



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3237

DATE FILMED 6/3/92 CAMERA NO. 1

CAMERAMAN EES.

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THIS IS THE BEGINNING OF MUR # 3237

92040903076

REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL

DATE: 4 December 1990

ANALYST: Pat Sheppard

I. COMMITTEE: Kentuckians for Brock
(C00239129)
William G. Johnson, Treasurer
#15 Fountain Plaza
Frankfort, KY 40601

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

III. BACKGROUND:

Receipt of Excessive Loan

The Kentuckians for Brock committee ("the Committee") has in 1990, accepted and refunded an excessive loan in the amount of \$6,000 from one (1) individual.

Schedule C of the Committee's 1990 July Quarterly Report discloses the receipt of a \$6,000 excessive loan from Al Brock on May 29, 1990 (Attachment 2). A Request for Additional Information ("RAI") was sent to the Committee on September 11, 1990 (Attachment 3). A Second Notice was sent to the Committee on October 4, 1990 for failure to respond (Attachment 4). On October 19, 1990 the Committee filed an Amended 1990 July Quarterly Report ("Amended Report") (Attachment 5). In the written portion of the Amended Report, the Committee stated that the loan had been repaid and that they have requested a copy of the canceled check.

Schedule C of the Committee's 1990 October Quarterly Report filed with the Commission on October 18, 1990 indicated that the loan was repaid on October 2, 1990 (Attachment 6). On November 5, 1990, a Reports Analysis Division analyst called the Committee to inquire about the canceled check (Attachment 7). The analyst spoke with the treasurer who stated that upon receiving the canceled check from the candidate on Wednesday, November 7, 1990, he would forward a copy to the Commission. To date, the Committee has failed to provide the copy of the refund check.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 27NOV90
ATTACHMENT #1
PAGE 1 of 1

CANDIDATE / COMMITTEE / DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
	OFFICE SOUGHT / PARTY	PRIMARY GENERAL	PRIMARY GENERAL				
BROCK, JOHN H	SENATE	DEMOCRATIC PARTY			KENTUCKY	1990 ELECTION	ID# 80KY00107
1. STATEMENT OF CANDIDATE							
1989 STATEMENT OF CANDIDATE					24OCT89		3 89SEN/009/2775
1990 STATEMENT OF CANDIDATE					5FEB90		1 90SEN/005/2903
2. PRINCIPAL CAMPAIGN COMMITTEE							
KENTUCKIANS FOR BROCK							ID #C00239129 SENATE
1989 STATEMENT OF ORGANIZATION					24OCT89		3 89SEN/009/2776
YEAR-END		18,400		11,654	18OCT89 -31DEC89		17 90SEN/005/2885
YEAR-END - AMENDMENT		-		-	18OCT89 -31DEC89		13 90SEN/009/0246
REQUEST FOR ADDITIONAL INFORMATION					18OCT89 -31DEC89		2 90FEC/631/2681
REQUEST FOR ADDITIONAL INFORMATION 2ND					18OCT89 -31DEC89		3 90FEC/634/2273
1990 STATEMENT OF ORGANIZATION - AMENDMENT					5FEB90		3 90SEN/005/2905
48 HOUR CONTRIBUTION NOTICE					24MAY90		3 90SEN/009/3594
48 HOUR CONTRIBUTION NOTICE					4JUN90		3 90SEN/010/0905
APRIL QUARTERLY		87,856		49,880	1JAN90 -31MAR90		90 90SEN/008/2902
APRIL QUARTERLY - AMENDMENT		-		-	1JAN90 -31MAR90		5 90SEN/009/3063
APRIL QUARTERLY - AMENDMENT		87,856		49,880	1JAN90 -31MAR90		9 90SEN/015/0443
REQUEST FOR ADDITIONAL INFORMATION					1JAN90 -31MAR90		2 90FEC/648/1608
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN90 -31MAR90		3 90FEC/651/4343
PRE-PRIMARY		39,989		70,391	1APR90 - 9MAY90		70 90SEN/009/2064
JULY QUARTERLY		40,812		53,789	10MAY90 -30JUN90		23 90SEN/013/2149
JULY QUARTERLY - AMENDMENT		40,812		53,789	10MAY90 -30JUN90		8 90SEN/019/3423
JULY QUARTERLY - AMENDMENT		40,812		53,789	10MAY90 -30JUN90		8 90SEN/021/1782
REQUEST FOR ADDITIONAL INFORMATION					10MAY90 -30JUN90		5 90FEC/655/1387
REQUEST FOR ADDITIONAL INFORMATION 2ND					10MAY90 -30JUN90		6 90FEC/658/0637
OCTOBER QUARTERLY		10,600		9,036	1JUL90 -30SEP90		10 90SEN/019/1768
REQUEST FOR ADDITIONAL INFORMATION					1JUL90 -30SEP90		1 90FEC/670/2534
TOTAL		197,657	0	194,750			287 TOTAL PAGES
3. AUTHORIZED COMMITTEES							
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN							

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ALL REPORTS HAVE BEEN REVIEWED

CASH ON HAND AS OF 9/30/90 - \$2,905.66

Debts Owed By the Committee as of 9/30/90 - \$13,000

Name of Committee (in Full)

KENTUCKIANS FOR TOM BROCK

A. Full Name, Mailing Address and ZIP Code of Loan Source <u>FL Brock</u> <u>P.O.B. 103</u> <u>PIKEVILLE Ky 40977</u>	Original Amount of Loan <u>6000.-</u>	Cumulative Payment To Date <u>0</u>	Balance Outstanding at Close of This Period <u>6000.00</u>
--	--	--	---

Election: Primary General Other (specify):

Terms: Date Incurred 5-29-90 Date Due 08-90 Interest Rate UNSPECIFIED % (apr) Secured

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

1. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
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Election: Primary General Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) Secured

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

1. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code	Name of Employer	
	Occupation	
	Amount Guaranteed Outstanding: \$	

SUBTOTALS This Period This Page (optional) 6000.00

TOTALS This Period (last page in this line only) 6000.00

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

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Any information received from such Reports and Statements may not be used by any person for the purpose of establishing a claim or for any other purpose, other than using the name and address of any political candidate to which such returns have been such candidate.

NAME OF CONTRIBUTOR TO FUND

Contributors for John Brock

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Chuck Brockback 44 Edgmont Lane Louisville KY 40118 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$ 100.00	02/07/90	100.00 check
Bob Brownel 3100 Madison Blvd. Louisville KY 40220 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$ 25.00	02/07/90	25.00 cash
Barry Briscoe 6 Justice Ln. Frankfort KY 40601 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer SELF EMPLOYED Occupation Attorney Aggregate Year-to-Date > \$ 250.00	02/07/90	250.00 check
Ellen Briscoe 26 Justice Dr. Frankfort KY 40601 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 25.00	02/07/90	25.00 check
Lorna Brantman 308 Jacks Creek Rd. Richard KY 40175 Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 10.00	01/02/90	10.00 check
Al Brock P.O. Box 103 Pineville KY 40177 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer SELF EMPLOYED Occupation Businessman Aggregate Year-to-Date > \$ 1000.00	01/15/90	1000.00 check
Ellen Brock P.O. Box 949 Paducah KY 40313 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer SELF EMPLOYED Occupation Businessman Aggregate Year-to-Date > \$ 1000.00	02/01/90	1000.00 check

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (next page this line number only)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RO-2

SEP 11 1990

William G. Johnson, Treasurer
Kentuckians for Brock
815 Fountain Plaza
Frankfurt, KY 40601

Identification Number: C00239129

Reference: July Quarterly Report (5/10/90-6/30/90)

Dear Mr. Johnson:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$1,000 or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the

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KENTUCKIANS FOR BROCK
PAGE 2

authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

-Please provide the omitted figures for Lines 11(a)(iii), Column A and all appropriate lines of Column B.

-Column A, Line 6(c) of the Summary Page should equal the difference of Line 6(a) and Line 6(b).

-Line 11(e), Column A, of the Detailed Summary Page does not equal the sum of Lines 11(a) through 11(d). Please amend your report(s) to clarify this discrepancy. (11 CFR 104.3(a))

-The aggregate year-to-date totals for certain entries on your report indicate there were additional contributions that should have been itemized. When contributions from an individual reach \$200 for a calendar year, each subsequent contribution from that individual must be itemized regardless of the amount. Additionally, each contribution from a political committee must be itemized regardless of the amount. Please amend your report to correct the discrepancy for the aggregate totals for: F.N. Hazen, Joe Woolums, Roger Coffey and Everett Montgomery.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

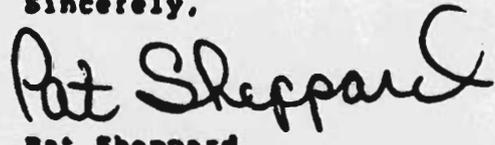
9 2 0 4 0 9 0 3 0 8 2
7 1 3 6 . 5 1 3 3 3

KENTUCKIANS FOR BROCK
PAGE 3

-For future reports, please be advised that: contributions from individuals and political committees should be itemized on separate Schedules A. Committees as well as disbursements for operating expenditures should be itemized on separate Schedules A and b, respectively.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

RO-3

October 4, 1990

William G. Johnson, Treasurer
Kentuckians for Brock
#15 Fountain Plaza
Frankfurt, KY 40601

Identification Number: C00239129

Reference: July Quarterly Report (5/10/90-6/30/90)

Dear Mr. Johnson:

This letter is to inform you that as of October 3, 1990, the Commission has not received your response to our request for additional information, dated September 11, 1990. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

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33337

Charles T. Mitchell Company

1000 ...
1000 ...
1000 ...
1000 ...

1000 ...
1000 ...
1000 ...
1000 ...

October 8, 1990

Secretary of the Senate
232 Hart Senate Office Building
Washington, D.C. 20510

Re: Attached correspondence from the Federal Election Commission
July quarterly report
Kentuckians for Brock
C00239129

Gentlemen:

We are in receipt of the attached and referenced correspondence and are responding as follows:

AK

The loan from Al Brock has been repaid. We have requested a copy of the cancelled check refunding the six thousand dollar loan referenced in section 1 of the letter. This represents complete refund of the loan. Refund of the loan and a copy of the check is a suggested response in the September 11, 1990 letter. If additional information is desired on this matter please advise.

All corrections or omissions on or for lines 11(a)(iii), column A, all appropriate column B, column A line 6(c) of the summary page, and line (e) (a) (b) (c) and (d) of the detail page have been entered as correction on the attached page. Again we invite full audit or examination of these amounts. If there is additional information needed or correction of this number please advise.

Enclosed is a complete analysis of the contributions from: F.W. Hazen, Joe Woolums, Roger Coffey, and Everette Montgomery.

Enclosed also is a list of contributions in excess of \$1,000.00 received between May 10, 1990 and May 29, 1990.

Thank you for your attention to our small report. We have complete records on all financial matters of this campaign and welcome your scrutiny.

Respectfully submitted,

Wm. G. Johnson CPA

Wm. G. Johnson, CPA
Treasurer, Kentuckians for Brock

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90000103423

Name of Committee (in Full)			
KENTUCKIANS FOR JOHN BROCK			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
AL BROCK P.O.B. 103 PINNACLES KY 40977		6000-	THIS NOTE RECEIVED FULL 10/1/90
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Balance Outstanding at Close of This Period
			6000-
Terms: Date Incurred <u>5-23-90</u> Date Due <u>OPRY</u> Interest Rate <u>N/A</u> % (per) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
JOHN BROCK (CANDIDATE) 15 FOUNTAIN PLAZA FRANKFORT KY 40601		7000-	
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			Balance Outstanding at Close of This Period
			7000-
Terms: Date Incurred <u>9-30-90</u> Date Due <u>OPRY</u> Interest Rate <u>N/A</u> % (per) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			12000
TOTALS This Period (last page in this line only)			12000
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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MEMORANDUM TO FILES: DATE: November 5, 1990
XX Telecon
 Visit

NAME OF THE COMMITTEE: Kentuckians for Brock (KY Senate)

SUBJECT: Canceled Check

FEC REP: Pat Sheppard

COMMITTEE REP: William G. Johnson, Treasurer (520) 227-7395

I called Mr. Johnson to ask if he had received the canceled check for the loan payment to Al Brock. He stated that he was meeting with the candidate on Wednesday, November 7, and that he would call him today and remind him to bring the check with him. Mr. Johnson said that as soon as he gets the check, he will copy it and send the copy to me.

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91 MAR 12 AM 11:15

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 90L-59
STAFF MEMBER: Frances B. Hagan

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

RESPONDENTS: Kentuckians for Brock
William G. Johnson, Treasurer
Al Brock

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 103.3(b)(3)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the Kentuckians for Brock Committee ("the Committee") and William G. Johnson, as treasurer, to the Office of the General Counsel on December 5, 1990, for accepting excessive contributions. The Committee is the principal campaign committee of U.S. Senate candidate John H. Brock.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of

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money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

RAD's review of Committee reports reveals that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

The individual's direct contribution of \$1,000 and the loan of \$6,000 to the Committee's primary election campaign resulted in an excessive amount of \$6,000 with respect to a single election. Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441a(f) by knowingly accepting excessive contributions. This Office also

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recommends that the Commission find reason to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Al Brock violated 2 U.S.C § 441a(a)(1)(A).
4. Approve the attached Factual and Legal Analyses and the appropriate letters.

Lawrence M. Noble
General Counsel

3/8/91
Date

BY: 
Lois G. Lerner
Associate General Counsel

- Attachments:
- A. Referral Materials
 - B. Factual and Legal Analyses (2)

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BEFORE THE FEDERAL ELECTION COMMISSION

(MUR 3237)

In the Matter of)	
)	
Kentuckians for Brock;)	RAD Referral 90L-59
William G. Johnson, Treasurer;)	
Al Brock.)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 14, 1991, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 90L-59:

1. Open a MUR.
2. Find reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A).
4. Approve the Factual and Legal Analyses and the appropriate letters, as recommended in in the General Counsel's Report dated March 8, 1991.

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

Attest:

3-15-91
Date

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

Received in the Secretariat:	Tues., Mar. 12, 1991 11:15 a.m.
Circulated to the Commission:	Tues., Mar. 12, 1991 4:00 p.m.
Deadline for vote:	Thurs., Mar. 14, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1991

William G. Johnson, Treasurer
Kentuckians for Brock
No. 15 Fountain Plaza
Frankfort, Kentucky 40601

RE: MUR 3237
Kentuckians for Brock
William G. Johnson, as
treasurer

Dear Mr. Johnson:

On March 14, 1991, the Federal Election Commission found that there is reason to believe the Kentuckians for Brock Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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William G. Johnson, Treasurer
Page 2

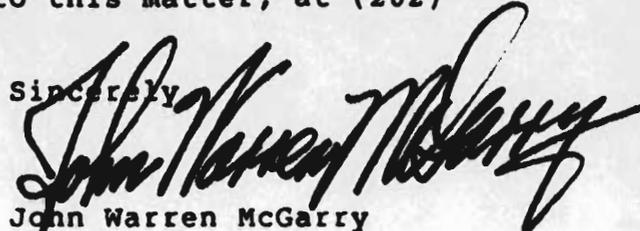
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

92040903093

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Kentuckians for Brock Committee **MUR:** 3237
William G. Johnson, as treasurer

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

The Reports Analysis Division's review of Committee reports reveals that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on

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October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990. The direct contribution of \$1,000 and the loan of \$6,000 to the Committee's primary election campaign resulted in an excessive amount of \$6,000 with respect to a single election.

Therefore, there is reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting excessive contributions.

92040903095



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 1991

Mr. Al Brock
P.O. Box 103
Pineville, Kentucky 40977

RE: MUR 3237
Al Brock

Dear Mr. Brock:

On March 14, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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

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Mr. Al Brock
Page 2

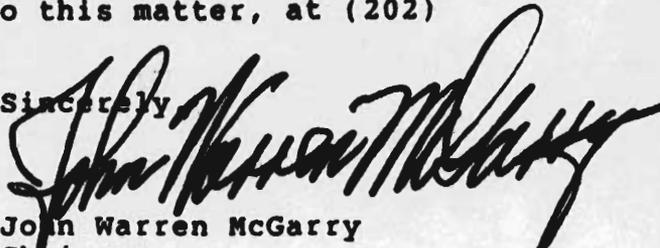
Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

92040903097

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Al Brock MUR: 3237

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

The Reports Analysis Division's ("RAD") review of Committee reports reveals that on May 29, 1990, the date of the Kentucky primary election, the Kentuckians for Brock Committee ("the Committee") and William G. Johnson, as treasurer, received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported

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repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990. The direct contribution of \$1,000 and the loan of \$6,000 to the Committee's primary election campaign resulted in an excessive amount of \$6,000 with respect to a single election.

Therefore, there is reason to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions.

