:29

November 28, 1989

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: Mur 2071
Jerry Harris

Dear Mr. Noble:

This is in response to your letter of November 22, 1989 concerning MUR 2071. I am requesting a ten day extension to a response to the above referenced letter.

Further, I am requesting that you accept my authorization to appoint Robert L. Welch as my representative to act on my behalf in reference to any further correspondence or transactions concerning MUR 2071.

Sincerely,

Jerry Harris

Jerry Harris

2104036+009

89DEC-4 PM 12:37

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

89 DEC -4 AH10: 54

06 C 4742
November 29, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
89 DEC -4 PH12: 37

Mr. Lawrence M. Noble
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

In reference to MUR 2071, I would like to respond that I do not agree with your allegation that I violated an election law in 1982 during Robin Tallon's race for the U.S. Congress. As an American citizen I have the right to contribute up to \$4,000.00 dollars to a political candidate of my choice. This is exactly what I did. Furthermore, I was aware that the contribution would be legally recorded and published in newspapers as a matter of public record. (Note: It was reported in the Charleston News and Courier.) Therefore, it was not done in any secret or covert nature. As a public school teacher, past president of many civic organizations, active church worker and area artist, I can assure you that I would not jeopardize my reputation and standing in my community to commit any such wrongdoing.

In 1982, I was married to Gary Slavens (we are now divorced) and as husband and wife we not only filed joint tax returns but regularly comingled (withdrew/deposited/transferred) our monies in our bank accounts as was necessary. Often he would deposit

money in my account toward household expenses, civic/church expenses, gifts for special occasions and general operating costs of living. As a citizen of a democracy, as an adult of earning capacity and as a legal wife, I had the authority and the right to utilize the money in my account as I deemed fit. No court in the land would negate this premise.

On Monday, November 27, 1989, I contacted your attorney, Mr. Philip L. Wise concerning this matter. He stated that my ex-husband had said that he'd given me the money for the campaign; this is false. I have contacted Mr. Slavens about this and he vehemently denies this allegation. He will be glad to verify my stance.

After three or four years of being contacted by your commission, of replying, of even receiving correspondence from you stating the issue had been dismissed, I am still to this day being harassed by this. I feel like my inherent rights as an American citizen as well as my integrity has been violated. The time has come for this ~~this~~ matter to be resolved due to the extreme anxiety it has imposed on me. Please consider that I honestly had no idea that what I did could ever be misconstrued as an illegal wrongdoing.

Sincerely,
Vicki Slavens
864 Indian Drive
Florence, S.C. 29501

Phone: 803-662-9058 (after 4:00 p.m.)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1989

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, SC 29503

RE: MUR 2071
Mark Lawson

Dear Mr. Jack Lawson:

This is in response to your letter dated November 28, 1989, which we received on November 30, 1989, requesting an extension until December 18, 1989 to respond to the Commission's proposed post probable cause conciliation agreement. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 18, 1989.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
General Counsel *by [Signature]*

2104035 + J 7 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1989

Dwight F. Drake, Esquire
Nelson, Mullins, Riley & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Drake:

This is in response to your letter dated November 27, 1989, which we received on November 30, 1989, requesting an extension of 30 days to respond to the Commission's proposed post probable cause conciliation agreement. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on January 3, 1990.

If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
General Counsel *LMN*

71040364073

89 DEC 21 PM 5:02

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gary H. Slavens, et al.) **MUR 2071**

GENERAL COUNSEL'S REPORT

On October 3, 1989, the Federal Election Commission (the "Commission") found probable cause to believe that Gary H. Slavens, Vicki Slavens, Jerry Harris, Jane Harris, Roland G. Minshew, Lynn Hartnett, and Robert L. Welch each violated 2 U.S.C. § 441f. On that same date the Commission found probable cause to believe that Robin's of Florence, Inc., violated 2 U.S.C. §§ 441b(a) and 441f.

On October 6, 1989, this Office mailed each Respondent notification of the Commission's findings. Enclosed with each notification was a conciliation agreement approved by the Commission in settlement of this matter. The Respondents made no reply to the notifications and conciliation agreements. On November 22, 1989, the Office of the General Counsel mailed reminder letters to the Respondents, requesting a response within 5 days from receipt thereof.

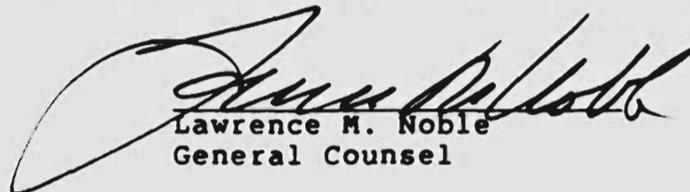
Gary H. Slavens has not responded. Vicki Slavens responded on December 4, 1989. Ms. Slavens once again asserted that she did nothing wrong when she contributed \$1,000.00 to the 1982 Tallon Campaign Committee. By letters received at the Commission from November 30, 1989 to December 4, 1989, Lynn Hartnett, Jane Harris, Jerry Harris, and Roland G. Minshew each appointed Robert L. Welch to represent them in settlement of

71540364074

this matter. On December 4, 1989, Mr. Welch responded on behalf of himself, and those Respondents who authorized his representation. On November 30, 1989, counsel for Mark Lawson, and counsel for Robin's of Florence, Inc. each requested an extension of time to respond until December 18, 1989, and January 3, 1990, respectively. These extension requests were granted by this Office.

After all responses are received this Office will report to the Commission with appropriate recommendations.

12/20/89
Date _____


Lawrence M. Noble
General Counsel

Staff Assigned: Phillip L. Wise

11040351070

0009592



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 21, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary H. Slavens
2924 West Palmett Street
Florence, SC 29501

RE: MUR 2071
Gary Slavens

Dear Mr. Slavens:

On October 6, 1989, you were notified that the Federal Election Commission found probable cause to believe that you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter. On November 22, 1989, this Office by certified mail, mailed you a reminder letter requesting a response within 5 days from receipt thereof. The green return receipt shows that the reminder letter was received by you on November 29, 1989. To date you have not responded.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, the Office of the General Counsel will recommend that the Commission authorize the filing of a civil suit unless we receive a response from you within 10 days of your receipt of this letter.

Should you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

40,51076

90 FEB 21 PM 2:10

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gary H. Slavens, et al.)
)

MUR 2071

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 3, 1989, the Federal Election Commission (the "Commission") found probable cause to believe that Gary H. Slavens, Vicki Slavens, Jerry Harris, Jane Harris, Roland G. Minsheu, Lynn Hartnett, and Robert L. Welch each violated 2 U.S.C. § 441f. On that same date the Commission found probable cause to believe that Robin's of Florence, Inc., violated 2 U.S.C. §§ 441b(a) and 441f.

