FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3158

DATE FILMED 11/8/91 CAMERA NO. 2

CAMERAMAN AS

9 1 0 4 0 3 7 3 7 7 7

JOAN KELLY HORN
CONGRESS

OGC 8491

90 NOV -1 AM 11:15

October 25, 1990

MUR 3158

Lawrence Noble, General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Mr. Noble:

I am writing to file a complaint against Congressman Jack Buechner from Missouri's Second District because I believe that he has violated federal election laws.

90 NOV -1 PM 1:00
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Enclosed are copies of two newspaper articles that appeared in the St. Louis Post-Dispatch on Saturday, October 13, and Thursday, October 18, 1990, respectively. The articles outline discrepancy in the reporting of a $10,000 loan and $576.41 contributions to Congressman Buechner's election campaigns in 1984 and 1986. The candidate and his treasurer bear the responsibility for these reports.

The $10,000 campaign loan in question was guaranteed by 10 employees of The White Co. As reported in the article, one of the listed employees, Mindy Komen, says she signed no papers guaranteeing such a loan. A Buechner campaign document also listed each of the 10 employees as contributing $576.41 or $576.42 on January 15, 1986. But Mindy Komen says she did not make the reported campaign contribution. Further, Komen claims she never even knew about the campaign loan or contribution. Federal law prohibits the knowing acceptance of a contribution made by one person in the name of another. Sec. 110.4(b)(1), 11 CFR Ch. 1 (1-1-88 Edition).

Federal law bars corporations from making direct campaign contributions and makes it illegal for a corporation to reimburse employees for campaign contributions. Sec. 114.5(b)(1). In the Post-Dispatch newspaper article dated 10/18/90, T.M. Mohan, vice president of The White Co., said the workers were complying with a request of the company's owner, Tom White, now deceased. Mr. Mohan is also quoted as saying the company "probably made it up to the employees later," by raises. Such an arrangement would be a violation of federal law under Sec. 114.5.

Two other White Co. employees, Patricia McBride and Judith [Moran] Harris, have said that they did not know about being a guarantor of the loan or that they did not make a contribution to Buechner's campaign or know that a contribution was made in their name.

9104037378

1750 S. BRENTWOOD BLVD., SUITE 256 • ST. LOUIS, MO 63144 • (314) 968-3111

PAID FOR BY JOAN KELLY HORN FOR CONGRESS PETER MCMILLAN, TREASURER

Here are the names of the White Co. employees listed as loan guarantors/contributors and where they may be located now, to the best of my knowledge:

Eileen Buhlinger - retired from The White Co.
1192 Cantina Drive
St. Louis, Missouri 63141
(314) 434-6155

Robert J. Wittmann - apparently studying at Kenrick-Cardinal Glennon Seminary
5200 Glennon Drive
St. Louis, Missouri 63119
(314) 644-0266

Patricia McBride - no longer at The White Co.
1960 Caposele Lane
Hazelwood, Missouri 63042
(314) 895-1876

Joan Campbell, Comptroller
The White Co.
940 West Port Plaza
St. Louis, Missouri 63146
(314) 878-0400

T.M. Mohan, Vice President
The White Co.
940 West Port Plaza
St. Louis, Missouri 63146
(314) 878-0400

Evelyn N. Mosley
The White Co.
940 West Port Plaza
St. Louis, Missouri 63146
(314) 878-0400

Judith [Moran] Harris
Designs for Tomorrow
2401 Schuetz Road
Maryland Heights, Missouri 63043
(314) 432-5566

Joyce A. Heston
The White Co.
940 West Port Plaza
St. Louis, Missouri 63146
(314) 878-0400

9104037379

Beverly J. Stewart
112 Carriage House Lane
St. Charles, Missouri 63303
(314) 926-0195

Mindy Komen
Paragon Group Inc.
12400 Olive Boulevard
St. Louis, Missouri 63141
(314) 878-1660

Additional pertinent documentation regarding this case has been enclosed. Please consider this a formal complaint against Congressman Buechner. Let me know as soon as possible what the next step should be or if you need further information.

Sincerely,

Joan Kelly Horn

Joan Kelly Horn
1750 South Brentwood Boulevard, Suite 256
St. Louis, Missouri 63144

Subscribed and sworn to before me this 25th day of October, 1990.

Liz B. Seymour
Notary Public

My Commission Expires:

LIZ B. SEYMOUR
NOTARY PUBLIC—STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXPIRES JAN. 19, 1991

9104037380

ST. LOUIS POST-DISPATCH

ST. LOUIS/SATURDAY

SATURDAY, OCTOBER 13, 1990

Woman Denies Guaranteeing $10,000 Loan To Buechner Effort

By Jo Mannies
Of the Post-Dispatch Staff

Mindy Komen denies that she ever guaranteed a $10,000 campaign loan for U.S. Rep. Jack Buechner, R-Kirkwood, or contributed $576.42 to his campaign.

But Buechner's federal campaign reports say that Komen did.

The discrepancy was discovered by the staff of Joan Kelly Horn, the Democratic candidate running against Buechner. Horn's campaign is raising questions about the accuracy of Buechner's reports filed with the Federal Election Commission.

"It certainly looks as if some not-straight-up-front dealing was going on," Judi Roman, Horn's press secretary, said Thursday.

Buechner says he doesn't personally fill out the reports, denies that any intentional improprieties occurred and adds, "If Joan Horn has a complaint, she can file it with the FEC."

In particular, Horn is questioning an arrangement in 1984 that allowed a $10,000 loan to Buechner's campaign to be guaranteed by 10 employees of the White Co., a real estate firm in West Port Plaza. Komen was among the 10 employees listed in federal documents as guaranteeing the loan, which was obtained through Boatmen's Bank.

By 1986, the loan was paid off. Komen and the other nine were listed in a Buechner campaign document as each contributing $576.41 or $576.42 on Jan. 15, 1986. The implication is that the money was used to pay off part of the loan.

Federal law allows individuals, but not corporations, to make contributions of up to $1,000 to an individual candidate for each election.

Roman said that a campaign worker had recognized Komen's name, called her and discovered that Komen knew nothing about the arrangement.

Komen told the Post-Dispatch: "I was completely shocked. At that time of my life, I didn't make any political contributions. And I didn't sign any papers guaranteeing a loan."

Buechner said the loan had been arranged by Thomas White, the head of the White Co., who since has died. Buechner said he was in the midst of a hot race against then U.S. Rep. Robert A. Young, D-Maryland Heights. Buechner lost that 1984 bid but then ousted Young in 1986.

91040873781

ST. LOUIS POST-DISPATCH

CAMPAIGN '90

THURSDAY, OCTOBER 18, 1990

Horn Asks Probe Of Buechner

Charges Are Focused On Campaign Loan

Horn

Buechner

Slavin

By Jo Mannies
Of the Post-Dispatch Staff

Democratic congressional candidate Joan Kelly Horn has asked the Federal Election Commission to investigate the reporting by U.S. Rep. Jack Buechner, R-Kirkwood, of a $10,000 campaign loan in 1984 and related campaign contributions.

The commission request is part of a series of attacks made this week by Horn and her Democratic supporters against Buechner, who Horn is seeking to unseat on Nov. 6. Buechner is leading in the polls.

In a letter sent to the Federal Election Commission, Horn accuses Buechner of "political arrogance."

She enclosed documents which she says support her contention of improprieties in the handling of the loan and related contributions by Buechner's campaign.

A spokesman for Buechner declined comment Wednesday. Buechner said last week that he did not personally handle the reporting of the loan or contributions. He denied any intentional improprieties by his campaign staff.

A spokesman for the Federal Election Commission said he could not comment on Horn's request.

The spokesman, Fred Eiland, said that a formal complaint must meet strict specifications and be notarized.

If Horn's letter does not comply, she will be asked to submit it in proper form before any commission action can be taken, Eiland said.

The $10,000 campaign loan in question was guaranteed by 10 employees of The White Co., a real estate firm based in West Port Plaza. By 1986, the loan was paid off, with more than half coming from contributions of $576.41 or $576.42 each from the 10 employees.

But one of the 10, Mindy Komen, told Horn's campaign and the Post-Dispatch that she had signed no papers guaranteeing the loan and made no campaign contributions to Buechner.

Individuals can contribute up to $1,000 to a candidate; federal law bars corporations from making direct campaign contributions.

In interviews last week, two top executives with The White Co. — who also were among the 10 — recalled the loan and contributions.

Company Vice President T. M. Mohan said the workers were complying with a request of company owner Thomas White, now dead.

White was a backer of Buechner in his unsuccessful bid in 1984 to unseat then-incumbent U.S. Rep. Robert A. Young, D-Maryland Heights.

Buechner ousted Young in a 1986 rematch.

The company "probably made it up to the employees later" by raises, Mohan said.

FEC spokesman Eiland said it is illegal for a corporation to reimburse employees for campaign contributions.

The other attacks this week against Buechner by Horn include:

- Criticism of Buechner's vote Tuesday against a 5-year deficit reduction plan that includes $149 billion in higher taxes, including an increase in the tax rate of wealthy taxpayers to 33 percent from 28 percent.

"The House has proven that it is possible to trim the deficit without beating up on working Americans and without fattening the wallets of the wealthy," Horn said.

A spokesman for Buechner disputed Horn's conclusion. He said Buechner opposed the proposal, in part, because it eliminated tax indexing — which annually increasing deductions and tax rates to reflect inflation.

A middle-class family of four with an income of $40,000 would see an increase of $500-$600 in their federal taxes, the spokesman for Buechner said.

- A request to the Missouri Bar's disciplinary committee by Alberta Slavin of Clayton, a former Democratic candidate for lieutenant governor. Slavin asked that the panel investigate the payment this year by Buechner, a lawyer, of some Missouri income taxes for the years 1985 through 1987.

Buechner made the payments in March. In recent interviews, he has said the payments were not the result of an audit or a notice from the government but from his own re-evaluation of liabilities.

The amounts were "primarily interest and penalties," he said. He said he now is up to date on all tax payments.

Mark Schlinkmann of the Post-Dispatch staff contributed information for this story.