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

06-0749

91 APR 12 AM 10:06

MUR

3237

91 APR 12 PM 12:59

RECEIVED
FEDERAL ELECTION COMMISSION

APRIL 5, 1991

FEDERAL ELECTION COMMISSION
999 E. STREET N.W.
WASHINGTON DC 20463

ATTENTION: FRANCES B. HAGAN

COMMISSION:

WE ARE IN RECEIPT OF YOUR CORRESPONDENCE TO MR AL BROCK, DATED 3-21-91 (COPIES ENCLOSED). IT IS THE INTENTION OF THE KENTUCKIANS FOR JOHN BROCK TO COOPERATE IN EVERY WAY WITH THE COMMISSION IN THIS MATTER.

ON MAY 29, 1990, MR AL BROCK LOANED HIS BROTHER, MR. JOHN BROCK, A CANDIDATE FOR THE U S SENATE IN THE KENTUCKY DEMOCRATIC PRIMARY, \$6,000.

THE LOAN WAS REPORTED TO THE FEDERAL ELECTION COMMISSION ON 7-18-90, WITH THE FILING OF THE REPORT OF RECEIPTS AND DISBURSEMENTS FOR THE PERIOD 5-10-90 THROUGH 6-30-90. A COPY OF THIS REPORT IS ENCLOSED.

THE COMMITTEE INTENDED TO REPAY THE LOAN, WITHIN A SHORT PERIOD OF TIME. THE CANDIDATE HAD RECEIVED ORAL REPRESENTATION FROM POLITICAL ORGANIZATIONS AN ENTITIES THAT FUNDS WOULD BE AVAILABLE TO HIM FOR THIS CAMPAIGN AND HAD DESIGNATED THESE FUNDS FOR CAMPAIGN EXPENDITURES. WHEN PROMISED FUNDS DID NOT MATERIALIZE, MR. JOHN BROCK WAS FACED WITH CAMPAIGN EXPENSES INCURRED IN ANTICIPATION OF FUTURE FINANCIAL SUPPORT. THE CANDIDATE WAS MORALLY AND LEGALLY RESPONSIBLE FOR THESE EXPENSES AND PAID THEM AS QUICKLY AS POSSIBLE.

MR. JOHN BROCK IS NOT A WEALTHY MAN AND AFTER PAYMENT OF ALL CAMPAIGN EXPENSES HE WAS UNABLE TO MAKE A TIMELY REPAYMENT TO HIS BROTHER. THE REPAYMENT TO HIS BROTHER WAS MADE IN OCTOBER THROUGH ADVANCEMENT OF PERSONAL FUNDS TO THE COMMITTEE AND ISSUANCE OF COMMITTEE CHECK TO MR AL BROCK. A COPY OF THIS CHECK IS ENCLOSED.

I AM NOT AN ATTORNEY, AND IF IT WAS THE INTENTION OF THE F.E.C. TO STRIKE FEAR IN MY HEART, YOU HAVE BEEN SUCCESSFUL. AS TREASURER, I AM ASSUMING FULL RESPONSIBILITY FOR THIS TRANSACTION. MR. AL BROCK WAS NOT AWARE OF ANY WRONGDOING AND INTENDED ONLY TO MAKE A TEMPORARY LOAN TO HIS BROTHER. MR. JOHN BROCK WAS FACED WITH MORAL COMMITMENTS BEYOND THE STRENGTH OF HIS CAMPAIGN TREASURY AND RETIRED THEM IN THE ONLY MANNER AVAILABLE. MR. JOHN BROCK RAN A THINLY FINANCED CAMPAIGN AGAINST AN EXTREMELY WEALTHY AND WELL FINANCED OPPONENT. AS MIGHT BE EXPECTED: HE LOST, HIS FINANCIAL SUPPORT MIGRATED TO HIS OPPONENT, AND MR. JOHN BROCK WAS LEFT TO RETIRE HIS DEBT WITH HIS MODERATE FINANCIAL RESOURCES.

ERRORS WERE MADE IN JUDGEMENT, BUT THERE WAS NEVER ANY INTENT OF ANY PARTY TO THIS TRANSACTION TO VIOLATE THE LAW, OR TO COMMIT ANY ACT DETRIMENTAL TO THE F.E.C OR THE ELECTION PROCESS AS WE UNDERSTAND IT.

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WE RESPECTFULLY REQUEST ANY CONSIDERATION THAT THE COMMISSION MAY
BE ABLE TO EXTEND IN THIS MATTER.

Wm. G. Johnson
WM. G. JOHNSON, TREASURER,
KENTUCKIANS FOR JOHN BROCK

COPIES WITH ENCLOSURES TO
JOHN BROCK
779 A RIDGEVIEW DRIVE
FRANKFORT, KY 40601

AL BROCK
POB 103
PINEVILLE, KY 40977

9 2 0 4 0 9 0 3 1 0 1

1-7-91

SECRETARY OF THE SENATE,
OFFICE OF PUBLIC RECORDS,
232 HART SENATE OFFICE BUILDING
WASHINGTON, D.C. 10510-7116.

FEDERAL ELECTION COMM
999 E. STREET N.W.
WASHINGTON DC 20463
ATTENTION PAT SHEPPARD

REFERENCE: ATTACHED CORRESPONDENCE FROM THE FEDERAL
ELECTION COMMISSION REGARDING KENTUCKIANS FOR JOHN BROCK
COO239129 DATED 11-6-90, 11-29-90 (12-28-90)

GENTLEMEN:

IN REGARD TO THE LOAN, REFERENCED IN THE ATTACHED
CORRESPONDENCE, ALL FUNDS LOANED TO THE CAMPAIGN OF JOHN
BROCK BY JOHN BROCK WERE FROM THE PERSONAL FUNDS OF JOHN
BROCK, NOT FUNDS BORROWED FROM A LENDING INSTITUTION.

MR. BROCK'S CAMPAIGN DID RECEIVE A LOAN FROM HIS BROTHER, AL
BROCK. THIS LOAN WAS REFERRED TO IN THE SEPTEMBER 11, 1990
LETTER FROM THE FEDERAL ELECTION COMMISSION WHICH WAS
ANSWERED ON OCTOBER 8, 1990. COPIES OF THIS CORRESPONDENCE
ARE ALSO ENCLOSED.

THE FINAL ENCLOSURE IS A COPY OF THE CANCELLED CHECK FROM
THE CAMPAIGN TO AL BROCK, DATED 10-3-90, WHICH REPAID THE
LOAN FROM AL BROCK. THIS CANCELLED CHECK, WHICH WAS
REFERENCED IN OUR 10-8-90, WAS MISPLACED AND A COPY WAS
RECENTLY PROVIDED BY THE BANK. WE THOUGHT THAT THE NOVEMBER
6, 1990 AND NOVEMBER 9, LETTERS WERE IN REFERENCED TO THIS
MATTER AND WERE WAITING FOR THE CHECK COPY PRIOR TO
RESPONDING.

IF THE OPENING EXPLANATION OF LOANED FUNDS AND THE COPY OF
THE CHECK TO MR. AL BROCK DO NOT FULLY CLARIFY ALL
OUTSTANDING MATTERS AT THIS TIME, PLEASE DO NOT HESITATE TO
CALL.

Wm. G. Johnson CPA
WM. G. JOHNSON CPA
TREASURER KENTUCKIANS FOR JOHN BROCK

COPY WITH ENCLOSURES TO JOHN BROCK

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Handwritten text

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1922 APR 2 7:45 AM

Large handwritten signature



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-2

NOV 6 1990

William G. Johnson, Treasurer
Kentuckians for John Brock
#15 Fountain Plaza
Frankfort, KY 40601

Identification Number: C00239129

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. Johnson:

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

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903104



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

November 29, 1990

William G. Johnson, Treasurer
Kentuckians for John Brock
c/o Willian G. Johnson, JR. CPA
201 West Main, P.O. Box 689
Frankfort, KY 40601

Reopened

DEC 28 1990

Identification Number: C00239129

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. Johnson:

This letter is to inform you that as of November 28, 1990, the Commission has not received your response to our request for additional information, dated November 6, 1990. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

92040903105

Charles T. Mitchell Company

Certified Public Accountants
201 WEST MAIN, P.O. BOX 698
FRANKFORT, KENTUCKY 40602
FRANKFORT - (502) 227-7395
TELECOPIER - (502) 227-8005

||^C T^M

CHARLES T. MITCHELL, C.P.A.
DON C. GILES, C.P.A.
WILLIAM G. JOHNSON, JR., C.P.A.
GARY L. HARBIN, C.P.A.
LARRY T. WILLIAMS, C.P.A.

October 8, 1990

Secretary of the Senate
232 Hart Senate Office Building
Washington, D.C. 20510

Re: Attached correspondence from the Federal Election Commission
July quarterly report
Kentuckians for Brock
C00239129

Gentlemen:

We are in receipt of the attached and referenced correspondence and are responding as follows:

The loan from Al Brock has been repaid. We have requested a copy of the cancelled check refunding the six thousand dollar loan referenced in section 1 of the letter. This represents complete refund of the loan. Refund of the loan and a copy of the check is a suggested response in the September 11, 1990 letter. If additional information is desired on this matter please advise.

All corrections or omissions on or for lines 11(a)(iii), column A, all appropriate column B, column A line 6(c) of the summary page, and line (e) (a) (b) (c) and (d) of the detail page have been entered as correction on the attached page. Again we invite full audit or examination of these amounts. If there is additional information needed or correction of this number please advise.

Enclosed is a complete analysis of the contributions from: F.N. Hazen, Joe Woolums, Roger Coffey, and Everette Montgomery.

Enclosed also is a list of contributions in excess of \$1,000.00 received between May 10, 1990 and May 29, 1990.

Thank you for your attention to our small report. We have complete records on all financial matters of this campaign and welcome your scrutiny.

Respectfully submitted,

Wm. G. Johnson CPA

Wm. G. Johnson, CPA
Treasurer, Kentuckians for Brock

92040903106

	11-14-89	EVERETTE				
	12-5-89	MONTGOMERY	F. N.	JOE	ROGER	
	12-15-89		HAZEN	WOLLUMS	COFFEY	200.00
	1-15-90	100.00	200.00	250.00		
	5-15-90		200.00			
	5-24-90			250.00		
	5-25-90				200.00	
	5-30-90	399.53				
	TOTAL	499.53	400.00	500.00	400.00	
5-15-90		JACK WADDELL	1000.00			
5-18-90		SHARON COLLETT	1000.00			
5-25-90		ELIZABETH JONES	1000.00			
2-29-90		AL BROCK (LDAN)	6000.00			

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DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)		Report Covering the Period:	
		From:	To:
I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A) Cash: 22,751.05 in kind		24,639.16	
(ii) Unitemized	1,868.11	10,772.87	
(iii) Total of contributions from individuals		35,412.03	162,633.62
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) The Candidate			
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))		34,812.03	162,633.62
TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.			
LOANS:			
(a) Made or Guaranteed by the Candidate			
(b) All Other Loans		6,000.00	6,000.00
(c) TOTAL LOANS (add 13(a) and (b))		6,000.00	6,000.00
OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
OTHER RECEIPTS (Dividends, Interest, etc.)			25.08
TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		40,812.03	168,658.70
II. DISBURSEMENTS			
OPERATING EXPENDITURES		51,789.55	170,062.26
TRANSFERS TO OTHER AUTHORIZED COMMITTEES.			
LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			
(b) Of All Other Loans			
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			
REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		2,000.00	2,000.00
(b) Political Party Committees			
(c) Other Political Committees (such as PACs)			
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))		2,000.00	2,000.00
OTHER DISBURSEMENTS			
TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)		53,789.55	172,062.26
III. CASH SUMMARY			
CASH ON HAND AT BEGINNING OF REPORTING PERIOD		\$ 14,319.38	
TOTAL RECEIPTS THIS PERIOD (from Line 16)		\$ 40,812.03	
SUBTOTAL (add Line 23 and Line 24)		\$ 55,131.41	
TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)		\$ 53,789.55	
CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)		\$ 1,341.86	



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RQ-2

SEP 11 1990

William G. Johnson, Treasurer
Kentuckians for Brock
#15 Fountain Plaza
Frankfurt, KY 40601

Identification Number: C00239129

Reference: July Quarterly Report (5/10/90-6/30/90)

Dear Mr. Johnson:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$1,000 or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the

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KENTUCKIANS FOR BROCK
PAGE 2

authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

-Please provide the omitted figures for Lines 11(a)(iii), Column A and all appropriate lines of Column B.

-Column A, Line 6(c) of the Summary Page should equal the difference of Line 6(a) and Line 6(b).

-Line 11(e), Column A, of the Detailed Summary Page does not equal the sum of Lines 11(a) through 11(d). Please amend your report(s) to clarify this discrepancy. (11 CFR 104.3(a))

-The aggregate year-to-date totals for certain entries on your report indicate there were additional contributions that should have been itemized. When contributions from an individual reach \$200 for a calendar year, each subsequent contribution from that individual must be itemized regardless of the amount. Additionally, each contribution from a political committee must be itemized regardless of the amount. Please amend your report to correct the discrepancy for the aggregate totals for: F.N. Hazen, Joe Woolums, Roger Coffey and Everett Montgomery.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

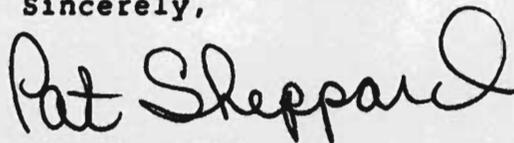
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KENTUCKIANS FOR BROCK
PAGE 3

-For future reports, please be advised that contributions from individuals and political committees should be itemized on separate Schedules A. Committees as well as disbursements for operating expenditures should be itemized on separate Schedules A and B, respectively.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903111

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Kentuckians for John Brock		2. FEC IDENTIFICATION NUMBER C 00239129
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. #15 Fountain Plaza		3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CITY, STATE and ZIP CODE Frankfort, KY 40601	STATE/DISTRICT	

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input checked="" type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____
<input type="checkbox"/> January 31 Year End Report	
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period <u>5/10/90</u> through <u>6/30/90</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	34,812.03	162,633.62
(b) Total Contribution Refunds (from Line 20(d))	2,000.00	2,000.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	32,512.03	160,633.62
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).	51,789.55	170,062.36
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a)).	51,789.55	170,062.36
8. Cash on Hand at Close of Reporting Period (from Line 27)	1,341.86	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	6,000.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer William G. Johnson CPA	
Signature of Treasurer <i>Wm. G. Johnson CPA</i>	Date 7-18-90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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92040903112

DETAILED SUMMARY PAGE

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

Name of Committee (in full) _____ Report Covering the Period:
From: _____ To: _____

I. RECEIPTS

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A) Cash: 22,751.05 in kind	24,639.16		11(a)(i)
(ii) Unitemized 1,888.11	10,772.87		11(a)(ii)
(iii) Total of contributions from individuals			11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) The Candidate			11(d)
(e) TOTAL CONTRIBUTIONS (other than loans)(add 11(a)(iii), (b), (c) and (d))	34,812.03		11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13(a)
(b) All Other Loans	6,000.00		13(b)
(c) TOTAL LOANS (add 13(a) and (b))	6,000.00		13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	40,812.03		16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	51,789.55		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			19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	2,000.00		20(a)
(b) Political Party Committees			20(b)
(c) Other Political Committees (such as PACs)			20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))			20(d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	53,789.55		22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	14,319.38	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	40,812.03	24
25. SUBTOTAL (add Line 23 and Line 24)	\$	55,131.41	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	53,789.55	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	1,341.86	27

92040903113

SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)
Kentuckians for John Brock

92040903114

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ronald W. Clark 101 D.H. Court Franklin, KY 42134	SELF EMPLOYED	5/11/90 5/17/90	\$500.00 500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation BUSINESSMAN	Aggregate Year-to-Date > \$ 1000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
George B. Stone 1100 Hinkston Pike Mt. Sterling, KY 40353	Self-employed	5/11/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Highway Contractor	Aggregate Year-to-Date > \$ 350.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ron Mowbray 206 Dewey Dr. Frankfort, KY 40601	COMMONWEALTH OF KY	5/11/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation ACCOUNTANT	Aggregate Year-to-Date > \$ 225.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
R. Dudley Webb Lexington Financial Center, Suite 3000 Lexington, KY 40507	Self-employed	5/11/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman	Aggregate Year-to-Date > \$ 250.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Donald Webb 250 W. Main St., Suite 3000 Lexington, KY 40507	Self-employed	5/11/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date > \$ 250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Carl H. Bradley 438-7 Harrodswood Rd. Frankfort, KY 40601	Natural Resources - Environmental Protection Cabinet	5/11/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 350	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
H.G. Graham P.O. Box 1136 Frankfort, KY 40602	Department of Education	5/14/90	\$25.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 1000.00	

