



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2563

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN PC.

88040723873



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

30 July 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

THROUGH: JOHN C. SURINA  
STAFF DIRECTOR

FROM: JOHN D. GIBSON *JDG*  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF JANE SHEY FOR CONGRESS

The Jane Shey for Congress committee (the "Committee") has accepted an excessive contribution of \$13,000 in the form of a loan from an individual. According to the 1985-1986 Reports Analysis Division Review and Referral Procedures for Authorized Committees (Standard 2), this matter requires further examination by your office.

Please note that the Committee was sent a valid termination notice on September 19, 1986. The Committee had filed a Termination Report on July 16, 1986, and had not reported any outstanding debts or cash-on-hand at that time. The 1986 Year-End Report, filed March 27, 1987, disclosed an outstanding \$14,000 loan. The Committee will be expected to file reports now until the loan is repaid or resolved.

The candidate, Jane Shey, lost the Iowa primary election held on June 3, 1986, with 20% of the vote.

If you have any questions, please contact Linda Tangney at 376-2480.

Attachment

88040723874

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 30 July 1987

ANALYST: Linda Tanqney

I. COMMITTEE: Jane Shey for Congress  
(C00206383)  
Jane Shey, Treasurer<sup>1/</sup>  
1007 Taylor Street, N.E.  
Washington, DC 20017

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

The Acceptance of an Apparent Excessive Contribution

The Jane Shey for Congress committee (the "Committee") disclosed an apparent excessive contribution of \$13,000 in the form of a loan from an individual.

The Committee's 1986 Year End Report, filed on March 27, 1987, disclosed the receipt of a \$14,000 loan on Line 13, and a \$14,000 loan repayment on Line 24 of the Detailed Summary Page (Attachment 2).<sup>2/</sup> Schedule A, supporting Line

<sup>1/</sup> Dean Schlapia was the treasurer of record; however, the candidate, Jane Shey, signed the 1986 Year End Report and indicated a change of address from P.O. Box 454, Algona, Iowa, 50511, to the address listed above. Also, in a statement received on June 18, 1987, Jane Shey stated that she will be responsible for filing future reports.

<sup>2/</sup> The 1986 Year End Report was filed on a Form 3X (used by Unauthorized Committees) instead of a Form 3 (used by Authorized Committees). Therefore, the Line numbers which represent different categories of receipts and disbursements on the Summary Page and Detailed Summary Page of the Form 3X differ from the Line numbers on the Summary Page and Detailed Summary Page of the Form 3.

8 7 5 2 3 8 7 5

JANE SHEY FOR CONGRESS  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 2

13 of the Detailed Summary Page, disclosed the receipt of a \$14,000 loan from the candidate, Jane Shey, on January 11, 1987. The loan was designated for the primary election, and was listed as a "personal loan" (Attachment 3). Schedule B, supporting Line 24 of the Detailed Summary Page, disclosed a \$14,000 loan repayment to Dr. D.J. Shey on January 11, 1987. The loan repayment was designated for the primary election (Attachment 4). Schedule C disclosed a \$14,000 loan owed to Jane Shey, with an incurred date of January 11, 1987, a due date listed as "N/A", and a zero percent (0%) interest rate (Attachment 5).

On April 8, 1987, a Reports Analysis Division analyst telephoned the candidate, Jane Shey. The analyst informed Ms. Shey, that the Committee had been sent a termination letter on September 19, 1986, which terminated the Committee's reporting requirements. The analyst explained that the Committee had filed a Termination Report that had not disclosed any outstanding debts or loans, and now a 1986 Year End Report has been filed that discloses a \$14,000 loan received for the primary election. Ms. Shey explained that she had received a loan from her father, Dr. D.J. Shey, and now she was repaying him. Ms. Shey stated that she was unaware that the Committee had never reported the receipt of the loan. The analyst requested that Ms. Shey send in all information related to this loan, and informed her that the loan from her father was considered a contribution to the Committee until it was repaid. The analyst explained that Ms. Shey's father may have made an excessive contribution of \$13,000. Ms. Shey stated that she did not know the loan was considered a contribution, and she would send in all information related to the loan (Attachment 6).

On April 28, 1987, the Committee was sent a Request for Additional Information ("RFAI") regarding the \$14,000 loan disclosed on the 1986 Year-End Report. The RFAI informed the Committee that its report disclosed a \$14,000 loan repayment to a Dr. D.J. Shey, however, previous reports did not disclose the receipt of this \$14,000 loan. The RFAI also stated that if there had been a loan from Dr. D.J. Shey, the amount in excess of \$1,000 would be considered an excessive contribution. The RFAI requested that the Committee provide in detail any clarifying information about the loan (Attachment 7). On May 8, 1987, Ms. Shey telephoned the analyst and stated that as soon as she compiled all the information about the loan, she would send it in (Attachment 8). No written response was received and on May 21, 1987, a Second Notice was sent to the Committee (Attachment 9).

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JANE SHEY FOR CONGRESS  
REPORTS ANALYSIS OGC REFERRAL  
PAGE 3

On June 5, 1987, a written response was received from Jane Shey which clarified circumstances regarding the loan disclosed on the 1986 Year End Report. In the response, Ms. Shey acknowledged the receipt of the \$14,000 loan from Dr. D.J. Shey, and stated that this was a personal loan to her, not her campaign. Ms. Shey stated that her treasurer "assumed (the loan) would be listed as a candidate contribution." Ms. Shey noted that when the Termination Report was filed, she had assumed responsibility for the repayment of the loan, and the "treasurer assumed that the campaign committee had no further reporting obligations." The response also included the following dates and amounts of the loans received by Jane Shey from Dr. D.J. Shey, and the loan repayments to Dr. D.J. Shey from Jane Shey:

<u>Date</u>	<u>Amount Received</u>	<u>Date</u>	<u>Repayment Amount</u>
5/23/86	\$1,500	9/4/86	\$500
5/28/86	\$5,000	9/28/86	\$500
6/11/86	\$2,850	11/1/86	\$500
7/3/86	\$4,650	11/28/86	\$500
		1/11/87	\$12,500
	<u>\$14,000</u>		<u>\$14,500</u>

The response noted that an interest payment of \$500 was included in the loan repayment schedule. Jane Shey noted that there was no intent to conceal the loan, nor did she know that she was violating the law. Ms. Shey stated that she intended to cooperate with the Federal Election Commission (Attachment 10).

On June 18, 1987, the Commission received a written statement which explained the source of the funds used by Jane Shey to repay the loan to her father. Ms. Shey explained that her father had purchased stock several years ago to give to his children. Ms. Shey stated that the stock was transferred to her "before the end of 1986". Jane Shey stated that she then sold the stock "at the end of December and used it to repay the loan." Jane Shey also stated that she would take full responsibility for the "inaccuracies in filing", and did not wish the campaign treasurer (Dean Schlapia) to be held liable. Jane Shey stated that she would be responsible for filing future reports (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

88040723877

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FEDERAL ELECTION COMMISSION  
1985-1986

DATE 30JUN87

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
SHEY, JANE		HOUSE 06 DEMOCRATIC PARTY			IOWA		1986 ELECTION	ID# H6IA06097	
1. STATEMENT OF CANDIDATE							12MAY86	1 86HSE/303/4076	
1986 STATEMENT OF CANDIDATE									
2. PRINCIPAL CAMPAIGN COMMITTEE									
JANE SHEY FOR CONGRESS								ID #C00206383 HOUSE	
1986 STATEMENT OF ORGANIZATION							12MAY86	1 86HSE/303/4075	
MISCELLANEOUS REPORT FROM FEC			8,915		8,263		19SEP86	1 86FEC/431/4048	
PRE-PRIMARY					14,000		19MAR86 -14MAY86	5 86HSE/304/1142	
YEAR-END			14,000				15JUL86 -31JAN87	5 87HSE/332/4267	
YEAR-END - AMENDMENT							15JUL86 -31JAN87	2 87HSE/333/2558	
YEAR-END - AMENDMENT							15JUL86 -31JAN87	1 87HSE/333/2994	
REQUEST FOR ADDITIONAL INFORMATION							15JUL86 -31JAN87	1 87FEC/466/3307	
REQUEST FOR ADDITIONAL INFORMATION 2ND							15JUL86 -31JAN87	2 87FEC/468/1780	
TERMINATION REPORT			16,001		16,653		15MAY86 -11JUN86	5 86HSE/307/2973	
TOTAL			38,916	0	38,916	0		23 TOTAL PAGES	
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

All reports have been reviewed.