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From Buechner FEC report
Covering 7-1-85 — 12-31-85

Page 2, FEC FORM 3

Name of Committee (in Full): Jack Buechner for Congress

Report Covering the Period: From 7/1/85 To 12/31/85

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unexpended $ ____)	$4750.00	$207,988.26	11 (a)
(b) Political Party Committees	0	$ 28,733.53	11 (b)
(c) Other Political Committees	0	$ 72,128.82	11 (c)
(d) The Candidate	0	$ 202.50	11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b), 11(c) and 11(d))	$4750.00	$305,053.11	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	0	$ 3,500.00	13 (a)
(b) All Other Loans	0	$ 10,000.00	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))	0	$ 13,500.00	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0		14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	0	$ 90.35	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	$4175.00	$325,598.41	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	$6268.56	$310,870.29	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	$ 0	$ 3,500.00	19 (a)
(b) Of All Other Loans	$2235.89	$ 4,235.89	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	$2235.89	$ 7,535.89	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	0	$ 1,250.00	20 (a)
(b) Political Party Committees	0	0	20 (b)
(c) Other Political Committees	0	$ 1,000.00	20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	0	$ 2,250.00	20 (d)
21. OTHER DISBURSEMENTS	0	$ 6,827.91	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	$8504.45	$327,484.09	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$	4521.98	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$	4750.00	24
25. SUBTOTAL (Add Line 23 and Line 24)	$	9321.98	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$	8504.45	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$	817.53	27

9 4 0 1 2 9 5 2 5 3 5

SCHEDULE B

Revised 2/82

LOANS

Page 1 of 1 for Line Number 21b
Use separate schedule for each numbered line

Name of Committee (in Full): Jack Buechner for Congress — C00182873 — 110922

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Boatmen's Bank of St. Louis County 222 South Central Clayton, Mo. 63105	$10,000.00	$ 4,235.89	$ 5,764.11

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 10/30/84 Date Due 12/14/84 Interest Rate 13 % (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Amount Guaranteed Outstanding
1. Buhlinger, Eileen A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Receptionist	$ 800.00
2. Wittmann, Robert J. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Asst to Director	$ 800.00
3. McBride, Patricia A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Executive Secretary	$ 800.00

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Same as above			

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred ____ Date Due ____ Interest Rate ____ % (Mo/yr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Amount Guaranteed Outstanding
4. Campbell, Joan 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant	$ 800.00
5. Mohan, T. M. 940 West Port Plaza ST. Louis, Mo. 63146	The White Co. Vice-President	$ 800.00
6. Mosley, Evelyn M. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant	$ 800.00

SUBTOTALS This Period This Page (optional) . . . . . .

TOTALS This Period (last page in this line only) . . . . . .

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE B
(Revised 2/88)

LOANS
(Other)

Page ___ of ___ for Line Number ___ on the summary page for each numbered line

Name of Committee (In Full): Jack Buechner for Congress — C00192873 — 110922

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Boatmen's Bank (Con't from page 1)			

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ (Mkpt) ☐ Secured

List All Endorsers or Guarantors (If any) to Item A

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding
Moran,, Judith K. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Secretary $ 800.00
Heston, Joyce A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Claim Coordinator $ 800.00
Stewart, Beverly J. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant $ 800.00

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Same as above			

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ (Mkpt) ☐ Secured

List All Endorsers or Guarantors (If any) to Item B

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding
Komen, Mindy 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Public Relations $ 800.00
2. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (subtotal) . . . . . _____

TOTALS This Period (last page in this line only) . . . . . _____

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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From Buechner's FEC report
Covering 10-18-84 – 11-26-84

ITEMIZED RECEIPTS
(Other Loans)

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

Name of Committee (In Full): Jack Buechner for Congress — C00182873 — 110922

A. Full Name, Mailing Address and ZIP Code Boatmen's Bank of St. Louis County 222 South Central Clayton, Mo. 63105	Name of Employer Occupation	Date (month, day, year) 10/30/84	Amount of Each Receipt this Period $10,000.00 $30,000.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify)	Aggregate Year-to-Date – $ 10,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date – $		
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date – $		
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date – $		
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date – $		
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date – $		
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date – $		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			10,000.00

840112280017 3

Jack Buechner

REPUBLICAN FOR U.S. CONGRESS

C00182873
110922

Clerk of the House
Office of Records and Registration
1036 Longworth House Office Building
Washington,D. C. 20515

110922

Nov 14 1984

RECEIVED
OFFICE OF RECORDS & REGISTRATION
1984 NOV -5 PM 3:58
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

To whom it may concern:

The Jack Buechner for Congress Committee, 11040 Manchester Rd., Kirkwood, Mo., 63122 recieved a loan in the form of a Cashier's Check from the Boatmen's Bank of St. Louis County, 222 South Central, Clayton, Mo. 63105 on Oct. 30, 1984 in the amount of $10,000.00.

This loan is guaranteed by the following, each for $1,000.00. The address for each of the following is c/o The White Company, 940 West Port Plaza, St. Louis, Mo. 63146. They are all employed by The White Co.

Eileen A. Buhlinger
Robert J. Wittmann
Patricia A. McBride
Joan Campbell
T. M. Mohan
Evelyn M. Mosley
Judith K. Moran
Joyce A. Heston
Beverly J. Stewart
Mindy Komen

Sincerely,

Randy Mulcahy
Campaign Manager

11040 Manchester Rd. • Kirkwood, Mo. 63122
314/822-7176

Paid for by Jack Buechner for Congress Committee

8401277120 9

Jack Buechner for Congress C00182873 110922

	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Sheraton Plaza Hotel 900 West Port Plaza St. Louis, MO 63141	Food and beverage	12/6/84	$836.07
B. Full Name, Mailing Address and ZIP Code Buechner, John W. #14 West Ponca Trail Kirkwood, MO 63122	Loan repayment	12/6/84	$1500.00
C. Full Name, Mailing Address and ZIP Code Boatman's Bank of West County 222 S. Central Avenue Clayton, MO 63105	Loan payment	12/11/84	$2000.00
D. Full Name, Mailing Address and ZIP Code			
E. Full Name, Mailing Address and ZIP Code			
F. Full Name, Mailing Address and ZIP Code			
G. Full Name, Mailing Address and ZIP Code			
H. Full Name, Mailing Address and ZIP Code			
I. Full Name, Mailing Address and ZIP Code			
SUBTOTAL of Disbursements This Page (optional)			$4336.07
TOTAL This Period (last page this line number only)			$6

85012044651

Joan Dutchmer for Congress C00182075 110722

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Boatmen's Bank of St. Louis County 222 South Central Clayton, Mo. 63105	$10,000.00	2,000.00	8,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 10/30/84 Date Due 12/14/84 Interest Rate 13 % (apr) ☐ Unsecured ☐ Secured (Describe)

List All Endorsers or Guarantors (if any) to Item A

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Amount Guaranteed Outstanding
1. Buhlinger, Eileen A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Receptionist	$ 800.00
2. Wittmann, Robert J. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Asst to Director	$ 800.00
3. McBride, Patricia A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Executive Secretary	$ 800.00

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Same as above			

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred ____ Date Due ____ Interest Rate ____ % (apr) ☐ Unsecured ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Amount Guaranteed Outstanding
4. Campbell, Joan 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant	$ 800.00
5. Mohan, T. M. 940 West Port Plaza ST. Louis, Mo. 63146	The White Co. Vice-President	$ 800.00
6. Mosley, Evelyn M. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant	$ 800.00

SUBTOTALS This Period This Page (optional) .....

TOTALS This Period (last page in this line only) ..... $ 8,000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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C00182073

Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
(Continued from page 1)			

Status: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ Value ☐ Secured ☐ Unsecured

List All Endorsers or Guarantors (if any) to Item A

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding
Horen, Judith K. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Secretary $ 800.00
Heston, Joyce A. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Claim Coordinator $ 800.00
Stewart, Beverly J. 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Accountant $ 800.00

Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Same as above			

Status: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ Value ☐ Secured ☐ Unsecured

List All Endorsers or Guarantors (if any) to Item B

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding
Komen, Mindy 940 West Port Plaza St. Louis, Mo. 63146	The White Co. Public Relations $ 800.00
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (optional) . . . . . .

TOTALS This Period (last page in this line only) . . . . . $ 6,000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

18 15 10 11 12 13 14 15 16 17 18

From Buechner's FEC report covering 1-1-86 — 3-31-86

Buechner for Congress

From 1-1-86

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	88,094.11	88,094.11	11 (a)
(b) PAC (Memo Entry Unlimited)			11 (b)
(c) Political Party Committees			11 (c)
(d) Other Political Committees	775.00	775.00	11 (d)
(e) The Candidate			11 (e)
(f) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	8,869.11	8,869.11	11 (f)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	240.00	240.00	13 (a)
(b) All Other Loans	1,000.00	1,000.00	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))	1,240.00	1,240.00	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (f), 12, 13 (c), 14 and 15)	10,109.11	10,109.11	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	1,190.03	1,190.03	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans	5,764.11	5,764.11	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b) and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	6,954.14	6,954.14	22
III. CASH SUMMARY			
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ 817.53		23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 10,109.11		24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 10,926.64		25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 6,954.14		26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD	$ 3,972.50		27

ITEMIZED RECEIPTS

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

Name of Committee (in Full): Jack Buechner for Congress

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
James T. Panagos 12208 Parkton Way Barnhart, MO 63012 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Self Elect. Contractor Aggregate Year-to-Date-$	1/15/86	250.00
Airport Township Republican Citizens Club Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	1/4/86	25.00
Eileen A. Buhlinger 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Receptionist Aggregate Year-to-Date-$	1/15/86	576.41
Robert J. Wittmann 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Asst. to Director Aggregate Year-to-Date-$	1/15/86	576.41
Patricia A. McBride 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Ex. Secretary Aggregate Year-to-Date-$	1/15/86	576.41
Joan Campbell 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Accountant Aggregate Year-to-Date-$	1/15/86	576.41
T. M. Mohan 940 West Port St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Vice President Aggregate Year-to-Date-$	1/15/86	576.41
SUBTOTAL of Receipts This Page (optional)			3,157.05
TOTAL This Period (last page this line number only)			

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

Name of Committee (in Full): Jack Buechner for Congress

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
A. Evelyn M. Mosley 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Occupation: Accountant Aggregate Year-to-Date—$	1/15/86	576.41
B. Judith K. Moran 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Occupation: Secretary Aggregate Year-to-Date—$	1/15/86	576.41
C. Joyce A. Heston 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Occupation: Claim Coordinator Aggregate Year-to-Date—$	1/15/86	576.41
D. Beverly J. Stewart 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Occupation: Accountant Aggregate Year-to-Date—$	1/15/86	576.41
E. Mindy Komen 940 West Port Plaza St. Louis, MO 63146 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	The White Company Occupation: Public Relations Aggregate Year-to-Date—$	1/15/86	576.42
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			2,882.06
TOTAL This Period (last page this line number only)			8,119.11

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Joan Campbell, Comptroller
The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

Dear Ms. Campbell:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

9104037794

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373795

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Evelyn N. Mosley
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

Dear Ms. Mosley:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

9104037796

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373797

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Judith Moran Harris
c/o Designs for Tomorrow
2410 Schuetz Road
Maryland Heights, MO 63043