SUBTOTAL of Receipts This Page (optional) 1925-

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

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<p>A. Full Name, Mailing Address and ZIP Code Larry C. Conner 1894 Colchester Dr. Lexington, KY 40511</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer State of Kentucky</p> <p>Occupation State Government</p> <p>Aggregate Year-to-Date > \$ 250.00</p>	<p>Date (month, day, year) 5/14/90</p>	<p>Amount of Each Receipt this Period \$250.00</p>
<p>B. Full Name, Mailing Address and ZIP Code James E. Conley 301 Leewood Dr. Frankfort, KY 40601</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer McMillan Publishing</p> <p>Occupation Salesman</p> <p>Aggregate Year-to-Date > \$ 550.00</p>	<p>Date (month, day, year) 5/14/90</p>	<p>Amount of Each Receipt this Period \$100.00</p>
<p>C. Full Name, Mailing Address and ZIP Code David C. Jackson 1021 Holly Hill Dr. Frankfort, KY 40601</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Department of Education</p> <p>Occupation State Government</p> <p>Aggregate Year-to-Date > \$ 250.00</p>	<p>Date (month, day, year) 5/14/90</p>	<p>Amount of Each Receipt this Period \$150.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Lynne Stone 1173 Tanbark Rd. Lexington, KY 40515</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Self-employed</p> <p>Occupation Businesswoman</p> <p>Aggregate Year-to-Date > \$ 1000.00</p>	<p>Date (month, day, year) 5/15/90</p>	<p>Amount of Each Receipt this Period \$1000.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Anna Lee Tasker P.O. Box 6 Liberty, KY 42539</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Commonwealth of Kentucky</p> <p>Occupation State Government</p> <p>Aggregate Year-to-Date > \$ 1000.00</p>	<p>Date (month, day, year) 5/15/90 5/24/90</p>	<p>Amount of Each Receipt this Period \$1000.00 1000.00 refunded</p>
<p>F. Full Name, Mailing Address and ZIP Code Jack F. Waddell 231 Wildwood Place Frankfort, KY 40601</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer Commonwealth of Kentucky</p> <p>Occupation State Government</p> <p>Aggregate Year-to-Date > \$ 1000.00</p>	<p>Date (month, day, year) 5/15/90</p>	<p>Amount of Each Receipt this Period \$1000.00</p>
<p>G. Full Name, Mailing Address and ZIP Code F.N. Hazen Cumberland, KY 40823</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$ 400</p>	<p>Date (month, day, year) 5/15/90</p>	<p>Amount of Each Receipt this Period \$200.00</p>

<p>SUBTOTAL of Receipts This Page (optional)</p>	<p>4700.00</p>
<p>TOTAL This Period (last page this line number only)</p>	<p></p>

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Data Summary Page

PAGE 3 OF 9 FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)
Kentuckians for John Brock

9204090316

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Billy Wayne Patrick P.O. Box 566 Clay City, KY 40312-0566	Self-employed	5/15/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Consultant	Aggregate Year-to-Date > \$ 600.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dwayne Gatewood 1624 Highview Circle Frankfort, KY 40601	Department of Education	5/15/90	\$75.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 575.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Harold Holbrook P.O. Box 814 Grayson, KY 41143	Retired	5/16/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-to-Date > \$ 400.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Charles Derrickson 405 Edgewood Dr. Morehead, KY 40351	SELF EMPLOYED	5/16/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman	Aggregate Year-to-Date > \$ 250.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Quenton Caudill P.O. Box 769 Morehead, KY 40351	Self-employed	5/16/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Insurance	5/15/90	121.68 Contribution in-kind
Aggregate Year-to-Date > \$ 221.68			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Stephen Towler 453 Wooden Lane Elizabethtown, KY 42701	Hardin County Board of Education	5/17/90	\$300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Superintendent	Aggregate Year-to-Date > \$ 300.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
David T. Thompson 722 Sunrise Lane Elizabethtown, KY 42701	Self-employed	5/17/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Sales	Aggregate Year-to-Date > \$ 500.00	

SUBTOTAL of Receipts This Page (optional)	1246.68
TOTAL This Period (last page this line number only)	

CASH 1125.00 In Kind 121.68

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE (in Full)

9204090317

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bill Rideout 2781 U.S. 60 E Henderson, KY 42420	Sent letter 5/8 requesting	5/17/90	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Fred Williams 70 Pentland Place Fort Thomas, KY 41075	Campbell County Board of Education	5/17/90	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Superintendent	Aggregate Year-to-Date > \$ 250.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Kenneth Cherry 1009 Cooper Drive Lexington, KY 40502		5/17/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Nancy C. Estes 145 Locust Ave. Frankfort, KY 40601	Retired	5/18/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-to-Date > \$ 250.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ray Collett Box 522 Pineville, KY 40977	Self-employed	5/18/90	\$1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman	Aggregate Year-to-Date > \$ 1000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sharon Collett Box 522 Pineville, KY 40977	Mill Creek Christian School	5/18/90	\$1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Principal	Aggregate Year-to-Date > \$ 1000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Betty Lundy P.O. Box 901 Pineville, KY 40977	Retired	5/18/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired	Aggregate Year-to-Date > \$ 400	

SUBTOTAL of Receipts This Page (optional)	3050.00
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 5 OF 19 FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. James C. Ausmus, III P.O. Box P Middlesboro, KY 40965	Self-employed	5/18/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Chiropractor	Aggregate Year-to-Date > \$ 500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bernard McCulloch 1225 Garvin Place Louisville, KY 40203	Self-employed	5/18/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Architect	Aggregate Year-to-Date > \$ 300.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ted Edmonds Rt. 1 Box 436 Jackson, KY 41339	Department of Education	5/21/90	\$176.05
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 926.05	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lorenzo D. Eads 1037 Sioux Trail Frankfort, KY 40601	Commonwealth of Kentucky	5/22/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	6/5/90	25.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ralph G. Nall 1747 Stonehaven Dr. Frankfort, KY 40601	FIRST KENTUCKY SECURITIES	5/22/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation BOND DEALER	Aggregate Year-to-Date > \$ 250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Charles W. Byers 2011 Capital Plaza Tower Frankfort, KY 40601	Commonwealth of Kentucky	5/22/90	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 250.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Billie Clayton 429 Allen Ave. Morehead, KY 40351	Rowan County Board of Education	5/23/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Assistant Superintendent	Aggregate Year-to-Date > \$ 241.00	

SUBTOTAL of Receipts This Page (optional) 1501.05

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

List separate schedule(s) for each category of the Deduction Summary Page

PAGE 6 OF 9
FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

9204090319

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Alvin R. Tasker P.O. Box 659 Liberty, KY 42539	Self-employed	5/24/90 5/25/90	\$500.00 \$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Business man	Aggregate Year-to-Date > \$ 1000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Wanda R. Terry Box 164 Mt. Sterling, KY 40353	Commonwealth of Kentucky	5/24/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: State Government	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
William Terry Box 164 Mt. Sterling, KY 40353	Commonwealth of Kentucky	5/24/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: State Government	Aggregate Year-to-Date > \$ 550.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mark R. Hutchinson 100 E. First St. Owensboro, KY 42301		5/24/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 300.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Donald E. Bradshaw 137 Locust Hill Frankfort, KY 40601		5/24/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 250.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Shirley Porter Williamson 905-2 Leawood Frankfort, KY 40601	Department of Education	5/24/90	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Assoc. Superintendent	Aggregate Year-to-Date > \$ 800.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joe Woolums 27 Regents Park Lane Frankfort, KY 40601	Commonwealth of Kentucky	5/24/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: State Government	Aggregate Year-to-Date > \$ 500.00	

SUBTOTAL of Receipts This Page (optional)

2.850 -

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

NAME OF COMMITTEE (in Full)
Kentuckians for John Brock

02040903120

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Coleman LeFevers Rt, 3 Box 149 Kettle Island KY 40859	Self-employed	5/25/90	500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman		Aggregate Year-to-Date > \$ 500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. Elizabeth Jones Pineville, KY 40977	Retired	5/25/90	\$1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Retired		Aggregate Year-to-Date > \$
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Jeff Whitehead P.O. Box 1043 Pineville, KY 40977		5/25/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date > \$ 600.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mickey Wilder HC 86, Box 577 Kettle Island, KY 40958	Pineville Community Hospital	5/25/90	\$900.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Secretary		Aggregate Year-to-Date > \$ 1000.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Pam Whitehead P.O. Box 1043 Pineville, KY 40977	Bell County Board of Education	5/25/90	\$600.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Teacher		Aggregate Year-to-Date > \$ 700.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Roger Coffey Rt 4, Box A-1 Liberty, KY 42539		5/25/90	\$200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date > \$ 500.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. Anne G. Felty 724 Shelby St. Frankfort, KY 40601		5/25/90	\$975.00 Refunded
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date > \$ -0-

SUBTOTAL of Receipts This Page (optional) 4675.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for
itemized category of the
Donor Summary Page

PAGE 819
OF
FOR LINE NUMBER

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NAME OF COMMITTEE (In Full)

Kentuckians for John Brock

92040903121

A. Full Name, Mailing Address and ZIP Code David Caldwell Box 962 Hyden, KY 41749	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$500.00
	Occupation	5/25/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		

B. Full Name, Mailing Address and ZIP Code Ike M. Slusher, Jr. P.O. Bpx 1484 Middlesboro, KY 40965	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$500.00
	Occupation	5/25/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1000.00		

C. Full Name, Mailing Address and ZIP Code L.E. Browning 108 Stone Road Lexington, KY 40503	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$250.00
	Occupation	5/25/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 250.00		

D. Full Name, Mailing Address and ZIP Code Al Brock P.O. Box 103 Pineville, KY 40977	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$6000.00 loan
	Occupation	5/29/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 6000.00		

E. Full Name, Mailing Address and ZIP Code Wendell Ann Burris P.O. Box 231 Liberty, KY 42539	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$200.00
	Occupation	5/29/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 300.00		

F. Full Name, Mailing Address and ZIP Code Alma Waddell 231 Wildwood Place Frankfort, KY 40601	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$500.00
	Occupation	5/29/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		

G. Full Name, Mailing Address and ZIP Code Charles Wade 12 Regents Park Lane Frankfort, KY 40601	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period \$100.00
	Occupation	5/29/90	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 225.00		

SUBTOTAL of Receipts This Page (optional) 8050.00

TOTAL This Period (last page this line number only)

CONTRIBUTIONS 2050 - LOAN 6000

SCHEDULE A

ITEM RECEIPTS

Separate schedule(s) for category of the Date Summary Page

PAGE 9 OF 19 FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903122

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lamar Goad Box 480 Brownsville, KY 42210		5/29/90	\$250.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 250.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
R. David Lester 2060 Norborne Dr. Lexington, KY 40502		5/30/90	\$500.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Freda Combs Hazard, KY		5/30/90	306.00 in-kind 125.00 484.00 in-kind
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 915.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Everett Montgomery Mt. Sterling, KY	Self-employed	5/30/90	\$233.28 in-kind 166.25 in-kind
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Businessman	Aggregate Year-to-Date > \$ 999.53	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Fred Waters Carrollton, KY	Commonwealth of Kentucky	5/30/90	\$497.10 in-kind 79.80 in-kind
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation State Government	Aggregate Year-to-Date > \$ 691.70	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) CASH 750.00 In Kind 1891.43 2641.43

TOTAL This Period (last page this line number only) 30,639.16

TOTAL CONTRIBUTIONS CASH 22,626.05 In Kind 2013.11 LOANS 6000-

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule(s) for each copy of the Detailed Summary Page

PAGE 1 OF 8
FOR LINE NUMBER

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NAME OF COMMITTEE (In Full)

Kentuckians for John Brock

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
KHSAA Cooper Drive Lexington, KY	Mailing Labels Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/10/90	50.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kentucky State Treasurer Frankfort, KY 40601	Mailing Labels Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/10/90	289.79
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Frankfort, KY 40601	Bulk Mailing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/10/90	967.93
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Frank Shoop Chey Olds Georgetown, KY	Automobile Rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/11/90	500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Frankfort, KY 40601	Bulk Mailing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/11/90	1354.84
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comair - Dash Bluegrass Airport Lexington, KY	Air Mail Package Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/11/90	51.45
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wal Mart 202 Limestone Lane Frankfort, KY 40601	Office Supplies Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	33.45
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Frankfort, KY 40601	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	11.40
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Val Com Computer Center Fountain Place Frankfort, KY 40601	Tone Cartridge-Printer Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	135.45

SUBTOTAL of Disbursements This Page (optional)	3394.31
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 8
FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Konica Business Machines Dept. L406P Pittsburgh, PA 15264-0406	Toner for Copier Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	33.60
Capital Plaza Authority 405 Mero Street Frankfort, KY 40601	Rent & Electricity Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	758.61
Central American Airways Bowman Field Louisville, KY	Plane flights Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	\$1895.40
Anita Mawery Lexington, KY	Expenses for Derby B-fast Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	237.89
Executive West Fairgrounds Louisville, KY	Reception Food & Drink Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	417.79
Executive West South Central Bell Louisville, KY	Phone bill Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	413.01
Sower Office Equipment St. Clair St. Frankfort, KY 40601	Office Supplies Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90 5/22/90	30.10 10.79
Triangle Printing Louisville Road Frankfort, KY 40601	Printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	243.08
Dan Boone Co. Louisville, KY	Name Badges Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	95.13

SUBTOTAL of Disbursements This Page (optional)	4135.40
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cardinal Office Systems East main Frankfort, KY 40601	Copier Paper Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	25.14
B. Full Name, Mailing Address and ZIP Code Tillett Firestone Versailles Road Frankfort, KY 40601	Campaign Car Maintenance Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	197.36
C. Full Name, Mailing Address and ZIP Code Don Mills Printing Lexington, KY	Campaign Cards Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	708.75
D. Full Name, Mailing Address and ZIP Code National Velvet Lexington, KY	Band for Reception Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/14/90	400.00
E. Full Name, Mailing Address and ZIP Code Below-Tobe & Associates Washington, DC	Phone lists Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	3000.00
F. Full Name, Mailing Address and ZIP Code Federal Express Frankfort, KY 40601	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90 5/22/90	48.00 15.50
G. Full Name, Mailing Address and ZIP Code Farmers Bank & Trust Frankfort, KY 40601	Payroll Tax Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90 5/22/90	1976.92 0
H. Full Name, Mailing Address and ZIP Code Dawne Keckler 30 American Way #1 Frankfort, KY 40601	Pay Period end 5/15 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	579.42
I. Full Name, Mailing Address and ZIP Code Jack G. Nichols 1658 Highway Circle Frankfort, KY 40601	Pay Period end 5/15 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	1441.25

SUBTOTAL of Disbursements This Page (optional)

8392.34

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903126

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laurie Pack Chickasaw Trail Georgetown, KY	Payroll Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	167.96
Patrick M. Melton Louisville, KY	Payroll Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	377.70
Postmaster Frankfort, KY 40601	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/15/90	6.53
Postmaster Frankfort, KY 40601	Bulk Mailing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/16/90	1870.95
Woodford Sun Versailles, KY	Newspaper Advertisement Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/17/90	280.00
Postmaster Frankfort, KY 40601	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/17/90 5/18/90 5/18/90 5/18/90	543.10 290.00 1853.21 1205.17
Rees Printing Co. Winchester, KY	Brochure Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/18/90 5/22/90 5/25/90	1000.00 1000.00 1021.96
Tamara Lee Louisville, KY	TV Makeup Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/18/90	53.95
Konica Business Machines (See previous entry)	Copier Rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/21/90	176.05

SUBTOTAL of Disbursements This Page (optional)

9846.58

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)
Kentuckians for John Brock

92040903127

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jack Waddell Frankfort, KY 40601	Refund of Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/21/90	25.00
B. Full Name, Mailing Address and ZIP Code Postmaster (See previous entry)	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/21/90 5/22/90	12.00 51.40
C. Full Name, Mailing Address and ZIP Code WYMT-TV Hazard, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/22/90	2828.38
D. Full Name, Mailing Address and ZIP Code WKYT-TV Lexington, KY	TV Spot Production Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/22/90	120.00
E. Full Name, Mailing Address and ZIP Code Postmaster (See previous entry)	Postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/23/90 5/24/90	102.11 28.80
F. Full Name, Mailing Address and ZIP Code Delahanty Screen Graphics Louisville, KY	Wires for Yard Signs Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	200.00
G. Full Name, Mailing Address and ZIP Code WHAS-TV Louisville, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	1250.00
H. Full Name, Mailing Address and ZIP Code WLKY-TV Louisville, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	425.00
I. Full Name, Mailing Address and ZIP Code WAVE-TV Louisville, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	735.25

SUBTOTAL of Disbursements This Page (optional)	5777.94
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 6 OF 9
FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

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A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WTVQ-TV Lexington, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	148.75
WKYT-TV Lexington, KY	TV Spots Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90 5/25/90 5/25/90	552.50 320.00 740.57
WLEX-TV Lexington, KY	TV Spot Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90 5/25/90	191.25 212.50
Lou Ann Tupts Owenton, KY	Automobile Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90 5/30/90	118.80 110.00
Anna Lee Tasker P.O. Box G Liberty, KY	Refund of Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/24/90	1000.00
Cash - WHAS Louisville, KY	advertising Wire Cash to WHAS Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/25/90	816.00
Cash - WANZ Louisville, KY	advertising Wire Cash to WANZ Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/25/90	530.00
Laurie Pack (see previous entry)	Reimburse expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/25/90	47.00
W43AG-TV Hopkinsville, KY	TV Spots Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/26/90	1230.00

SUBTOTAL of Disbursements This Page (optional)