Ending cash-on-hand as of 1/31/87: \$0

Outstanding debts owed by the Committee as of 1/31/87: \$14,000

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

ATTACHMENT 2

1986 YEAR-END REPORT

Name of Committee (or Fund)

Jane Shey for Congress

Report Covering the Period  
From 7/15/86 To 1/11/87

	COLUMN A Total This Period	COLUMN B Calendar Year To-Date	
<b>I. RECEIPTS</b>			
11 CONTRIBUTIONS (other than loans) FROM			
(a) Individuals/Persons Other Than Political Committees	0	0	11(a)
(Memo Entry Unitemized \$ _____)			
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	0	0	11(d)
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13 ALL LOANS RECEIVED	14,000	14,000	13
14 LOAN REPAYMENTS RECEIVED	0	0	14
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17 OTHER RECEIPTS (Dividends, Interest, etc.)	0	0	17
18 TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	14,000	14,000	18
<b>II. DISBURSEMENTS</b>			
19 OPERATING EXPENDITURES	0	0	19
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	0	0	20
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	21
22 INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 and) (Use Schedule F)	0	0	23
24 LOAN REPAYMENTS MADE	14,000	14,000	24
25 LOANS MADE	0	0	25
26 REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27 OTHER DISBURSEMENTS	0	0	27
28 TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	14,000	14,000	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
29 TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	0	0	29
30 TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31 NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	0	0	31
32 TOTAL OPERATING EXPENDITURES from Line 19	0	0	32
33 OFFSETS TO OPERATING EXPENDITURES from Line 15	0	0	33
34 NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	0	0	34

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**SCHEDULE A**

**ITEMIZED RECEIPTS  
1986 YEAR-END REPORT**

Separate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Jane Shey for Congress

93090723880

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jane Shey 1007 Taylor St. NE Washington, D.C.	Cong. Tim Pennv 436 Cannon Wash. D.C. 20017	1/11/87	\$14,000.00
Receipt For: <input checked="" type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation Legislative Asst.		(personal loan) <input checked="" type="checkbox"/>
	Aggregate Year-to-Date: \$ 14,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation		
	Aggregate Year-to-Date: \$		

**SUBTOTAL** of Receipts This Page (last line)

\$14,000.00

**TOTAL** This Page (last page this schedule only)

\$14,000.00

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

1986 YEAR-END REPORT

Use this space (attachments) for each category of the Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Jane Shey for Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dr. D. J. Shey R.R. 2 Algona, IA 50511	payment of loan Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	1/11/87	\$14,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

14,000.00

TOTAL This Page (if last page this line number only)

14,000.00

1 3 8 2 7 0 1

**SCHEDULE C**  
(Revised 3/88)

**1986 YEAR END REPORT**  
**LOANS**

Page 1 of 1 for  
LINE NUMBER  
(Use separate schedules  
for each numbered line)

Name of Committee (in Full) <b>Jane Rhey for Congress</b>			
A. Full Name, Mailing Address and ZIP Code of Loan Source <b>Jane Rhey 1007 Taylor St. NE Washington, D.C. 20017</b>		Original Amount of Loan <b>\$14,000.00</b>	Balance Outstanding at Close of This Period <b>\$14,000.00</b>
Section <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date <b>0</b>	
Terms Date Incurred <b>1/11/87</b> Date Due <b>N/A</b>		Interest Rate	Secured
List All Endorsers or Guarantors (if any) to Item A			
1 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
2 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
3 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Comprehensive Payments To Date	
Terms Date Incurred Date Due Interest Rate		Secured	
List All Endorsers or Guarantors (if any) to Item B			
1 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
2 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
3 Full Name, Mailing Address and ZIP Code	Name of Employer	[REDACTED]	[REDACTED]
	Occupation		
	Amount Guaranteed Outstanding <b>\$</b>		
SUBTOTALS This Period This Page (optional)			<b>\$14,000.00</b>
TOTALS This Period (last page in this line only)			<b>\$14,000.00</b>

Carry outstanding balances only to LINE 3, Schedule B, for this line. If on Schedule D, carry forward to appropriate line of Summary.

23882





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20543

EQ-2

Apr 28 1987

Jane Shey, Treasurer  
Jane Shey for Congress  
1007 Taylor Street, NE  
Washington, DC 20017

Identification Number: C00206383

Reference: Year End Report (7/15/86-1/31/87)

Dear Ms. Shey:

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

-Schedule B discloses a \$14,000 loan repayment to Dr. D. J. Shey; however, the receipt of this \$14,000 loan from Dr. Shey does not appear on your previous reports. Please clarify this discrepancy. Please note that a loan is considered a contribution until it is repaid. If the committee received a \$14,000 loan from Dr. Shey, the amount in excess of \$1,000 would be considered an excessive contribution. Please provide in detail any clarifying information about this loan.

-Please note that your committee was previously notified on September 19, 1986, that its reporting requirements were terminated. Your previous report, the Termination Report (5/15/86-6/11/86), did not disclose outstanding debts from the primary election. This report appears to disclose \$14,000 received for the primary election. Please clarify your reporting status.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact us on our toll-free number, (800) 424-9538. My local number is (202) 376-2400.

Sincerely,

*Linda Langney*  
Linda Langney  
Reports Analyst  
Reports Analysis Division

MEMORANDUM FOR FILES: TELECON  
SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - 1986 YEAR-END REPORT  
FROM: JANE SHEY  
TO: LINDA TANGNEY  
NAME OF COMMITTEE: JANE SHEY FOR CONGRESS COMMITTEE (IA)  
DATE: MAY 8, 1987

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Jane Shey telephoned today to state she had received a letter regarding the 1986 Year-End Report. Jane Shey stated that as soon as she compiled all the information about the loan, she would send it in.

83040 / 23888



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543  
May 21, 1987

EG-3

Jane Shey, Treasurer  
Jane Shey for Congress  
1007 Taylor Street, N.E.  
Washington, DC 20017

Identification Number: C00206303

Reference: Year End Report (7/15/86-1/31/87)

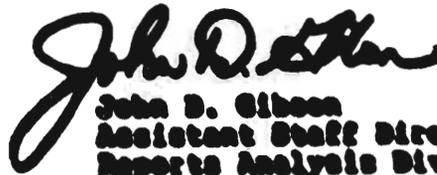
Dear Ms. Shey:

This letter is to inform you that as of May 20, 1987, the Commission has not received your response to our request for additional information, dated April 20, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Linda Tanager on our toll-free number (800) 426-9530 or our local number (202) 376-2480.

Sincerely,

  
John B. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

3 June 1987

**HAND DELIVERED**

Linda Tangney  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

119920

Dear Linda:

This letter is in response to your inquiry of April 28, 1987. I apologize for the delay in responding. I needed to return to Iowa to obtain my financial records from my campaign, which delayed my response.

Regarding the \$14,000 loan repayment to Dr. D.J. Shey, I did receive a \$14,000 loan from Dr. D.J. Shey. In my termination report of July 1986, this loan was listed under the category of candidate contributions. Since this was a personal loan to myself and not to the campaign committee, my treasurer assumed it would be listed as a candidate contribution.

I listed my July 1986 report as a termination report because my campaign committee had paid all its debts and the loan was in my name. I assumed responsibility for the payments and therefore my treasurer assumed that the campaign committee had no further reporting obligations.

The following are the dates and the amounts of the loans that I received from Dr. D.J. Shey.

- 1) 5-23-86 \$1500
- 2) 5-28-86 \$5000
- 3) 6-11-86 \$2850
- 4) 7-3-86 \$4650

Total \$14,000

Repayment Schedule

- 1) 9-4-86 \$500
- 2) 9-28-86 \$500
- 3) 11-1-86 \$500
- 4) 11-28-86 \$500
- 5) 5-11-87 \$12,500

The additional \$500 was my interest payment.