On October 6, 1989, this Office mailed each Respondent notification of the Commission's findings. Enclosed with each notification was a conciliation agreement approved by the Commission in settlement of this matter. The Respondents made no reply to the notifications and conciliation agreements. On November 22, 1989, the Office of the General Counsel mailed reminder letters to the Respondents, requesting a response within 5 days from receipt thereof.

Gary H. Slavens has not responded. Vicki Slavens responded on December 4, 1989. (Attachment 1). Ms. Slavens once again asserted that she did nothing wrong when she contributed \$1,000.00 to the 1982 Tallon Campaign Committee. By letters received at the Commission from November 30, 1989 to December 4, 1989, Lynn Hartnett, Jane Harris, Jerry Harris, and Roland G.

1040561071

Minshew each appointed Robert L. Welch to represent them in settlement of this matter. (Attachment 2). On December 4, 1989, Mr. Welch responded on behalf of himself, and those Respondents who authorized his representation. (Attachment 3). On November 30, 1989, counsel for Mark Lawson, and counsel for Robin's of Florence, Inc. each requested an extension of time to respond until December 18, 1989, and January 3, 1990, respectively. (Attachments 4 and 5, respectively). These extension requests were granted by this Office.

On December 27, 1989, counsel submitted a response on behalf of Mark Lawson. (Attachment 6). On January 3, 1990, counsel responded on behalf of Robins' Of Florence, Inc. (Attachment 7).

II. ANALYSIS

A. Robert L. Welch, Roland G. Minshew, Lynn A. Hartnett, Jerry Harris, and Jane Harris.

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B. Robin's Of Florence, Inc.

C. Mark Lawson

71040351JU

D. Vicki Slavens

2104055101



71040551103

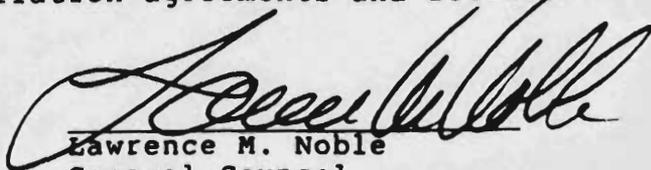
E. Gary H. Slavens

21040361103

III. RECOMMENDATIONS

Approve the attached conciliation agreements and letters.

2/21/90
Date


Lawrence M. Noble
General Counsel

Attachments:

1. V. Slavens' Response
2. Response naming Welch as representative
3. Counteroffer by Welch for himself and others
4. Mark Lawson's Request for extension
5. Robin's of Florence, Inc.'s request for extension
6. Mark Lawson's Response to agreement
7. Counteroffer by Robin's of Florence, Inc.
8. Proposed conciliation agreement with Welch
9. Proposed conciliation agreement with Minshe
10. Proposed conciliation agreement with Hartnett
11. Proposed conciliation agreement with Mr. Harris
12. Proposed conciliation agreement with Ms. Harris
13. Proposed conciliation agreement with Robin's of Florence
14. Proposed conciliation agreement with Mark Lawson
15. Vicki Slavens' affidavit
16. Proposed conciliation agreement with Vicki Slavens
17. Letters [4]

Staff assigned: Phillip L. Wise

71040354104



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 FEB 22 PM 5:20

SENSITIVE

February 23, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *LL*
Associate General Counsel

SUBJ: Errata in MUR 2071

The proposed letter to Robert Welch at Attachment 17, pages 2 and 3, of the General Counsel's Report, dated February 21, 1990, contains some typographical errors. Attached is a corrected letter.

Attachment

710400641J6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Robert Welch)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1990, the Commission decided by a vote of 5-0 to approve the letter to Robert Welch circulated in the General Counsel's February 23, 1990 Errata on MUR 2071.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

2-27-90

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Receive in the Secretariat: Thursday, Feb. 22, 1990 5:20 p.m.
Circulated to the Commission: Friday, Feb. 23, 1990 12:00 p.m.
Deadline for vote: Tuesday, Feb. 27, 1990 4:00 p.m.

21040351101

OGC 5880

RECEIVED
FEDERAL ELECTION COMMISSION
MAR 20 1990

NELSON, MULLINS, RILEY & SCARBOROUGH 90 APR -9 PM 12:58
ATTORNEYS AND COUNSELORS AT LAW

THIRD FLOOR, KEENAN BUILDING
1330 LADY STREET
POST OFFICE BOX 11070
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE (803) 799-2000
TELECOPY (803) 256-7500
(803) 733-9499

OTHER OFFICES:
GREENVILLE, SOUTH CAROLINA
LEXINGTON, SOUTH CAROLINA
MYRTLE BEACH, SOUTH CAROLINA

90 APR -9 4:00
FEDERAL ELECTION COMMISSION
WASHINGTON, DC

Dwight F. Drake
(803) 733-9420

April 3, 1990

Honorable Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Noble:

I am in receipt of your letter of March 9th and the attached conciliation agreement.

After conferring with my client, I have been authorized to sign this agreement and enclosed you will find a copy of the agreement signed by me.

Under separate cover, Mr. Bobby Welch of Robin's of Florence will forward to you a check in the amount of \$1,250 within 30 days.

Should you have any questions, please do not hesitate to let me know.

Sincerely,
Dwight F. Drake

Dwight F. Drake

DFD:jc

cc: Mr. Bobby Welch



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 3, 1990

POSTMASTER
1901 West Evans Street
Florence, South Carolina 29501

RE: MUR 2071
Gary H. Slavens

Dear Sir or Madam:

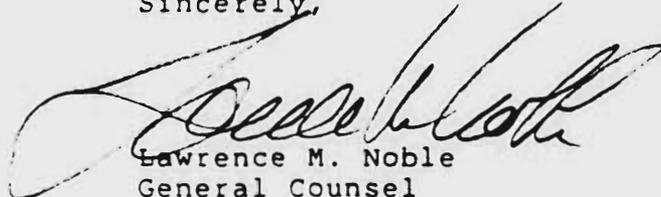
Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Gary H. Slavens. According to our records, the address of Mr. Slavens was 2924 West Palmett Street, Florence, South Carolina as of November 29, 1989.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Thank you for your assistance.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Envelope

710405 + 107

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 APR 12 AM 9:50



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 3, 1990

POSTMASTER
1901 West Evans Street
Florence, South Carolina 29501

RECEIVED
FEDERAL ELECTION COMMISSION
90 APR 12 PM 2:12

RE: MUR 2071
Gary H. Slavens

Dear Sir or Madam:

Pursuant to 39 C.F.R. § 265(d)(1), we request that you provide us with the present address of Gary H. Slavens. According to our records, the address of Mr. Slavens was 2924 West Palmett Street, Florence, South Carolina as of November 29, 1989.