RE: MUR 3158

Dear Ms. Harris:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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91040373798

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373799

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Joyce A. Heston
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

9104037380 0

Dear Ms. Heston:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373801

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Beverly J. Stewart
112 Carriage House Lane
St. Charles, MO 63303

RE: MUR 3158

Dear Ms. Stewart:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9 1 0 4 0 3 7 3 8 0 2

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373303

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Mindy Komen
c/o Paragon Group Inc.
12400 Olive Boulevard
St. Louis, MO 63141

RE: MUR 3158

Dear Ms. Komen:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9 1 0 4 0 3 7 3 8 0 4

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373305

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Mr. Jack Buechner
14 Ponca Trail
Kirkwood, MO 63122

RE: MUR 3158

Dear Mr. Buechner:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9 1 0 4 0 3 7 3 3 0 6

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373807

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Jack Buechner for Congress and
Robert A. Hutton, Jr., as treasurer
14418 South Outer Forty
St. Louis, MO 63017

RE: MUR 3158

Dear Mr. Hutton:

The Federal Election Commission received a complaint which alleges that Jack Buechner for Congress and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9104037308

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Jack Buechner

91040373809

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Mr. Samuel B. Hayes, III, President
Boatmen's Bank of St. Louis County
222 South Central
Clayton, MO 63105

RE: MUR 3158

Dear Mr. Hayes:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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91040373810

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373811

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Mr. Thomas White, President
The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

Dear Mr. White:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9 1 0 4 0 3 7 3 8 1 2

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373813

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

T.M. Mohan, Vice President
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

Dear Mr. Mohan:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9 1 0 4 0 3 7 3 8 1 4

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373815

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Eileen Buhlinger
1192 Cantina Drive
St. Louis, MO 63141

RE: MUR 3158

Dear Ms. Buhlinger:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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9104037316

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373817

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Mr. Robert J. Wittman
c/o Kendrick-Cardinal Glennon
Seminary
5200 Glennon Drive
St. Louis, MO 63119

RE: MUR 3158

Dear Mr. Wittman:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

91040373818

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373819

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Ms. Patricia McBride
1960 Caposele Lane
Hazelwood, MO 63042

RE: MUR 3158

Dear Ms. McBride:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

9104037382 0

If you have any questions, please contact Michael Marinelli, the attorney assigned to this matter at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

91040373821

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1990

Joan Kelly Horn
1750 S. Brentwood Blvd.
Suite 256
St. Louis, MO 63144

RE: MUR 3158

Dear Mrs. Horn:

This letter acknowledges receipt on November 1, 1990, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Jack Buechner, Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, Samuel B. Hayes, III, Thomas White, T.M. Mohan, Eileen Buhlinger, Robert J. Wittman, Patricia McBride, Joan Campbell, Evelyn N. Mosley, Judith Moran Harris, Joyce A. Heston, Beverly J. Stewart and Mindy Komen. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

91040873822

ARMSTRONG, TEASDALE, SCHLAFLY, DAVIS & DYGUS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AND COUNSELORS
ONE METROPOLITAN SQUARE
ST. LOUIS, MISSOURI 63102-2740
(314) 621-5070
TELECOPIER (314) 621-5065

KANSAS CITY, MISSOURI
BELLEVILLE, ILLINOIS
OVERLAND PARK, KANSAS

THOMAS B. WEAVER, P.C.
(314) 342-8021

November 20, 1990

By Telecopier

9104 087 3823

Mr. Michael Marinelli
Federal Election Commission
Washington, D.C. 20463

Re: MUR3158

Dear Mr. Marinelli:

Pursuant to our telephone conversation, the undersigned hereby enter their appearance as attorneys for Patricia McBride with regard to the above matter. On her behalf, we request an additional 15 days, to and including December 8, 1990, within which to file a response to the complaint in this matter.

Please acknowledge receipt of this request.

Thank you for your cooperation in this matter.

Very truly yours,

Thomas B. Weaver

G. David Harpool

TBW:mdb

BUECHNER, MCCARTHY, LEONARD, KAEMMERER, OWEN & LADERMAN
ATTORNEYS AT LAW
EMERALD POINT
16141 NORTH OUTER FORTY DRIVE, SUITE 300
ST. LOUIS (CHESTERFIELD), MISSOURI 63017-1774
(314) 532-7100

JACK BUECHNER
THOMAS W. McCARTHY III
MICHAEL E. KAEMMERER
ANDREW B. LEONARD
JAMES C. OWEN
LOUIS N. LADERMAN
WALTER R. LAMKIN

DIANA K. WIELAND
JAMES P. TOWEY, JR.*
BRIAN E. McGOVERN
ELIZABETH M. DIETZMANN
TODD A. MASSA*

*ALSO LICENSED IN ILLINOIS

FACSIMILE (314) 532-0857

November 26, 1990

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3158

Dear Ms. Lerner:

Please be advised that this office represents Congressman Jack Buechner individually and the Jack Buechner for Congress Committee.

This letter is in response to your letter of November 8, 1990 regarding Ms. Horn's complaint which includes newspaper reports of her complaint and other hearsay evidence.

The letter of complaint contains no independent affidavits substantially Ms. Horne's allegations regarding a 1984 election to which she was not a party.

Neither Mr. Buechner not the committee admits any violations of Federal Election Laws.

The individual noted in Ms. Horne's letter, Thomas White was a prominent Republican donor who was active in Mr. Buechner's 1984 race. All dealings with Mr. White and the campaign were within the law. Mr. White secured the $10,000.00 loan guarantors. The proper notice of the guaranty was filed (see attached). None of the guarantors exceeded this maximum allowed by law ($1,000.00).

Following the election a portion of the note was paid by the campaign. Mr. Buechner did not have any contacts after the campaign with Mr. White but it is Mr. Buechner's recollection that Mr. White secured the balance of the unpaid loan from each

9104037324

of the co-guarantors. The bank notified the committee that the loan was paid and a pro-rata distribution of the balance was reflected by the Treasurer in the F.E.C. records filed in that campaign.

Mr. White is now deceased. Neither Mr. Buechner nor the campaign ever received any funds from the White Company as alleged by Congressman Buechner's 1990 opponent Joan Horn.

Very truly yours,

Andrew B. Leonard

ABL/cm

91040373825

Jack Buechner

REPUBLICAN FOR U.S. CONGRESS

C00182873
110922

Clerk of the House
Office of Records and Registration
1036 Longworth House Office Building
Washington,D. C. 20515

110922

Nov. 1984

RECEIVED
OFFICE OF RECORDS & REGISTRATION
1984 NOV -5 AM 8:58
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

To whom it may concern:

The Jack Buechner for Congress Committee, 11040 Manchester Rd. Kirkwood, Mo., 63122 recieved a loan in the form of a Cashier's Check from the Boatmen's Bank of St. Louis County, 222 South Central, Clayton, Mo. 63105 on Oct. 30, 1984 in the amount of $10,000.00.

This loan is guaranteed by the following, each for $1,000.00. The address for each of the following is c/o The White Company, 940 West Port Plaza, St. Louis, Mo. 63146 They are all employed by The White Co.

Eileen A. Buhlinger
Robert J. Wittmann
Patricia A. McBride
Joan Campbell
T. M. Mohan
Evelyn M. Mosley
Judith K. Moran
Joyce A. Heston
Beverly J. Stewart
Mindy Komen

Sincerely,

Randy Mulcahy
Campaign Manager

8401277 1209

11040 Manchester Rd. • Kirkwood, Mo. 63122
314/822-7178

Paid for by Jack Buechner for Congress Committee

06C8696

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
90 NOV 20 PM 4:19

ARMSTRONG, TEASDALE, SCHLAFLY, DAVIS & DICUS

ATTORNEYS AND COUNSELORS
ONE METROPOLITAN SQUARE
ST. LOUIS, MISSOURI 63102-2740
(314) 621-5070
TELECOPIER (314) 621-5065

DATE: 11/20/90 **TIME:** 3:10 P.M.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 20 PM 4:19

PLEASE DELIVER TO:

NAME: MICHAEL MARINELLI

FIRM: FEDERAL ELECTION COMMISSION

ADDRESS: WASHINGTON, D.C.

BUSINESS TELEPHONE: (202) 376-8200

FACSIMILE TELEPHONE: (202) 376-5280

FROM: THOMAS B. WEAVER

TOTAL PAGES INCLUDING THIS PAGE: 2

IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (314) 621-5070 and ASK FOR DOLORES

EXTENSION 7209.

INTERNAL USE: **CLIENT-MATTER NUMBER:** 08888\00220

TELECOPIER OPERATOR: DOLORES BROOKS

9104087382 7

90-C 8734

ARMSTRONG, TEASDALE, SCHLAFLY, DAVIS & DICUS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AND COUNSELORS
ONE METROPOLITAN SQUARE
ST. LOUIS, MISSOURI 63102-2740
(314) 621-5070
TELECOPIER (314) 621-5065

KANSAS CITY, MISSOURI
BELLEVILLE, ILLINOIS
OVERLAND PARK, KANSAS

Thomas B. Weaver, P.C.
(314) 342-8021

90 NOV 26 AM 10: 34

November 20, 1990

By Telecopier

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 26 PM 3:01

Mr. Michael Marinelli
Federal Election Commission
Washington, D.C. 20463

Re: MUR3158

Dear Mr. Marinelli:

Pursuant to our telephone conversation, the undersigned hereby enter their appearance as attorneys for Patricia McBride with regard to the above matter. On her behalf, we request an additional 15 days, to and including December 8, 1990, within which to file a response to the complaint in this matter.

Please acknowledge receipt of this request.

Thank you for your cooperation in this matter.

Very truly yours,

Thomas B. Weaver

G. David Harpool

G. David Harpool

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 26 PM 1:31

TBW:mdb

9104037328

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 NOV 28 AM 10:45

November 21, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 NOV 28 PM 3:19

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3158

Dear Ms. Lerner:

This letter is in response to your letter of November 8, 1990, which was received by me on November 15, 1990. You ask no specific questions so I assume you want a statement.

During the 1984 election, Mr. Thomas J. White, Sr. asked me to guarantee $1,000 of a loan from Boatmen's Bank. I signed that guarnatee as requested by Mr. White. About one year later I received a past due notice from Boatmen's. Between then (September or October of 1985) until October 1990, I heard nothing else about the subject.

I assure you I had no intention to violate any law in signing that guarantee and don't feel I did anything wrong.

Yours truly,

Evelyn Mosley

Evelyn Mosley

EM:ldm

9104087382 9

OGC 8759

RECEIVED
FEDERAL ELECTION COMMISSION

90 NOV 28 AM 10:47

November 21, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 28 PM 3:19

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3158

Dear Ms. Lerner:

This letter is in response to your letter of November 8, 1990, which was received by me on November 15, 1990.