6017.37

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 7 OF 8 FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903129

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Glenn Bastin Frankfort, KY	TV Buy Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5/26/90	2700.00
B. Full Name, Mailing Address and ZIP Code Field McChesney Washington, DC	Purpose of Disbursement Auto Expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/29/90	Amount of Each Disbursement This Period 1206.25
C. Full Name, Mailing Address and ZIP Code The Braidwood Company Louisville, KY	Purpose of Disbursement Postcards Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/29/90	Amount of Each Disbursement This Period 886.00
D. Full Name, Mailing Address and ZIP Code Tom Mowery Lexington, KY	Purpose of Disbursement Reimburse-Radio Spots Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/30/90	Amount of Each Disbursement This Period 994.00
E. Full Name, Mailing Address and ZIP Code Anne Felty Frankfort, KY 40601	Purpose of Disbursement Refund of Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/30/90	Amount of Each Disbursement This Period 975.00
F. Full Name, Mailing Address and ZIP Code John Brock 779 A Ridgeview Dr. Frankfort, KY 40601	Purpose of Disbursement Computer & Auto Rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/30/90	Amount of Each Disbursement This Period 2400.00
G. Full Name, Mailing Address and ZIP Code Kyle Keckler 30 American Way #1 Frankfort, KY 40601	Purpose of Disbursement Auto Expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/30/90	Amount of Each Disbursement This Period 756.25
H. Full Name, Mailing Address and ZIP Code REES PRINTING COMPANY 515 LEANING ROCK AVENUE MURKIN KY	Purpose of Disbursement SUPPLIES & PRINTING Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 6-30-90	Amount of Each Disbursement This Period 4295.-
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

14212.50

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 8 OF 8
FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903130

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Quenton Caudill P.O. Box 769 Morehead, KY 40351</i>	<i>Contribution - In-kind Food for Reception</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>5/30/90</i>	<i>121.68</i>
<i>Freda Combs Hazard, KY</i>	<i>Contribution - In-kind Radio & Newspaper ads</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>5/30/90</i>	<i>915.00</i>
<i>Everett Montgomery Mt. Sterling, KY</i>	<i>Contribution - In-kind Radio & Newspaper Ads</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>5/30/90</i>	<i>399.53</i>
<i>Fred Waters Carrollton, KY</i>	<i>Contribution - In-kind Letters to Voters</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>5/30/90</i>	<i>576.90</i>
<i>E. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>
<i>F. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>
<i>G. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>
<i>H. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>
<i>I. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>

SUBTOTAL of Disbursements This Page (optional)	<i>CASH - 0 - IN KIND 2013, "</i>	<i>2013, "</i>
TOTAL This Period (last page this line number only)	<i>CASH 51776.44 IN KIND 2013, "</i>	<i>53789.55</i>

Name of Committee (in Full) KENTUCKIANS FOR TOM BROCK			
A. Full Name, Mailing Address and ZIP Code of Loan Source AL Brock P.O.B. 103 PIPERVILLE KY 40977	Original Amount of Loan 6000.-	Cumulative Payment To Date 0	Balance Outstanding at Close of This Period 6000.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred <u>5-29-90</u> Date Due <u>DEC</u> Interest Rate <u>12.00%</u> (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source			
		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			6000.00
TOTALS This Period (last page in this line only)			6000.00
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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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 APR 12 AM 11: 12

MUR 3237

April 9, 1991

Frances B. Hagan
Federal Election Commission
999 E. Street N.W.
Washington, D.C. 20463

Dear Ms. Hagan:

I am writing in reference to a letter dated March 21, 1991, concerning a loan of \$6,000.00 to my brother, John Brock, while a candidate for the U.S. Senate.

John was running a campaign on very limited funds against an opponent with millions. He was having a hard time paying his bills and, at that point, I loaned him money to meet these unpaid bills not realizing that I was violating the Federal Election Campaign Act of 1971. John's Campaign Committee repaid this loan in early October, 1990. There was never any intent on my part, John's or the Campaign Committee to violate this Election Law.

If there is anything more I need to do to clear this matter, please call 606-337-5001 or mail to P.O. Box 103, Pineville, Kentucky 40977.

Sincerely,



Al Brock

91 APR 12 PM 12: 58

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Kentuckians for Brock Committee
William G. Johnson, as treasurer

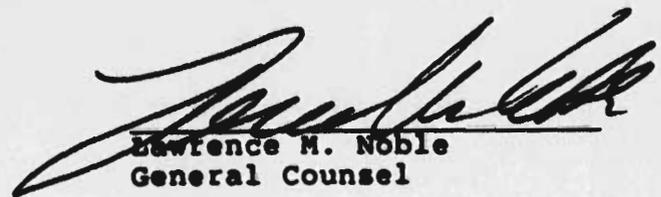
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) MUR 3237
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SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the Kentuckians for Brock Committee and William G. Johnson, as treasurer, based on the assessment of the information presently available.

8/28/91
Date


Lawrence M. Noble
General Counsel

92040903133



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

August 28, 1991

MEMORANDUM

TO: The Commission
FROM: Lawrence M. Noble *LMN*
General Counsel
SUBJECT: MUR 3237

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe were mailed on August 28, 1991. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

- A. Briefs (2)
- B. Letters to respondents

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1991

William G. Johnson, Treasurer
Kentuckians for Brock
No. 15 Fountain Plaza
Frankfort, Kentucky 40601

RE: MUR 3237
Kentuckians for Brock and
William G. Johnson, as
treasurer

Dear Mr. Johnson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1991, the Federal Election Commission found reason to believe that the Kentuckians for Brock Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441(a)(f), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less

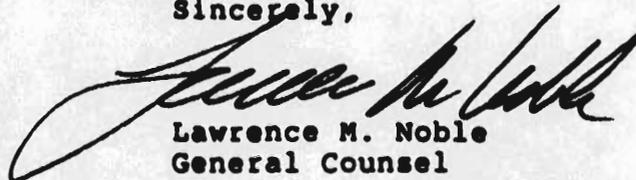
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William G. Johnson, Treasurer
Page 2

than 30, but not more than 90 days, to settle this matter through
a conciliation agreement.

Should you have any questions, please contact Frances B.
Hagan, the staff member assigned to this matter, at (202)
219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Kentuckians for Brock Committee and) MUR 3237
William G. Johnson, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 14, 1991, the Commission found reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer (collectively "the Committee"), violated 2 U.S.C. § 441a(f) by receipt of excessive contributions from an individual during the 1990 primary election campaign in Kentucky.

The Reports Analysis Division's ("RAD") review of Committee reports revealed that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

The Committee responded to the reason to believe finding by stating that the Committee had depended on representations from certain political organizations that funds for expenses would be made available, and that the Committee had incurred campaign obligations in anticipation of that future support. When such funds were not realized, the candidate's brother, Al Brock, apparently made the loan so the Committee could pay its expenses.

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According to the Committee, the candidate "was faced with moral commitments beyond the strength of his campaign treasury and retired them in the only manner available." The Committee stated that "[e]rrors were made in judgement [sic], but there was never any intent of any party to this transaction to violate the law"

Mr. Al Brock stated that his brother, John Brock, was running a campaign for U.S. Senate with limited funds against a well-financed opponent. Al Brock stated that his brother was in need of funds to pay bills, and "I loaned him the money to meet these unpaid bills not realizing that I was violating the Federal Election Campaign Act of 1971."

II. ANALYSIS

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which are excessive on their face and those that exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as

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appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

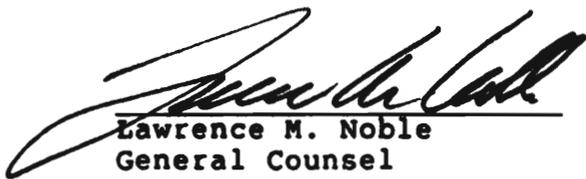
Regardless of the Respondents' purported lack of intent to violate the law, the receipt of a \$6,000 loan from an individual constitutes the knowing acceptance of an excessive contribution. Moreover, since the Committee previously accepted a \$1,000 contribution from Al Brock, the receipt of the \$6,000 loan resulted in an excessive amount of \$6,000 received with respect to a single election. Therefore, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting contributions in excess of the limitations set forth at 2 U.S.C. § 441a(a)(1)(A).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).

Date

8/28/91


Lawrence M. Noble
General Counsel

92040903139



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1991

Mr. Al Brock
P.O. Box 103
Pineville, Kentucky 40977

RE: MUR 3237
Al Brock

Dear Mr. Brock:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

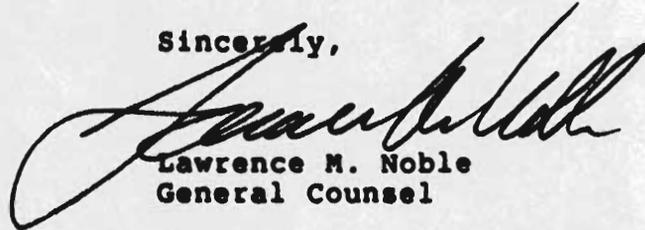
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

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Mr. Al Brock
Page 2

Should you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

92040903141

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Al Brock

)
) MUR 3237
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 14, 1991, the Commission found reason to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to the Kentuckians for Brock Committee ("the Committee") during the 1990 primary election campaign in Kentucky.

The Reports Analysis Division's ("RAD") review of Committee reports revealed that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that Mr. Brock had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

Mr. Brock's response to the Commission's reason-to-believe finding stated that his brother, John Brock, was running a campaign for U.S. Senate with limited funds against a well-financed opponent. Respondent further stated that his brother was in need of funds to pay bills, and "I loaned him the money to meet these unpaid bills not realizing that I was violating the Federal Election Campaign Act of 1971."

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II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended, limits the amount that individuals may contribute to Federal candidates to \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. 2 U.S.C. § 431(8)(A)(i).

11 C.F.R. § 103.3(b)(3) explains that contributions which on their face and those that exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

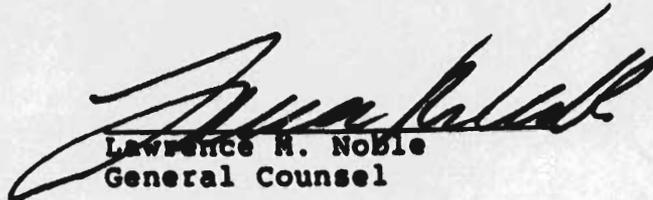
Regardless of the Respondent's purported lack of intent to violate the law, the giving of a \$6,000 loan to a candidate's campaign constitutes an excessive contribution. Moreover, since the Committee previously accepted a \$1,000 contribution from Al Brock, the receipt of the \$6,000 loan resulted in an excessive amount of \$6,000 received with respect to a single election. Therefore, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions to the Kentuckians for Brock Committee.

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III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A).

Date 8/28/91


Lawrence M. Noble
General Counsel

92040903144



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1991

POSTMASTER

Frankfort, KY 40601

MUR 3237

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Kentuckians for Brock Committee

William G. Johnson, Treasurer

LAST KNOWN ADDRESS: No. 15 Fountain Plaza

Frankfort, KY 40601

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- () Moved, left no forwarding address
- () No such address
- () Other (Please Specify)

New Address : _____

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Laurence M Noble
General Counsel
Federal Election Commission
Washington D.C.

MUR 3237

Dear Mr. Noble

I am writing in reply to the letter
I received on September 3, 1991 in
regards to my response to your
Previous letter to me concerning a
loan I made to my brother John
Brock to help him pay his unpaid
Primary bills.

I stated in that response that I
was totally unaware of doing anything
illegal. Since it was a loan and
not a contribution, I did not think
there was anything illegal.

I don't know what other recourse
to take in this matter. I respectfully
submit this letter to you as a means

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of showing my sincere desire to settle this matter through a Conciliation agreement with the Federal Election Commission.

I respectfully ask the Federal Election Commission to consider issuing me ~~a~~ a reprimand, because there was no intent on my part to break the Election laws.

Please be assured that I will co-operate fully with the Commission and am available at their convenience for any further questions they ~~might~~ may have.

Thank you
A. Brock
MUR 3237

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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September 16, 1991

POSTMASTER

Frankfort, KY 40601

MUR 3237

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Kentuckians for Brock Committee
William G. Johnson, Treasurer
LAST KNOWN ADDRESS: No. 15 Fountain Plaza
Frankfort, KY 40601

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- () Moved, left no forwarding address
- () No such address
- () Other (Please Specify)

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FEDERAL ELECTION COMMISSION
999 E. STREET N. W.
WASHINGTON DC 20463

MUR 3237

ATTENTION: FRANCES B. HAGAN
LAWRENCE N. NOBLE

RE: KENTUCKIANS FOR JOHN BROCK, AND
WILLIAM G. JOHNSON CPA, TREASURER

RECEIVED
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OFFICE OF GENERAL COUNSEL
91 NOV -8 PM 3:23

IN ACCORDANCE WITH MY RECENT TELEPHONE CONVERSATION WITH MS FRANCES B. HAGAN, I AM RESPONDING TO THE AUGUST 28, 1991 LETTER FROM THE COMMISSION TO ME (COPY ENCLOSED).

THE REFERENCED LETTER WAS NOT RECEIVED BY MY OFFICE UNTIL RECENTLY SINCE THE CAMPAIGN OFFICE HAS LONG SINCE BEEN CLOSED AND THE LETTER WAS HELD AT THE POST OFFICE WITHOUT NOTIFICATION.

DURING THE TIME THE REFERENCED LETTER FROM THE FEDERAL ELECTION COMMISSION WAS HELD BY THE POST OFFICE THE TERMINATION REPORT AND DEBT SETTLEMENT PLAN WAS FILED WITH THE COMMISSION. THROUGH TELEPHONE CONVERSATION AND WRITTEN RESPONSE TO THE COMMISSION'S SEPTEMBER 19, 1991 LETTER (COPY ENCLOSED), OUR CAMPAIGN WAS ADVISED THAT KENTUCKIANS FOR JOHN BROCK HAD SATISFIED ALL FILING REQUIREMENTS. THE CAMPAIGN'S SOLE DEBT WAS \$4,000 TO THE CANDIDATE AND ALL MEANS OF REPAYING THIS DEBT WERE THOROUGHLY EXHAUSTED PRIOR TO TERMINATION. WE WOULD LIKE TO THANK PAT SHEPPARD FOR WORKING WITH US DURING THE THE REPORTING PERIODS. FILING RECORDS ARE MAINTAINED AT MY OFFICE AND WE WELCOME ANY AUDIT OR REVIEW PROCEDURES YOU MAY DEEM NECESSARY.

AS REGARDS THE VIOLATION REFERENCED IN THE AUGUST 28, 1991 LETTER, WE ARE ENCLOSED COPIES OF OTHER CORRESPONDENCE WHICH DEMONSTRATES OUR COOPERATION AND TIMELY RESPONSE TO THE COMMISSION. THE APRIL 5, 1991 LETTER TO THE COMMISSION SUBSTANTIALLY DETAILS MY RESPONSE TO THE VIOLATION. I WOULD ASK THE COMMISSION TO REVIEW AGAIN THIS LETTER.

ON MAY 29, 1990, MR AL BROCK LOANED HIS BROTHER JOHN BROCK \$6,000. THIS \$6,000 WAS DEPOSITED IN THE CAMPAIGN AND AND A TIMELY REPORT WAS MADE TO THE COMMISSION OF THE TRANSACTION EXACTLY AS IT INCURRED. THE COMMITTEE INTENDED TO REPAY THE LOAN ALMOST IMMEDIATELY AND FOR REASONS EXPLAINED IN THE APRIL 5, 1991 LETTER WAS UNABLE TO DO SO. THE LOAN WAS REPAID WHEN FUNDS WERE AVAILABLE. THE REPAYMENT IS DOCUMENTED IN THE ATTACHED CORRESPONDENCE, AND THE APRIL 5, LETTER. THE REQUIRED REDESIGNATION OR REATTRIBUTION OF THE LOAN WAS NOT DONE BECAUSE THAT WOULD HAVE BEEN A FALSIFICATION OF THE TRANSACTION. THE TRANSACTION WAS EXACTLY WHAT THE COMMISSION STATES (I.E. A LOAN FROM AL BROCK TO JOHN BROCK WHICH WAS PLACED IN THE CAMPAIGN) I WONDER NOW, AS TREASURER, IF ANOTHER TREASURER MIGHT HAVE STRUCTURED A REDESIGNATION OR REATRIBUTION REGARDLESS OF THE FACTS AND NOT BE FACED WITH THIS PROBLEM. NEVERTHELESS, THE TRANSACTION WAS REPORTED IN THE SAME HONEST MANNER AS THE CAMPAIGN WAS RUN. HAD I KNOWN THAT THE FUNDS COULD NOT BE REPAID, I WOULD HAVE ASKED FOR REDISIGNATION OR REATRIBUTION BY THE DONOR, BUT I AM NOT ABLE TO SEE THE FUTURE.

