



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 3446

DATE FILMED 11-9-93 CAMERA NO. 2

CAMERAMAN JMH

93043503583



**Resolution Trust Corporation**  
Chicago Consolidated Office

Pre-MUR 241

0280

P.O. Box 867  
Elk Grove Village, IL 60009-0867  
Scott J. Hlavacek

25 Northwest Point Blvd.  
Elk Grove Village, IL 60007

(708) 290-7768  
(800) 526-7521  
(708) 806-7780 - FAX

March 4, 1991

Federal Election Commission  
Office of General Counsel  
999 E Street Northwest  
Washington D.C. 20463

Dear Sirs:

I am writing to notify you of what may be violations of the Federal Election Campaign Act of 1971. In 1976 the Chairman and the President of Germania Bank a Federal Savings Bank opened a checking account at the institution in their names. The Chairman and President solicited contributions to the account from the employees of the institution. They requested the employees contribute .0032% of their salaries. The Chairman and President were told who had contributed to the account and who had not. Contributions to the account appear to have averaged about \$2,000.00 a year.

Funds were disbursed from the account in the form of contributions to the campaigns of various State and Federal officials, as well as various PAC's. The contributions were many times made in the name of Germania Bank. In the case of the Home Builders PAC Germania Bank was listed as a sponsor.

The way in which funds were solicited to this account and the representations made when they were disbursed appear to violate the Federal Election Campaign Act. I have included copies of supporting documents regarding the solicitation and the disbursal of funds from the account as well as a listing of where the disbursed funds went.

If you require additional information please feel free to contact either myself or Chris Kostopoulos at 1-800-284-6197.

Sincerely

*Scott J. Hlavacek*  
Scott J. Hlavacek  
Investigator

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 MAR -7 PM 12:50

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 MAR -7 PM 11:16

93043503584

GERMANIA BANK POLITICAL CONTRIBUTIONS

<u>Name</u>	<u>80-85</u>	<u>1986</u>	<u>87-88</u>	<u>Total</u>
THRIFTPAC	1050.00	425.00		1475.00
ISLPEC	1600.00	225.00		1825.00
SAPEC	1050.00	225.00		1275.00
Home Builders Inc PAC		500.00	500.00	1000.00
Senator Vince Demuzio	55.00			55.00
Citizens for Percy	225.00			225.00
Citizens for Jim Edgar		150.00		150.00
Friends of Jim McPike	100.00	200.00		300.00
Citizens for Cosentino		125.00	300.00	425.00
Danforth for Senate			500.00	500.00
Friends of Karen Hasara		25.00	30.00	55.00
Missouri Govenor Ashcroft	100.00		500.00	600.00
Friends of Margaret Kelly		250.00	100.00	350.00
John Shear Election Campaign			200.00	200.00
Houston for Mayor		30.00	50.00	80.00
Friends of Mike Henklaus			100.00	100.00
Citizens for Bill Webster			250.00	250.00
John Davidson Campaign		100.00		100.00
Missouri Republican Party		300.00		300.00
Banning Testimonial Commitee		200.00		<u>200.00</u>
		<u>Total Contributions</u>		<u>9265.00</u>

93043503585

MEMO # 85-35

TO: Sandy Young  
FROM: Jan Wickenhauser  
SUBJECT: Political Contribution  
DATE: February 26, 1985

Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians.

If you would make a minimum contribution in the amount of \$4.20, we can reach our goal this year of \$700.00. (You are entitled to claim one-half of your contribution as a tax credit up to \$50.00 on an individual return, or up to \$100.00 on a joint return.) By being a "Super Leader", you can help the industry, Germania and yourself by supporting legislation that supports the savings and loan industry.

Please make your check payable to William G. Osborn and return to me by March 22, 1985.

Thank you for your cooperation and support.