Under 39 C.F.R. § 265.8e(8)(iii), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted.

A return envelope is enclosed. Should you have any questions or require any further information, please call Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Thank you for your assistance.

Sincerely,

Lawrence M. Noble
Lawrence M. Noble
General Counsel

*enclosure
envelope*

Enclosure
Envelope



21040564110

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Vicki Slavens)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 13, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2071:

1. Accept the conciliation agreement with Vicki Slavens, as recommended in the General Counsel's report dated April 10, 1990.
2. Close the file as to this respondent.
3. Approve the letter, as recommended in the General Counsel's report dated April 10, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

4-13-90

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., April 10, 1990 4:18 p.m.
Circulated to the Commission: Wed., April 11, 1990 11:00 a.m.
Deadline for vote: Fri., April 13, 1990 11:00 a.m.

2104056+1112



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 17, 1990

Vicki Slavens
864 Indian Drive
Florence, SC 29501

RE: MUR 2071
Vicki Slavens

Dear Ms. Slavens:

On April 13, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

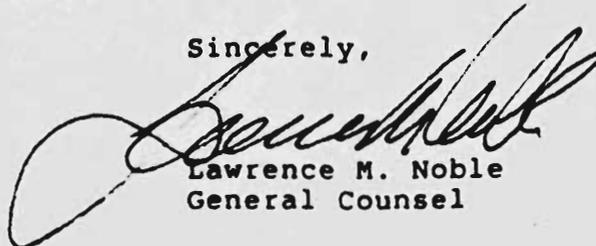
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Vicki Slavens
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

2104006114

Commission on September 10, 1986 she stated, "...that during 1982 she was married to Gary Slavens and she was told by him that he had been advised that a man and wife could each contribute \$1,000.00 to the Tallon for Congress Campaign, and that he had already contributed \$1,000.00 and that he would like her to contribute \$1,000.00. She told her husband that she was not sure that she had the money in her checking account and he said that he would deposit the \$1,000.00 out of his personal checking account into hers." After the \$1,000.00 was deposited into Vicki Slavens' account by Gary Slavens, Vicki Slavens contributed \$1,000.00 by check to the 1982 Tallon for Congress Committee.

V. Respondent knowingly permitted her name to be used to effect a contribution for another person, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission

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90 APR 10 PM 4:18

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert L. Welch, Roland G.) MUR 2071
Minshew, and Lynn A.)
Hartnett)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are conciliation agreements which have been signed by Robert L. Welch, Roland G. Minshew, and Lynn A. Hartnett.

The attached agreements contain no changes from the agreement approved by the Commission on March 6, 1990. Checks for the civil penalty have been received from each of the three respondents.

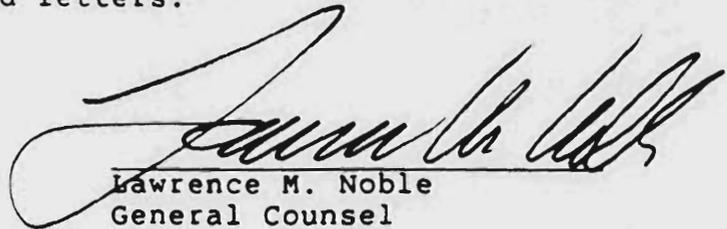
II. RECOMMENDATIONS

1. Accept the attached conciliation agreements with Robert L. Welch, Roland G. Minshew, and Lynn A. Hartnett.
2. Close the file as to these respondents.
3. Approve the attached letters.

Date

4/10/90

Lawrence M. Noble
General Counsel



Attachments

1. Conciliation Agreements and Photocopy of civil penalty checks
2. Letter to Respondent

Staff Assigned: Phillip L. Wise

1104036118

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert L. Welch, Roland G.) MUR 2071
MinsheW, and Lynn A.)
Hartnett)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 13, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2071:

1. Accept the conciliation agreements with Robert L. Welch, Roland G. MinsheW, and Lynn A. Hartnett, as recommended in the General Counsel's report dated April 13, 1990.
2. Close the file as to these respondents.
3. Approve the letters, as recommended in the General Counsel's report dated April 13, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

4-13-90
Date

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

Received in the Secretariat: Tues., April 10, 1990 4:18 p.m.
Circulated to the Commission: Wed., April 11, 1990 11:00 a.m.
Deadline for vote: Fri., April 13, 1990 11:00 a.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1990

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
Robert L. Welch
Roland G. Minshew
Lynn A. Hartnett

Dear Mr. Welch:

On April 13, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalties submitted by Roland G. Minshew, Lynn A. Hartnett, and you in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Roland G. Minshew, Lynn A. Hartnett, and you.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

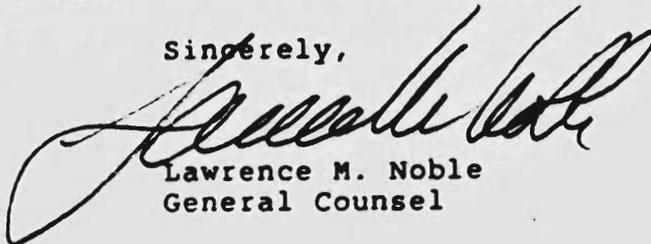
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

7104006+120

Robert L. Welch
Page 2

Enclosed you will find a copy of the fully executed conciliation agreements for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

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RECEIVED
FEDERAL ELECTION COMMISSION

90 MAR 27 AM 10:37

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Roland G. Minshew) **MUR 2071**

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Roland G. Minshew ("Respondent") violated 2 U.S.C. § 441f.

90 MAR 29 PM 1:41

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

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

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

1. Roland G. Minshew is a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person

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shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

3. Robin Tallon, Jr., was a candidate for the House of Representatives in 1982. The Tallon for Congress Committee was Mr. Tallon's principal campaign committee for his 1982 campaign.

4. Various employees of stores owned by Robin Tallon, Jr., including Roland G. Minshew, received \$1,500.00 bonuses on April 12, 1982 and made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982.

5. Roland G. Minshew made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus from Robin's of Florence, Inc.

6. Respondent contends that the violation of the Act was not knowing and willful.

V. Respondent knowingly permitted his name to be used to effect a contribution by another person, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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the District of Columbia.

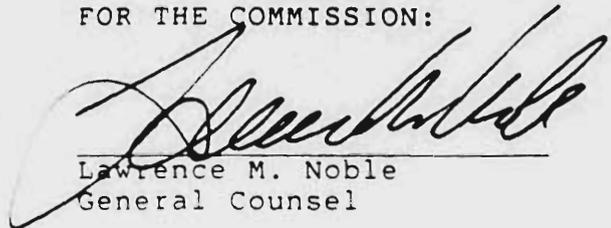
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent 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.