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MR. NOBLE IN HIS BRIEF STATES THAT WM. G. JOHNSON, AS TREASURER, VIOLATED CERTAIN LAWS BY KNOWINGLY ACCEPTING CERTAIN CONTRIBUTIONS IN EXCESS OF THE LIMITATIONS. THIS IS NOT TRUE:

1. AS SOON AS I BECAME AWARE OF THE LOAN, I ADVISED THAT IT BE RETURNED. HOWEVER, THERE WERE NO FUNDS AVAILABLE FOR REPAYMENT.
2. I REPORTED THE TRANSACTION EXACTLY AS IT OCCURRED. THERE WAS NO ATTEMPT AT ANY FORM OF REATTRIBUTION OR REDESIGNATION.
3. THE FUNDS WERE REPAID AS QUICKLY AS FUNDS WERE AVAILABLE.

I DID NOT KNOWINGLY ACCEPT, OR RECEIVE ANY FUNDS IN VIOLATION OF THE LAW. IN MY CAPACITY AS TREASURER, I ACCEPT THE RESPONSIBILITY FOR THIS ACT. HOWEVER, THE TRANSACTION WAS CORRECTED AS QUICKLY AS POSSIBLE AND AN ATTEMPT WAS MADE TO CORRECT THE MATTER WITHIN THE 60 DAYS DESIGNATED FOR REFUND.

MR. BROCK WAS UNDERFUNDED AND THE ATTEMPT FOR OFFICE WAS MADE BASED UPON SUPPORT PROMISED BUT NEVER DELIVERED FROM THE INCUMBENT GOVERNOR GOVERNOR. WITHOUT THIS SUPPORT THE CAMPAIGN COULD NOT PAY INCURRED BILLS, AND THE TEMPORARY LOAN FROM AL BROCK WAS USED FOR THIS PURPOSE. EVERY ATTEMPT WAS MADE TO REPAY THE LOAN WITHIN 60 DAYS AND IT WAS EVENTUALLY REPAID.

AT THE BEGINNING OF MR BROCK'S CAMPAIGN, I PROVIDED COMPLETE INSTRUCTIONS REGARDING THE ACCOUNTING FOR RECEIPTS AND DISBURSEMENTS. I AM ENCLOSING A COPY OF THOSE INSTRUCTIONS (MARKED SCHEDULE # 1, DIRECTLY BEHIND THIS LETTER). AT THE CLOSE OF THESE INSTRUCTIONS, WHICH WERE PROVIDED TO EACH OF THE PRINCIPALS INVOLVED IN MR. BROCK'S CAMPAIGN, ARE THE WORDS " IF YOU THINK IT MAY BE WRONG DON'T DO IT".

IF TECHNICAL VIOLATION DID OCCUR, IT WAS PROPERLY REPORTED ON A VOLUNTARY AND CORRECT BASIS TO THE COMMISSION AND CORRECTED AS QUICKLY AS POSSIBLE. WE ASK FOR CONSIDERATION IN THIS MATTER AND WISH TO PLACE THIS MATTER IN THE PROPER PROSPECTIVE AND PROCEED. IF ADDITIONAL INFORMATION IS DESIRED PLEASE DO NOT HESITATE TO ASK.

ERRORS WERE MADE IN JUDGEMENT, BUT THERE WAS NEVER ANY INTENT OF ANY PARTY TO THIS TRANSACTION TO VIOLATE THE LAW, OR TO COMMIT ANY ACT DETRIMENTAL TO THE F. E. C. OR THE ELECTION PROCESS. WE WOULD APPRECIATE ANY CONSIDERATION YOU MAY GIVE US IN THIS MATTER.

RESPECTFULLY SUBMITTED:

Wm. G. Johnson CPA

WM. G. JOHNSON CPA, TREASURER,
KENTUCKIANS FOR JOHN BROCK

COPIES WITH ENCLOSURES TO: JOHN BROCK
779 A RIDGEVIEW DRIVE
FRANKFORT, KENTUCKY 40601

AL BROCK
POB 103
PINEVILLE, KY

92040903150

To: Kentuckians For John Brock
From: William G. Johnson CPA, Treasurer
Purpose: Accounting For Receipts & Disbursements

> Definitions of Contributions

Gifts - Cash or currency

"In Kind" Contributions - Contributions other than cash or currency
i.e. Goods, Space or Services

Loans - Balances provided which are expected to be repaid

*Tickets & Sales of goods (i.e. T-shirts) are considered as contributions.

> Limitations on Contributions

- An individual may not make a contribution in excess of \$1000.00 per election
- A committee may not make a contribution in excess of \$5000.00 per election
- National Committees may make up to \$17,500.00 of contributions to a senate candidate for the campaign period
- A candidate cannot accept more than \$100.00 in cash from a given source during the campaign period
- Anonymous contributions are limited to \$50.00

> Prohibited Sources of Contributions

The campaign cannot receive contributions from:
Corporations
Labor Organizations
National Banks

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> Accounting Procedures - Contributions

1. Determine that the contribution is proper by review of the preceding requirements
2. For each contribution record:
 - A. The Donor's Name
 Address
 Occupation & Employer-if available
 - B. Date of Receipt
 - C. Total to date by the giver

* All contributions must be deposited promptly intact
If donation is prohibited or over limit-"REFUND"

> Accounting Procedures for Disbursements

1. All disbursements made by check.
2. All disbursements must identify
 Amount
 Date
 Payee
 Purpose
3. Travel, food, Lodging must be supported by travel vouchers
4. A paid invoice file must be maintained supporting payments

> Accounting for In-Kind

The date & fair market value of in-kinds must be recorded

> General

- The cash balance must be accurate at all times (check book balance)
- Cash must be reconciled with depository monthly
- Bills must be paid promptly and in full
- Proper payroll withholding must be made & City, State, & Federal withholding & payroll deposits made on a timely basis

> Summary : For additional information, refer to -

- The attached campaign guide
- The Federal Election Commission 1-800-424-9530
- Wm. G. Johnson CPA 1-502-227-7395

IF YOU THINK IT MAY BE WRONG

DON'T DO IT

9 2 0 4 0 9 0 3 1 5 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1991

William G. Johnson, Treasurer
Kentuckians for Brock
No. 15 Fountain Plaza
Frankfort, Kentucky 40601

RE: MUR 3237
Kentuckians for Brock and
William G. Johnson, as
treasurer

Dear Mr. Johnson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1991, the Federal Election Commission found reason to believe that the Kentuckians for Brock Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441(a)(f), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less

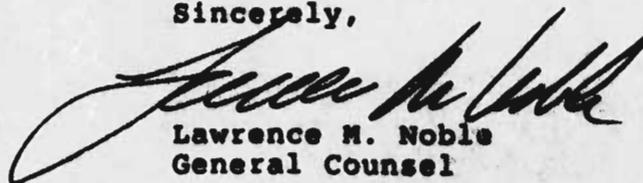
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William G. Johnson, Treasurer
Page 2

than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

92040903155

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Kentuckians for Brock Committee and) MUR 3237
William G. Johnson, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 14, 1991, the Commission found reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer (collectively "the Committee"), violated 2 U.S.C. § 441a(f) by receipt of excessive contributions from an individual during the 1990 primary election campaign in Kentucky.

The Reports Analysis Division's ("RAD") review of Committee reports revealed that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

The Committee responded to the reason to believe finding by stating that the Committee had depended on representations from certain political organizations that funds for expenses would be made available, and that the Committee had incurred campaign obligations in anticipation of that future support. When such funds were not realized, the candidate's brother, Al Brock, apparently made the loan so the Committee could pay its expenses.

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According to the Committee, the candidate "was faced with moral commitments beyond the strength of his campaign treasury and retired them in the only manner available." The Committee stated that "[e]rrors were made in judgement [sic], but there was never any intent of any party to this transaction to violate the law"

Mr. Al Brock stated that his brother, John Brock, was running a campaign for U.S. Senate with limited funds against a well-financed opponent. Al Brock stated that his brother was in need of funds to pay bills, and "I loaned him the money to meet these unpaid bills not realizing that I was violating the Federal Election Campaign Act of 1971."

II. ANALYSIS

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which are excessive on their face and those that exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as

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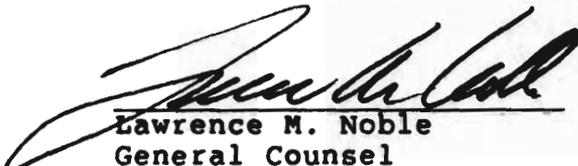
appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

Regardless of the Respondents' purported lack of intent to violate the law, the receipt of a \$6,000 loan from an individual constitutes the knowing acceptance of an excessive contribution. Moreover, since the Committee previously accepted a \$1,000 contribution from Al Brock, the receipt of the \$6,000 loan resulted in an excessive amount of \$6,000 received with respect to a single election. Therefore, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting contributions in excess of the limitations set forth at 2 U.S.C. § 441a(a)(1)(A).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).

8/28/91
Date


Lawrence M. Noble
General Counsel

92040903158

APRIL 5, 1991

FEDERAL ELECTION COMMISSION
999 E. STREET N.W.
WASHINGTON DC 20463

ATTENTION: FRANCES B. HAGAN

COMMISSION:

WE ARE IN RECEIPT OF YOUR CORRESPONDENCE TO MR AL BROCK, DATED 3-21-91 (COPIES ENCLOSED). IT IS THE INTENTION OF THE KENTUCKIANS FOR JOHN BROCK TO COOPERATE IN EVERY WAY WITH THE COMMISSION IN THIS MATTER.

ON MAY 29, 1990, MR AL BROCK LOANED HIS BROTHER, MR. JOHN BROCK, A CANDIDATE FOR THE U S SENATE IN THE KENTUCKY DEMOCRATIC PRIMARY, \$6,000.

THE LOAN WAS REPORTED TO THE FEDERAL ELECTION COMMISSION ON 7-18-90, WITH THE FILING OF THE REPORT OF RECEIPTS AND DISBURSEMENTS FOR THE PERIOD 5-10-90 THROUGH 6-30-90. A COPY OF THIS REPORT IS ENCLOSED.

THE COMMITTEE INTENDED TO REPAY THE LOAN, WITHIN A SHORT PERIOD OF TIME. THE CANDIDATE HAD RECEIVED ORAL REPRESENTATION FROM POLITICAL ORGANIZATIONS AN ENTITIES THAT FUNDS WOULD BE AVAILABLE TO HIM FOR THIS CAMPAIGN AND HAD DESIGNATED THESE FUNDS FOR CAMPAIGN EXPENDITURES. WHEN PROMISED FUNDS DID NOT MATERIALIZE, MR. JOHN BROCK WAS FACED WITH CAMPAIGN EXPENSES INCURRED IN ANTICIPATION OF FUTURE FINANCIAL SUPPORT. THE CANDIDATE WAS MORALLY AND LEGALLY RESPONSIBLE FOR THESE EXPENSES AND PAID THEM AS QUICKLY AS POSSIBLE.

MR. JOHN BROCK IS NOT A WEALTHY MAN AND AFTER PAYMENT OF ALL CAMPAIGN EXPENSES HE WAS UNABLE TO MAKE A TIMELY REPAYMENT TO HIS BROTHER. THE REPAYMENT TO HIS BROTHER WAS MADE IN OCTOBER THROUGH ADVANCEMENT OF PERSONAL FUNDS TO THE COMMITTEE AND ISSUANCE OF COMMITTEE CHECK TO MR AL BROCK. A COPY OF THIS CHECK IS ENCLOSED.

I AM NOT AN ATTORNEY, AND IF IT WAS THE INTENTION OF THE F.E.C. TO STRIKE FEAR IN MY HEART, YOU HAVE BEEN SUCCESSFUL. AS TREASURER, I AM ASSUMING FULL RESPONSIBILITY FOR THIS TRANSACTION. MR. AL BROCK WAS NOT AWARE OF ANY WRONGDOING AND INTENDED ONLY TO MAKE A TEMPORARY LOAN TO HIS BROTHER. MR. JOHN BROCK WAS FACED WITH MORAL COMMITMENTS BEYOND THE STRENGTH OF HIS CAMPAIGN TREASURY AND RETIRED THEM IN THE ONLY MANNER AVAILABLE. MR. JOHN BROCK RAN A THINLY FINANCED CAMPAIGN AGAINST AN EXTREMELY WEALTHY AND WELL FINANCED OPPONENT. AS MIGHT BE EXPECTED: HE LOST, HIS FINANCIAL SUPPORT MIGRATED TO HIS OPPONENT, AND MR. JOHN BROCK WAS LEFT TO RETIRE HIS DEBT WITH HIS MODERATE FINANCIAL RESOURCES.

ERRORS WERE MADE IN JUDGEMENT, BUT THERE WAS NEVER ANY INTENT OF ANY PARTY TO THIS TRANSACTION TO VIOLATE THE LAW, OR TO COMMIT ANY ACT DETRIMENTAL TO THE F.E.C OR THE ELECTION PROCESS AS WE UNDERSTAND IT.

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WE RESPECTFULLY REQUEST ANY CONSIDERATION THAT THE COMMISSION MAY
BE ABLE TO EXTEND IN THIS MATTER.

Wm. G. Johnson CPA
WM. G. JOHNSON, TREASURER,
KENTUCKIANS FOR JOHN BROCK

COPIES WITH ENCLOSURES TO
JOHN BROCK
779 A RIDGEVIEW DRIVE
FRANKFORT, KY 40601

AL BROCK
POB 103
PINEVILLE, KY 40977

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 21, 1991

William G. Johnson, Treasurer
Kentuckians for Brock
No. 15 Fountain Plaza
Frankfort, Kentucky 40601

RE: MUR 3237
Kentuckians for Brock
William G. Johnson, as
treasurer

Dear Mr. Johnson:

On March 14, 1991, the Federal Election Commission found that there is reason to believe the Kentuckians for Brock Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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William G. Johnson, Treasurer
Page 2

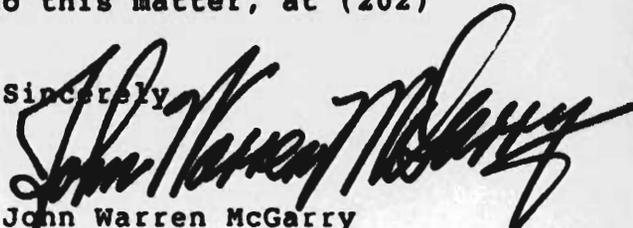
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Kentuckians for Brock Committee **MUR:** 3237
William G. Johnson, as treasurer

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

The Reports Analysis Division's review of Committee reports reveals that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on

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October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990. The direct contribution of \$1,000 and the loan of \$6,000 to the Committee's primary election campaign resulted in an excessive amount of \$6,000 with respect to a single election.

Therefore, there is reason to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting excessive contributions.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 21, 1991

Mr. Al Brock
P.O. Box 103
Pineville, Kentucky 40977

RE: MUR 3237
Al Brock

Dear Mr. Brock:

On March 14, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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

Mr. Al Brock
Page 2

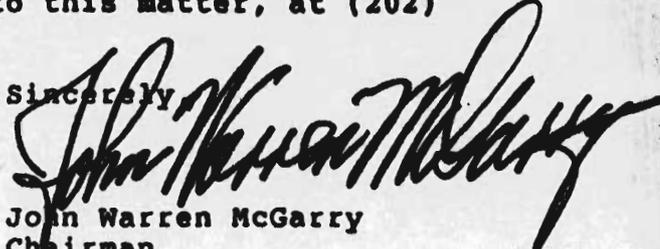
Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


John Warren McGarry
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: Al Brock MUR: 3237

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

The Reports Analysis Division's ("RAD") review of Committee reports reveals that on May 29, 1990, the date of the Kentucky primary election, the Kentuckians for Brock Committee ("the Committee") and William G. Johnson, as treasurer, received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported

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repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990. The direct contribution of \$1,000 and the loan of \$6,000 to the Committee's primary election campaign resulted in an excessive amount of \$6,000 with respect to a single election.

Therefore, there is reason to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions.

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**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of the General Counsel where they are assigned to a staff member.

Following review of the information which generated the matter, a recommendation on how to proceed, based on a preliminary legal and factual analysis, shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act of 1971, as amended (hereinafter "the Act") may have occurred or is about to occur; or (b) that the Commission find no reason to believe that a possible violation of the Act has occurred or is about to occur, and that the Commission close the file in the matter.

Thereafter, if the Commission decides by an affirmative vote of four Commissioners to open a Matter Under Review (MUR) and finds that there is reason to believe that a violation of the Act has been committed or is about to be committed, the Office of the General Counsel shall conduct an investigation into the matter. Within 15 days of notification of the Commission's finding(s), a respondent(s) may submit any factual or legal materials relevant to the allegations. During its investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order written answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is a agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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If the investigation warrants, and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief stating their position on the issues. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four Commissioners that there is probable cause to believe that a violation of the Act has been committed, or is about to be committed, conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the Act through conciliation the Office of the General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Act. Thereafter, the Commission may, upon an affirmative vote of four Commissioners, institute civil action for relief in the United States District court.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

92040903170

1-7-91

SECRETARY OF THE SENATE,
OFFICE OF PUBLIC RECORDS,
232 HART SENATE OFFICE BUILDING
WASHINGTON, D.C. 10510-7116.