During the 1984 election, Mr. Thomas J. White, Sr. asked me to guarantee $1,000 of a loan from Boatmen's Bank. I signed that guarantee as requested by Mr. White. About one year later I received notice from the bank that the loan had not been fully repaid. I contacted the bank and learned they had been unable to collect the total loan from Mr. Buechner and had been unsuccessful in contacting him. I tried to contact him and was also unsuccessful. In November, 1985, Mr. White paid Boatmen's Bank $7,203.83, the remaining balance of the loan including accrued interest.

I assure you I had no intention to violate any law in signing that guarantee and I don't feel I did anything wrong.

Between November 1985 and October 1990, I heard nothing of this subject. In early October 1990 Mindy Komen telephoned to ask me what I remembered about this situation. I reminded her that Mr. White had asked ten employees to sign guarantees. She asked if I remembered who signed and more specifically whether she had signed. I told her I did not remember, for sure, who had signed but thought she might have been one of the ten.

Several days later, a reporter from the St. Louis Post Dispatch telephoned. I spoke to this reporter for approximately fifteen minutes. The quotes she used in her article of October 18, 1990, were taken out of context and twisted to say things I was not really saying. I told her throughout the interview I really did not remember how things were resolved and that it would be necessary to check the records to be more certain.

Again, I assure you there was no intention to violate the law by any of the people named in Joan Kelly Horn's letter to the Federal Election Commission. I, therefore, respectfully request you take no action against these individuals.

Yours truly,

Thomas M. Mohan

TMM:idm

9104037330

OGC 8758

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3158

NAME OF COUNSEL: ANDREW B. LEONARD

ADDRESS: 16141 NO. OUTER FORTY
CHESTERFIELD, MO. 63017

TELEPHONE: 314 532 7100

90 NOV 28 AM 10:51

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 28 PM 3:18

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.

11-21-90
Date

Jack Buechner
Signature
M.C.

RESPONDENT'S NAME: JACK BUECHNER FOR CONGRESS COMMITTEE

ADDRESS: 14418 So. OUTER FORTY
ST. LOUIS, MO. 63017

HOME PHONE:

BUSINESS PHONE: (314) 965-1101

9104037331

06C8771

RECEIVED
FEDERAL ELECTION COMMISSION

90 NOV 29 AM 9:29

November 21, 1990

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 NOV 29 AM 12:12

RE: MUR 3158

Dear Ms. Lerner:

This letter is in response to your letter of November 8, 1990, which was received by me on November 15, 1990. You ask no specific questions so I assume you want a statement.

During the 1984 election, Mr. Thomas J. White, Sr. asked me to guarantee $1,000 of a loan from Boatmen's Bank. I signed that guarantee as requested by Mr. White. About one year later I received a past due notice from Boatmen's. Between then (September or October of 1985) until October 1990, I heard nothing else about the subject.

I assure you I had no intention to violate any law in signing that guarantee and don't feel I did anything wrong.

Yours truly,

Joyce Heston

Joyce Heston

JH:ldm

9104037332

06C8793

RECEIVED
FEDERAL ELECTION COMMISSION

90 NOV 30 AM 11:02

112 Carriage House Drive
St. Charles, MO 63303
November 27, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 30 AM 12:39

Lawrence Noble, General Counsel
Federal Election Commission
1325 K. Street, NW
Washington, D.C. 20463

RE: MUR 3158

Dear Mr. Noble:

I have received the information from your office concerning the above-referenced matter. The following summarizes the extent of my involvement and knowledge of this situation:

- I guaranteed a loan to Jack Buechner's campaign. It was my understanding that Jack Buechner would repay the loan, and I was not aware that he did not repay the loan.
- I did not contribute any money to his campaign nor was I aware that a contribution was reported under my name.
- It was never inferred or implied in any way that any wage increases or bonuses were tied to any contributions.

Although I am not aware of anything else that increases your knowledge of this matter, you may feel free to contact me concerning this situation.

Sincerely,

Beverly J. Stewart

Beverly J. Stewart

9104037333

OG-8732

RECEIVED
FEDERAL ELECTION COMMISSION

90 NOV 30 AM 11:03

November 26, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 NOV 30 AM 12:39

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

I am writing in response to your letter dated November 8, 1990 in regards to matter MUR 3158.

Your letter and accompanying material provided the first evidence to me that I was in any way party to the loan in question. I was not asked to make such a loan by Mr. White or Mr. Buechner, nor did I sign any loan papers nor did I make any loan repayment myself.

I was only vaguely aware, via second-hand conversation, that some type of loan arrangement was made between Mr. White and Mr. Buechner. However, I knew none of the details nor was I in any way party to any of the discussion or negotiations pertaining to the arrangement in question.

Respectfully yours,

Robert J. Wittmann

Robert J. Wittmann
c/o Kenrick-Glennon Seminary
5200 Glennon Rd.
St. Louis, MO 63119

9104037383 4

OGC 7839

Nov. 20, 1990

90 DEC -3 PM 12:25

Lawrence Noble, Gen. Counsel
Federal Election Comm.
1325 K Street, NW
Washington, DC 20463

Re: Mur 3158

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC -4 AM 10:57

Yes, I did guarantee a loan in the amount of $1,000 for Jack Buchner.

I was not later compensated by the White Company.

I have heard nothing until your letter of November 8, 1990 regarding this loan.

Eileen Buchner

9104037333335

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1990

Thomas B. Weaver, Esquire
Armstrong, Teasdale, Schlafly, Davis & Dicus
One Metropolitan Square
St. Louis, Missouri 63102-2740

RE: MUR 3158
Patricia McBride

Dear Mr. Weaver:

This is in response to your letter dated November 20, 1990, which we received on November 20, 1990, and your client's designation of counsel which received on November 27, 1990, requesting an extension of 15 days until December 10, 1990, to respond to the complaint filed against your client. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 10, 1990.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9104037338 36

EC-C 5769

90 NOV 29 AM 12: 12
RECEIVED
FEDERAL ELECTION COMMISSION

November 21, 1990

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3158

Dear Ms. Lerner:

This letter is in response to your letter of November 8, 1990, which was received by me on November 15, 1990. You ask no specific questions so I assume you want a statement.

During the 1984 election, Mr. Thomas J. White, Sr. asked me to guarantee $1,000 of a loan from Baotmen's Bank. I signed that guarantee as requested by Mr. White. About one year later I received a past due notice from Baotmen's. In November 1985, Mr. White told me to prepare one of his personal checks in the amount of $7,203.83 to pay off the Boatmen's loan, as one of his accountants I did as he instructed. Between then (November 1985) until October 1990, I heard nothing else about the subject.

I assure you I had no intention to violate any law in signing that guarantee and don't feel I did anything wrong.

Yours truly,

Joan Campbell

JC:ldm

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OGC 8832

RECEIVED
FEDERAL ELECTION COMMISSION
90 DEC -3 PM 12:58

ARMSTRONG, TRASDALE, SCHLAFLY, DAVIS & DICUS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AND COUNSELORS
ONE METROPOLITAN SQUARE
ST. LOUIS, MISSOURI 63102-2740
(314) 621-5070
TELECOPIER (314) 621-5065

KANSAS CITY, MISSOURI
BELLEVILLE, ILLINOIS
OVERLAND PARK, KANSAS

Thomas B. Weaver, P.C.
(314) 342-8021

November 27, 1990

Mr. Michael Marinelli
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3158

Dear Mr. Marinelli:

Enclosed please find the Statement of Designation of Counsel executed by Patricia A. McBride in the above-referenced matter.

Very truly yours,

Tom Weaver

Thomas B. Weaver

TBW:mdb
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC -4 AM 10:56

9104087338

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3158

NAME OF COUNSEL: THOMAS B. WEAVER
G. DAVID HARPOOL

ADDRESS: ARMSTRONG, TEASDALE, SCHLAFLY,
DAVIS & DICUS
ONE METROPOLITAN SQUARE
SUITE 2600
ST. LOUIS, MO 63102-2740

TELEPHONE: (314) 621-5070

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.

November 25, 1990
Date

Patricia A. McBride
Signature

RESPONDENT'S NAME: PATRICIA A. McBRIDE

ADDRESS: 1960 Caposele Lane
Hazelwood, MO 63042

HOME PHONE: (314) 895-1876

BUSINESS PHONE:

9104037339

00 C 8903

December 1, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 DEC 10 AM 11: 11

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 DEC 10 PM 4: 13

Mr. Lawrence M. Noble
General Counsel
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

MUR 3158

Dear Mr. Noble:

To reply to your letter of November 8th, the following is my written statement: I I contacted Mr. Marinelli the day before Thanksgiving, the letter was sent to my office and I work out of my home, I only go in once or twice a month to the home office so I did not receive it right away).

I, Judith Kay Harris, to the best of my knowledge do not recall being involved in this situation in anyway. I do not remember signing anything with regards to Mr. Buechner's campaign. It was so long ago, but I did not contribute.

If you need additional information, please call or write me at the following address and phone number:

MRS. Judith Kay HARRIS
9701 LETHIE BAESCH LANE
Sunset Hills, MO 63127
(314) 849-4365

Sincerely,

Judith Kay Harris

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 DEC 17 AM 11:37

ARMSTRONG, TEASDALE, SCHLAFLY, DAVIS & DICUS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AND COUNSELORS
ONE METROPOLITAN SQUARE
ST. LOUIS, MISSOURI 63102-2740
(314) 621-5070
TELECOPIER (314) 621-5065

Thomas B. Weaver, P.C.
(314) 342-8021

KANSAS CITY, MISSOURI
BELLEVILLE, ILLINOIS
OVERLAND PARK, KANSAS

December 10, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 17 PM 3:07

Mr. Michael Marinelli
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3158

Dear Mr. Marinelli:

As attorney of record on behalf of Patricia McBride in the above matter, I submit this letter in response to the letter dated November 8, 1990, from Lois G. Lerner to Mrs. McBride. The letter states that the Federal Election Commission has received a complaint which purportedly alleges that Mrs. McBride may have violated the Federal Election Campaign Act of 1971. Included with Ms. Lerner's letter was a letter dated October 25, 1990, from Joan Kelly Horn to Lawrence Noble, General Counsel of the Federal Election Commission. We assume that Ms. Horn's letter is the complaint to which we are referred.

We have reviewed Ms. Horn's letter and the accompanying materials. We submit the following in response.