X. 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 enforceable.

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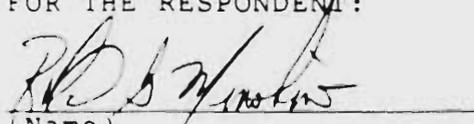
FOR THE COMMISSION:



Lawrence M. Noble
General Counsel

4/17/90
Date

FOR THE RESPONDENT:



(Name)
(Position)

3-23-90
Date

OGC 5797

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FEDERAL ELECTION COMMISSION
MAR 29 1990

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robert L. Welch) MUR 2071
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Robert L. Welch ("Respondent") violated 2 U.S.C. § 441f.

90 MAR 29 PM 1:41

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

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

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

1. Robert L. Welch is a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person

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shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

3. Robin Tallon, Jr., was a candidate for the House of Representatives in 1982. The Tallon for Congress Committee was Mr. Tallon's principal campaign committee for his 1982 campaign.

4. Various employees of stores owned by Robin Tallon, Jr., including Robert L. Welch, received \$1,500.00 bonuses on April 12, 1982 and made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982.

5. Robert L. Welch, who was the president of all stores owned by Robin Tallon, Jr., in 1982, authorized the \$1,500.00 bonuses to the Robin's employees on April 12, 1982, and joined these employees in making \$1,000.00 contributions to the Tallon for Congress Committee two days later on April 14, 1982.

6. Respondent contends that the violation of the Act was not knowing and willful.

V. Respondent knowingly permitted his name to be used to effect a contribution by another person, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Five Hundred dollars (\$500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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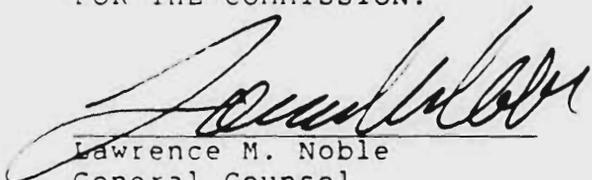
this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondent 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.

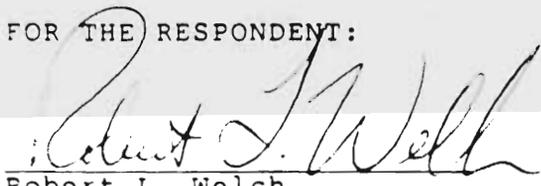
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

4/17/90
Date

FOR THE RESPONDENT:


Robert L. Welch
Respondent

3/25/90
Date

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RECEIVED
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90 MAR 29 AM 9:47

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Lynn A. Hartnett) MUR 2071
)

90 MAR 29 PM 1:40

FEDERAL ELECTION COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Lynn A. Hartnett ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Lynn A. Hartnett is a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person or knowingly permit

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his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

3. Robin Tallon, Jr., was a candidate for the House of Representatives in 1982. The Tallon for Congress Committee was Mr. Tallon's principal campaign committee for his 1982 campaign.

4. Various employees of stores owned by Robin Tallon, Jr., received \$1,500.00 bonuses on April 12, 1982 and made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982. Lynn A. Hartnett received her identical \$1,500.00 bonus on May 4, 1982, and made a \$1,000.00 contribution to the Tallon for Congress Committee, that same day.

5. Respondent contends that the violation of the Act was not knowing and willful.

V. Respondent knowingly permitted her name to be used to effect a contribution by another person, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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the District of Columbia.

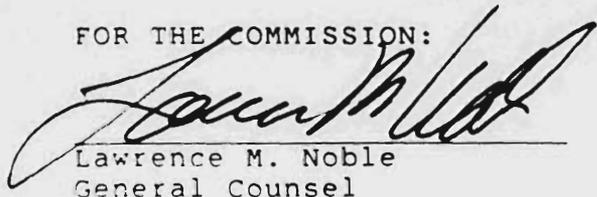
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent 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.

X. 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 enforceable.

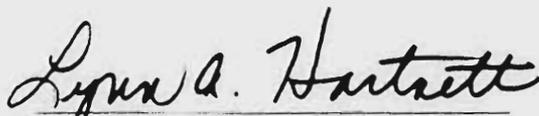
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FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

4/17/90
Date

FOR THE RESPONDENT:


(Name)
(Position)

March 26, 1990
Date

Robin's

The Pee Dee's Largest Men's Shop
TELEPHONE 689-3541
2180 WEST EVANS STREET
P. O. BOX 3667
FLORENCE, SOUTH CAROLINA 29502

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 APR 16 AM 11:25

April 11, 1990

Hon. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Noble:

Please find the enclosed check for \$1250.00 for the civil penalty in the above mentioned matter.

Sincerely yours,

Carson J. Minshew

Carson T. Minshew

Enclosure

4005101

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ROBIN'S OF FLORENCE, INC.

P.O. BOX 1967
2180 WILVANS ST
FLORENCE, SC 29501

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April 11, 1990

Federal Election Comm.

\$ 1250.00

THE FIRST FEDERAL BANK OF FLORENCE

DOLLARS

C&S

THE CITIZENS AND SOUTHERN NATIONAL BANK
OF SOUTH CAROLINA
FLORENCE, SOUTH CAROLINA 29501

Carman J. McQuisels

FOR MUR - 2071

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90 APR 17 AM 10:59

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Robin's of Florence, Inc.) MUR 2071

SENSITIVE

GENERAL COUNSEL'S REPORT

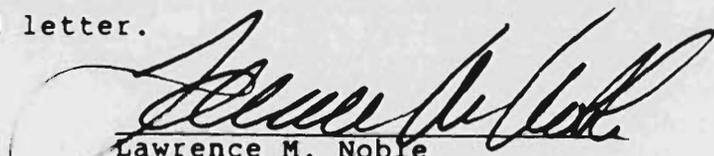
I. BACKGROUND

Attached is a conciliation agreement which has been signed by counsel for Robin's of Florence, Inc. The attached agreement contains no changes from the agreement approved by the Commission on March 6, 1990. A check for the civil penalty has not been received from the respondent.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Robin's of Florence, Inc.
2. Close the file as to this respondent.
3. Approve the attached letter.

4/17/90
Date


Lawrence M. Noble
General Counsel

- Attachments
1. Agreement
 2. Letter to Respondent

Staff Assigned: Phillip L. Wise

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Robin's of Florence, Inc.) MUR 2071

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 19, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2071:

1. Accept the conciliation agreement with Robin's of Florence, Inc., as recommended in the General Counsel's Report dated April 17, 1990.
2. Close the file as to this respondent.
3. Approve the letter attached to the General Counsel's Report dated April 17, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald and McGarry voted affirmatively for the decision; Commissioner Thomas did not cast a vote.