FEDERAL ELECTION COMM
999 E. STREET N.W.
WASHINGTON DC 20463
ATTENTION PAT SHEPPARD

REFERENCE: ATTACHED CORRESPONDENCE FROM THE FEDERAL
ELECTION COMMISSION REGARDING KENTUCKIANS FOR JOHN BROCK
C00239129 DATED 11-6-90, 11-29-90 (12-28-90)

GENTLEMEN:

IN REGARD TO THE LOAN, REFERENCED IN THE ATTACHED
CORRESPONDENCE, ALL FUNDS LOANED TO THE CAMPAIGN OF JOHN
BROCK BY JOHN BROCK WERE FROM THE PERSONAL FUNDS OF JOHN
BROCK, NOT FUNDS BORROWED FROM A LENDING INSTITUTION.

MR. BROCK'S CAMPAIGN DID RECEIVE A LOAN FROM HIS BROTHER, AL
BROCK. THIS LOAN WAS REFERRED TO IN THE SEPTEMBER 11, 1990
LETTER FROM THE FEDERAL ELECTION COMMISSION WHICH WAS
ANSWERED ON OCTOBER 8, 1990. COPIES OF THIS CORRESPONDENCE
ARE ALSO ENCLOSED.

THE FINAL ENCLOSURE IS A COPY OF THE CANCELLED CHECK FROM
THE CAMPAIGN TO AL BROCK, DATED 10-3-90, WHICH REPAID THE
LOAN FROM AL BROCK. THIS CANCELLED CHECK, WHICH WAS
REFERENCED IN OUR 10-8-90, WAS MISPLACED AND A COPY WAS
RECENTLY PROVIDED BY THE BANK. WE THOUGHT THAT THE NOVEMBER
6, 1990 AND NOVEMBER 9, LETTERS WERE IN REFERENCED TO THIS
MATTER AND WERE WAITING FOR THE CHECK COPY PRIOR TO
RESPONDING.

IF THE OPENING EXPLANATION OF LOANED FUNDS AND THE COPY OF
THE CHECK TO MR. AL BROCK DO NOT FULLY CLARIFY ALL
OUTSTANDING MATTERS AT THIS TIME, PLEASE DO NOT HESITATE TO
CALL.

Wm. G. Johnson CPA
WM. G. JOHNSON CPA
TREASURER KENTUCKIANS FOR JOHN BROCK

COPY WITH ENCLOSURES TO JOHN BROCK

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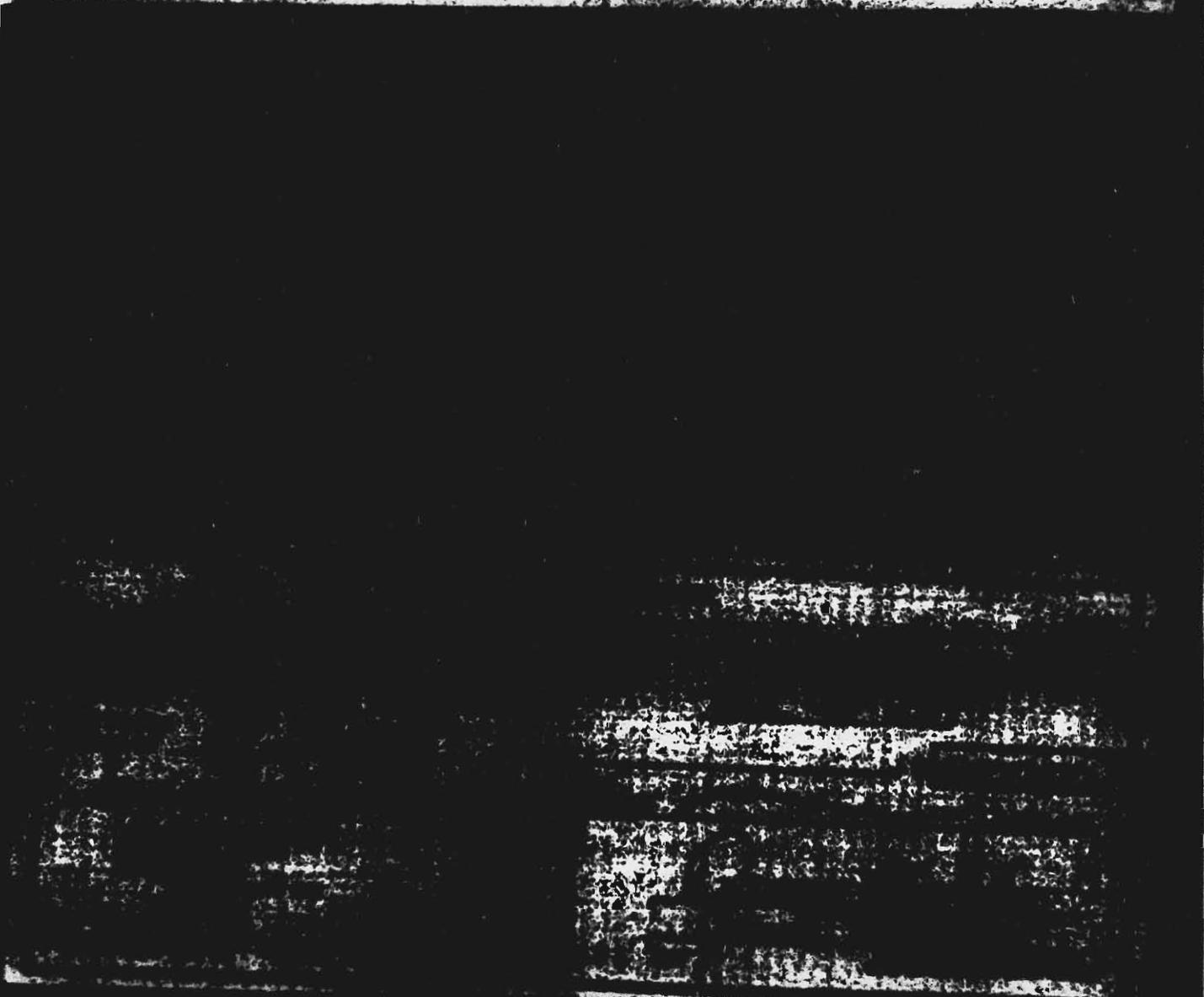
Brook

MISSOURI

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 6 1990

William G. Johnson, Treasurer
Kentuckians for John Brock
#15 Fountain Plaza
Frankfort, KY 40601

Identification Number: C00239129

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. Johnson:

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

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903173



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

November 29, 1990

William G. Johnson, Treasurer
Kentuckians for John Brock
c/o William G. Johnson, JR. CPA
201 West Main, P.O. Box 689
Frankfort, KY 40601

Re mailed

DEC 28 1990

Identification Number: C00239129

Reference: October Quarterly Report (7/1/90-9/30/90)

Dear Mr. Johnson:

This letter is to inform you that as of November 28, 1990, the Commission has not received your response to our request for additional information, dated November 6, 1990. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

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

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

92040903174

Charles T. Mitchell Company

Certified Public Accountants
201 WEST MAIN, P.O. BOX 608
FRANKFORT, KENTUCKY 40602
FRANKFORT - (502) 227-7195
TELECOPIER - (502) 227-8005

|| C T M

CHARLES T. MITCHELL, C.P.A.
DON C. GILES, C.P.A.
WILLIAM G. JOHNSON, JR., C.P.A.
GARY L. HARBIN, C.P.A.
LARRY T. WILLIAMS, C.P.A.

October 8, 1990

Secretary of the Senate
232 Hart Senate Office Building
Washington, D.C. 20510

Re: Attached correspondence from the Federal Election Commission
July quarterly report
Kentuckians for Brock
C00239129

Gentlemen:

We are in receipt of the attached and referenced correspondence and are responding as follows:

The loan from Al Brock has been repaid. We have requested a copy of the cancelled check refunding the six thousand dollar loan referenced in section 1 of the letter. This represents complete refund of the loan. Refund of the loan and a copy of the check is a suggested response in the September 11, 1990 letter. If additional information is desired on this matter please advise.

All corrections or omissions on or for lines 11(a)(iii), column A, all appropriate column B, column A line 6(c) of the summary page, and line (e) (a) (b) (c) and (d) of the detail page have been entered as correction on the attached page. Again we invite full audit or examination of these amounts. If there is additional information needed or correction of this number please advise.

Enclosed is a complete analysis of the contributions from: F.N. Hazen, Joe Woolums, Roger Coffey, and Everette Montgomery.

Enclosed also is a list of contributions in excess of \$1,000.00 received between May 10, 1990 and May 29, 1990.

Thank you for your attention to our small report. We have complete records on all financial matters of this campaign and welcome your scrutiny.

Respectfully submitted,

Wm. G. Johnson CPA

Wm. G. Johnson, CPA
Treasurer, Kentuckians for Brock

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	EVERETTE MONTGOMERY	F. N. HAZEN	JOE WOLLUMS	ROGER COFFEY
11-14-89				200.00
12-5-89			250.00	
12-15-89		200.00		
1-15-90	100.00			
5-15-90		200.00		
5-24-90			250.00	
5-25-90				200.00
5-30-90	399.53			
TOTAL	499.53	400.00	500.00	400.00

5-15-90	JACK WADDELL	1000.00
5-18-90	SHARON COLLETT	1000.00
5-25-90	ELIZABETH JONES	1000.00
2-29-90	AL BROCK (LOAN)	6000.00

9 2 0 4 0 9 0 3 1 7 6

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)	Report Covering the Period:	
	From:	To:
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A) Cash: 22,751.05 in kind	24,639.16	
(ii) Unitemized 1,888.11	18,772.87 ^{10/17/23}	
(iii) Total of contributions from individuals	37,812.03	162,633.62
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) The Candidate		
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	34,812.03	162,633.62
TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.		
LOANS:		
(a) Made or Guaranteed by the Candidate		
(b) All Other Loans	6,000.00	6,000.00
(c) TOTAL LOANS (add 13(a) and (b))	6,000.00	6,000.00
OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
OTHER RECEIPTS (Dividends, Interest, etc.)		25.08
TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	40,812.03	168,658.70
II. DISBURSEMENTS		
7. OPERATING EXPENDITURES	51,789.55	170,062.36
8. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.		
9. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate		
(b) Of All Other Loans		
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))		
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	2,000.00	2,000
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	2,000	2,000
21. OTHER DISBURSEMENTS		
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).	53,789.55	172,062.36
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 14,319.38	
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 40,812.03	
25. SUBTOTAL (add Line 23 and Line 24)	\$ 55,131.41	
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).	\$ 53,789.55	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25).	\$ 1,341.86	

92040903177



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

SEP 11 1990

William G. Johnson, Treasurer
Kentuckians for Brock
#15 Fountain Plaza
Frankfurt, KY 40601

Identification Number: C00239129

Reference: July Quarterly Report (5/10/90-6/30/90)

Dear Mr. Johnson:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$1,000 or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the

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**KENTUCKIANS FOR BROCK
PAGE 2**

authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

-Please provide the omitted figures for Lines 11(a)(iii), Column A and all appropriate lines of Column B.

-Column A, Line 6(c) of the Summary Page should equal the difference of Line 6(a) and Line 6(b).

-Line 11(e), Column A, of the Detailed Summary Page does not equal the sum of Lines 11(a) through 11(d). Please amend your report(s) to clarify this discrepancy. (11 CFR 104.3(a))

-The aggregate year-to-date totals for certain entries on your report indicate there were additional contributions that should have been itemized. When contributions from an individual reach \$200 for a calendar year, each subsequent contribution from that individual must be itemized regardless of the amount. Additionally, each contribution from a political committee must be itemized regardless of the amount. Please amend your report to correct the discrepancy for the aggregate totals for: F.N. Hazen, Joe Woolums, Roger Coffey and Everett Montgomery.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

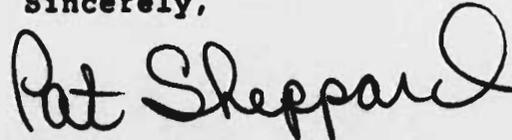
92040903179

KENTUCKIANS FOR BROCK
PAGE 3

-For future reports, please be advised that contributions from individuals and political committees should be itemized on separate Schedules A. Committees as well as disbursements for operating expenditures should be itemized on separate Schedules A and B, respectively.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903180

DEBT SETTLEMENT PLAN

NAME OF COMMITTEE <i>KENTUCKIANS FOR JOHN BROCK</i>	
ADDRESS <i>C/O Wm G. JOHNSON CPA TREASURER</i> <i>P.O. B. 698 FRANKFORT</i>	
CITY, STATE AND ZIP CODE <i>FRANKFORT</i>	FEC I.D. NUMBER <i>C-00239127</i>

PART I - COMMITTEE SUMMARY INFORMATION

1. CASH ON HAND AS OF <i>3/31/91</i>	<i>- 0 -</i>	6. TOTAL AMOUNT OF DEBTS OWED BY THE COMMITTEE	<i>4000.-</i>
2. TOTAL ASSETS TO BE LIQUIDATED	<i>- 0 -</i>	7. TOTAL NUMBER OF CREDITORS OWED	<i>1 (CANDIDATE)</i>
3. TOTAL (ADD 1 AND 2)	<i>- 0 -</i>	8. NUMBER OF CREDITORS IN PART II OF THIS PLAN	<i>1</i>
4. YEAR TO DATE RECEIPTS	<i>0</i>	9. TOTAL AMOUNT OF DEBTS OWED TO THE CREDITORS IN PART II OF THIS PLAN	<i>4000.-</i>
5. YEAR TO DATE DISBURSEMENTS	<i>95.95</i>	10. TOTAL AMOUNT TO BE PAID TO CREDITORS IN PART II OF THIS PLAN	<i>- 0 -</i>

11. IS THE COMMITTEE TERMINATING ITS ACTIVITIES?

YES NO IF YES, WHEN DOES THE COMMITTEE EXPECT TO FILE A TERMINATION REPORT? IF NO, COMMITTEE IS NOT ELIGIBLE TO FILE A DEBT SETTLEMENT PLAN (SEE INSTRUCTIONS).

TERMINATION REPORT (FINAL) FILED WITH LETTER 4-28-91 FOR THE PERIOD 1-1-91 THROUGH 3-31-91

12. IF THIS IS AN AUTHORIZED COMMITTEE, DOES THE CANDIDATE HAVE OTHER AUTHORIZED COMMITTEES?

YES NO IF YES, LIST BELOW.

13. DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE TOTAL AMOUNT INDICATED IN THIS PLAN?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS? *NO / DEBT IS TO CANDIDATE & IS FORGIVEN BY CANDIDATE*

14. HAS THE COMMITTEE FILED PREVIOUS DEBT SETTLEMENT PLANS?

YES NO

15. AFTER DISPOSING OF ALL THE COMMITTEE'S DEBTS AND OBLIGATIONS, WILL THERE BE ANY RESIDUAL FUNDS?

YES NO IF YES, HOW WILL THE FUNDS BE DISBURSED?

I certify, to the best of my knowledge, that the information contained in this Debt Settlement Plan is true, correct and complete.

SIGNATURE OF TREASURER OF COMMITTEE <i>Wm. G. Johnson CPA</i>	DATE <i>9-15-91</i>
--	------------------------

92040903181

INSTRUCTIONS FOR PREPARING THE DEBT SETTLEMENT PLAN

Political committees that settle their debts for less than the full value are required to file a debt settlement plan for Commission review. Only terminating committees are eligible to file debt settlement plans. A terminating committee is one that is winding down its political activities in preparation of filing a termination report and would be able to terminate except that it has outstanding debts and obligations. A political committee will be considered to be winding down its political activities if it has ceased to make or accept contributions and expenditures, other than contributions accepted for debt retirement purposes and expenditures representing payments of debts or obligations previously incurred or payments for the costs associated with the termination of political activity.

Every terminating committee that settles a debt for less than full value shall file at least one debt settlement plan for the Commission to review, prior to filing its termination report. The plan should be filed *after* the creditors have agreed to the settlement. Payments should not be made until completion of Commission review.

Debts and obligations subject to debt settlement and Commission review include amounts owed to commercial vendors, debts arising from advances by committee staff and other individuals, salary owed to committee employees and debts arising from loans from political committees or individuals, including candidates, to the extent permitted under 11 C.F.R. Part 110.

Debts and obligations that shall not be forgiven or settled for less than the amount due include repayment obligations pursuant to 11 C.F.R. 9007.2, 9008.10, 9008.11, 9038.2 or 9038.3 of funds received from the Presidential Election Campaign Fund or the Presidential Primary Matching Payment Account. Debts that are disputed are not subject to the debt settlement and Commission review requirements and procedures.

Committees that file or who have filed a debt settlement plan should continue to report each outstanding debt or obligation included in a debt settlement plan on its report of receipts and disbursements until the Commission has informed the committee that it has completed its review of the plan.

TREASURER'S RESPONSIBILITIES

A copy of this Plan must be preserved by the treasurer of the political committee for a period of not less than three years from the date of filing. The treasurer of the political committee is personally responsible for the information submitted in the plan and for responding to any Commission request regarding the plan or any information contained in it.