Mrs. McBride was an employee of the White Company in 1984. While an employee of the White Company Mrs. McBride was approached by her then boss, Mr. Thomas White, and asked whether she would be willing to sign a form with regard to a loan to be made by a bank to Mr. Jack Buechner. Mr. White advised Mrs. McBride that the form was a formality and indicated that several other employees at White intended to sign the form. In response to this request by Mr. White, Mrs. McBride did in fact sign the form. Although Mrs. McBride did not fully understand the effect of her signing the document and did not review the document that she had been asked to sign, she does remember signing the form, again at the request of Mr. White.

With regard to purported campaign contributions by Mrs. McBride to Mr. Buechner's campaign, Mrs. McBride states that at no time did she make any campaign contribution in any amount to

9 1 0 4 0 3 7 3 3 4 1

Mr. Buechner's campaign. Mrs. McBride states that at no time did she authorize the White Company or any other person to make a campaign contribution in her name. Mrs. McBride states that at no time prior to this year was she aware that any campaign contribution had been made in her name. Her only knowledge with regard to any purported campaign contribution made in her name comes from the newspaper articles attached to Ms. Horn's October 25, 1990 letter.

Mrs. McBride further points out that in Ms. Horn's letter and one of the newspaper articles, Tom Mohan, Vice President of the White Company, speculates that the company "probably made it up to the employees later." Mr. Mohan's speculation is simply wrong. At no time did Mrs. McBride receive any raises or bonuses reflecting repayment of any campaign contribution which may have been made in her name, without her knowledge. The only raises or bonuses Mrs. McBride received were performance related. Obviously, considering the fact that she made no contribution to Mr. Buechner's campaign, it is somewhat frivolous to even discuss the issue of whether any raise or bonus was paid to her in repayment for a non-existent contribution.

Based on the above facts, it is clear that Mrs. McBride did not participate in any violation of any provisions of the Federal Election Campaign Act of 1971. She did not participate in any improper donations or erroneous campaign reports.

In light of the above, we believe it is clear that no action should be taken against Mrs. McBride in this matter.

Mrs. McBride is willing to cooperate in any way appropriate. She has nothing to hide. It is unfortunate that she has been dragged into this matter, through no fault of her own.

Please feel free to contact me with any questions or comments you may have with regard to this submission. If you need any additional information, please advise and we will cooperate with you as much as possible.

I look forward to hearing from you.

Very truly yours,

Thomas B. Weaver

TBW:mdb

Thomas B. Weaver

9 1 0 4 0 3 7 3 3 4 2

I, Patricia McBride, hereby state and aver that I have read the foregoing letter and that the facts recited therein are true and correct.

Patricia McBride

Patricia McBride

Subscribed and sworn to before me, a Notary Public, this 14th day of December, 1990.

Karen S. Newell

Notary Public

KAREN S. NEWELL, NOTARY PUBLIC
Jefferson County, State of Missouri
My Commission Expires 4-27-92

9 1 0 4 0 3 7 3 3 4 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1991

Mr. Samuel B. Hayes, III, President
Boatmen's Bank
800 North Market
St. Louis, Missouri 63101

RE: MUR 3158

Dear Mr. Hayes:

On November 1, 1990, the Federal Election Commission received a complaint alleging that you may have violated sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). The notification letter sent to you on November 8, 1990, as well as a copy of the complaint, a description of the Commission's procedures for handling complaints and a designation of counsel form, were returned to this Office due to an incorrect address. Enclosed please find that letter and accompanying documents.

We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the Office of the General Counsel, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

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If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Letter dated November 8, 1990 (and accompanying documents)

9104037384 5

OGC 1832

HAND DELIVERED

FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JUL 10 PM 12:28

LEWIS, RICE & FINGERSH

A PARTNERSHIP INCLUDING PARTNERSHIPS AND INDIVIDUALS

ATTORNEYS AT LAW

611 OLIVE STREET
ST. LOUIS, MISSOURI 63101
314/444-7600

FACSIMILE 314/241-6056

Robert B. Hoemeke

St. Louis, Missouri
Overland Park, Kansas
Kansas City, Missouri
Clayton, Missouri

91 JUL 10 PM 3:20

July 9, 1991

Via Federal Express

Mary Ann Bumgarner, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3158

Dear Ms. Bumgarner:

Enclosed is our Entry of Appearance on behalf of Boatmen's Bank in this matter. We respectfully request an additional fourteen (14) days, up to and including July 26, 1991, within which to submit any factual or legal materials which we believe are relevant to the Commission's analysis of this matter.

We request the additional fourteen days to file our response in order to allow us sufficient time to locate and review any relevant documentation and to speak with Boatmen's personnel. As you know, the campaign loan in question was made in 1984. Congresswoman Horn did not file her complaint until late 1990 and we did not receive a copy of the complaint until very recently. During the passage of time, at least one of the persons involved in the campaign loan has left Boatmen's Bank. Additionally, as part of Boatmen's routine document handling, the original loan documents may no longer be in its possession and may have to be sought elsewhere.

We therefore request the additional time to allow us to prepare an appropriate response.

Very truly yours,

Robert B. Hoemeke

RBH:lz
Enclosure

91040373346

JUL 9 1991

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3158

NAME OF COUNSEL: Mr. Robert Hoemeke

ADDRESS: Lewis, Rice & Fingersh
611 Olive Street, Suite 1400
St. Louis, MO 63101

TELEPHONE: (314) 444-7600

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.

THE BOATMEN'S NATIONAL BANK OF ST. LOUIS

July 9, 1991
Date

Signature
Richard C. Jensen, President of Central Region

RESPONDENT'S NAME: Boatmen's Bank

ADDRESS: 800 North Market Street
St. Louis, MO 63101

HOME PHONE:

BUSINESS PHONE:

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1991

Robert B. Hoemeke, Esquire
Lewis, Rice & Fingersh
611 Olive Street
St. Louis, Missouri 63101

RE: MUR 3158
Boatmen's Bank

Dear Mr. Hoemeke:

This is in response to your letter dated July 9, 1991, which we received on July 10, 1991, requesting an extension of 14 days to respond to the complaint in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 26, 1991.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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MAIL ROOM

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LEWIS, RICE & FINGERSH

A PARTNERSHIP INCLUDING PARTNERSHIPS AND INDIVIDUALS

ATTORNEYS AT LAW

611 OLIVE STREET
ST. LOUIS, MISSOURI 63101
314/444-7600

FACSIMILE 314/241-6056

Robert B. Hoemeke

St. Louis, Missouri
Overland Park, Kansas
Kansas City, Missouri
Clayton, Missouri

July 23, 1991

Via Federal Express

Mary Ann Bumgarner, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3158

Dear Ms. Bumgarner:

91 JUL 26 AM 10:36

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

This letter is the response of the Boatmen's National Bank of St. Louis to your letter of June 24, 1991, regarding MUR 3158. This matter was initiated by the complaint of Joan Kelly Horn, dated October 25, 1990, against then Congressman Jack Buechner of Missouri's Second District. Ms. Horn was, at the time of the complaint, running against Mr. Buechner for election to Missouri's Second District Seat in the United States Congress. Ms. Horn's complaint does not directly mention Boatmen's but the Federal Election Commission has requested a reply from Boatmen's.

Boatmen's has reviewed its records but has been unable to locate the original loan file. From the interviews of employees, and the records that are available to Boatmen's, it is possible to put together some of the loan history.

On October 30, 1984, a $10,000 loan was made to the Buechner for Congress Committee. The loan was evidenced by a demand note which was signed by Jack Buechner (Exhibit A). The loan was unsecured except for ten separate $1,000 guaranties made by individuals.

On November 5, 1984, a $2,000 payment was made by the Buechner for Congress Committee on the loan. Boatmen's expended some effort in collecting the remaining balance of the loan which was ultimately paid in full on November 25, 1985. At this time, the bank has not been able to locate a copy of the item that was used to pay the loan.

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Boatmen's has no knowledge regarding the claims that Patricia McBride and Judith (Moran) Harris had no knowledge of being guarantors on the loan. The individual guaranties were not signed in the presence of bank officials.

Please contact me if we can be of further assistance.

Very truly yours,

Robert B. Hoemeke

RBH:lz
Enclosures

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GJG

BOATMEN'S WEST PORT BANK

St. Louis, Mo., October 30, 1984

On demand and if no demand be made, then on December 14, 1984

The Undersigned promise to pay to the order of Boatmen's West Port Bank

Ten Thousand and No/100----------($10,000.00)---------- Dollars

for value received, together with interest thereon from date at the rate of 13.00% per cent per annum payable Maturity and from maturity at the rate of two (2%) per cent per annum over the stated rate in this note. If this note be not paid at maturity and if it should be placed in the hands of an attorney for collection, the parties hereto agree to pay in addition all costs of collection and a reasonable percentage of the amount due hereon as an attorney's fee.

Boatmen's Bank of St. Louis County, formerly known as:

Payable at BOATMEN'S WEST PORT BANK

Presentment for payment, and notice of dishonor are hereby waived by all parties whether as makers, endorsers, guarantors or in any other capacity and this note may be extended or renewed and waivers or modifications may be granted by the bank with respect to the payment or other provisions of this note from time to time all without notice and without releasing any of said parties.

If the undersigned fails to pay this note when due or made due hereunder, the Bank shall have the right to apply the amount of any deposit made, or any monies held by the Bank for the undersigned, towards the payment of this note. The Bank shall not be liable for any such action or failure to act, but shall be liable only for what it actually receives and collects on account thereof.

A/C #

Name ~~Jack~~ Buechner-~~Republican~~ for ~~U.S.~~ Congress ~~Campaign~~ Committee

Address 11040 Manchester Rd.
Kirkwood, MO 63122

Due December 14, 1984

Amount $ 10,000.00

04-17

~~Jack~~ Buechner-~~Republican~~ for ~~U.S.~~ Congress
~~Campaign~~ Committee

By: Jack Buechner

not individually liable.

EXHIBIT A

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 26, 199

CLOSED

White Diversified, Inc.
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158

Dear Sir or Madam:

The Federal Election Commission received a complaint which alleges that The White Company may have violated sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3158. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to administrative oversight. Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the Office of the General Counsel, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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 matter to be made public. 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.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief

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description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

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OGC 2870

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM

White Company

940 West Port Plaza St. Louis, MO 63141
(314) 878-0400

91 SEP -2 AM 10: 41

August 30, 1991

MUR 3158

CLOSED

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Lerner:

This letter is in response to your letter of August 26, 1991.

White Diversified, Inc., a Corporation that was owned by Thomas J. White, Sr. during 1984 was the employer of the people listed in Ms. Horn's complaint. The Corporation had no involvement in the matter described in Ms. Horn's complaint.

The employees of the Corporation and the Corporation had no intention to violate any law. Therefore, we respectfully request you take no action against the employees or the Corporation.