Attest:

4-20-90
Date

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

Received in the Secretariat:	Tues., April 17, 1990	10:59 a.m.
Circulated to the Commission:	Tues., April 17, 1990	4:00 p.m.
Deadline for vote:	Wed., April 19, 1990	4:00 p.m.

dr

71040361154



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 23, 1990

Dwight F. Drake, Esquire
Nelson, Mullins, Riley & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Robin's of Florence, Inc.

Dear Mr. Drake:

On April 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 441b(a) and 441f, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your client.

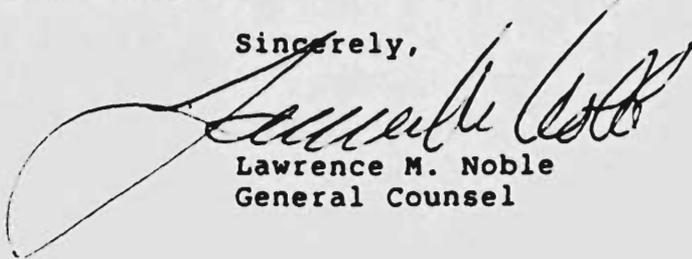
This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

Dwight F. Drake
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

7104036+106

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Robin's of Florence, Inc.) MUR 2071

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Robin's of Florence, Inc. ("Respondent") violated 2 U.S.C. §§ 441b(a) and 441f.

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

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

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

1. Robin's of Florence, Inc., is a corporation within the meaning of 2 U.S.C. § 441b and a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that it is unlawful for any corporation whatever to make a contribution in connection with a federal election. 2 U.S.C. § 441b(a). The Act also provides

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that no person shall make a contribution in the name of another person and no person shall knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

3. Robin Tallon, Jr., was a candidate for the House of Representatives in 1982. The Tallon for Congress Committee was Mr. Tallon's principal campaign committee for his 1982 campaign.

4. Various employees of stores owned by Robin Tallon, Jr., including Roland G. Minshe, an employee of Robin's of Florence, Inc., received \$1,500.00 bonuses on April 12, 1982 and made \$1,000.00 contributions to the Tallon for Congress Committee on April 14, 1982.

5. Roland G. Minshe made a \$1,000.00 contribution on April 14, 1982 to the Tallon for Congress Committee, two days after receiving his bonus from Robin's of Florence, Inc.

6. Respondent contends that the violation of the Act was not knowing and willful.

V. Respondent made a contribution in the name of another person, by giving a bonus to Roland G. Minshe with the intent that a portion thereof be given as a contribution to the Tallon for Congress Committee in violation of 2 U.S.C. § 441f.

VI. Respondent made a contribution in connection with a federal election in violation of 2 U.S.C. § 441b(a).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Two Hundred

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Fifty dollars (\$1,250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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

IX. Respondent 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.

X. 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 enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

4/23/90
Date

FOR THE RESPONDENT:


Dwight F. Drake
Attorney

4/3/90
Date

21040364139

90 APR 19 PM 4:36

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Jane Harris and Jerry Harris) MUR 2071

GENERAL COUNSEL'S REPORT

I. BACKGROUND

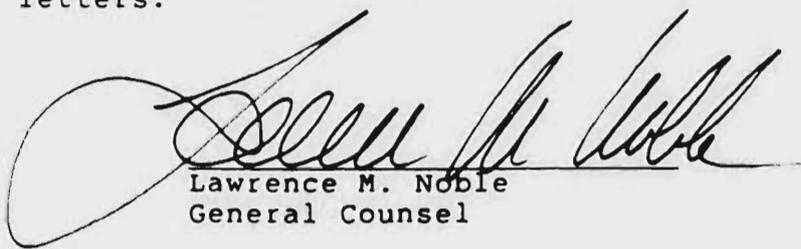
Attached are conciliation agreements which have been signed by Jane Harris and Jerry Harris. (Attachment 1).

The attached agreements contain no changes from the agreements approved by the Commission on March 6, 1990. A check for the civil penalties has been received from the two respondents. (Attachment 2).

II. RECOMMENDATIONS

1. Accept the attached conciliation agreements with Jane Harris and Jerry Harris.
2. Close the file as to these respondents.
3. Approve the attached letters.

4/19/90
Date


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreements and Photocopy of civil penalty check
2. Letter to Respondent

Staff Assigned: Phillip L. Wise

2104035, 140

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jane Harris and Jerry Harris) MUR 2071

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 24, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 2071:

1. Accept the conciliation agreements with Jane Harris and Jerry Harris, as recommended in the General Counsel's Report dated April 19, 1990.
2. Close the file as to these respondents.
3. Approve the letters, as recommended in the General Counsel's Report dated April 19, 1990.

Commissioners Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioners Aikens and McDonald did not cast votes.

Attest:

April 24, 1990
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., April 19, 1990 4:34 p.m.
Circulated to the Commission: Fri., April 20, 1990 12:00 p.m.
Deadline for vote: Tues., April 24, 1990 4:00 p.m.

7104036 + 141



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

April 26, 1990

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
Jane Harris
Jerry Harris

Dear Mr. Welch:

On April 24, 1990, the Federal Election Commission accepted the signed conciliation agreements and civil penalties submitted by Jane Harris, and Jerry Harris in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Jane Harris, and Jerry Harris.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

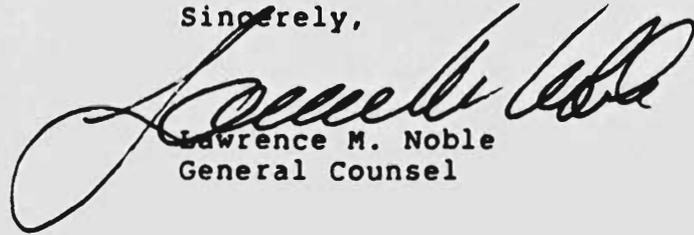
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

7104036 + 142

Robert L. Welch
Page 2

Enclosed you will find a copy of the fully executed conciliation agreements for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreements

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90 APR -9 AM 10: 13

RECEIVED
FEDERAL ELECTION COMMISSION
90 APR 12 PH 2: 09

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jerry Harris) MUR 2071
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CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Jerry Harris ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

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

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

1. Jerry Harris is a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person

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shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f.

3. Robin Tallon, Jr., was a candidate for the House of Representatives in 1982. The Tallon for Congress Committee was Mr. Tallon's principal campaign committee for his 1982 campaign.

4. Various employees of stores owned by Robin Tallon, Jr., including Jerry Harris, (the husband of Jane Harris who was not an employee), received \$1,500.00 bonuses on April 12, 1982.