WHERE TO FILE

An original must be filed as follows: - Committees which only support or oppose a candidate(s) for the House of Representatives must file with the Clerk of the House of Representatives, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515-6612. - Committees which only support or oppose a candidate(s) for the Senate must file with the Secretary of the Senate, Office of Public Records, 232 Hart Senate Office Building, Washington, D.C. 20510-7116. - All other political committees must file with the Federal Election

Commission, 909 E Street, N.W., Washington, D.C. 20463. - Political committees filing a debt settlement plan must file with the Secretary of State (or appropriate State officer) of each state a copy of that portion of the report applicable to candidates seeking (who sought) election in that State.

LINE BY LINE INSTRUCTIONS FOR PART I

Fill out the committee's full name, address and the FEC identification number assigned to your committee.

LINE 1 Enter the committee's cash on hand and the date.

LINE 2 Calculate the value of any of the committee's assets that can be liquidated. Enter the total amount on line 2.

LINE 3 Add Lines 1 and 2.

LINE 4 Enter the year to date receipts for the calendar year.

LINE 5 Enter the year to date disbursements for the calendar year.

LINE 6 Enter the total amount of debts and obligations owed by the committee, including loans.

LINE 7 Enter the total number of creditors owed by the committee.

LINE 8 Enter the number of creditors that are in Part II of this plan.

LINE 9 Total the debts owed to the creditors in Part II of this plan, and enter the amount on this line.

LINE 10 Add the amounts to be paid to the creditors in Part II of this plan, and enter the amount on this line.

LINE 11 Only committees that are terminating are eligible to file a debt settlement plan. Check the appropriate box. If you check the "no" box, do not go any further. If yes, put the date you expect the committee to file a termination report.

LINE 12 List any other political committee(s) the candidate has authorized to support his/her candidacy for election to federal office.

LINE 13 If Line 3 above is less than Line 10, please explain how the committee expects to obtain the additional funds.

LINE 14 If the committee has filed any debt settlement plans prior to this one, check yes, even if the committee has not received an acknowledgment of the plan from the Commission.

LINE 15 Should the committee have any residual funds after it has paid or settled all debts and obligations, state how they will be spent.

After completing the entire plan, the treasurer should sign and date the plan.

DEBT SETTLEMENT PLAN

PART III

NAME OF COMMITTEE <i>KENTUCKIANS For JOHN BROCK</i>	FEC I.D. NUMBER <i>C-00239129</i>	PAGE <i>1</i>	OF <i>1</i>
--	--------------------------------------	------------------	----------------

LIST REMAINING DEBTS

A. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR <i>JOHN BROCK 779 A RIDGEVIEW FRANKFORT KY 40601</i>	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input checked="" type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL	<i>4000</i>	<i>-0-</i>
IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

B. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL		
IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

C. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL		
IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

D. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL		
IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

E. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR	AMOUNT OWED TO CREDITOR	AMOUNT EXPECTED TO PAY/OFFER
TYPE OF CREDITOR: <input type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL		
IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input type="checkbox"/> NO		

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED?

YES NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?

ALL POSSIBLE PROCEDURES TAKEN / DEBT FORGIVEN BY CANDIDATES

92040903183

INSTRUCTIONS FOR PART III

Fill in the committee's full name and FEC identification number. For PART III put in the page number as well as the number of pages included in the plan for this part.

LIST REMAINING DEBTS List any debts and obligations that the committee owes that are not included in this plan. Fill out the appropriate information for each remaining creditor.

AMOUNT EXPECTED TO PAY OR OFFER This should represent the amount that the committee expects to offer the creditor to settle the debt.

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED? If the committee does not have sufficient funds to cover the total amount to be offered or paid to its remaining creditors, briefly explain how the funds will be obtained.

9 2 0 4 0 9 0 3 1 8 4



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

August 20, 1991

William G. Johnson, Treasurer
Kentuckians For Brock
779 A. Ridgeview
Frankfort, KY 40601

Remaind

AUG 28 1991

Identification Number: C00239129

Reference: Mid-Year Report (4/1/91-6/30/91)

Dear Mr. Johnson:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced Report of Receipts and Disbursements as required by the Federal Election Campaign Act. You were previously notified of the due date for this report.

It is important that you file this report immediately with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, DC 20515, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510, as appropriate. A copy of the report should also be filed with the Secretary of State or equivalent state officer of your state.

The failure to file this report may result in an audit or legal enforcement action.

If you have any questions regarding this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

9 2 0 4 0 9 0 3 1 8 5
// NO ACTIVITY
BROCK CASH - 0 -
REC - 0 -
DISB - 0 -
END CASH - 0 -

SEE LETTER ATTACHED
TO FINAL REPORT:
1-1-91 THROUGH 3-31-91

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Kentuckians for John Brock		2. FEC IDENTIFICATION NUMBER C 00239129
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. c/o Wm G Johnson 201 West Main Street		3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CITY, STATE and ZIP CODE Frankfort, KY 40601	STATE/DISTRICT	

4. TYPE OF REPORT

- | | |
|---|---|
| <input type="checkbox"/> April 15 Quarterly Report | <input type="checkbox"/> Twelfth day report preceding _____
(Type of Election) |
| <input type="checkbox"/> July 15 Quarterly Report | election on _____ in the State of _____ |
| <input type="checkbox"/> October 15 Quarterly Report | <input type="checkbox"/> Thirtieth day report following the General Election on _____ |
| <input type="checkbox"/> January 31 Year End Report | _____ in the State of _____ |
| <input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only) | <input checked="" type="checkbox"/> Termination Report |

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period <u>1/1/91</u> through <u>3/31/91</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))		165,183.62
(b) Total Contribution Refunds (from Line 20(d))		2,000.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))		163,183.62
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).	95.95	179,792.75
(b) Total Offsets to Operating Expenditures (from Line 14)		1,462.61
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a)).		178,330.14
8. Cash on Hand at Close of Reporting Period (from Line 27)	0	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	none	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) . . . to candidate	4,000	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Wm. G. JOHNSON CPA	
Signature of Treasurer <i>Wm. G. Johnson CPA</i>	Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

9 2 0 4 0 9 0 3 1 8 6

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)	Report Covering the Period:	
Kentuckians for John Brock	From: 1/1/91	To: 3/31/91
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)		
(ii) Unitemized		
(iii) Total of contributions from individuals		164,433.62
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		800.00
(d) The Candidate		
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))		165,233.62
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	-	-
13. LOANS:		
(a) Made or Guaranteed by the Candidate	-	13,000.00
(b) All Other Loans	-	6,000.00
(c) TOTAL LOANS (add 13(a) and (b))		19,000.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-	1,462.61
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-	6,351.81
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		192,048.00
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES Copy of check attached	95.95	179,792.75
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-	-
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	2,000.00	9,000.00
(b) Of All Other Loans		6,000.00
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	2,000.00	15,000.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	-	2,000.00
(b) Political Party Committees	-	-
(c) Other Political Committees (such as PACs)	-	-
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))		2,000.00
21. OTHER DISBURSEMENTS	-	-
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).	- 2,095.95	196,792.75

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	2,095.95	
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$		
25. SUBTOTAL (add Line 23 and Line 24)	\$	2,095.95	
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	2,095.95	
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	-0-	

7
8
1
3
0
9
0
4
0
2
9

11(a)(i)
11(a)(ii)
11(a)(iii)
11(b)
11(c)
11(d)
11(e)
12
13(a)
13(b)
13(c)
14
15
16
17
18
19(a)
19(b)
19(c)
20(a)
20(b)
20(c)
20(d)
21
22
23
24
25
26
27

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Name of Committee (in Full) Kentuckians for John Brock			
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
-Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name; Mailing Address and ZIP Code of Loan Source John Brock - Candidate (address on page 1)	Original Amount of Loan 13,000.00	Cumulative Payment To Date 9,000.00	Balance Outstanding at Close of This Period 4,000.00
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			4,000.00
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

DEBT SETTLEMENT PLAN

PART II

NAME OF COMMITTEE Kentuckians for John Brock	FEC LD. NUMBER C 00239	PAGE 1	OF 1
--	----------------------------------	------------------	----------------

CREDITOR SUMMARY INFORMATION (FILL OUT FOR EACH CREDITOR IN PLAN)

FULL NAME AND MAILING ADDRESS OF CREDITOR	DATE INCURRED	AMOUNT OWED TO CREDITOR	AMOUNT OFFERED IN SETTLEMENT
John Brock 779 A Ridgeview Frankfort, KY 406011		4,000	-0-

TYPE OF CREDITOR:

INCORPORATED COMMERCIAL VENDOR
 UNINCORPORATED COMMERCIAL VENDOR
 CANDIDATE
 COMMITTEE EMPLOYEE
 OTHER INDIVIDUAL

A. TERMS OF THE INITIAL EXTENSION OF CREDIT AND NATURE OF THE DEBT

Unsecured Advance

B. EFFORTS MADE BY THE COMMITTEE TO PAY THE DEBT

"Total"
No Funds Available

1/ ALL CONTRIBUTORS WERE ADVISED OF CANDIDATES DROPT TO COMMITTEE
 2/ FUND RAISERS WERE SUGGESTED BY TREASURER (MR) BUT THE MAJORITY ADVISED AGAINST THIS SUGGESTION.
 3/ EFFORTS WERE MADE TO GENERATE INCOME THROUGH OTHER CANDIDATES,

C. STEPS TAKEN BY THE CREDITOR TO COLLECT THE DEBT

VISITS, PHONE CALLS
 PLEADINGS &
 BROUING

"Total"
No Funds Available

1/ CANDIDATE REQUESTED PRIOR CONTRIBUTORS WERE ASKED FOR NUMEROUS TIMES ADDITIONAL CONTRIBUTIONS. YOUR CALL IN TO THE TREASURY.
 2/ CANDIDATE CAME TO TREASURER'S OFFICE & REQUEST-PMT TWICE. Wm. G. Johnson CPA TREASURER

**CREDITOR SECTION
(TO BE FILLED OUT BY CREDITOR)**

D. WAS THE EFFORT MADE BY THE CREDITOR TO COLLECT THE DEBT SIMILAR TO OTHER DEBT COLLECTION EFFORTS AGAINST NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN

"Creditor is the Candidate"

"THERE ARE NO NON POLITICAL DEBTORS"

E. ARE THE TERMS OF THE DEBT SETTLEMENT COMPARABLE TO OTHER SETTLEMENTS MADE BY THE CREDITOR WITH OTHER NONPOLITICAL DEBTORS?

YES NO IF NO, PLEASE EXPLAIN N/A

There are no other debtors

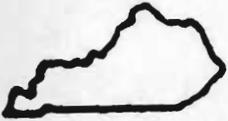
As a representative of the creditor, I hereby accept the settlement offer made to me by the committee and upon payment agree to consider the debt satisfied (or attach a copy of the signed settlement).

SIGNATURE OF CREDITOR OR REPRESENTATIVE

John D. Brock Candidate
Wm. G. Johnson CPA TREASURER

DATE
4-28-91

92040903189



9 2 0 4 0 9 0 5 1 9 0
KENTUCKIANS FOR JOHN BROCK

15 FOUNTAIN PLACE
FRANKFORT, KY 40601-1942

477

MARCH 21 19 91

PAY TO THE
ORDER OF

Wm. G. JOHNSON

\$

95.75

NINETY FIVE & 75/100

DOLLARS



Farmers Bank
& Capital Trust
Company
Frankfort, Kentucky 40601

Dawn Keckler

CAMPAIGN SUPPLIES

⑆00000477⑆ ⑆083900619⑆ 10 5171 7⑆



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-S

September 19, 1991

William G. Johnson, Treasurer
Kentuckians For Brock
779 A Ridgeview
Frankfort, KY 40601

Identification Number: C00239129

Reference: Debt Settlement Plan received 5/6/91

Dear Mr. Johnson:

This letter is to inform you that your response of September 19, 1991 to our request for additional information, dated August 28, 1991 did not adequately provide all the information requested. Please note that Part II of your amended Debt Settlement Plan is incomplete. In order to complete the processing of the Debt Settlement Plan, the following information is still needed:

- A brief description of the committee's efforts to collect the funds necessary to pay the candidate the amount owed.
- Item B, steps the committee took to repay the candidate (example: fundraiser).
- Item C, steps creditor took (example: regular billing, phone calls).
- Part II should be completed and signed by the candidate.

The processing of the debt settlement plan cannot continue until the requested information is obtained. In addition, the debts involved in the settlement must be continuously reported until the Commission completes its review to ensure that the settlement is in compliance with the Federal Election Campaign Act and Commission Regulations. (11 CFR §104.11)

If you should have any questions related to this matter, please contact Pat Sheppard on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

PAT. SEE ATTACHED

Wm. G. Johnson CPA
TREASURER

THANKS

Bill

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director

92040903191



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-C

William G. Johnson, Treasurer
Kentuckians For Brock
779 A Ridgeview
Frankfort, KY 40601

AUG 28 1991

Identification Number: C00239129

Reference: Debt Settlement Plan received 5/6/91

Dear Mr. Johnson:

We are in receipt of your debt settlement plan. The Commission is in the process of reviewing the plan to determine if it complies with the requirements of the Federal Election Campaign Act (the Act) and Commission Regulations governing debt settlements. (11 CFR Part 116) In order to complete our review, the following information is needed:

- Please provide Parts I and III of the Debt Settlement Plan,
- In addition a brief description of the committees' and creditors' effort to collect the funds is necessary,
- Item B, steps committee took (example: fundraiser, candidate donated funds),
- Item C, steps creditor took (example: regular billing, phone calls), and
- Part II should be completed and signed by the candidate.

If the information is not provided, the processing of the debt settlement plan will be discontinued. Until the Commission is able to complete its review, all debt including the debts involved in the debt settlement must be continuously reported. 11 CFR §104.11

If you have any questions regarding this matter, please feel free to contact me on our toll-free number (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903192

Charles T. Mitchell Company

Certified Public Accountants
201 WEST MAIN, P.O. BOX 698
FRANKFORT, KENTUCKY 40602-0698
FRANKFORT (502) 227-7395
TELECOPIER (502) 227-8005



DON C. GILES, C.P.A.
WILLIAM G. JOHNSON, JR., C.P.A.
GARY L. HARBIN, C.P.A.
LARRY T. WILLIAMS, C.P.A.
JAMES CLOUSE, C.P.A.
CHARLES F. WHELAN, C.P.A.

CHARLES T. MITCHELL, C.P.A.
CONSULTANT

June 5, 1991

Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, D.C. 10510-7116

Federal Election Comm
999 E. Street N.W.
Washington, D.C. 20463
Attention Pat Sheppard

Reference: Attached correspondence from the Federal Election
Commission regarding Kentuckians for John Brock
C00239129 Dated 5/15/91

Gentlemen:

The attached letter from the Federal Election Commission requested certain information regarding the loans and loan repayments reported in the 10/1/90 thru 12/31/90 report for the referenced candidate.