93043503586

93043503587

~~Brown, Vickie~~  
 Office: Duro Office  
 Current pay \$ 7900 00/year  
 Current job: Assistant Vice Pr  
 9-5  
 5-9

~~Charles~~  
 Office: Alton-Corporate  
 Current pay \$ 14000 00/year  
 Current job: Assistant Vice Pr  
 4-11  
 15-00  
 3-20

~~John~~  
 Office: Mt. Vernon Office  
 Current pay \$ 9000 00/year  
 Current job: Vice President  
 4-4  
 14.88

~~Margie~~  
 Office: Alton-Corporate  
 Current pay \$ 16300 00/year  
 Current job: Assistant Secret  
 4-20  
 3-6

~~Down, Leann~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-5

~~John~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-12

~~Mike~~  
 Office: Belleville Office  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-5  
 4-5

~~David~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Executive  
 30-09  
 3-7

~~Phel~~  
 Office: Alton-Corporate  
 Current pay \$ 28650 00/year  
 Current job: Treasurer  
 4-7

~~Linda~~  
 Office: Alton-Corporate  
 Current pay \$ 11100 00/year  
 Current job: Assistant Vice Pr  
 4-4  
 3-21

~~Levi, Carl~~  
 Office: Geranica Financial  
 Current pay \$ 10000 00/year  
 Current job: Senior Vice Pres  
 4-2

~~Larive, Bob~~  
 Office: Springfield Office  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-21

~~Carl~~  
 Office: Duro Office  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 2-28

~~David~~  
 Office: Geranica Financial  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice Pr  
 4-4  
 4-5

~~William~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: President  
 4-4  
 3-1

~~John~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Senior Vice Pres  
 4-4  
 30-00  
 2-27

~~Carl~~  
 Office: Geranica Financial  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice Pr  
 4-4

Cur 201-200000/year 7.11  
 Cur: Job Assistant

~~Robert, Robert~~  
 Office: Alton-Corporate  
 Current pay \$ 11000 00/year  
 Current job: Senior Vice Pres  
 4-11  
 20-00

~~Rush, Ed~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-11  
 2-27

~~Leann, Bernie~~  
 Office: Springfield Office  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-11  
 3-2

~~Schleim, John~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-11  
 2-28

~~Stephen~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 4-4

~~Leann~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-5

~~Telby~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-15

~~Donald~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 20-00  
 3-21

~~Brenda~~  
 Office: Springfield Office  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-19

~~Lauren~~  
 Office: Springfield Office  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 20-00  
 4-22

~~Terri~~  
 Office: Alton-Corporate  
 Current pay \$ 21750 00/year  
 Current job: Assistant Secret  
 4-4  
 2-28

~~Debbie~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 4-5

~~Bob~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Senior Vice  
 4-4  
 3-19

~~Charles~~  
 Office: DFC - West County  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 3-15

~~Timothy~~  
 Office: Alton-Corporate  
 Current pay \$ 11700 00/year  
 Current job: Vice President  
 4-4  
 25-00  
 3-7

~~Jan~~  
 Office: Alton-Corporate  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 20-00  
 4-28

~~John~~  
 Office: Alton Office  
 Current pay \$ 10000 00/year  
 Current job: Assistant Vice  
 4-4  
 3-7

~~Carl~~  
 Office: Alton Office  
 Current pay \$ 10000 00/year  
 Current job: Vice President  
 4-4  
 3-7



● ● ● INTER-OFFICE MEMO ● ● ●

FROM Loretta DATE 3-24-86

TO ED TIME 12:06 P.M.

SUBJECT Up-date on political contributions--

Other officers requested to contribute who have made a contribution since my last report to you:  
Brenda Stroh - paid \$28.45

Other staff members making contributions:

David Sovanski - \$15.00

Charles McKean 25.00

Susanne Curtis 5.00

Kevin Kattelman 5.00

Patricia McGuigan 5.00

Previous Cont. \$2,387.80

Add-Up-date 83.45

T-010 Rev 200 10M

Total contributions to date \$2,471.25

93043503589

Others making contributions

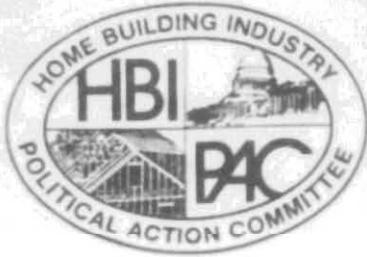
Mike Drury	\$ 25.00
Ann Gutherz	25.00
Keith Kassel	15.00
Branda Boone	5.00
Sharon Hamilton	10.00
Debbie Higgins	20.00
Carol Hitt	10.00
Rita Schumacher	10.00
Janice Terrell	5.00
Nancy Zagar	10.00
Kim Anderson	5.00
Loretta Clayton	10.00
Jo Ann Groves	5.00
Steve Klingbeil	35.00
Bethany Miller	10.00
Kathy Scoggins	5.00
	<u>205.00</u>

Total to date paid by officers \$ 2,182.80  
Add other staff contributions 205.00

Total 1986 contributions \$ 2,387.80  
As of 3/20/86

93043503590





*"Strengthening the Housing Industry through Political Action"*

September 9, 1986

Mr. Steve Rull  
Germania Federal Savings  
543 E. Broadway  
Alton, IL 62002

Dear Mr. Rull:

I have learned from Ed LeBeau that Germania Federal Savings and Loan has decided to sponsor one hole for the HBI-PAC Golf Tournament at Norwood Hills Country Club on September 15. I was directed to address the billing information to you.