5. Jerry Harris made a \$500.00 contribution on April 14, 1982 to the Tallon for Congress Committee, by a check dated April 13, 1982 drawn from a joint bank account with Jane Harris, two days after he received his bonus.

6. Respondent contends that the violation of the Act was not knowing and willful.

V. Respondent knowingly permitted his name to be used to effect a contribution by another person, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Hundred Twenty-Five dollars (\$125.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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

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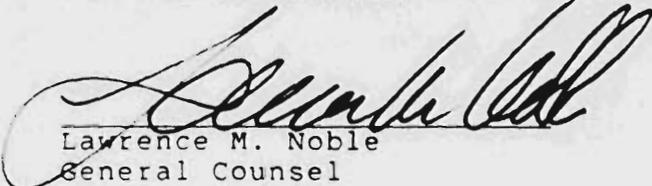
the District of Columbia.

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

IX. Respondent 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.

X. 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 enforceable.

FOR THE COMMISSION:


Lawrence M. Noble
General Counsel

4/26/90
Date

FOR THE RESPONDENT:


(Name)
(Position)

4/26/90
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Jane Harris) MUR 2071

90 APR 12 PM 2:09
FEDERAL ELECTION COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Jane Harris ("Respondent") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondent, 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in his matter.

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

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

1. Jane Harris is a person within the meaning of 2 U.S.C. § 431(11).

2. The Federal Election Campaign Act of 1971, as amended ("the Act") provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person

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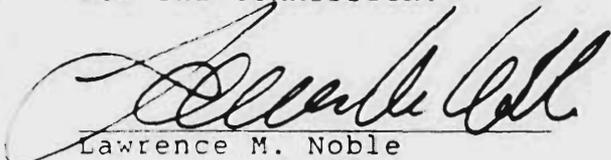
the District of Columbia.

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

IX. Respondent 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.

X. 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 enforceable.

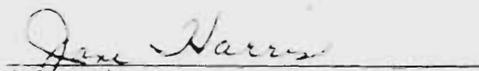
FOR THE COMMISSION:



Lawrence M. Noble
General Counsel

4/26/90
Date

FOR THE RESPONDENT:



(Name)
(Position)

4/2/90
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
Gary H. Slavens, et al.)

MUR 2071

JUN 5 1990

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

I. BACKGROUND

On October 3, 1989, the Federal Election Commission (the "Commission") found probable cause to believe that Gary H. Slavens, Vicki Slavens, Jerry Harris, Jane Harris, Roland G. Minsheu, Lynn Hartnett, Mark Lawson and Robert L. Welch each violated 2 U.S.C. § 441f. On that same date the Commission found probable cause to believe that Robin's of Florence, Inc., violated 2 U.S.C. §§ 441b(a) and 441f.

On October 6, 1989, this Office mailed each Respondent notification of the Commission's findings. Enclosed with each notification was a conciliation agreement approved by the Commission in settlement of this matter. The Respondents made no reply to the notifications and conciliation agreements. On November 22, 1989, the Office of the General Counsel mailed reminder letters to the Respondents, requesting a response within 5 days from receipt thereof.

Gary H. Slavens did not respond. Vicki Slavens responded on December 4, 1989. By letters received at the Commission from November 30, 1989 to December 4, 1989, Lynn Hartnett, Jane Harris, Jerry Harris, and Roland G. Minsheu each appointed Robert L. Welch to represent them in settlement of this matter. On December 4, 1989, Mr. Welch responded on behalf of himself,

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and those Respondents who authorized his representation. On November 30, 1989, counsel for Mark Lawson, and counsel for Robin's of Florence, Inc. each requested an extension of time to respond until December 18, 1989, and January 3, 1990, respectively. These extension requests were granted by this Office. On December 27, 1989, counsel submitted a response on behalf of Mark Lawson. On January 3, 1990, counsel responded on behalf of Robins' Of Florence, Inc.

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On April 13, 1990, the Commission accepted the signed conciliation agreements and civil penalties, and closed this matter as it pertained to Robert L. Welch, Roland G. Minshew, and Lynn Hartnett. On April 19 and 20, 1990, the Commission also accepted the signed agreements and civil penalties, and closed this matter as it pertained to Robin's of Florence, Inc. and Jerry Harris and Jane Harris, respectively.

II. ANALYSIS

A. Mark Lawson

21040354102

In view of the above, and the facts that Mark Lawson's actions in this matter were similar to the other Robin's employees who were respondents in this matter, and that these respondents signed agreements admitting a violation of the Act as a result of this similar conduct, the Office of the General Counsel recommends that the Commission authorize the filing of civil suit for relief in the United States District Court against Mr. Lawson.

B. Gary H. Slavens

On October 6, 1989, this Office mailed Gary H. Slavens notification of the Commission's findings. Enclosed with the notification was a conciliation agreement approved by the Commission in settlement of this matter. Mr. Slavens made no reply to the notification and conciliation agreement. On November 22, 1989, the Office of the General Counsel, by certified mail, mailed a reminder letter to Mr. Slavens, requesting a response within 5 days from receipt thereof. The green return receipt shows that this letter was signed for by Mr. Slavens on November 29, 1989. This Office also attempted to contact Mr. Slavens by telephone; however the telephone number he gave in his deposition was no longer valid. This Office also contacted telephone information for Florence, South Carolina and was informed that there was no telephone listing for

Mr. Slavens.

On or about February 20, 1990, this Office mailed Mr. Slavens a certified letter describing the various notifications. This certified letter also informed him that if a response was not received within 10 days the General Counsel would recommend that the Commission authorize civil suit in this matter, as it pertains to Mr. Slavens. On March 29, 1990, this letter was returned by the Post Office, as not deliverable. On April 3, 1990, this Office by letter requested Mr. Slavens' new address from the Postmaster in Florence, South Carolina. On April 12, 1990, the Postmaster informed this Office that the address was unknown. Mr. Slavens' address was finally obtained through Vicki Slavens, and as evidenced by the signed green return receipt, he received the Commission's notification and conciliation agreement on May 1, 1990. (Attachment 1).

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and authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Mr. Slavens.

III. RECOMMENDATIONS

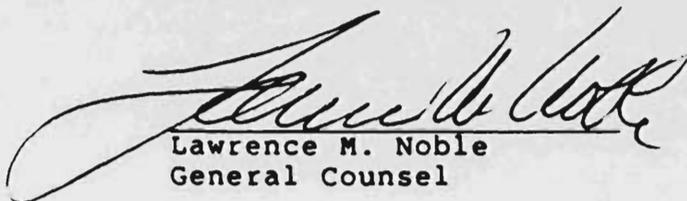
1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Mark Lawson and Gary H. Slavens.