Yours truly,

Thomas M. Mohan
Executive Vice President

TMM:ldm

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F.E.C.
SECRETARIAT

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

MUR: 3158
DATE COMPLAINT RECEIVED BY OGC: 11-01-90
DATE OF NOTIFICATION TO RESPONDENTS: 11-8-90
STAFF MEMBER: MARY ANN BUMGARNER

COMPLAINANT: Joan Kelly Horn

RESPONDENTS:
Jack Buechner
Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer
Eileen Buhlinger
Joan Campbell
Judith Moran Harris
Joyce A. Heston
Mindy Komen
Patricia McBride
Thomas M. Mohan
Evelyn N. Mosley
Beverly J. Stewart
Robert J. Wittmann
Thomas White
Boatmen's National Bank
White Diversified, Inc.

RELEVANT STATUTES:
2 U.S.C. § 434(b)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b
2 U.S.C. § 441f

11 C.F.R. § 110.4(b)(1)
11 C.F.R. § 114.5

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Commission received a complaint from Joan Kelly Horn alleging that Congressman Jack Buechner, her opponent in the

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1990 general election for the seat in the U.S. House of Representatives from Missouri's Second District, violated the Commission's regulations.[1] Attachment 1. Congressman Buechner was defeated in the 1990 general election by Ms. Horn by only approximately 50 votes. Ms. Horn won the election with 50.01% of the votes, as compared to Mr. Buechner's 49.99% of the votes.[2]

This Office notified Congressman Buechner of this complaint, as well as his campaign committee and treasurer. This Office also notified the ten employees of The White Company who were listed as co-guarantors of a $10,000 loan referenced in the complaint. These employees are Eileen Buhlinger, Joan Campbell, Judith Moran Harris, Joyce A. Heston, Mindy Komen, Patricia McBride, T.M. Mohan, Evelyn N. Mosley, Beverly J. Stewart and Robert J. Wittmann. This Office also notified Samuel Hayes, III, President of Boatmen's Bank, which made the subject loan. A letter was also sent to Thomas White, President of The White Company and to White Diversified, Inc.[3] Responses have been received from all

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1.

2. Mr. Buechner first ran for Congress in 1984, but was unsuccessful. However, in 1986 and 1988, Mr. Buechner was elected to the United States House of Representatives.

3. As discussed <u>infra</u>, The White Company is a fictitious name used by White Diversified, Inc., an incorporated for-profit company in Missouri.

respondents except for Mindy Komen and Mr. White, who is now deceased.

II. FACTUAL AND LEGAL ANALYSIS

A. Complaint

Complainant alleges various violations of the Commission's regulations by the parties referenced therein. The primary issue in the complaint appears to be whether campaign contributions allegedly made by ten employees of The White Company, and reported as such by the Jack Buechner for Congress committee (the "Committee") on their reports filed with the Commission, were in fact contributions made by those individuals. Based on information contained in the complaint, a $10,000 loan from Boatmen's Bank to the Buechner committee was guaranteed by 10 employees of The White Company; however, the Buechner committee defaulted on part of the loan. This loan was reported on the Committee's 1984 Post-General Report in connection with the 1984 general election. Subsequently, reports filed with the Commission by Congressman Buechner's committee listed each of these 10 employees as contributing either $576.41 or $576.42 on January 15, 1986, thereby raising the implication that these contributions were made to pay off part of the loan. These contributions were reported on the Committee's 1986 April Quarterly Report in connection with the 1986 primary election.

According to complainant, at least three of the guarantors referenced above had no knowledge as to the loan guarantees or the subsequently reported contributions in question. Attached

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to the complaint were two newspaper articles from the St. Louis Post-Dispatch dated October 13 and October 18, 1990, respectively. Attachment 1 at 4-5. Both articles address statements made by Mindy Komen, an employee of The White Company. According to Ms. Komen, she signed no papers guaranteeing the loan in question, nor did she make a campaign contribution to Congressman Buechner. In fact, she claims she never even knew about the campaign loan or contribution. The complaint further alleges that two other White Company employees, Patricia McBride and Judith Moran Harris, have stated that they did not know about being a guarantor of the loan, nor did they make a contribution to Buechner's campaign or know that a contribution was made in their name. Based on the foregoing, complainant cites to a possible violation of 11 C.F.R. § 110.4(b)(1), which prohibits the knowing acceptance of a contribution made by one person in the name of another. See also 2 U.S.C. § 441f. In addition, a question arises as to the accuracy of the Committee's reports since these guarantors are listed as contributors on the Committee's Schedules A of itemized receipts.

The second issue addressed by complainant concerns the possibility of corporate contributions made by The White Company to the Buechner committee. Complainant refers to statements made by Thomas M. Mohan, Vice President of The White Company, that appeared in the article dated October 18, 1990. In recalling the loan and contributions, Mr. Mohan stated that the workers were complying with a request of the Company's

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owner, Mr. Thomas White, to guarantee the loan. Mr. Mohan is also quoted as saying that the company "probably made it up to the employees later" by raises. Based on the foregoing, complainant cites to 11 C.F.R. §§ 114.5 and appears to be alleging that The White Company, through its employees, made a corporate contribution to Congressman Buechner's campaign committee in violation of 2 U.S.C. § 441b. Complainant also cites to a possible violation of 11 C.F.R. § 114.5(b)(1), which disallows a contributor to be paid for his or her contribution through any form of compensation.

B. Responses

In the response from counsel representing both Congressman Buechner and the Jack Buechner for Congress committee (Attachment 2), Counsel states that neither Congressman Buechner nor the Committee admit any violations of the "Federal Election Laws." According to Counsel, Thomas White, who was referenced in the complaint, was a prominent Republican donor and was active in Congressman Buechner's 1984 race. Counsel states that Mr. White secured the ten employees of The White Company as guarantors of a $10,000 campaign loan to Congressman Buechner's committee. Counsel further states that the proper notice of the guarantee was filed and none of the guarantors exceeded the applicable statutory limit of $1,000.

Counsel further states that following the 1984 election, a portion of the note was paid by the campaign; however, it is Congressman Buechner's recollection that Mr. White secured the balance of the unpaid loan from each of the co-guarantors.

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Counsel states that after the campaign Congressman Buechner did not have any contacts with Mr. White and it was the bank that notified the Committee that the loan was paid. At that time, Counsel states the Committee attributed the final repayment of the loan balance to each of the guarantors on a pro-rata basis, as was reflected by the treasurer in the reports filed with the Commission during the 1986 campaign. Lastly, Counsel asserts that neither Congressman Buechner nor the Committee ever received any funds from The White Company as alleged by complainant.

In a letter from Thomas M. Mohan (Attachment 3), Vice President of The White Company, Mr. Mohan states that during the 1984 election, Mr. White asked him to guarantee a loan from Boatman's Bank. Mr. Mohan states that he signed that guarantee as requested and approximately one year later he received a notice from the bank stating that the loan had not been fully repaid. According to Mr. Mohan, he contacted the bank and learned that they had been unsuccessful in contacting Congressman Buechner and, therefore, were unable to collect the total amount of the loan. According to Mr. Mohan, in November 1985, Mr. White paid Boatman's Bank $7,203.83, the remaining balance of the loan including accrued interest.

Mr. Mohan states that between November 1985 and October 1990, he heard nothing about the loan or contributions. He states that sometime in October a reporter from the St. Louis Post-Dispatch telephoned and he spoke with the reporter for approximately fifteen minutes. According Mr. Mohan, the quotes

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used in the article dated October 18, 1990, were "taken out of context and twisted to say things I was not really saying." According to Mr. Mohan, he told the reporter throughout the interview that he did not remember how things were resolved and that it would be necessary to check the records to be more certain. Finally, Mr. Mohan states that there was no intention to violate the law by the ten guarantors named in the complaint and requests that no action be taken against these individuals.

In the response from Boatmen's National Bank (Attachment 4), counsel for the Bank states that while Boatmen's reviewed its records, it has been unable to locate the original loan file in connection with this matter. However, from interviews of employees and available records, Boatmen's reconstructed the loan history. According to Boatmen's, on October 30, 1984, a $10,000 loan was made to the Jack Buechner for Congress committee. The loan was unsecured except for ten separate $1,000 guarantees made by individuals. On November 5, 1984, a $2,000 payment was made by the Jack Buechner for Congress committee on the loan; however, according to the Bank, that was the only payment made by the Committee. Counsel states that Boatmen's Bank expended some effort in collecting the remaining balance of the loan, which was ultimately paid in full on November 25, 1985. Counsel further states that, at this time, Boatmen's Bank is unable to locate the instrument that was used to pay the loan.

In the responses received from Eileen Buhlinger, Joan Campbell, Joyce Heston, Patricia McBride, Evelyn Mosley

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and Beverly J. Stewart (Attachments 5-10), these respondents admit they were co-guarantors of the loan in question, but they each deny any further involvement in this matter. According to Ms. Campbell, Ms. Heston and Ms. Mosley, these respondents signed the subject guarantee as requested by Mr. White, and about one year later each one received a past due notice from Boatman's Bank. These respondents state that between the time the past due notice was received and October 1990, they heard nothing else concerning this matter. However, Ms. Campbell does state in her response that in her capacity as an accountant for Mr. White, at his request she prepared a personal check for him in the amount of $7,203.83 to pay off the remainder of the subject loan.

Further, in her response, Eileen Buhlinger states that after guaranteeing the loan in question, she did not hear of it again until the Commission's letter of notification regarding the complaint in this matter. Ms. Buhlinger also states that she was not compensated by The White Company with regard to this matter. Patricia McBride and Beverly J. Stewart also deny in their responses that they were ever reimbursed in any way in connection with the alleged contributions made by the ten guarantors. Both of these individuals also deny that they contributed any money to Buechner's campaign and, in addition, deny any knowledge of any kind concerning the alleged contributions from the ten guarantors reported by the Buechner campaign.

In responses from Robert J. Wittmann and

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Judith Moran Harris (Attachments 11-12), each respondent denies any knowledge of the loan in question. Both respondents deny signing anything in connection with loan. According to Ms. Harris, she did not make any contribution to Congressman Buechner's campaign. Mr. Wittmann also states that he made no loan repayments in this matter.

Lastly, in the response received from White Diversified, Inc., Thomas Mohan, Vice President of The White Company and an individual respondent in this matter, states that White Diversified, Inc. is a corporation which was owned by Thomas J. White during 1984. According to Mr. Mohan, the corporation had "no involvement in the matter described in Ms. Horn's complaint." Furthermore, Mr. Mohan states that the employees of the corporation and the corporation itself had "no intention to violate any law." Therefore, Mr. Mohan requests that no action be taken against the employees of the corporation, which are the individuals listed in Ms. Horn's complaint.