I would appreciate payment of \$500.00 for the sponsorship as soon as possible. Payment should be made to HBI-PAC. Thank you.

If you have any questions, please let me know.

Sincerely,

John Stephens  
Legislative Representative

JS/lmp

*a.k. to pay  
from  
9/12/86*

93043503592



*Sincerely - to you & I are going to pass unless  
some appropriate who we  
can't say no to.*

RECEIVED JUL 24 1987



"Strengthening the Housing Industry through Political Action"

July 22, 1987

Mr. Jim New  
Germania Federal  
543 E. Broadway  
Alton, IL 62002

Dear Jim:

We hope you will again support the HBI-PAC Golf Tournament at Norwood Hills by sponsoring a green, tee, or hole, as you did last year. The event is attended by the top home builders' leadership and is important for supporting pro-building political candidates.

Last year you sponsored 1 hole for a contribution of \$500.

We wanted to give you first opportunity for sponsorship at our second tournament and preference for placement of your signs recognizing your support.

We hope you will continue your commitment to a first-class event. Your sponsorship entitles you to join us for dinner, drinks, prizes, and festivities in the evening at Norwood Hills.

Please contact John Stephens at 994-7700 by July 29 to guarantee your preferential sponsorship

We look forward to hearing from you.

Dave Forrest, HBI-PAC  
Chairman

Gregory B. Vatterott, HBA  
President

John L. Gutmann, HBA  
Executive Vice President

*Please advise what I will  
be able to contribute  
was requested by  
person last year  
Jim*

93043503593

GermaniaBank  
Executive Offices  
701 Market Street, Suite 201  
Gateway One on The Mall  
St. Louis, Missouri 63101  
314 982 9726

Jimmie W. New  
Executive Vice President

# GermaniaBank

A Federal Savings Bank

September 14, 1987

Mr. John Stephens  
Deputy Treasurer  
Home Building Industry  
10104 Old Olive Street Road  
St. Louis, MO 63141

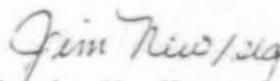
Dear Mr. Stephens:

Enclosed is our check in the amount of \$500 payable to HBI-PAC for the golf tournament at Norwood Hills Country Club on October 5, 1987.

Please be advised that we are no longer "Germania, F.A.". As of June 1, 1987, we changed our name to "Germania Bank, A Federal Savings Bank" and we would like that to read on the sign at the two tees/greens which Germania Bank is sponsoring.

We appreciate the opportunity to be of service to HBI-PAC and hope the golf tournament goes well.

Very truly yours,



Jimmie W. New

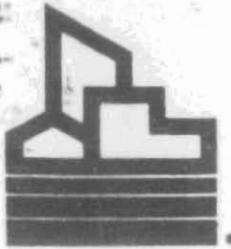
/slg  
Enclosure

93043503594

	EDWARD L. MORRIS JIMMIE W. NEW 543 E. BROADWAY 618-465-5543 ALTON, IL 62002	219
Pay to the order of	HBI-PAC	9-14 87 70-7070/2810
Five Hundred and no/100-----		\$ 500.00
		
		
⑆28⑆070707⑆00⑆0303445⑆0219		

RECEIVED MAY - 8 1987

**The J.L. Mason  
Group, Inc.**  
Corporate Office



1215 Fern Ridge Parkway  
Suite 200  
St. Louis, MO 63141  
314-434-4100

JOSEPH L. MASON  
President,  
Chief Executive Officer

May 6, 1987

Route to:  
 Morris  Pollaci  
 New  Waxman  
 Rull  Wickhsr  
 \_\_\_\_\_  
Return to Brenda

Mr. Ed Morris  
Germania  
543 E. Broadway  
Alton, IL 62002

Dear Ed:

I am writing this letter to ask for your help. As one of Missouri's more concerned and politically involved people your assistance is urgently needed.

Last November we helped elect Margaret Kelly as Missouri State Auditor. Margaret has displayed the dedication, integrity and independence we knew we could count on with her election.