At the end of January, I was talking with another congressional candidate who told me that I needed to continue filing reports with the Federal Election Commission. At that time, I contacted Linda Tangney with the F.E.C. who verified that I still had filing requirements. This is what led to the filing of another report after my termination report.

In closing, I would like to make several points. Although the loan was not listed under the loan category in the F.E.C. report, it was listed under candidate contributions. Secondly, I hope it is clear to the Commission that there was no intent on my part to conceal this loan. If there was, I would not have filed a report in January, since in the eyes of the Commission, I had completed my filing requirements.

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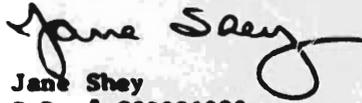
page two  
Federal Election Commission

For the record, I also would like to state that I negotiated the loan without the knowledge that to receive a loan in excess of \$1,000 was in violation of the law. If I had been aware of this law, I would not have accepted the loan.

I have every intention of cooperating with the Federal Election Commission and I am anxious to resolve this matter as expeditiously as possible.

If you require any further information, please feel free to contact me.

Sincerely,



Jane Shey  
I.D. # C00206383

8 8 0 4 0 7 2 3 8 9 8

1987 YEAR-END REPORT  
WASHINGTON, D.C. 20463

RECEIVED BY THE FEC

07 JUN 87 08:00

Linda Tugney  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

119920

RECEIVED  
06 JUN 87 11:46  
FEDERAL ELECTION COMMISSION

Dear Linda:

I am writing you to supply you with further information on the inquiry that was made on my January 1987 report.

I would like to further clarify the source of the money that I used to pay off my campaign indebtedness. Several years ago, my father purchased stock for each of his children. He was planning on giving this stock to us at some point in time which had never really been determined. The stock was in his name but it was clear that it was his intent to transfer it to the children at some point. This was a consideration for me as I borrowed money during the campaign. Without a job and very few assets I might have been reluctant to borrow such a large sum of money without the knowledge that at some point this stock would be made available to me and in a sense was some guarantee of my ability to repay the loan. With the change in the tax code and more specifically capital gains it became much more beneficial for my father to transfer the stock to his children before the end of 1986. Myself and my five brothers and sisters received 350 shares of stock. I sold my stock at the end of December and used it to repay the loan I had taken out to help finance my campaign.

In addition, I would also like to state that I will take full responsibility for the inaccuracies in filing and the loan that I received. It is my understanding that under FEC regulations, the treasurer is liable. Because my treasurer was a campaign supporter and no expert on FEC regulations, I would not feel right in making him liable. So from this point on, I will take responsibility for continued filing obligations, correspondence with the commission and any penalties that may result from this inquiry.

Again, if I can provide you with any further information, please feel free to contact me.

Sincerely,

*Gene Slay*  
Gene Slay

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FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

87 DEC -9 PM 1:50

FIRST GENERAL COUNSEL'S REPORT

**SENSITIVE**

RAD Referral 87L-34  
Staff Member: John Drury

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: Jane Shey for Congress and Jane Shey,  
as treasurer  
Jane Shey  
Dr. D. J. Shey

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)  
2 U.S.C. § 441a(f)  
11 C.F.R. § 110.10

**EXECUTIVE SESSION**

**DEC 15 1987**

I. GENERATION OF MATTER

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

II. FACTUAL AND LEGAL ANALYSIS

According to the attached RAD referral, the Jane Shey for Congress Committee (the "Committee") reported receipt of a \$14,000 loan on January 11, 1987 from federal candidate Jane Shey. The Committee's 1986 Year End Report disclosed receipt of the loan and reported that the loan was fully repaid on January 11, 1987. Schedule C of the report contained entries showing that the loan was incurred on January 11, 1987, that a due date was "N/A" and that there was a zero percent interest rate.

However, in correspondence with the Reports Analysis Division ("RAD"), Ms. Shey stated that what occurred was that her father, Dr. D.J. Shey, made loans totalling \$14,000 to her prior to the 1986 election in which Ms. Shey was a candidate, and that Ms. Shey then loaned the \$14,000 to her committee.

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According to a letter dated June 5, 1987 from Ms. Shey to RAD, Dr. Shey loaned the \$14,000 to his daughter in four ~~payments~~ payments, beginning on May 23, 1986 and ending on July 3, 1986. Ms. Shey then forwarded a loan in the same amount to the Jane Shey for Congress committee. Ms. Shey repaid \$1,500 before November 4, 1986. She repaid the bulk of the loan - \$13,000 - after the election in which she was running for office, repaying \$12,500 approximately seventy days after the election. The repayment included a \$500 interest payment. The details of the loan from Dr. Shey to Ms. Shey are as follows:

<u>Amount Received</u>	<u>Date</u>	<u>Repayment</u>	<u>Date</u>
\$1,500	5/23/86	\$ 500	09/04/86
\$5,000	5/28/86	\$ 500	09/28/86
\$2,850	6/11/86	\$ 500	11/01/86
\$4,650	7/03/86	\$ 500	11/28/86
<u>\$14,000</u>		<u>\$12,500</u>	01/11/87
		<u>\$14,500</u>	

In later correspondence, Ms. Shey stated that her father also presented her with a large amount of stock at an unspecified time in 1986. According to Ms. Shey, "I sold my stock at the end of December and used it to repay the [\$14,000] loan I had taken out to help finance my campaign." (Attachment I, page 16).

Ms. Shey stated that at some point during the latter half of 1986, Dr. Shey presented her and his five other children with stock. According to Ms. Shey, the timing of this transfer was due to a factor external to FECA, viz. the increased capital gains tax applying to sales of stock after January 1, 1987.

R 3 0 4 0 7 2 3 8 9 1

Pursuant to 11 C.F.R. § 110.10, candidates are permitted to make unlimited expenditures from personal funds. Personal funds are defined to include "dividends and proceeds from the sale of the candidate's stock or other investments..." 11 C.F.R. § 110.10(b)(2).

A contribution is defined as, inter alia, a loan made for the purpose of influencing a election. 2 U.S.C. § 431(8)(A)(i). Dr. Shey loaned \$14,000 to his daughter between May 23 and July 3, 1986. Ms. Shey has indicated in her response to RAD that she took the loan to help finance her campaign. Therefore, the funds transferred to Ms. Shey cannot be considered to be her personal funds, but instead appear to constitute a contribution.

By contrast, although Dr. Shey gave his daughter stock in 1986, this does not appear to constitute a contribution, because his gift of stock was part of a pattern of gifts which Dr. Shey made to all of his children at that time. In addition, it appears that the timing of this transfer was the result of the amended capital gains tax rate effective January 1, 1987, rather than the product of an effort to influence his daughter's chances of being elected. For these reasons, Dr. Shey's gift of stock to his daughter does not appear to qualify as a contribution and therefore cannot be said to have been made or accepted in violation of Section 441a. Moreover, it appears that the funds

93040723892

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Jane Shey for Congress and	)	
Jane Shey, as treasurer	)	RAD Referral 87L-34 (MUR 2563)
Jane Shey	)	
Dr. D. J. Shey	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 15, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referral 87L-34:

1. Open a Matter Under Review (MUR).
2. Find reason to believe Dr. D.J. Shey violated 2 U.S.C. § 441a(a) (1) (A).
3. Find reason to believe Jane Shey for Congress and Jane Shey, as treasurer, violated 2 U.S.C. §§ 441a(f), 434(b) (2) (H) and 434(b) (3) (E).
4. Send appropriate letters and Factual and Legal Analyses.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12-16-87  
Date

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

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which Ms. Shey used to repay her father the original loan of \$14,000 were her personal funds, as were any other stock sale proceeds which Ms. Shey may have given to her committee.

11 C.F.R. § 110.10(b)(2).

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. Dr. Shey made a loan of \$14,000 to his daughter in the months leading up to the election in which she was running for office. Moreover, no claim has been made that Ms. Shey turned the money over to her committee for a purpose unconnected with the election. Therefore, there is reason to believe Dr. Shey has violated 2 U.S.C. § 441a(a)(1)(A).