The requested information has been inserted "Written" into the enclosed copy of the report as filed. Kentuckians for John Brock is an inactive account and, as reported in the 1/1/91 through 3/31/91 report, owes one debt of \$4,000 to the candidate. This debt will never be repaid and the bank balance is -0-. There is no activity and there will be no activity. We would like to be official dissolved, and ask your assistance in this matter,

Respectfully submitted,

Wm. G. Johnson CPA

Wm G. Johnson, CPA

cc: John Brock

92040903193



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 3 1991

William G. Johnson, CPA, Treasurer
Kentuckians for Brock
201 W. Rain Street
Frankfort, Kentucky 40601

Identification Number: C00239129

MAY 15 1991

Reference: Year End Report (10/1/90-12/31/90)

Dear Mr. Johnson:

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

-Please provide a Schedule A to support the amount reported on Line 13(a) of the Detailed Summary Page. Each person who makes a loan to your committee or to the candidate acting as an agent of the committee must be reported on Schedule A and Schedule C. The itemization on Schedule A must include the person's full name, mailing address and zip code, along with the name of his/her employer, the date of the contribution/loan and the aggregate year-to-date amount of contributions made by the person. Schedule C must include any endorser or guarantor of the loan, the date the loan was made and all other terms of the loan. If the loan is from the candidate, you must indicate if it is from his/her personal funds. (11 CFR §104.3(a)(4)(iv))

-Please provide a Schedule B to support the amount reported on Line 19(a) and 19(b), Column A, of the Detailed Summary Page. Each loan repayment made by the committee must be itemized on a supporting Schedule B, regardless of the amount of the repayment. (11 CFR §104.3(b)(4)(iii) and (iv))

-When a committee reports receiving a loan from the candidate, it is necessary to clarify whether or not the candidate used his/her personal funds or borrowed the money from a lending institution or any other source. If the candidate borrowed funds from a lending institution, or any other source, please provide the name of the lending institution and the complete terms

92040903194

of the loan. If the loan(s) was from personal funds, please acknowledge that fact in an amendment to this report. It is important to note that "personal funds" is strictly defined by Commission Regulations and may be found in 11 CFR §110.10. (11 CFR §§100.7(a)(1) and 104.3(d))

-When several loans are owed by the same person or bank, you must report each loan separately, including the original date, the amount, the outstanding balance and all other terms. These loans should not be combined into a single figure. Please amend your report to clarify this matter.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Pat Sheppard

Pat Sheppard
Senior Reports Analyst
Reports Analysis Division

92040903195

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Kentuckyans for John Brock		2. FEC IDENTIFICATION NUMBER C 00239
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. c/o Wm G. Johnson CPA 201 W Main Street		3. IS THIS REPORT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CITY, STATE and ZIP CODE Frankfort, KY 40601	STATE/DISTRICT	

4. TYPE OF REPORT

- | | |
|---|---|
| <input type="checkbox"/> April 15 Quarterly Report | <input type="checkbox"/> Twelfth day report preceding _____
(Type of Election) |
| <input type="checkbox"/> July 15 Quarterly Report | election on _____ in the State of _____ |
| <input type="checkbox"/> October 15 Quarterly Report | <input type="checkbox"/> Thirtieth day report following the General Election on _____ |
| <input checked="" type="checkbox"/> January 31 Year End Report | _____ in the State of _____ |
| <input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only) | <input type="checkbox"/> Termination Report |

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
10/1/90 through 12/31/90		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	500.00	165,183.62
(b) Total Contribution Refunds (from Line 20(d))		2,000.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a)) . .	500.00	163,183.62
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	597.66	179,696.80
(b) Total Offsets to Operating Expenditures (from Line 14)		1,462.61
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	597.66	178,234.19
8. Cash on Hand at Close of Reporting Period (from Line 27)	2,059.95 2095.95	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	6,000.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer WILLIAM G. JOHNSON CPA	
Signature of Treasurer <i>Wm. G. Johnson CPA</i>	Date 1-16-90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

9 2 0 4 0 9 0 3 1 9 6

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) **Kentuckyan for John Brock** Report Covering the Period: From: **10/1/90** To: **12/31/90**

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	500.00		11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals	500.00	164,433.62	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)		800.00	11(c)
(d) The Candidate			11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	500.00	165,233.62	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	6,000.00	13,000.00	13(a)
(b) All Other Loans		6,000.00	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	6,000.00	19,000.00	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		1,462.61	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	6,287.95	6,351.81	15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	12,787.95	192,048.00	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	597.66	179,696.80	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	7,000.00		19(a)
(b) Of All Other Loans	6,000.00		19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	13,000.00	13,000.00	19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		2,000.00	20(a)
(b) Political Party Committees			20(b)
(c) Other Political Committees (such as PACs)			20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))		2,000.00	20(d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21).	13,579.66	194,696.80	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 2,905.66	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 12,787.95	24
25. SUBTOTAL (add Line 23 and Line 24)	\$ 15,693.61	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).	\$ 13,597.66	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25).	\$ 2,095.95	27

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SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER

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

NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903198

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Bob Babbage Lexington, KY 40234	Commonwealth of KY	10/17/90	300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Auditor	Aggregate Year-to-Date > \$ 300.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sylvia Price Frankfort, Ky 40601	Commonwealth Of KY	10/17/90	200.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 200.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
JOHN H BROCK 779 A RIDGEVIEW (RESIDENCE) FRANKFORT KY 40601	COMMONWEALTH OF KENTUCKY	10/8/90	"LOAN" 6000-
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation SUPERINTENDANT OF PUBLIC INSTRUCTION	Aggregate Year-to-Date > \$ (LOANS 13,000)	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) 500.00

TOTAL This Period (last page this line number only) 500.00

TOTAL 6,500-

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

NAME OF COMMITTEE (in Full)

Kentuckians for John Brock

92040903199

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lantz Typesetting Lexington, KY	Typesetting Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/90	50.00
Capital Plaza Authority Frankfort, Kentucky 40601	Utilities Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/90	61.43
Ky Utility Co Frankfort, KY	Utilities Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/4/90	81.86
Konica Lexington, KY	Supplies Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/17/90	50.00
Southcreek Properties Lexington, KY	Cleaning Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/17/90	50.00
Holiday Inc. Lexington, KY	Campaign Expense "On Account Final" Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/17/90	284.28
Cellular One Inc. Lexington, KY	Telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/17/90	6.74
AL BROCK P.O. Box 103 PINEVILLE, KENTUCKY 40977	REPAY LOAN Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-3-90	6000.-
JOHN H BROCK (RES) 779 A RIDGEVIEW FRANKFORT KY 40601	REPAY LOAN Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-12-90	7000.-

SUBTOTAL of Disbursements This Page (optional)	597.66
TOTAL This Period (last page this line number only)	597.66

TOTAL \$ 12,597.66

92040903200

Name of Committee (in Full) Kentuckians for John Brock			
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
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name; Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
John Brock - Candidate (address on page 1) <i>LOAN WAS FROM PERSONAL FUNDS</i>	13,000.00	7,000.00	6,000.00 <i>ONE LOAN</i>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Terms: Date Incurred _____ Date Due <i>N/A</i> Interest Rate <i>0</i> % (apr) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B <i>NONE</i>			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			6,000.00
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.			

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Kentuckians for Brock Committee
William G. Johnson, as treasurer
Al Brock

)
) MUR 3237
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)

SENSITIVE
DEC 19 1991

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 14, 1991, the Commission found reason to believe that the Kentuckians for Brock Committee ("the Committee") and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by receipt of excessive contributions from an individual during the 1990 primary election campaign in Kentucky.

The Reports Analysis Division's ("RAD") review of Committee reports revealed that on May 29, 1990, the date of the Kentucky primary election, the Committee received a contribution of \$6,000 in the form of a loan from an individual, Al Brock. Following inquiries from RAD, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

The Committee responded to the reason to believe finding by stating that the Committee had depended on representations from certain political organizations that funds for expenses would be made available, and that the Committee had incurred campaign obligations in anticipation of that future support. When such funds were not realized, the candidate's brother, Al Brock,

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apparently made the loan so the Committee could pay expenses. According to the Committee, the candidate "was faced with moral commitments beyond the strength of his campaign treasury and retired them in the only manner available." The Committee stated that "Errors were made in judgement [sic], but there was never any intent of any party to this transaction to violate the law...."

Mr. Al Brock stated that his brother John Brock was running a campaign for U.S. Senate with limited funds against a well-financed opponent. Al Brock stated that his brother was in need of funds to pay bills, and "I loaned him the money to meet these unpaid bills not realizing that I was violating the Federal Election Campaign Act of 1971."

On August 28, 1991, General Counsel's Briefs were sent to respondents. The Committee's brief was subsequently returned and a new address obtained from the Postmaster. Both the individual respondent and the Committee have now responded to the briefs.

II. ANALYSIS

The Federal Election Campaign of 1971, as amended, prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

11 C.F.R. § 103.3(b)(3) explains that contributions which

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exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

In response to the General Counsel's Brief, the Committee treasurer reiterated previous arguments and made three points. He stated that he did not knowingly accept contributions in excess of limitations because:

"1. As soon as I became aware of the loan, I advised that it be returned. However, there were no funds available for repayment.

2. I reported the transaction exactly as it occurred. There was no attempt at any form of reattribution or redesignation.

3. The funds were repaid as quickly as funds were available."

The treasurer provided a document he prepared for the campaign concerning accounting for receipts and disbursements. In it he notes that loans come under the definition of contributions, and that contributions by individuals are limited to \$1,000 per election.

Mr. Al Brock responded to the Brief by referring to the previous response noted above. He asserted that he was unaware that a loan was considered a contribution, and that he wants to cooperate with the Commission during the conciliation process.

Although the Committee's refund of the excessive

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loan/contribution may be viewed as mitigating the violation, the Committee's receipt of a direct contribution of \$1,000 and of the loan of \$6,000 to the Committee's primary election campaign from Al Brock resulted in an excessive amount of \$6,000 received with respect to a single election. Therefore, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by knowingly accepting contributions in excess of limitations at 2 U.S.C. § 441a(a)(1)(A). This Office also recommends that the Commission find probable cause to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A).

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

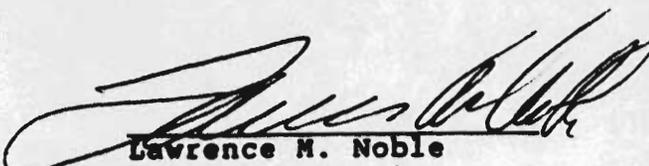
1. Find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A).

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3. Approve the attached conciliation agreements and appropriate letters.

Date

12/18/91


Lawrence M. Noble
General Counsel

Attachments:

A. Conciliation Agreements (2)

Staff assigned: Frances B. Hagan

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3237
Kentuckians for Brock Committee;)
William G. Johnson, as treasurer;)
Al Brock.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 19, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3237:

1. Find probable cause to believe that the Kentuckians for Brock and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Al Brock violated 2 U.S.C. § 441a(a)(1)(A).
3. Approve the conciliation agreements and appropriate letters as recommended in the General Counsel's report dated December 18, 1991.

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

Attest:

12-23-91
Date


Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

William G. Johnson, Treasurer
Kentuckians for Brock
#15 Fountain Plaza
Frankfort, Kentucky 40601

RE: MUR 3237
Kentuckians for Brock
William G. Johnson, as treasurer

Dear Mr. Johnson:

On December 19, 1991, the Federal Election Commission found that there is probable cause to believe the Kentuckians for Brock Committee and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with accepting an excessive contribution of \$6,000 in the form of a loan.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 8, 1992

Mr. Al Brock
P.O. Box 103
Pineville, Kentucky 40977

RE: MUR 3237
Al Brock

Dear Mr. Brock:

On December 19, 1991, the Federal Election Commission found that there is probable cause to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, in connection with making an excessive contribution of \$6,000 in the form of a loan to the Kentuckians for Brock Committee.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

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STATEMENT OF DESIGNATION OF COUNSEL

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MUR 3237

NAME OF COUNSEL: J.C. Helton

ADDRESS: Helton & Helton, Attorneys

P.O. Box 740

Pineville, Kentucky 40977

TELEPHONE: (606) 337-3087

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.

19 Mar 92
Date

A. Brock
Signature

RESPONDENT'S NAME: Al Brock

ADDRESS: P.O. Box 103

Pineville, Kentucky 40977

HOME PHONE: (606) 337-8870

BUSINESS PHONE: (606) 248-4081

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FEDERAL ELECTION
COMMISSION
OFFICE OF FEDERAL COUNSEL

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HELTON & HELTON
ATTORNEYS AT LAW
ASHER BUILDING - P. O. DRAWER 740
PINEVILLE, KENTUCKY 40977

J. C. HELTON
JEFFERY W. HELTON

TELEPHONE
(606) 337-3087
FAX
(606) 337-3089

April 27, 1992

Ms. Veronica M. Gillespie
Attorney at Law
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3237
Kentuckians for Brock Committee and
William G. Johnson, as Treasurer
Al Brock

Dear Ms. Gillespie:

Enclosed are the two (2) Conciliation Agreements which have been signed by Al Brock and William G. Johnson, together with their checks in the amount of \$900.00 each. Please forward a copy of the Conciliation Agreements to my attention when they have been signed by the Commission.

Very truly yours,


J.C. HELTON

JCH/jcs

Enclosure

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kentuckians for Brock Committee
and William G. Johnson, as treasurer
Al Brock

)
)
) MUR 3237
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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 19, 1991, the Federal Election Commission found that there was probable cause to believe the Kentuckians for Brock Committee (the "Committee") and William G. Johnson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting an excessive contribution of \$6,000 in the form of a loan. On the same day, the Commission found that there was probable cause to believe that Al Brock, the brother of the candidate, violated 2 U.S.C. § 441a(a)(1)(A) by making the excessive \$6,000 contribution. Thereafter, the Commission entered into post-probable cause conciliation with the Kentuckians for Brock Committee and William G. Johnson, as treasurer, and Al Brock ("Respondents").

Attached are two conciliation agreements which have been signed by the Respondents.

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreements with Kentuckians for Brock Committee and William G. Johnson, as treasurer, and Al Brock.
2. Close the file.
3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

5/2/92
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Proposed conciliation agreement (Committee)
2. Proposed conciliation agreement (Al Brock)
3. Photocopy of civil penalty check (Committee)
4. Photocopy of civil penalty check (Al Brock)

Staff Assigned: Veronica M. Gillespie



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: MAY 12, 1992

SUBJECT: MUR 3237 - GENERAL COUNSEL'S REPORT
DATED MAY 7, 1992

The above-captioned document was circulated to the Commission on FRIDAY, MAY 8, 1992 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens _____
Commissioner Elliott _____
Commissioner McDonald _____
Commissioner McGarry _____
Commissioner Potter _____
Commissioner Thomas XXX

This matter will be placed on the meeting agenda for TUESDAY, MAY 19, 1992.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Kentuckians for Brock Committee) MUR 3237
and William G. Johnson, as treasurer;)
Al Brock.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 19, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3237:

1. Accept the conciliation agreements with Kentuckians for Brock Committee and William G. Johnson, as treasurer, and Al Brock, as recommended in the General Counsel's report dated May 2, 1992.
2. Close the file.
3. Approve the appropriate letters as recommended in the General Counsel's report dated May 2, 1992.

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

Attest:

5-21-92
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 2, 1992

Mr. J. C. Helton
Helton & Helton
P.O. Box 740
Pineville, Kentucky 40977

CLOSED

RE: MUR 3237
Kentuckians for Block Committee and
William G. Johnson, as treasurer
Al Brock

Dear Mr. Helton:

On May 19, 1992, the Federal Election Commission accepted the signed conciliation agreements and civil penalty amounts submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreements, however, will become part of the public record.

Enclosed you will find copies of the fully executed conciliation agreements for your files. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Veronica M. Gillespie
Attorney

Enclosures
Conciliation Agreements

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Kentuckians for Brock Committee) MUR 3237
William G. Johnson, as treasurer)
)

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FEDERAL ELECTION COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Kentuckians for Brock Committee and William G. Johnson, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(f).

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

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

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

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

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

1. Kentuckians for Brock is a principal campaign committee within the meaning of 2 U.S.C. § 431(5).

2. William G. Johnson is treasurer of the respondent committee.

3. The Federal Election Campaign of 1971, as amended,

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prohibits a candidate or committee from knowingly accepting any contribution in violation of the provisions of Section 441a. 2 U.S.C. § 441a(f). The limit for individuals is \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

4. 11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

5. On May 29, 1990, the date of the Kentucky primary election, the respondents received a contribution of \$6,000 in the form of a loan from an individual, Al Brock.

6. Following inquiries from the Reports Analysis Division, the Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan.

7. The 1990 April Quarterly Report shows that this individual had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

V. Respondents accepted excessive contributions totaling \$6,000 in violation of 2 U.S.C. § 441a(f). Respondents contend

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that the violation was not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of nine hundred dollars (\$900), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: *L.G. Lerner*
Lois G. Lerner
Associate General Counsel

6-1-92
Date

FOR THE RESPONDENTS:

Name
Position

Date

Wm. G. Johnson CPA TREASURER 4/13/92
KENTUCKIANS For JOHN BROCK

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Al Brock

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)
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MUR 3237

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RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

CONCILIATION AGREEMENT

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

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

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

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

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

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

1. Al Brock is an individual contributor to the Kentuckians for Brock Committee, principal campaign committee for U.S. Senate candidate John Brock, during the 1990 primary election campaign.

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2. The Federal Election Campaign of 1971, as amended, limits individual contributions to an authorized candidate committee to \$1,000 per election. 2 U.S.C. § 441a(a)(1)(A). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office.

3. 11 C.F.R. § 103.3(b)(3) explains that contributions which exceed the contribution limits when aggregated with other contributions from the same contributor may be either deposited into a campaign depository or returned to the contributor. If deposited, the treasurer may request redesignation or reattribution, as appropriate. If reattribution or redesignation is not obtained, the treasurer shall, within sixty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

4. On May 29, 1990, the date of the Kentucky primary election, the respondent made a contribution of \$6,000 in the form of a loan to the Kentuckians for Brock Committee.

5. Following inquiries from the Reports Analysis Division, the Kentuckians for Brock Committee reported repayment of the \$6,000 loan on October 2, 1990, 112 days after receipt of the loan.

6. The 1990 April Quarterly Report shows that respondent had contributed \$1,000 to the Committee's primary election campaign on January 15, 1990.

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V. Respondent made excessive contributions totaling \$6,000 in violation of 2 U.S.C. § 441a(a)(1)(A). Respondent contends that the violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of nine hundred dollars (\$900), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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

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

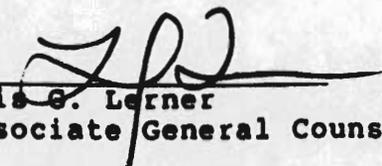
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

6/1/92
Date

FOR THE RESPONDENTS:


Name
Position

13 apr. 92
Date

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3237

DATE FILMED 6/3/92 CAMERA NO. 1

CAMERAMAN EES

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