C. Committee Reports

On October 30, 1984, the Committee reported on their 1984 Post General Report the receipt of the subject $10,000 campaign loan. According to the Committee's response, only a portion of the note was paid; however, the Committee's reports filed with the Commission show three payments, totaling $5,235.89, were made on the loan. The Committee apparently miscalculated the total of these payments or misreported one of these payments, because on the Committee's 1985 Year End Report, the cumulative

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payment to date on the loan was reported as $4,235.89, i.e. $1,000 less than was previously reported as paid. Also inconsistent with the Committee's reports is a statement made in the response from Boatmen's Bank. In the response, counsel for the Bank states that the Committee made only one $2,000 payment on the loan on November 5, 1984. Additional inconsistent numbers result from responses received from T.M. Mohan, Vice President of The White Company and Joan Campbell, an accountant for The White Company. Based on these responses, it appears that Mr. White paid off the remainder of the subject loan by a personal check in the amount of $7,203.83, which far exceeds all the above figures. Apparently, this payment by Mr. White included all interest accrued on the loan.[4]

In any case, while a discrepancy exists in the amount that was actually paid by the Committee on the subject loan, the fact remains that the remaining balance was apparently paid in full by Mr. White but, on the 1986 April Quarterly Report, the Committee listed the ten co-guarantors as contributing either $576.41 or $576.42. However, as set out above, each co-guarantor denies making a contribution to the Buechner

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4. The Committee reported on their 1984 Year End Report interest due on the subject loan as $172.38. In addition, on the Committee's 1985 Mid-Year Report, the Committee reported interest due on the loan as $467.67. Based on the Committee reports, it is unclear whether the initial amount of interest accrued on the loan was paid by the Committee or whether it was included in the $467.67 reported as accrued on the Committee's 1985 Mid-Year Report. In any case, the amount of interest due on the loan does not clear up the discrepancy in the amounts referenced above.

campaign committee in order to pay off the remaining balance of the loan.

D. Contributions in the name of another

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

The loan made to the Buechner campaign committee was signed by Congressman Buechner, but as indicated on the note, the Congressman was not individually liable. Instead, the loan was unsecured except for the ten separate $1,000 guarantees reportedly made by ten individuals. In their responses, two of these individuals deny any knowledge of the loan in question and deny signing any "loan papers" in connection with this matter. One individual, who did not respond to the complaint, is quoted in a separate response as being unable to recall whether she in fact signed the guarantee. However, in responses from the seven remaining co-guarantors, each individual admits to signing the loan guarantee. In addition, it appears that the loan guarantees were properly reported to the Commission based on the Committee's belief that the ten individuals listed were the co-guarantors of the subject loan. Thus, it appears that the $10,000 loan made to the Buechner committee was in fact guaranteed by at least seven of the ten

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individuals listed.[5] Since none of the co-guarantors made any other contributions to the Buechner committee, the loan guarantees would not result in excessive contributions from the individuals.[6] Therefore, the primary issue in this matter becomes whether the nine $576.41 contributions and the one $576.42 contribution reported by the Buechner committee as being subsequently received from the co-guarantors of the subject loan, were in fact contributions from those individuals.

Based on the evidence, it does not appear that the co-guarantors did in fact make the reported contributions. In addition to the denials made by all ten individuals,[7] Joan Campbell states in her response that in her capacity as an

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5. In their responses, five co-guarantors specifically state that the amount for which they agreed to guarantee the loan totaled $1,000 each.

6. An additional contribution was made to the Buechner committee from the authorized campaign committee of Robert J. Wittmann, one of the listed co-guarantors of the subject loan, who was a candidate for the House in 1986 from the First District of Missouri. However, contributions from a candidate committee are not considered to be personal contributions by the candidate and thus would not impact upon the candidate's personal contribution limits to other campaigns. See Advisory Opinion 1984-34. Therefore, Mr. Wittmann could make the individual contribution to the Buechner campaign, without violating 2 U.S.C. § 441a.

7. While eight individuals deny making the loan guarantees, all ten individual respondents deny making the contributions reported by the Buechner committee. Of these denials, nine are made in responses to the complaint and one denial is made in newspaper articles attached to the complaint. A response to the complaint was not received from Mindy Komen; however, Ms. Komen, in the subject newspaper articles, denies making a contribution to the Buechner campaign committee in order to pay off the remaining balance of the loan.

accountant for Mr. White, she prepared a "personal check" for him in the amount of $7,203.83 to pay off the remainder of the subject loan. Furthermore, in the response from Thomas Mohan, he states that in November, 1985, Mr. White paid Boatman's Bank the remaining balance of the loan including accrued interest. Based on the foregoing, it appears that the money used to pay off the remaining portion of the subject loan came from Mr. White's personal account and not from contributions made by the co-guarantors. Indeed, the guarantors apparently were not even aware of this payment by Mr. White. Therefore, this Office recommends that the Commission find there is no reason to believe that Eileen Buhlinger, Joan Campbell, Judith Moran Harris, Joyce A. Heston, Mindy Komen, Patricia McBride, T.M. Mohan, Evelyn N. Mosley, Beverly J. Stewart and Robert J. Wittmann violated 2 U.S.C. § 441f by knowingly allowing their name to be used to effect a contribution. Similarly, this Office recommends that the Commission find no reason to believe that the Jack Buechner for Congress Committee and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. § 441f by accepting contributions in the name of another.

Furthermore, while it appears that the money used to pay off the remainder of the loan came from Mr. White's personal account, it is not known whether Mr. White was ultimately reimbursed by The White Company or White Diversified, Inc. According to the response from White Diversified, Inc., the corporation had no involvement in the matter described in

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Ms. Horn's compliant; however, it remains unclear whether Mr. White, at some later date, was reimbursed by the corporation of which he was the owner. It does not appear that this Office will be able to discover whether any such repayment occurred since the loan in question took place over five years ago and Mr. White is now deceased. Therefore, based on the foregoing, this Office recommends that the Commission take no action against White Diversified, Inc. with respect to 2 U.S.C. § 441f.[8]

E. Prohibited and Excessive Contributions

Pursuant to 2 U.S.C. § 441b, corporations are generally prohibited from making contributions and expenditures in connection with federal elections. Section 441b further prohibits political committees from knowingly receiving or accepting such prohibited contributions. Further, pursuant to 11 C.F.R. § 114.5(b)(1), a contributor may not be paid for his or her contribution through a bonus, expense account, or other form of direct or indirect compensation.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person shall make contributions to any candidate and his authorized committee

8. In addition, with regard to the initial guarantees of the subject loan, while seven of the co-guarantors admit to signing a guarantee, at least two guarantors deny making such a guarantee. Therefore, it is unclear whether Mr. White, who it appears personally asked the employees to guarantee the loan, possibly made any of these guarantees himself. If this is the case, in effect, Mr. White would have made guarantees in the name of another. Since Mr. White is deceased, this Office has no way of determining what actually happened at the time these guarantees were made and, therefore, this Office makes no recommendation as to a possible violation of the Act relating to the making of the guarantees.

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with respect to any election for Federal office which, in the aggregate, exceed $1,000. Further, 2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of the provisions of 2 U.S.C. § 441a.

The White Company is a fictitious name used by White Diversified, Inc. White Diversified, Inc. is an incorporated for-profit company operating in Missouri. According to the Missouri Secretary of the State, both White Diversified, Inc. and The White Company list the same mailing address.

As discussed supra, Complainant appears to be alleging in the complaint that The White Company, through its employees, made a corporate contribution to Congressman Buechner's campaign committee in violation of 2 U.S.C. § 441b. Based on information in the complaint, this allegation would appear to be based upon the denials by three co-guarantors that they did not in fact make the reported campaign contributions to the Buechner committee and the fact that the co-guarantors of the subject loan were all employees of The White Company. Similarly, Complainant cites to a possible violation of 11 C.F.R. § 114.5(b)(1), which disallows a contributor to be paid for his or her contribution through any form of compensation. This allegation stems from statements reported as being made by Thomas M. Mohan in the October 18, 1990 article. Attachment 1 at 5. In the article, Mr. Mohan is quoted as saying that in regard to the loan and contributions, the workers were complying with a request of the Company's

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owner and the company probably made it up to the employees later through raises.

Despite Complainant's allegations, it appears that the money used to pay of the remaining portion of the subject loan came from Mr. White's personal account and, therefore, there appear to be no violations of 2 U.S.C. § 441b in this matter. Once again, it is not known whether Mr. White was ever in fact reimbursed by The White Company or White Diversified, Inc. for his payment of the remaining portion of the subject loan. In addition, in his response, Mr. Mohan states that he was misquoted in the October 18, 1990 article and he had told the reporter that he did not remember how things were resolved and would have to check the records to be more certain. Also, in the responses received from Ms. Buhlinger, Ms. McBride and Ms. Stewart, each of these respondents deny that they were ever reimbursed in any way by The White Company with regard to this matter. Based on the foregoing, this Office recommends that the Commission take no action against White Diversified, Inc. with respect to 2 U.S.C. § 441b. Further, this Office recommends that the Commission find no reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. § 441b by accepting corporate contributions from White Diversified, Inc.

While is unclear how much of the loan was actually paid by the Buechner committee, by the Committee's own admission a portion of the loan was defaulted on by the Committee. The remaining portion, which was ultimately paid by Mr. White from

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his personal funds, apparently totaled not less than $5,764.11, which is the last amount reported by the Committee as being due on the loan, and not more than $7,203.83, which is the amount that was paid by Mr. White according to the accountant. Regardless of which figure is used, the payment by Mr. White clearly exceeds the applicable statutory limit of $1,000. It is unclear what information was provided to the Buechner Committee when the balance on the loan in question was paid. Counsel for the Committee states that it is the Congressman's recollection that Mr. White secured the balance of the unpaid loan from each of the co-guarantors; however, Mr. White was no longer in contact with the campaign at the time the loan was repaid. Thus, it apparently was the bank that notified the Committee that the loan had been repaid. Therefore, it is unclear what would lead the Committee to believe that the balance of the loan had been repaid by the co-guarantors. In any event, at the time the Committee was notified that the loan had been repaid, it seems that the Committee could have easily discovered who was responsible for the final loan repayment, thus avoiding possible violations of the Act. Therefore, based on the available evidence, this Office recommends that the Commission find there is reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Mr. Thomas White. However, this Office makes no recommendation as to the making of this excessive contribution, since Mr. White is now deceased.

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F. Reporting

Pursuant to 2 U.S.C. § 434(a)(1), each treasurer of a political committee shall file reports of receipts and disbursements. Section 434(b)(3)(A) further requires each report to disclose the identification of each person who makes contributions to the reporting committee with an aggregate value in excess of $200 within the calendar year, together with the date and the amount of such contributions.