Pursuant to 2 U.S.C. § 441a(f), no political committee shall knowingly accept any contributions which violate Section 441a. By accepting the \$14,000 loan, the Committee appears to have violated Section 441a(f).

The facts in this matter raise the question of whether Jane Shey individually violated 2 U.S.C. § 441a(f). Section 441a(f) states: "No candidate ... shall knowingly accept ... any contribution in violation ... of this section."

A candidate may be found in violation of Section 441a(f) if there is sufficient evidence that the candidate was personally involved in the transfer of excessive funds to his or her

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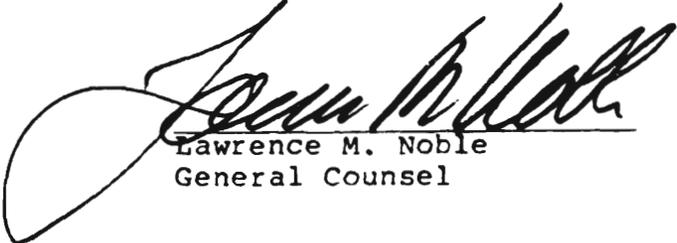
authorized committee. Here, Jane Shey accepted the \$14,000 loan from her father and subsequently transferred the funds to the Committee. This indicates a high degree of involvement by the candidate. For these reasons, a recommendation of reason to believe against Jane Shey appears warranted.

**III. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe Dr. D.J. Shey violated 2 U.S.C. § 441a(a)(1)(A).
3. Find reason to believe Jane Shey for Congress and Jane Shey, as treasurer, violated 2 U.S.C. § 441a(f).
4. Find reason to believe Jane Shey violated 2 U.S.C. § 441a(f).
5. Approve the attached Letters and Factual and Legal Analyses.

Date

12/9/87

  
Lawrence M. Noble  
General Counsel

Attachments

1. Referral Materials
2. Proposed Letters [2]
3. Proposed Factual and Legal Analyses

83040723895



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

MEMORANDUM TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL  
FROM: MARJORIE W. EMMONS / SUSAN GREENLEE SG.  
DATE: DECEMBER 14, 1987  
SUBJECT: OBJECTION TO RAD Ref. 87L-34 -First General  
Counsel's Report  
December 8, 1987

The above-captioned document was circulated to the Commission on Thursday, December 10, 1987 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 Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X _____

This matter will be placed on the Executive Session agenda for December 15, 1987.

Please notify us who will represent your Division before the Commission on this matter.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 18, 1988

Jane Shey, Treasurer  
Jane Shey for Congress  
1007 Taylor Street, N.E.  
Washington, D.C. 20017

RE: MUR 2563  
Jane Shey for Congress  
Jane Shey

Dear Ms. Shey:

On December 15, 1987, the Federal Election Commission found that there is reason to believe Jane Shey for Congress ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(b)(2)(H), § 434(b)(3)(E), and § 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. This notification was not sent to you earlier due to administrative inadvertence. We apologize for the delay.

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 that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and 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 the 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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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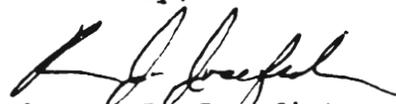
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

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

This matter will remain 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 Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

  
Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 18, 1988

Dr. D.J. Shey  
R.R. 2  
Algona, IA 50511

RE: MUR 2563  
Dr. D.J. Shey

Dear Dr. Shey:

On December 15, 1987, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. This notification was not sent to you earlier due to administrative inadvertence. We apologize for the delay.

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 that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating 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 the 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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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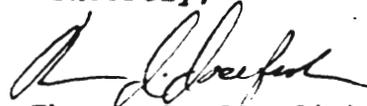
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel is not authorized to give extensions beyond 20 days.

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

This matter will remain 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 Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Thomas J. Josefiak  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

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RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

acc # 6611  
/ 7/25/63

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Feb. 25, 1988

SEARCHED ON LINE INDEXED  
SERIALIZED FILED

Federal Election Commission  
Washington, D. C. 20463

Dear Sir:

I acknowledge receiving your letter on Feb. 22, 1988. This is the first notice I have received concerning any possible election law violations.

I am requesting an additional 30 days beyond the 15 days you gave me. I need this time in order to get my material together.

Thank you for your consideration.

Sincerely,

*D. J. Shey*  
D. J. Shey

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FEDERAL ELECTION COMMISSION  
OFFICE OF THE ASSISTANT ATTORNEY GENERAL

600#4653  
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24 February 1988

Thomas J. Josefiak  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

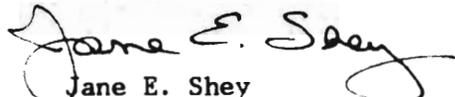
Dear Mr. Josefiak:

I am writing to request an additional thirty days to present the legal and factual material on my case to the Commission.

I have decided to seek legal counsel on this matter. The additional time period will allow me to work with the attorney in preparation of the necessary materials. I am also enclosing my statement of designation of counsel.

Your approval of my request would be deeply appreciated.

Sincerely,

  
Jane E. Shey  
MUR 25638

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
88 MAR - 2 AM 10:57

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 25638

NAME OF COUNSEL: Judith L Corley

ADDRESS: Perkins Coie

1110 Vermont Ave NW

Washington, D.C. 20005

TELEPHONE: 887-2088

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.

24 Feb 1988  
Date

Jane E. Shey  
Signature

RESPONDENT'S NAME: Jane Shey

ADDRESS: 1007 Taylor St NE

Washington, D.C. 20017

HOME PHONE: 529-7884

BUSINESS PHONE: 225-2472

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*rdm*



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1988

Judith Corley, Esquire  
Perkins, Coie  
1110 Vermont Ave., N.W.  
Washington, D. C. 20005

RE: MUR 2563  
Dr. D.J. Shey

Dear Ms. Corley:

This is in response to your client's letter dated February 25, 1988, which we received on February 29, 1988, requesting an extension of 30 days to respond to the Commission's notice in connection with its reason to believe determination. After considering the circumstances presented in Dr. Shey's letter, I have granted the requested extension. Accordingly, your response is due by close of business on April 7, 1988.

If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

cc: Dr. D.J. Shey

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1988

Judith L. Corley, Esquire  
Perkins, Coie  
1110 Vermont Ave., N.W.  
Washington, D.C. 20005

RE: MUR 2563  
Jane Shey

Dear Ms. Corley:

This is in response to your client's letter dated February 24, 1988, which we received on March 2, 1988, requesting an extension of 30 days to respond to the Commission's notice in connection with its reason to believe determination. After considering the circumstances presented in Ms. Shey's letter, I have granted the requested extension. Accordingly, your response is due by close of business on April 7, 1988.

If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

By: Lois G. Lerner  
Associate General Counsel

cc: Jane Shey

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# PERKINS COIE

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION  
1110 VERMONT AVENUE, N.W. • WASHINGTON, D.C. 20005 • (202) 887-9030

88 APR -4 PM 4:24

April 4, 1988

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2563 - Jane Shey for Congress, Jane Shey,  
Dr. D.J. Shey

Attention: Beverly Kramer

Dear Mr. Noble:

Jane Shey, Dr. D.J. Shey and the Jane Shey for Congress Committee ("Respondents") hereby jointly respond through counsel to your letter of February 18, 1988, in which the Commission found reason to believe that Respondents had violated the Federal Election Campaign Act of 1971, as amended ("FECA").

### Background

In early 1986, Jane Shey decided to seek election to the United States House of Representatives from the 6th Congressional District of Iowa. The campaign was, from the beginning, a low-budget one. Because she was not working while campaigning, Shey found it necessary to borrow funds from her father to meet living and campaign expenses. The amount borrowed over the period of about a month and a half came to a total of \$14,000.

While the loans were essentially unsecured, Ms. Shey's father held certain stocks that he planned to distribute to her in the future.<sup>1/</sup> The value of the stocks more than covered

---

<sup>1/</sup> Dr. Shey had purchased stock for all six of his children which he intended to distribute to them in the future. He had made it clear to each child, including Jane Shey, the amount of the stock that would be eventually made available. Because of changes in the tax laws, the stock was actually distributed to all the children at the end of 1986.