Unfortunately, during this tough campaign a sizable debt was incurred to assure the victory. This debt is due and payable by May 30, 1987.

Your continued support is urgently needed now to pay off the debt and remove the concern so Margaret can concentrate her full efforts on her work as State Auditor.

Please help by responding today with your contribution. Thanks for your help.

Most Sincerely,

JOSEPH L. MASON  
Margaret Kelly Finance Chairman

93043503595



3 1987

MEMO TO: ED MORRIS

JULY 6, 1987

FROM: BERNIE SCANLAN

On June 24, 1987, I was invited to an Envelope Party for the campaign of Jerry Cosentino who is the incumbent in the election for State Treasurer. It was held at the 38 Club at Lake Springfield.

I have been working very hard with Jack Livengood and Barry MacArney, Cosentino's assistants, to get some large deposits from the Treasurer's Office. I made arrangements for a Pontoon boat and took people on tours of Lake Springfield.

I have been asked for a \$200.00 contribution will you please see if we can contribute this from our Political fund.

Thanks.

*Bernie Scanlan*  
Bernie

*Scanned  
By [unclear]  
[unclear]*

93043503597

11-11-87

Memo to: Mr. Morris  
From: Robin Loftus  
RE: Political Contributions

Enclosed please find a copy of a check for a contribution to Jerry Cosentino, Treasurer, paid by Bernie. He is requesting a refund from the political fund. We have been quite successful in establishing a deposit relationship with the Treasurer's office (\$3,000,000 in October with potential for over \$20,000,000 in the next year)

Thank you for your consideration in this matter.

93043503598

93043503599

NUMBER

285

70-1070/2810

9/30 1987

PAY TO THE ORDER OF CITIZENS For Copypaper \$ 100.00

One Hundred and No/100 DOLLARS



Bernie Saulin

MEMO

[Redacted area]

⑈00000⑈00000⑈

ENCLOSURE

93043503600



EDWARD L. MORRIS  
JIMMIE W. NEW  
543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

221

11-16 87 70-7070/2810

Pay to the order of Bernie Scanlan \$ 100.00

One Hundred and no/100-----



543 E. Broadway • Alton, IL 62002

Citizens for Cosentino [Signature]

[Redacted line]

93043503601

OT 87 09  
AMALGAMATED TRUST & SAVINGS BANK  
CHICAGO, ILLINOIS

PAY TO THE ORDER OF  
AMALGAMATED TRUST & SAVINGS BANK  
CHICAGO, ILLINOIS  
FOR DEPOSIT ONLY  
CITIZENS COMMITTEE FOR  
JERRY COSENTINO  
09-301-1  
10/10/87

20594541  
090129795

April 23, 1986

Chairman's Memo #86-29

TO: JIMMIE W. NEW

FROM: W. G. OSBORN

SUBJECT: U. S. LEAGUE PAC MANUAL

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

At one of our early Management Committee meetings, we discussed the advantages and disadvantages of a formally organized PAC and agreed to not form one. It was requested that the U. S. League PAC Manual information be referred to Jan Wickenhauser for her review. The updated forms received from the U.S. League on April 11, 1986 have been referred to Jan.

CC: Jan Wickenhauser  
Ed Morris ✓

93043503602

Memo #87-41

TO: Brent Waxman  
FROM: Ed Morris *EM*  
DATE: June 16, 1987  
SUBJECT: Political Action Committee

Would you please review our procedures for political action committees? My reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations. Please determine whether or not we are following the guidelines and, if not, what procedures must be implemented for our committee to operate legally.

93043503603

ELM/slg  
cc: Jim New



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 18, 1991

Scott J. Hlavacek  
Resolution Trust Corporation  
P.O. Box 867  
Elk Grove Village, IL 60009-0867

RE: Pre-MUR 241

Dear Mr. Hlavacek:

This is to acknowledge receipt of your letter dated March 4, 1991, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") by the Germania Bank. We are currently reviewing the matter and will advise you of the Commission's determination.

If you have any questions or additional information, please call Mary Mastrobattista, the attorney assigned to this matter, at (202) 376-8200. Our file number for this matter is Pre-MUR 241.