As discussed supra, it is unclear what information was provided to the Buechner committee when the balance on the loan in question was paid. According to the Committee's response, it is only the Congressman's "recollection" that Mr. White secured the balance of the unpaid loan from each of the co-guarantors. The Committee did in fact attribute the final repayment on the loan to each of the guarantors on a pro-rata basis, as is reflected in the reports on file with the Commission. This erroneous information, however, was apparently not provided to the Committee by Mr. White since he was no longer in contact with the campaign at the time the loan was repaid. Instead, it was the bank that notified the Committee that the loan had been paid; however, the bank is unable to corroborate this claim or provide any additional information since it is unable to locate its file on the loan and the instrument used to pay off the loan. As is the case with the Committee's violation of section 441a(f), it appears that the Committee could have determined, at the time the

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remaining balance of the loan was paid, the correct identity of party responsible for the final payment on the subject loan.

In any event, the Committee erroneously attributed the final payment on the loan to the guarantors when, as already demonstrated, the actual source of those funds apparently was Mr. White. Thus, it is Mr. White who should have been identified on the Committee's reports as the contributor of the remaining balance paid on the subject loan. Therefore, this Office recommends that the Commission find reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. § 434(b)(3)(A) by failing to correctly identify the contributor on their reports. However, since there is no indication that the candidate, Jack Buechner, was personally involved in this or any of the alleged violations here, this Office recommends that the Commission find no reason to believe that Mr. Buechner violated the Act.

Based on the circumstances of this case, particularly the fact that this activity occurred over five years ago, that the relevant bank records are apparently now unavailable and that Mr. White is deceased, and consistent with the proper ordering of the Commission's priorities and resources, this Office recommends that the Commission take no further action with respect to this or the other section 441a(f) violation by the Committee and close the entire file in this matter. See Heckler v. Chaney, 470 U.S. 821 (1985).

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III. RECOMMENDATIONS

1. Find no reason to believe that Eileen Buhlinger, Joan Campbell, Judith Moran Harris, Joyce A. Heston, Mindy Komen, Patricia McBride, T.M. Mohan, Evelyn N. Mosley, Beverly J. Stewart and Robert J. Wittmann violated 2 U.S.C. § 441f.

2. Take no action against White Diversified, Inc. with respect to 2 U.S.C. §§ 441b and 441f.

3. Find no reason to believe that Jack Buechner for Congress and Robert A. Hutton, as treasurer, violated 2 U.S.C. §§ 441b and 441f.

4. Find reason to believe that Jack Buechner for Congress and Robert A. Hutton, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and 441a(f), but take no further action.

5. Find no reason to believe that Jack Buechner violated the Federal Election Campaign Act of 1971, as amended.

6. Approve the appropriate letters.

7. Close the file.

Lawrence M. Noble
General Counsel

9/23/91
Date

BY: Lois G. Lerner by [illegible]
Lois G. Lerner
Associate General Counsel

Attachments
1. Complaint
2. Response from the Buechner committee
3. Response from Thomas M. Mohan
4. Response from Boatmen's Bank
5. Response from Eileen Buhlinger
6. Response from Joan Campbell
7. Response from Joyce Heston
8. Response from Patricia McBride
9. Response from Evelyn Mosley
10. Response from Beverly J. Stewart
11. Response from Robert J. Wittmann
12. Response from Judith Moran Harris
13. Response from White Diversified, Inc.

Staff Assigned: Mary Ann Bumgarner

91040373874

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: September 24, 1991

SUBJECT: MUR 3158 - First General Counsel's Report

The attached is submitted as an Agenda document

for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]		
Non-Sensitive	[ ]	Audit Matters	[ ]
24 Hour No Objection	[ ]	Litigation	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[ ]	Status Sheets	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Other	[ ]	Other (see distribution below)	[ ]

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Jack Buechner; Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer;	)	
Eileen Buhlinger; Joan Campbell;	)	MUR 3158
Judith Moran Harris; Joyce A. Heston;	)	
Mindy Komen; Patricia McBride;	)	
Thomas M. Mohan; Evelyn N. Mosley;	)	
Beverly J. Stewart; Robert J. Wittmann;	)	
Thomas White; Boatmen's National Bank;	)	
White Diversified, Inc.	)	

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 27, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 3158:

1. Find no reason to believe that Eileen Buhlinger, Joan Campbell, Judith Moran Harris, Joyce A. Heston, Mindy Komen, Patricia McBride, Thomas M. Mohan, Evelyn N. Mosley, Beverly J. Stewart and Robert J. Wittmann violated 2 U.S.C. § 441f.

2. Take no action against White Diversified, Inc. with respect to 2 U.S.C. §§ 441b and 441f.

3. Find no reason to believe that Jack Buechner for Congress and Robert A. Hutton, as treasurer, violated 2 U.S.C. §§ 441b and 441f.

(Continued)

4. Find reason to believe that Jack Buechner for Congress and Robert A. Hutton, as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and 441a(f), but take no further action.

5. Find no reason to believe that Jack Buechner violated the Federal Election Campaign Act of 1971, as amended.

6. Approve the appropriate letters, as recommended in the General Counsel's Memorandum dated September 23, 1991.

7. Close the file.

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

Attest:

9-27-91
Date

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

Received in the Secretariat: Tues., Sept. 24, 1991 3:01 p.m.
Circulated to the Commission: Wed., Sept. 25, 1991 11:00 a.m.
Deadline for vote: Fri., Sept. 27, 1991 11:00 a.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

CLOSED

Robert B. Hoemeke, Esquire
Lewis, Rice & Fingerish
Boatmen's National Bank of St. Louis
611 Olive Street
St. Louis, MO 63101

RE: MUR 3158
Boatmen's National Bank
of St. Louis

Dear Mr. Hoemeke:

On June 24, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days.

Should you have any questions, contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9104037378

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Joyce A. Heston
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158
Joyce A. Heston

Dear Ms. Heston:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Beverly J. Stewart
112 Carriage House Lane
St. Charles, MO 63303

RE: MUR 3158
Beverly J. Stewart

Dear Ms. Stewart:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040373380

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Mindy Komen
c/o Paragon Group Inc.
12400 Olive Boulevard
St. Louis, MO 63141

RE: MUR 3158
Mindy Komen

Dear Ms. Komen:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040373381

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Judith Moran Harris
9701 Little Baisch Lane
Sunset Hills, MO 63127

RE: MUR 3158
Judith Moran Harris

Dear Ms. Harris:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Evelyn N. Mosley
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158
Evelyn N. Mosley

Dear Ms. Mosley:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

9104037383

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Joan Campbell
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158
Joan Campbell

Dear Ms. Campbell:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040373384

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Ms. Eileen Buhlinger
1192 Cantina Drive
St. Louis, MO 63141

RE: MUR 3158
Eileen Buhlinger

Dear Ms. Buhlinger:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Thomas B. Weaver, Esquire
Armstrong, Teasdale, Schlafly,
Davis & Dicus
One Metropolitan Square
St. Louis, MO 63102-2740

RE: MUR 3158
Patricia McBride

Dear Mr. Weaver:

On November 8, 1990, the Federal Election Commission notified your client, Patricia McBride, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that Patricia McBride violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

9104037386

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

White Diversified, Inc.
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158
White Diversified, Inc.

Dear Sir or Madame:

On August 26, 1991, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission determined, on the basis of the information in the complaint and information provided by you, to take no action against White Diversified, Inc. with respect to 2 U.S.C. §§ 441b and 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040373387

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Mr. T.M. Mohan
c/o The White Company
940 West Port Plaza
St. Louis, MO 63146

RE: MUR 3158
T.M. Mohan

Dear Mr. Mohan:

On November 8, 1990, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information supplied by you, that there is no reason to believe that you violated 2 U.S.C. § 441f. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

9104037388

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Andrew B. Leonard, Esquire
Buechner, McCarthy, Leonard,
Kaemnerer, Owen & Laderman
Emerald Point
16141 North Outer Forty Drive
Suite 300
St. Louis (Chesterfield), MO
63017-1774

RE: MUR 3158
Jack Buechner

Dear Mr. Leonard:

On November 8, 1990, the Federal Election Commission notified your client, Jack Buechner, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended, by your client, Jack Buechner.

On September 27, 1991, the Commission found, on the basis of the information in the complaint and information provided by your client, that there is no reason to believe that Jack Buechner violated the Act. Accordingly, the Commission closed its file in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040373389

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joan Kelly Horn
1750 S. Brentwood Blvd.
Suite 256
St. Louis, MO 63144

RE: MUR 3158

Dear Ms. Horn:

On September 27, 1991, the Federal Election Commission reviewed the allegations of your complaint dated October 25, 1990, and found that on the basis of the information provided in your complaint and information supplied by the respondents, there is reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and 441a(f), but determined to take no further action. The Commission also found there is no reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. §§ 441b and 441f. In addition, the Commission found there is no reason to believe that Eileen Buhlinger, Joan Campbell, Judith Moran Harris, Joyce A. Heston, Mindy Komen, Patricia McBride, Thomas M. Mohan, Evelyn N. Mosley, Beverly J. Stewart and Robert J. Wittmann violated 2 U.S.C. § 441f.

The Commission also found that there is no reason to believe that Jack Buechner violated the Federal Election Campaign Act of 1971, as amended. Lastly, the Commission determined to take no action against White Diversified, Inc. with respect to 2 U.S.C. §§ 441b and 441f. Accordingly, on September 27, 1990, the Commission closed the file in this matter.

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The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 18, 1991

Andrew B. Leonard, Esquire
Buechner, McCarthy, Leonard,
Kaemnerer, Owen & Laderman
Emerald Point
16141 North Outer Forty Drive
Suite 300
St. Louis (Chesterfield), MO
63017-1774

RE: MUR 3158
Jack Buechner for Congress
and Robert A. Hutton, Jr.,
as treasurer

Dear Mr. Leonard:

On November 8, 1990, the Federal Election Commission notified your clients, Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 27, 1991, the Federal Election Commission found that there is no reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. §§ 441b and 441f of the Federal Election Campaign Act of 1971, as amended (the "Act"). On that same date, the Commission found reason to believe that Jack Buechner for Congress and Robert A. Hutton, Jr., as treasurer, violated 2 U.S.C. §§ 434(b)(3)(A) and 441a(f); however, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file.

The Commission reminds your clients that when accepting contributions, it is necessary to determine the correct identity of the party responsible for the contributions in order to ensure the accuracy of reports filed with the Commission and prevent possible violations of the Act.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Please send such materials to the General Counsel's Office.

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If you have any questions, please contact Mary Ann Bumgarner, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosure
General Counsel's Report

9104037393

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3158

DATE FILMED 11/8/91 CAMERA NO. 2

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