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Lawrence M. Noble  
April 4, 1988  
Page 2

the amount of the loans and served, in effect, as collateral which assured repayment. After losing the primary, Ms. Shey returned to her job in Washington, D.C. and, within five months, by the middle of January 1987, repaid her father in full.

Because Ms. Shey borrowed the money from her father personally, and not in the name of her campaign committee, the committee reported the amount as a contribution from the candidate. Following the primary, because the committee showed no debts and obligations and no cash-on-hand, it filed a termination report with the Commission.

At the end of January, after the loans had been completely repaid, Ms. Shey was told, in a conversation with another congressional candidate, that the loans from her father should have been disclosed as loans on her FEC report. Upon verifying this information orally with the Reports Analysis Division of the Commission, Ms. Shey filed an additional FEC report disclosing the loans and the loan repayment.

#### Discussion

There is no question that Dr. Shey loaned his daughter funds in excess of the contribution limitations under the FECA. There are, however, several mitigating factors that the Commission should take into account in its consideration of this matter.

Neither Jane Shey nor her father understood at the time of the loans that such a personal loan would be considered a contribution under the FECA, subject to appropriate contribution limitations. This is shown by the fact that at the time, the loan was not disclosed on Ms. Shey's FEC reports as a loan, but as a contribution of personal funds of the candidate.

Once she discovered (from a source other than the FEC), that the loans should have been disclosed, Ms. Shey amended her FEC reports to reflect the loans and the loan repayment. She did this by her own choice; there was no effort to hide the loans or to misrepresent their character. The Commission at that time knew nothing about them. When she was subsequently questioned by the Reports Analysis Division about the loans, Ms. Shey responded truthfully and completely, on the public record, in spite of the fact these responses were, in essence, admissions against interest.

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Lawrence M. Noble  
April 4, 1988  
Page 3

Further, the loans were made with funds held by Dr. Shey, in effect, in trust for his daughter. Dr. Shey had made it clear to his children that the stock he held was for their benefit and would be distributed to them. This understanding was clear long before Jane Shey decided to run for Congress. Ms. Shey's decision to borrow funds from her father was based in large part on the existence of the stocks which would ensure her ability to repay the loans in the future. That the stocks were distributed to the children in late 1986, after the election, as a result of a change in the tax laws and not as a result of Jane Shey's decision to run for Congress, is further evidence that the stocks were held for the personal benefit of Dr. Shey's children.

It would appear from the discussion above that pre-probable cause conciliation may be appropriate in this case. We, therefore, request a meeting with appropriate members of the General Counsel's staff.

If you have any questions, or need additional information, please do not hesitate to contact the undersigned.

Very truly yours,



Judith L. Corley  
Counsel to Jane Shey for Congress,  
Jane Shey and Dr. D.J. Shey

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RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

# PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
1110 VERMONT AVENUE, N.W. • WASHINGTON, D.C. 20005 • (202) 887-9030

88 APR 21 PM 4:42

April 21, 1988

Beverly Kramer  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2563 - Jane Shey for Congress, Jane Shey,  
Dr. D.J. Shey

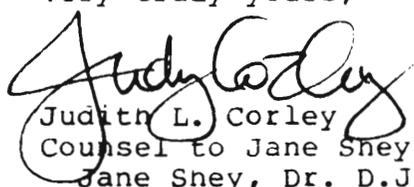
Dear Beverly:

This letter will confirm the request of Respondents in the above-mentioned Matter Under Review to enter into pre-probable cause conciliation.

As we discussed at our meeting today, the Jane Shey for Congress Committee will submit appropriate amendments to its reports to accurately reflect the transactions involved in this case.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,



Judith L. Corley  
Counsel to Jane Shey for Congress,  
Jane Shey, Dr. D.J. Shey

cc: Jane Shey  
Dr. D.J. Shey

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BEFORE THE FEDERAL ELECTION COMMISSION

88 MAY -4 AM 11:09

In the Matter of )  
 )  
Jane Shey for Congress and )  
and Jane Shey, as treasurer )  
Dr. D. J. Shey )

MUR 2563

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On December 15, 1987, the Commission determined that there is reason to believe Jane Shey for Congress and Jane Shey, as treasurer ("the Committee"), violated 2 U.S.C. § 441a(f) by accepting contributions, in the form of loans from the candidate's father, exceeding the limits of 2 U.S.C.

§ 441a(a)(1)(A) for the 1986 primary election by a total of \$13,000. Conversely, the Commission found reason to believe that the candidate's father, Dr. D. J. Shey, violated 2 U.S.C.

§ 441a(a)(1)(A) by making excessive contributions to the Committee. In addition, the Commission found reason to believe that the Committee failed to properly disclose receipt of the loans and pertinent loan information in violation of 2 U.S.C. § 434(b)(2)(H) and § 434(b)(3)(E).

On April 4, 1988, the Office of the General Counsel received the joint response of the Committee and Dr. D. J. Shey to notice of the Commission's findings. 1/ Attachment 1. Respondents

1/ Due to administrative inadvertence, notice of the Commission's finding was not mailed until February 18, 1988. On receipt of the notice, Respondents requested an extension of 30 days to respond, which this Office granted.

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generally admit the violations and request to enter into a conciliation agreement with the Commission prior to a finding of probable cause to believe. 2/ On requesting pre-probable cause conciliation, however, Respondents ask the Commission to consider, in mitigation, the circumstances surrounding the violations.

The response states that Jane Shey was not working while campaigning for election to the U.S. House of Representatives and, therefore, found it necessary to borrow funds from her father to meet living and campaign expenses. The amount borrowed over a period of about a month and a half was \$14,000. The response observes that while the loans were essentially unsecured, the value of certain stocks which Dr. Shey had planned to distribute to Ms. Shey in the future 3/ more than covered the amount of the loans and served, in effect, as collateral which assured repayment. After losing the primary, Ms. Shey resumed her employment and, within five months, by the middle of January 1987, repaid her father in full.

2/ In their letter of April 4, 1988 Respondents requested a meeting with members of this Office to discuss the possibility of conciliation. The meeting was held between the two parties on April 21, 1988. At this meeting, Respondents formally requested to enter into conciliation prior to a finding of probable cause to believe. By letter of April 21, 1988, counsel confirmed this request in writing. Attachment 2.

3/ According to the response, Dr. Shey had purchased stock for all six of his children which he intended to distribute to them in the future. He had made it clear to each child, including Jane Shey, the amount of stock that would be eventually made available. The response states that as a result of the change in tax laws and not as a result of Jane Shey's decision to run for Congress, the stocks were distributed to the children in late 1986.

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The response contends that neither Jane Shey nor her father understood at the time of the loans that such a personal loan would be considered a contribution under the Act, subject to limitations. In evidence of this, the response observes that Ms. Shey initially reported the amount not as a loan, but as a contribution of personal funds of the candidate.

The response claims that there was "no effort to hide the loans or to misrepresent their character." The response explains that as soon as Ms. Shey was told, in a conversation with another congressional candidate, that the amounts received from her father should have been disclosed as loans on her FEC reports, Ms. Shey verified the information with the Reports Analysis Division of the FEC and filed an additional report disclosing the loans and loan repayments.

In view of the foregoing response this Office recommends that the Commission enter into conciliation agreements with the Committee and Dr. D. J. Shey prior to a finding of probable cause to believe.

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTIES

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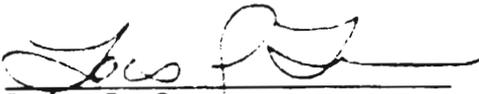
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III. RECOMMENDATIONS

1. Enter into conciliation with Jane Shey for Congress and Jane Shey, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement with Jane Shey for Congress and Jane Shey, as treasurer.
3. Enter into conciliation with Dr. D. J. Shey prior to a finding of probable cause to believe.
4. Approve the proposed conciliation agreement with Dr. D. J. Shey.
5. Approve the attached letter.