Pursuant to 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), the Commission's review of this matter shall remain confidential until the file has been closed.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:

  
Lois G. Zerner  
Associate General Counsel

93043503604



Resolution Trust Corporation  
Chicago Consolidated Office

PC 11/2/91

FAX TRANSMITTAL SHEET

Deliver To: Mary Mastrobattista

Fax Number: 1-202-219-3923

From: Scott Hlavacek

Date: September 9, 1991

Subject: Germania Bank Political Contributions

91 SEP -9 AM 9:42

Comments: Additional Information on the ISLPEC and the SAPEC. If you have any questions please give me a call.

If you do not receive 6 pages (including the cover sheet), please call Scott Hlavacek at 1-800-284-6197.

93043503605



543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

U. S. League - SAPEC  
1709 New York Ave., N.W.  
Suite 801  
Washington, D.C. 20006-9920

Gentlemen:

On behalf of the officers and staff members of Germania, F.A., who make voluntary contributions toward political candidates, we enclose our check number 105 in the amount of \$225 in support of SAPEC.

Sincerely,

  
Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

BC 6/24/86

93043503606

SENT BY: ST. LOUIS, MO 63101

91 : 13:21 :

GERMANIA BANK/R

708 290 7780: # 27 2

93043503607

	EDWARD L. MORRIS	216
	JIMMIE W. NEW	
543 E. BROADWAY	618-485-8843	6-2 87 70-7070/2210
ALTON, IL 62002		
 SAMPEC	\$ 360.00	
Three hundred and 60/100		
		
		

ST. LOUIS, MO 63101

09 09 91 13:25 708 290 780

RTC LCCO

004

SENT BY ST. LOUIS, MO 63101

6-91 : 13:45 : GERMANIA BANK

708 290 7780:# 3

EDWARD L. MORRIS 3-58		105
W. G. OSBORN		
543 E. BROADWAY 618-465-5543		April 23 19 86 70-7070/2810
ALTON, IL 62002		
PAY TO THE ORDER OF	SAPEC	\$ 225.00
Two Hundred Twenty Five and NO/100-----DOLLARS		
		
Contribution		<i>W. G. Osborn</i>

DATE	CHARGES AND CREDITS	BALANCE
	BALANCE FORWARD →	
	1986 ISLPEC GOAL	
	* To conform to current reporting requirements contributions must be received prior to July-31-1986	\$1,110 60

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois

Thank You

PAY LAST AMOUNT IN THIS COLUMN

**GERMANIA**

543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
918-485-8840

09661

Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, IL 62705

Gentlemen:

On behalf of the officers and staff  
who make voluntary contributions to  
enclose our check number 104 in the  
of ISLPEC.

Sincerely,

Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

BC E.P.

*me*

APR 11 29, 1986

RECEIVED APR 10 1986

Thank you for your \$ 225.00 contribution to  
the Illinois Savings and Loan Political Education  
Committee. ISLPEC helps support candidates for  
office who believe in a strong savings and loan  
environment for both the customer and the thrift  
business.

*Marilyn M. Muesel*  
For the Committee

Individual taxpayers may elect to take a credit or deduction  
for federal income tax purposes for political contributions  
under present federal law.

A copy of our report filed with the State Board of Elections  
(or will be) available for purchase from the State Board of  
Elections, Springfield, Illinois.

Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, Illinois 62705



W.G. Osborn  
543 East Broadway  
Alton, IL 62002

EDWARD L. MORRIS 3-96  
W. G. OSBORN 104  
543 E. BROADWAY 618-495-5543  
ALTON, IL 62002 April 23 19 86 70-7076/2810

PAY TO THE ORDER OF  
Two Hundred Twenty Five and NO/100 DOLLARS

  
MEMO Contribution *W. G. Osborn*



Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, Illinois 62705

### STATEMENT

DATE	FEB 1986
NUMBER	Dist # 112

TO: William G. Osborn  
Chairman of the Board  
Germania, F.A.  
543 East Broadway Box 557  
Alton, IL 62002

TERMS: Due Upon Receipt

PLEASE RETURN WITH YOUR REMITTANCE

\$ 225.00

RECEIVED  
F.E.C.  
SECRETARIAT

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

91 OCT 29 AM 10:03

**SENSITIVE**

FIRST GENERAL COUNSEL'S REPORT

Pre-MUR 241  
STAFF MEMBER Mary P. Mastrobattista

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

RESPONDENTS      Germania Bank, F.S.B.  
                    Joseph L. Mason  
                    Edward L. Morris  
                    Jimmie W. New

RELEVANT STATUTES: 2 U.S.C. § 431(4)(A)  
                          2 U.S.C. § 431(9)(A)(i)  
                          2 U.S.C. § 433(a)  
                          2 U.S.C. § 434(a)  
                          2 U.S.C. § 441b(a)  
                          2 U.S.C. § 441b(b)(3)  
                          2 U.S.C. § 441b(b)(4)(A)(i)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: Resolution Trust Corporation

I. GENERATION OF MATTER

This matter was referred to the Commission from the Resolution Trust Corporation.