2. Approve the attached letters.

Date

5/23/90

Lawrence M. Noble
General Counsel



Attachment

1. Receipt
2. Letters

Staff Assigned: Phillip L. Wise

4036100

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens, et al.) MUR 2071

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session of June 5, 1990, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 2071:

- 1.
2. Authorize the Office of the General Counsel to file a civil suit for relief in U.S. District Court against Mark Lawson.
3. Approve the appropriate letters.

Commissioners Aikens, Elliott, McGarry and Thomas voted affirmatively for the decision. Commissioners Josefiak and McDonald were not present.

Attest:

June 5, 1990

Date

Hilda Arnold

Hilda Arnold
Administrative Assistant

2104036+156



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

June 7, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack W. Lawson, Jr., Esquire
603 West Palmetto Street
Post Office Box 309
Florence, SC 29503

RE: MUR 2071
Mark Lawson

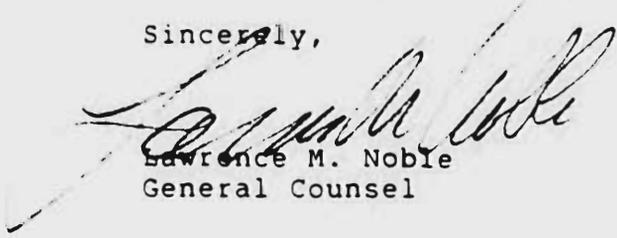
Dear Mr. Jack Lawson:

You were previously notified that on October 3, 1989, the Federal Election Commission found probable cause to believe that your client, violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with the captioned matter.

As a result of our inability to settle this matter through conciliation within the allowable time period, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to settle this matter prior to suit, please contact Robert W. Bonham, III, Acting Assistant General Counsel, at (202) 376-8200, within five days of your receipt of this letter.

Sincerely,


Lawrence M. Noble
General Counsel

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OGC# 7796

Jack W. Lawson, Jr., P.A.

Attorney at Law

90 SEP - 3 AM 11:04

603 West Palmetto Street
Post Office Box 309
Florence, South Carolina 29503

Telephone: (803) 667-0585

August 30, 1990

Mr. David M. FitzGerald
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

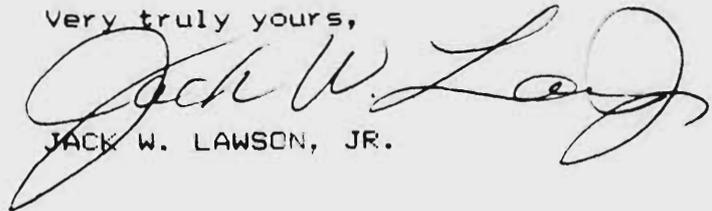
RE: MUR 2071
MARK LAWSON

Dear Mr. FitzGerald:

I am in receipt of yours of August 13, 1990, and must relay that I have been unable to contact my client, as he has been out of town for an extended period of time. Please accept the enclosed trust account check in the amount of one hundred (\$100.00) dollars, which I am sending in good faith. Additional funds will be forwarded when they are received.

With kind regards, I remain

Very truly yours,



JACK W. LAWSON, JR.

for

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
90 SEP 10 AM 8:13

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JACK W. LAWSON, JR., P.A.
TRUST ACCOUNT

1947

PAY
TO THE
ORDER OF

One Thousand & no/100

8/30 19 90

\$ 100.00

DOLLARS

First Citizens Bank
Florence, SC

Restitutions: Mark Lawson
Mark 2071

Paula Lawson

JACK W. LAWSON, JR.

⑈001947⑈ ⑆053201187⑆38000 20574⑈01

Note:
This check was returned to
Jack Lawson, uncashed, on
9/7/90 by letter which
also enclosed complaint



9/7/90

90 SEP 28 AM 9:55

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Gary H. Slavens) MUR 2071
)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

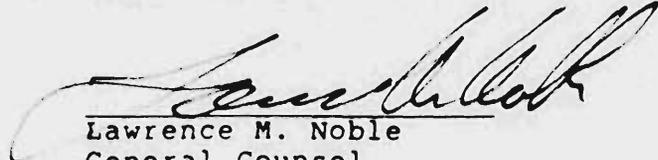
Attached is a conciliation agreement which has been signed by Gary H. Slavens. (Attachment 1).

The attached agreement contains no changes from the agreement approved by the Commission on June 5, 1990. A copy of the check for the \$250.00 civil penalty is also attached hereto. (Attachment 2).

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Gary H. Slavens.
2. Close the file.¹
3. Approve the appropriate letters.

Date 9/27/90


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check.

Staff Assigned: Phillip L. Wise

1. On or about September 4, 1990, the General Counsel filed suit for civil relief against Mark Lawson in the United States District Court for the District of South Carolina. Mr. Lawson is the only respondent with whom conciliation was unsuccessful. (FEC v. Mark Lawson , CA No. 6:90-2116-0).

21040361150

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2071
Gary H. Slavens)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 2, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2071:

1. Accept the conciliation agreement with Gary H. Slavens, as recommended in the General Counsel's Report dated September 27, 1990.
2. Close the file.
3. Approve the appropriate letters, as recommended in the General Counsel's Report dated September 27, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald and Thomas voted affirmatively for the decision; Commissioner McGarry did not cast a vote.

Attest:

10-3-90
Date

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

Received in the Secretariat: Friday, Sept. 28, 1990 9:55 a.m.
Circulated to the Commission: Friday, Sept. 28, 1990 12:00 p.m.
Deadline for vote: Tuesday, Oct. 2, 1990 4:00 p.m.

dh

21040361151



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 12, 1990

Gary H. Slavens
Tiddwell-Slavens Gallery
321 King Street
Charleston, South Carolina 29401

RE: MUR 2071
Gary H. Slavens

Dear Mr. Slavens:

On October 2, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to you.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

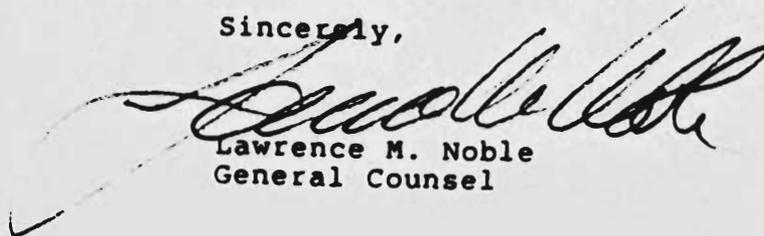
The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

71040364162

Gary Slavens
MUR 2071
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

71040364163

3. After the \$1,000.00 was deposited into Vicki Slavens' account by Respondent, Vicki Slavens contributed \$1,000.00 by check to the 1982 Tallon for Congress Committee.