Lawrence M. Noble  
General Counsel

Date 5/3/88

By:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. April 4, 1988 response
2. Request for Conciliation
3. Proposed conciliation agreement with Jane Shey for Congress and Jane Shey, as treasurer
4. Proposed conciliation agreement with Dr. D. J. Shey.
5. Proposed letter

Staff Member: Beverly Kramer

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Jane Shey for Congress and  
and Jane Shey, as treasurer  
Dr. D. J. Shey

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MUR 2563

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 6, 1988, the Commission decided by a vote of 5-0 to take the following actions in MUR 2563:

1. Enter into conciliation with Jane Shey for Congress and Jane Shey, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement with Jane Shey for Congress and Jane Shey, as treasurer, as recommended in the General Counsel's report signed May 3, 1988.
3. Enter into conciliation with Dr. D. J. Shey prior to a finding of probable cause to believe.
4. Approve the proposed conciliation agreement with Dr. D. J. Shey, as recommended in the General Counsel's report signed May 3, 1988.

(Continued)

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5. Approve the letter, as recommended in the  
General Counsel's report signed May 3, 1988.

Commissioners Aikens, Elliott, Josefiak, McGarry,  
and Thomas voted affirmatively for the decision;  
Commissioner McDonald did not cast a vote.

Attest:

5-6-88

Date

*Mary H. Done*  
for  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	5-4-88,	11:09
Circulated on 48 hour tally basis:	Wed.,	5-4-88,	4:00
Deadline for vote:	Fri.,	5-6-88,	4:00

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 1988

Judith L. Corley, Esquire  
Perkins Cole  
1110 Vermont Avenue, N.W.  
Washington, D.C. 20008

RE: MUR 2563  
Jane Shey for Congress and  
Jane Shey, as treasurer  
Dr. D. J. Shey

Dear Ms. Corley:

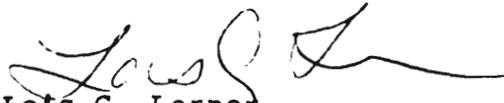
On December 15, 1987, the Federal Election Commission found reason to believe that your clients, Dr. D. J. Shey, Jane Shey for Congress and Jane Shey, as treasurer, violated certain provisions of the Federal Election Campaign Act of 1971, as amended. At your request, on May 6, 1988, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them, along with the civil penalties, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreements

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*plm*

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Jane Shey for Congress and ) MUR 2563  
Jane Shey, as treasurer )  
Dr. D.J. Shey )

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

The Respondents signed the Commission's proposed final agreements without modification and on September 16, 1988, submitted the agreements to this Office with checks for the full amount of Dr. Shey's civil penalty and the initial payment of the Committee's civil penalty. Attachment 1-4. Accordingly, the Office of the General Counsel recommends the acceptance of these agreements and the closing of the file.

**II. RECOMMENDATIONS**

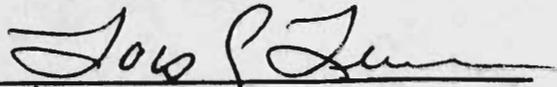
1. Accept the attached conciliation agreement with Jane Shey for Congress and Jane Shey, as treasurer.
2. Accept the attached conciliation agreement with Dr. D.J. Shey.
3. Close the file.

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4. Approve the attached letter.

Lawrence M. Noble  
General Counsel

9-22-88  
Date

By:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Conciliation Agreement with Jane Shey for Congress and Jane Shey, as treasurer
2. Initial civil penalty payment
3. Conciliation Agreement with Dr. D.J. Shey
4. Civil penalty check
5. Proposed letter

Staff Member: Beverly Kramer

33040725918

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Jane Shey for Congress and ) MUR 2563  
Jane Shey, as treasurer )  
Dr. D.J. Shey )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 27, 1988, the Commission decided by a vote of 6-0 to take the following actions in MUR 2563:

1. Accept the conciliation agreement with Jane Shey for Congress and Jane Shey, as treasurer, as recommended in the General Counsel's report signed September 22, 1988.
2. Accept the conciliation agreement with Dr. D.J. Shey, as recommended in the General Counsel's report signed September 22, 1988.
3. Close the file.

(Continued)

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4. Approve the letter, as recommended in the General Counsel's report signed September 22, 1988.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

9/28/88

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Fri.,	9-23-88,	3:58
Circulated on 48 hour tally basis:	Mon.,	9-26-88,	11:00
Deadline for vote:	Wed.,	9-28-88,	11:00

jm

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 30, 1988

Judith L. Corley, Esquire  
Perkins, Coie  
1110 Vermont Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 2563  
Jane Shey for Congress  
and Jane Shey, as  
treasurer  
Dr. D.J. Shey

Dear Ms. Corley:

On September 27, 1988, the Federal Election Commission accepted the signed conciliation agreements submitted on your clients' behalf in settlement of violations of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Dr. D.J. Shey, Jane Shey for Congress and Jane Shey, as treasurer. This matter will become a part of the public record within 30 days. 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 agreements, however, will become a part of the public record.

Enclosed you will find copies of the fully executed conciliation agreements for your files. If you have any questions, please contact Beverly Kramer, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreements

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flm

Received in OGC  
9-14-88  
OGC # 401

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Jane Shey for Congress and ) MUR 2563  
Jane Shey, as treasurer )  
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Jane Shey for Congress and Jane Shey, as treasurer ("Respondents"), violated 2 U.S.C. § 441a(f), § 434(b)(2)(H) and § 434(b)(3)(E).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Respondent, Jane Shey for Congress (the "Committee") is the principal campaign committee of Jane Shey, a candidate for election to the United States House of Representatives from the 6th Congressional District of Iowa in 1986.

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FEDERAL ELECTION COMMISSION  
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2. Respondent, Jane Shey, is treasurer of the Committee.

3. Dr. D. J. Shey is the father of Jane Shey.

4. Between May 23 and July 3, 1986, Dr. D. J. Shey made four loans totalling \$14,000 to his daughter, Jane Shey, to help meet campaign expenses relative to the 1986 Iowa primary election. The proceeds of the loans were forwarded to the Committee for its use.

5. By January 11, 1987, Jane Shey repaid Dr. D. J. Shey the full amount of the loans.

6. Section 441a(a)(1)(A) of Title 2, United States Code, prohibits individual contributions of more than \$1,000 per election to any candidate and authorized committee of the candidate. Section 441a(f) of Title 2, United States Code, makes it unlawful for any candidate or authorized committee of a candidate to accept contributions that exceed the donor's limit. This limitation applies to any type of contribution, including loans. Pursuant to 2 U.S.C. § 431(8)(A)(i), a loan made for the purpose of influencing any election for federal office is a contribution.

7. The transactions described above in paragraph 4 constituted contributions totalling \$14,000 from Dr. D. J. Shey to the candidate and her authorized committee in connection with the 1986 primary election.

8. Section 434(b)(2)(H) of Title 2, United States Code, requires authorized committees to disclose, for the

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reporting period and the calendar year, the total amount of all receipts in the form of loans.

9. Section 434(b)(3)(E) of Title 2, United States Code, requires authorized committees to disclose the identification of each person who makes a loan to the reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and date and amount of value of such loan.

10. In their Year End Report for 1986, Respondents listed the transactions described above in paragraph 4 under the receipt category of candidate contributions, rather than loans, and failed to disclose the identification of the person making the loans.

11. Respondents subsequently filed a report to accurately reflect the transactions described above in paragraphs 4 and 5.

V. Respondents accepted contributions exceeding the contribution limits of 2 U.S.C. § 441a(a)(1)(A) in violation of 2 U.S.C. § 441a(f); failed to disclose the receipt of loans, in violation of 2 U.S.C. § 434(b)(2)(H); and failed to disclose the identification of the person making the loans, in violation of 2 U.S.C. § 434(b)(3)(E).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Dollars (\$1,000), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

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1. One initial payment of \$100 due on October 1, 1988;

2. Thereafter, beginning on November 1, 1988, 18 consecutive monthly installment payments of \$50 each;

3. Each such installment shall be paid on the first day of the month in which it becomes due;

4. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

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.