II. FACTUAL AND LEGAL ANALYSIS

A. Factual Analysis

By letter dated March 4, 1991, the Resolution Trust Corporation ("RTC"), Chicago Consolidated Office, notified the Commission of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended, by Germania Bank, F.S.B. This referral concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of

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several years.<sup>1</sup>

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri. In 1990, Germania Bank was transferred to the RTC.<sup>2</sup> The RTC was acting as managing agent for Germania Bank pending completion of the sale of the Bank. In July of 1991, Germania Bank was purchased by Mercantile Bank of St. Louis, Missouri.

According to the information contained in the referral Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Edward Morris and Jimmie New solicited contributions to the account from Germania Bank employees. Edward Morris and Jimmie New requested that employees contribute .0032% of their salaries to the account. According to the referral, Edward Morris and Jimmie New were told which Bank employees had

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1. Germania Bank was also referred to this Office for possible violations of the Act by the Office of Thrift Supervision in 1990. That matter was designated Pre-MUR 236 and concerned a \$1,500 contribution to Citizens for Buzz Westfall, a candidate for a local election. According to the referral, the contribution was made by Jimmie W. New, who was later reimbursed by Germania Bank. It also appeared that Joseph L. Mason had consented to the reimbursement of the contribution by Germania Bank. On December 11, 1990, the Commission voted to find reason to believe that Germania Bank, F.S.B., Jimmie W. New, Joseph L. Mason, and Citizens for Buzz Westfall, and Michael W. Flynn, as treasurer violated 2 U.S.C. § 441b(a), but to take no further action against the Respondents and to close the file.

2. The RTC is an agency of the United States which manages and resolves cases of savings associations in conservatorship or receivership. 12 U.S.C. § 1331a(b)(1) and (b)(3).

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contributed to the account. It also appears that Joseph L. Mason, who became Germania Bank's Chief Executive Officer and Chairman of the Board of Directors sometime prior to 1987, may have been involved with the making of contributions from Germania Bank.

The referral indicated that funds were disbursed from the account in the form of contributions to candidates for various state and federal offices, as well as other political committees. Included with the referral was a list of contributions showing that Germania Bank made the following contributions from 1980 through 1988:

<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475*
ISLPEC	1980-1986	\$1,825
SAPEC	1980-1986	\$1,275
Home Building Industry PAC	1986-1988	\$1,000
Senator Vince Demuzio	1980-1985	\$ 55
Citizens for Percy	1980-1985	\$ 225*
Citizens for Jim Edgar	1986	\$ 150
Friends of Jim McPike	1980-1986	\$ 300
Citizens for Cosentino	1986-1988	\$ 425
Danforth for Senate	1987-1988	\$ 500* **
Friends of Karen Hasara	1986-1988	\$ 55
Missouri Governor Ashcroft	1980-1988	\$ 600
Friends of Margaret Kelly	1986-1988	\$ 350
John Shear Election Campaign	1987-1988	\$ 200
Houston for Mayor	1986-1988	\$ 80
Friends of Mike Henklaus	1987-1988	\$ 100
Citizens for Bill Webster	1987-1988	\$ 250
John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300*
Banning Testimonial Committee	1986	\$ 200
	Total	\$9,265

\* Indicates a federal committee.

\*\* Danforth for Senate was the only federal committee which reported receipt of a contribution listed above. Danforth for Senate reported receipt of a \$500 contribution from Edward L. Morris on June 4, 1987.

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B. Legal Analysis

1. Failure to Register a Political Committee

2 U.S.C. § 431(4)(A) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b(b) of the Act, the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization within 10 days after becoming a political committee. Political committees must file regular reports of receipts and disbursements. 2 U.S.C. § 434(a).

From the information received thus far, it appears that there is sufficient evidence to support a finding of reason to believe that Germania Bank violated 2 U.S.C. §§ 433(a) and 434(a) for failing to register, and file reports for, a political committee. As discussed below, the referral indicates that Germania Bank collected monies from its employees for a "political fund" and made contributions from this political fund to both federal and non-federal committees. Contributions from the political fund totaled \$9,265 over an eight year period.