V. Respondent made a contribution in the name of another, in violation of 2 U.S.C. § 441f.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

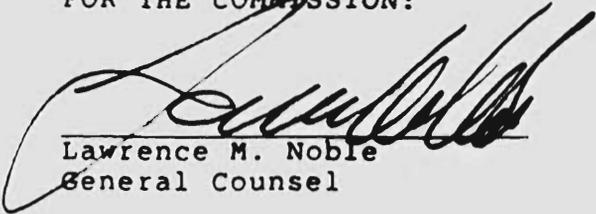
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent 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.

1040361105

X. 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 enforceable.

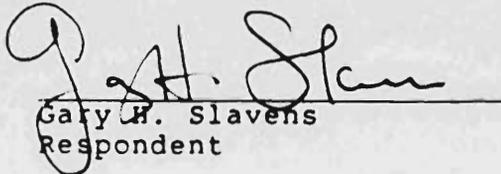
FOR THE COMMISSION:



Lawrence M. Noble
General Counsel

10/4/90
Date

FOR THE RESPONDENT:



Gary H. Slavens
Respondent

9-10-90
Date

7104035 + 156

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

FEDERAL ELECTION COMMISSION,)

Plaintiff,)

v.)

MARK LAWSON,)

Defendant.)

CA No. 6:90-2116-9

ACKNOWLEDGMENT OF
SATISFACTION OF
JUDGMENT

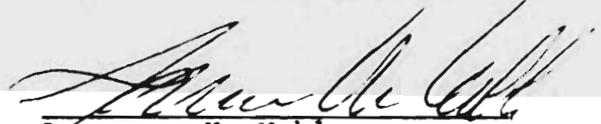
PLAINTIFF FEDERAL ELECTION COMMISSION'S
ACKNOWLEDGMENT OF SATISFACTION OF JUDGMENT

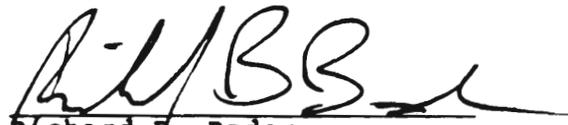
On April 8, 1991, this Court entered a Default Judgment against Defendant Mark Lawson, finding that defendant violated 2 U.S.C. § 441f, directing defendant to pay a civil penalty, and enjoining defendant from further violation; and

WHEREAS, the monetary portion of said judgment has been paid to the satisfaction of the plaintiff Federal Election Commission;

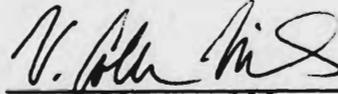
THEREFORE, satisfaction of the monetary portion of this judgment is hereby acknowledged, and the Commission authorizes the Clerk of the Court to cancel and discharge the same.

Respectfully submitted,


Lawrence M. Noble
General Counsel


Richard B. Bader
Associate General Counsel

71040364157



V. Colleen Miller
Attorney

September 13, 1991

FOR THE PLAINTIFF
FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463
(202) 219-3400

7 1 0 4 0 3 6 + 1 5 3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1991

Barbara Ohanesian
106 South Marlboro Street
P.O. Box 1373
Bennettsville, SC 29512-1373

RE: MUR 2071
Joe W. Pearce, Jr.

Dear Ms. Ohanesian:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

7154006 + 107



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1991

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
Robert L. Welch
Roland G. Minshew
Lynn A. Hartnett
Jerry Harris
Jane Harris

Dear Mr. Welch:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

2104035+170



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1991

Vicki Slavens
864 Indian Drive
Florence, SC 29501

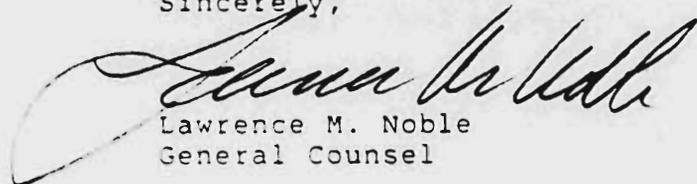
RE: MUR 2071
Vicki Slavens

Dear Ms. Slavens:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

1104035+1/1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1991

Lamar J. Rabon, Treasurer
Tallon for Congress Committee
1512 West Evans Street
Florence, SC 29501

RE: MUR 2071
Tallon for Congress Committee
and Lamar J. Rabon, as
treasurer

Dear Mr. Rabon:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

40354112



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1991

Benny R. Greer, Esquire
100 St. John Street
P.O. Drawer 519
Darlington, SC 29532

RE: MUR 2071
Edward E. Saleeby

Dear Mr. Greer:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

710403511/3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 26, 1991

Haigh Porter, Esquire
152 S. McQueen Street
P.O. Box 4337
Florence, South Carolina 29502-1337

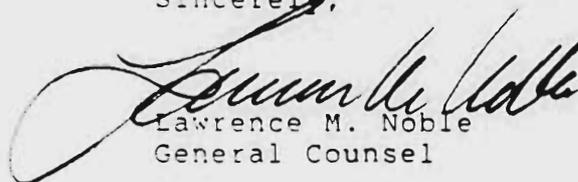
RE: MUR 2071
G.B. Stokes, Jr.

Dear Mr. Porter:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

7134036+1/4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 1991

Dwight F. Drake, Esquire
Nelson, Mullins, Riley & Scarborough
Keenan Building - 3rd Floor
1330 Lady Street
Post Office Box 11070
Columbia, SC 29211

RE: MUR 2071
Rep. Robin M. Tallon, Jr.
Robin's of Florence, Inc.

Dear Mr. Drake:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".

Lawrence M. Noble
General Counsel

4056110



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 20, 1991

Robert L. Welch
P.O. Box 6992
Florence, SC 29502

RE: MUR 2071
LeMasters, Inc.

RECEIVED

Dear Mr. Welch:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble (Handwritten signature)

Lawrence M. Noble
General Counsel

1040361176



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

September 20, 1991

Gary H. Slavens
Tiddwell-Slavens Gallery
321 King Street
Charleston, South Carolina 29401

RE: MUR 2071
Gary H. Slavens

Dear Mr. Slavens:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble (LH)

Lawrence M. Noble
General Counsel

110406411



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 20, 1991

Thomas Duval Guest
603 West Palmetto Street
P.O. Box 309
Florence, South Carolina 29503

RE: MUR 2071
Mark Lawson

Dear Mr. Guest:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Phillip L. Wise, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

A handwritten signature in cursive script that reads "L M Noble (FM)".

Lawrence M. Noble
General Counsel

910403641/8



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE END OF MUR # 2071

DATE FILMED 9/27/91 CAMERA NO. 4

CAMERAMAN AS

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