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IX. 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:

General Counsel  
Lawrence M. Noble

BY:   
Lois G. Lerner  
Associate General Counsel

September 30, 1988  
Date

FOR THE RESPONDENTS:

  
Judith L. Corley  
Attorney

14 September 1988  
Date

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Received in OGC  
9-14-88 5:55  
OGC# 400

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Dr. D. J. Shey ) MUR 2563  
 )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Dr. D. J. Shey ("Respondent") violated 2 U.S.C. § 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding and this agreement has the effect of an agreement entered into pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Jane Shey for Congress (the "Committee") is the principal campaign committee of Jane Shey, a candidate for election to the United States House of Representatives from the 6th Congressional District of Iowa in 1986.

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FEDERAL ELECTION COMMISSION  
RECEIVED

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2. Respondent, Dr. D. J. Shey, is the father of Jane Shey.

3. Between May 23 and July 3, 1986, Respondent made four loans totalling \$14,000 to his daughter, Jane Shey, to help meet campaign expenses relative to the 1986 Iowa primary election. The proceeds of the loans were forwarded to the Committee for its use.

4. By January 11, 1987, Jane Shey repaid Respondent the full amount of the loans.

5. Section 441a(a)(1)(A) of Title 2, United States Code, prohibits individual contributions of more than \$1,000 per election to any candidate and authorized committee of the candidate. Pursuant to 2 U.S.C. § 431(8)(A)(i), a loan made for the purpose of influencing any election for federal office is a contribution.

V. Respondent made contributions, in the form of a loans, exceeding the limits of 2 U.S.C. § 441a(a)(1)(A) by \$13,000, in violation of 2 U.S.C. § 441a(a)(1)(A).

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:

General Counsel  
Lawrence M. Noble

BY:   
Lois G. Lerner  
Associate General Counsel

9/30/88  
Date

FOR THE RESPONDENT:

  
Judith L. Corley  
Attorney

14 September 1988  
Date

93090723929



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2563

DATE FILMED 11-18-88 CAMERA NO. 3

CAMERAMAN PC.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2563

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OCC# 854

24 Oct 1988

To Whom It May Concern:  
I am enclosing my  
monthly payment for my  
FEC fine

Thank you

Jane E. Sh...

88 NOV - 2 PM 3:45

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88 OCT 31 AM 9:16

RECEIVED  
FEDERAL ELECTION COMMISSION  
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**CLOSED**

Celebrating the Congressional Bicentennial

1029

JANE E. SHEY  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

28 Oct 1938 50-947/219

PAY TO THE ORDER OF Federal Election Commission \$ 50.00

Fifty DOLLARS

 CONGRESSIONAL FEDERAL CREDIT UNION U.S. HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MONROE BRANCH MONROE, LA

MEMO: mur # 2563 Jane E. Shey

⑆021909478⑆ 719187715615⑈ 1029

06C#854

0725259

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 1029 [ A COPY OF WHICH IS ATTACHED ] RELATING TO

MJR 2563 AND NAME Jane Shey for Congress

(Kramer) WAS RECEIVED ON 11/2/88. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / ✓ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 11/3/88

88 NOV -2 PM 3:43

FEDERAL BUREAU OF INVESTIGATION



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

R02-16-89

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

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2563

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# Memo

From Jane Shey

RECEIVED  
FEDERAL RESERVE COMMISSION  
Rm. 4007

OGC 1515

89 JAN -5 AM 9:30  
# 900024

To Walm & May Concern.  
I am enclosing my payment  
for January.

Jane E. Shey

MUR # 2563

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**Corn  
Refiners  
Association,  
Inc.**

1001 Connecticut Ave.  
Northwest

Washington, D. C.  
20036

(202) 331-1634

89 JAN -5 PM 2:41

RECEIVED  
FEDERAL RESERVE COMMISSION

1/5/89

OGC 1515

# CLOSED

Celebrating the Congressional Bicentennial

JANE E. SHEY  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

29 Dec 1988

89 JAN -5 PM 2:41  
839  
50-947/219

PAY TO THE ORDER OF FEC

\$ 50.00

Fifty <sup>00</sup>/<sub>100</sub>

DOLLARS



CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20516

PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MONROE BRANCH MONROE, LA

MEMO. MUR # 2563

Jane E Shey

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OGC 1515

89 JAN -6 PM 2:41

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 839 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2563 AND NAME Jane Shey for Congress

(Bernstein)  
WAS RECEIVED ON 1/6/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT { 95F3875.16 }

/ ✓ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }

/ / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 1/9/89

- 4/4/89



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2563

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DEC 1984

# Memo

From Jane Shey

F E C

I apologize for the delay in  
making the payment. I thought  
I had mailed it until I found  
it on my desk

Jane Shey

PAID 21 10 8:05



**Corn  
Refiners  
Association,  
Inc.**

1001 Connecticut Ave  
Northwest  
Washington D C  
20036  
(202) 331-1634

# CLOSED

Celebrating the Congressional Bicentennial

883

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

3 Feb 1989 50-947/219

PAY TO THE ORDER OF Federal Election Commission \$ 50.00

3 Feb 1989 DOLLARS

 CONGRESSIONAL FEDERAL CREDIT UNION U.S. HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20518  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MEMPHIS BRANCH MEMPHIS, TN

MEMO MUR 2563 Jane E. Shey

⑆021909478⑆ 719187715615⑈ 0883

06C1884

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MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER

FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

FEB 21 11 09:09

CHECK NO. 883 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey,  
(Bernstein) as treasurer

WAS RECEIVED ON 2/21/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / ✓ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 2/21/89

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# Memo

From Jane Shey

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FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 MAR -6 AM 11: 08

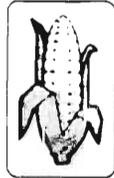
FSC

Enclosed is my \$ March  
payment

Jane Shey

JE

FSC



**Corn  
Refiners  
Association,  
Inc.**

1001 Connecticut Ave  
Northwest  
Washington D C  
20036  
(202) 331-1634

**CLOSED**

Celebrating the Congressional Bicentennial

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

907

1 March 1989

50-947/219

PAY TO THE ORDER OF F. E. C.

\$ 50.00

Fifty <sup>00</sup>/<sub>100</sub>

DOLLARS



CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20515  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MEMPHIS BRANCH MEMPHIS, TN

MEMO MUR # 2563

Jane E. Shey

⑆021909478⑆ 71918??15615⑆ 0907

1074213

DGC 3091

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 907 [ A COPY OF WHICH IS ATTACHED ] RELATING TO

MUR 2563 AND NAME Jane Shey For Congress and Jane Shey,  
(Bernstein) as treasurer

WAS RECEIVED ON 3/18/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 3/10/89

W 26 April 1949



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE FILE IN

MUR 2563

89040745295

ACC 2409

# Memo

From Jane Shey

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 APR -7 AM 11:30

FEC -

Enclosed is my monthly payment.

Jane Shey

MUR 2563

89 APR 10 PM 12:17



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave.  
Northwest

Washington, D.C.  
20036

(202) 331-1634  
FAX (202) 331-2054

89040745296

# CLOSED

Celebrating the Congressional Bicentennial

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

607

31 March 1989 50-947/219

PAY TO THE ORDER OF F.F.C. \$ 50.00  
Fifty 00 100 DOLLARS



CONGRESSIONAL FEDERAL CREDIT UNION U.S. HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MONROE BRANCH MONROE, LA

MEMO Mur # 2563

Jane E. Shey

⑆021909478⑆ 719187715615⑈ 0607

0602409

40745297

### MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

CHECK NO. 607 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey  
(Bernstein) as treasurer  
WAS RECEIVED ON 4/10/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- /  / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 4/10/89

APR 10 11:12:17



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2563

89040752170

# Memo

From Robert C. Liebenow

FEC -

Enclosed is my may  
payment of \$50.00.

MUR 2563

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

89 MAY 16 AM 9:40

9  
0  
4  
0  
7  
5  
2  
1  
7  
1



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave.  
Northwest

Washington, D.C.  
20036

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FAX (202) 331-2054

# CLOSED

Celebrating the Congressional Bicentennial

JANE E. SHEY  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

645

29 April 1989

90-947/219

PAY TO THE ORDER OF FSC \$ 50.00  
Fifty 00/100 DOLLARS



CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20540

MUR 2563

*Jane E. Shey*

⑆021909478⑆ 719187715615⑈ 0645

GCC 2795

FED

APR 29 1989

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 645 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey, (Bernstein) as treasurer.