The referral from the RTC included several lists of names of Germania Bank employees and the amounts which they had

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contributed to the Bank's political fund. (Attachment 1, pages 4-8). It appears from these lists that the amounts which individual employees contributed to the Bank's political fund ranged from under \$5 to over \$200. It also appears that these lists were provided to Edward Morris. On one list, the names of those employees who had not made a contribution to the Bank's political fund were highlighted in yellow.

The referral materials also included several memoranda regarding the Bank's political fund. The first memorandum, Memo # 85-35, dated February 26, 1985, solicited contributions from the Bank's employees to the political fund. (Attachment 1, page 3). "Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." (Attachment 1, page 3). The memorandum suggested a minimum amount for the employee to contribute to the fund, in order for the Bank to reach its goal for 1985 of \$700.

The second memorandum, Chairman's Memo # 86-29, dated April 23, 1986, was from W.G. Osborn to Jimmie New. (Attachment 1, page 19). The subject of this memorandum was the U.S. League PAC Manual. The memorandum begins with the following paragraph:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

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(Attachment 1, page 19). This memorandum also referred to a meeting of the Bank's management committee, in which the committee discussed "the advantages and disadvantages of a formally organized PAC and agreed to not form one." From this memorandum, it is evident that Germania Bank officials recognized the Commission's role in regulating political action committees, but chose not to register with the Commission as "a formally organized PAC."

The third memorandum included in the referral materials which relates to the Bank's political fund was from Edward Morris to Brent Waxman. (Attachment 1, page 20). In this June 16, 1987 memorandum, Memo # 87-41, Edward Morris asked Brent Waxman to review the Bank's procedures for political action committees. The memorandum states that "My [Edward Morris] reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations." (Attachment 1, page 20). The memorandum concludes by asking Brent Waxman to determine whether Germania Bank is "following the guidelines and, if not, what procedures must be implemented for our committee to operate legally." (Attachment 1, page 20). It appears that a copy of this memorandum was sent to Jimmie New.

The referral from the RTC indicates that Edward Morris and Jimmie New, acting on behalf of Germania Bank, solicited and collected contributions from Bank employees to a political fund. The political fund was established by Edward Morris and Jimmie New and was maintained by the Bank. The Bank, through

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Edward Morris and Jimmie New, used this political fund to make contributions totaling \$9,265 to various political committees over a period of eight years. The evidence indicates that Edward Morris and Jimmie New decided not to register with the Commission and disclose the contributions from the fund. Therefore, this Office recommends that the Commission find reason to believe that Edward L. Morris, Jimmie W. New, and Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a) and 434(a) See A.O.R. 1976-92. At this time, however, this Office recommends that the Commission take no further action against Germania Bank. The recommendation to take no further action against Germania Bank is based upon the fact that Germania Bank was transferred to the RTC subsequent to the events at issue in this matter. Although Germania Bank recently has been purchased by Mercantile Bank of St. Louis, this Office does not recommend that the Commission pursue Mercantile Bank as a successor in interest.

2. Solicitation of Contributions to the Fund

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is

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defined to include a corporation. 2 U.S.C. § 431(11)

Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families

It appears from the materials referred to this Office from the RTC that Edward Morris, Jimmie New, and Germania Bank also violated section 441b(b)(3) of the Act. The indication from the referral is that employees were expected to contribute a fixed portion of their salaries to the fund. The Bank then maintained lists of the names of Bank employees who had contributed to the political fund. (Attachment 1, pages 4-8). On one of these lists, the following notation is made: "Ed [Morris]: Those highlighted in yellow have not, as yet, made a political contribution." (Attachment 1, page 4). It appears that Edward Morris and Jimmie New were made aware of the names of those employees who had not contributed to the fund.

In addition, the memorandum dated February 26, 1985, which solicited contributions to the Bank's political fund, states that "we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." (Attachment 1, page 3). The memorandum suggested a minimum amount for the employee to contribute to the fund, but did not inform the employee of his right to refuse to contribute without reprisal. Although the memorandum was from an

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individual named Jan Wickenhauser, it is probable that the memorandum was issued under the direction of Edward Morris and Jimmie New, who controlled the political fund from which they authorized contributions to be made in the name of the Bank

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Furthermore, it appears that Germania Bank, Edward Morris, and Jimmie New also violated 2 U.S.C. § 441b(b)(4)(A)(i). Under this section of the Act, it is unlawful for a corporation or a separate segregated fund established by a corporation to solicit contributions from individuals outside the restricted class, except as provided under section 441b(b)(4)(B). It appears from the referral materials that Edward Morris and Jimmie New, acting on behalf of Germania Bank, solicited contributions from employees outside the restricted class. One list of employees who contributed to the Bank's political fund suggests that employees other than executive and administrative personnel were solicited to make contributions to the fund. This list indicates that lower lever employees such as teller supervisors, a purchasing agent, and a training assistant were solicited to contribute to Germania Bank's political fund. (Attachment 1, page 6).