WAS RECEIVED ON 5/19/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / ✓ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 5/19/89

40752172

# Memo

From Jane Shey

Enclosed is my June payment

Jane E. Shey

RECEIVED  
FEDERAL ELECTION COMMISSION  
ADMINISTRATIVE DIVISION

09 JUN 14 AM 8:38

09 JUN 16 PM 4:57

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

904075217



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave.  
Northwest

Washington, D.C.  
20036

(202) 331-1634  
FAX (202) 331-2054

3096

# CLOSED

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 688 [A COPY OF WHICH IS ATTACHED] RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey  
(Barnstein) as treasurer

WAS RECEIVED ON \_\_\_\_\_ . PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 6/19/89

8 3 0 4 0 7 5 2 7 7 4

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUN 16 1989

Celebrating the Congressional Bicentennial

688

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

June 1989 50-947/219

PAY TO THE ORDER OF FEC \$ 50.00

50 / 100 DOLLARS

 **CONGRESSIONAL FEDERAL CREDIT UNION**  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20540  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A., MONROE BRANCH, MONROE, LA

MEMO MUR 2563 Jane E. Shey

⑆021909478⑆ 719187715615⑈ 0688

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 JUN 16 1989



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2563

3 7 0 4 0 7 6 4 0 1 2

0605

# Memo

From Jane Shey

ENC.

Enclosed is my payment of

July

89 JUL 19 PM 3:52

RECEIVED  
FEDERAL RESERVE BANK  
OFFICE

Jane Shey  
MUR 2563

89 JUL 17 AM 10:13

RECEIVED  
FEDERAL RESERVE BANK  
OFFICE SERVICES BRANCH

3104920406



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave  
Northwest  
Washington, D.C.  
20036  
(202) 331-1634  
FAX (202) 331-2054

# CLOSED

Celebrating the Congressional Bicentennial

**JANE E. SHEY** 1066  
 1007 TAYLOR ST., N.E.  
 WASHINGTON, D.C. 20017 29 June 1989 50-947/219

PAY TO THE ORDER OF F.E.C. \$ 50.00  
50  
00  
100 DOLLARS

 CONGRESSIONAL FEDERAL CREDIT UNION U.S. HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515  
 PAYABLE THROUGH: CHASE MANHATTAN BANK, N.A. MONROIE BRANCH, MONROIE, NY

MEMO MUR 2563 Jane E. Shey  
 @021909478@ 71918??15615@ 1066

06C3468

10664

### MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CHERYL T WILLIAMS  
 FROM: CHERYL T WILLIAMS FROM: DEBRA A. TRIMIEW

CHECK NO. 1066 [A COPY OF WHICH IS ATTACHED] RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey  
(Beniston) as treasurer

WAS RECEIVED ON 7/19/89 PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95FE875.16 }
- /  / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 7/20/89

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF THE CLERK  
 89 JUL 19 PM 3:51

# Memo

From Jane Shey

FEDERAL RESERVE BANK  
WASHINGTON, D.C.

89 AUG 16 AM 11:09

*For  
information on my request payment*

*with \$1000*

*Thank you*

*Jane Shey*



**Corn  
Refiners  
Association,  
Inc.**

1001 Connecticut Ave.  
Northwest  
Washington, D. C.  
20036  
(202) 331-1634

00040764015

# CLOSED

000  
3798

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CHIEF CLERK  
89 AUG 18 PM 1:11

Celebrating the Congressional Bicentennial

1101

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

28 July 1989 50-947/219

PAY TO THE ORDER OF FEC \$ 5000

Fifty 00/100 DOLLARS

 CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20515  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MEMPHIS BRANCH MEMPHIS, TN

MEMO: MUR 2563 Jane E. Shey

⑆021909478⑆ ?1918??15615⑆ 1101

64010  
7  
37740

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS FROM: DEBRA A. TRIMIEW

CHECK NO. 1101 [A COPY OF WHICH IS ATTACHED] RELATING TO

MUR 2563 AND NAME Jane Shey For Congress and Jane Shey,  
(Bernstein) as treasurer

WAS RECEIVED ON 8/18/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- /  / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 8/21/89

262 3599

# Memo

From Jane Shey

89 AUG 29 AM 10:34

F2C

Increased my payment for  
September my mark # is 2565

Thank you  
Jane E Shey

**CLOSED**



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave.  
Northwest  
Washington, D.C.  
20036  
(202) 331-1634  
FAX (202) 331-2054

**FEDERAL RECEIVED  
OFFICE OF THE  
COMMISSIONER  
89 AUG 30 AM 10:09**

20040764017

# CLOSED

Celebrating the Congressional Bicentennial

1141

**JANE E. SHEY**  
1007 TAYLOR ST., N.E.  
WASHINGTON, D.C. 20017

26 Aug 1989 50-947/219

PAY TO THE ORDER OF Federal Election Commission \$ 50.00

50 DOLLARS

 CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20518  
PAYABLE THROUGH CHASE MANHATTAN BANK, N.A. MONROE BRANCH MONROE, LA

MEMO. sub 2563 Jane E. Shey

⑆021909478⑆ 719187715615⑈ 1141

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: DEBRA A. TRIMIEW

CHECK NO. 1141 [ A COPY OF WHICH IS ATTACHED ] RELATING TO

MUR 2563 AND NAME Jane Shey for Congress and Jane Shey,  
(Barnstain) as treasurer

WAS RECEIVED ON 8/30/89. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

- / / BUDGET CLEARING ACCOUNT [ 95F3875.16 ]
- / ✓ / CIVIL PENALTIES ACCOUNT [ 95-1099.160 ]
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew

DATE 8/31/89

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK  
89 AUG 30 AM 3:04



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC RECORD IN (CLOSED) MUR 2563

89040711711

CGC 42/2

# Memo

From Jane Shey

Enclosed is my October payment

MUR # 2563

Jane Shey

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

09 OCT -5 AM 11:04

90407/1712



**Corn  
Refiners  
Association,  
Inc.**

1100 Connecticut Ave.  
Northwest

Washington, D.C.  
20036

(202) 331-1634  
FAX (202) 331-2054





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO  
THE PUBLIC RECORD IN CLOSED MUR 2563.

90040705770

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

0665312  
**CLOSED**

90 MAR 16 AM 10:40<sup>15</sup> Merced 1990

F. E. C.

I am sorry for the delay in sending my March payment. I have had an extremely busy month and forgot to mail it.

According to my records, I will make one more payment on April 1 and then the penalty will be paid off. If your records indicate otherwise, please contact me immediately so we can get this misunderstanding resolved.

If I do not hear from you, I will consider the matter closed.

Sincerely,  
Jane E. Skerz

MUR # 2563

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

90 MAR 16 PH 3:49

00040703777

Celebrating the Congressional Bicentennial

JANE E. SHEY  
7 MIZZEN CT.  
ANNAPOLIS, MD 21403

1219

27 Feb - 1990

50-947  
219

PAY TO THE ORDER OF F & C \$ 50.00

50 DOLLARS



CONGRESSIONAL FEDERAL CREDIT UNION  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20515

MEMO MUR # 2563

Jane E. Shey

⑆021909478⑆ 719187715615⑆ 1219

0080703778

MEMORANDUM

TO: CHERYL FLEMING WILLIAMS

TO: CHERYL T WILLIAMS

FROM: CHERYL T WILLIAMS

FROM: CHERYL FLEMING WILLIAMS

CHECK NO. 1219 [A COPY OF WHICH IS ATTACHED] RELATING TO

MUR 2563 AND NAME Jane Shey

WAS RECEIVED ON 3/16/90. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

- BUDGET CLEARING ACCOUNT { 95F3875.16 }
- CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- OTHER \_\_\_\_\_

SIGNATURE M. D. Bussone

DATE 3/16/90