For these reasons, this Office recommends that the Commission find reason to believe that Edward L. Morris, Jimmie W. New, and Germania Bank violated 2 U.S.C § 441b(b)(3) and § 441b(b)(4)(A)(i). However, for the reasons stated earlier, this Office also recommends that the Commission take no further action against Germania Bank with respect to these violations of the Act.

3. Prohibited Contributions

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with an election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. Furthermore, 2 U.S.C. § 441b(a) prohibits any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

As stated earlier, Germania Bank was a federal savings and loan association. The Commission has held that federal savings and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the authority of a Federal statute, 12 U.S.C. § 1464(a), are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a).

The prohibition against contributions from national banks and corporations organized by authority of any law of Congress set forth in 2 U.S.C. § 441b(a) applies to contributions made in connection with an election to any political office. This prohibition is broader than that applicable to other corporations and labor organizations. The regulations make clear that the prohibition against contributions by national

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banks and corporations organized by authority of any law of Congress extends not only to federal elections, but to state and local elections as well. 11 C.F.R. § 114.2(a). Thus, the prohibition of section 441b(a) applies to the contributions from Germania Bank to candidates for state and local elections

It appears from the information in the referral that Germania Bank also may have violated 2 U.S.C. § 441b(a). According to the referral, several of the contributions made from Germania Bank's political fund were made in the name of the Bank. From the materials received thus far, it is uncertain whether the money in Germania Bank's political fund consisted exclusively of contributions made to the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts.<sup>3</sup> Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period. For these reasons, this Office recommends that the Commission find reason

3. In Pre-MUR 236, Germania Bank issued a Bank check in the amount of \$1,500 to a candidate for local office in response to a request from Jimmie New. This check was drawn on a Germania Bank account, rather than the account that Jimmie New and Edward Morris maintained in their names at the Bank.

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to believe that Germania Bank, F.S.B. violated 2 U.S.C. § 441b(a). We also recommend that the Commission take no further action against Germania Bank, F.S.B. for the reasons stated earlier in this Report.

Furthermore, it appears that Joseph Mason, Edward Morris, and Jimmie New also violated 2 U.S.C. § 441b(a). Attached to the referral were details of the transactions showing the involvement of these three individuals. If bank funds were used to make contributions, it appears these three individuals, all officers or directors of the bank, consented to the contributions. The referral included supporting documentation regarding contributions to three committees: the Home Building Industry PAC, Friends of Margaret Kelly, and Citizens for Cosentino. The supporting documentation regarding the Home Building Industry PAC consists of two letters to Germania Bank from the Home Building Industry PAC and one letter from Germania Bank to the Committee. (Attachment 1, pages 9-11). From this correspondence, it appears that the Bank was a sponsor for two golf tournaments which the Home Building Industry PAC hosted in 1986 and 1987. By letter dated September 9, 1986, the Home Building Industry PAC requested payment from the Bank of a \$500 sponsorship fee. (Attachment 1, page 9). The following notation appears at the bottom of this letter: "O.K. to Pay". It appears that this notation was signed and dated by Jimmie New. The second letter from the Home Building Industry PAC, dated July 22, 1987, invited the Bank again to be a sponsor for the golf tournament. (Attachment 1, page 10). This letter

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contains the following notation written by Jimmie New: "Please advise Ed I will handle - contribution was requested by Mason last year." (Attachment 1, page 10). The third piece of correspondence relates to the contributions from Germania Bank to the Home Building Industry PAC was a letter from Jimmie New forwarding a check to the Committee in the amount of \$500. (Attachment 1, page 11). The check was made out to "HBI-PAC" and was signed by Edward Morris. The check bore the names of Edward L. Morris and Jimmie W. New, with Germania Bank's address and telephone number.

The referral from the RTC also includes supporting documentation for the contribution made to Friends of Margaret Kelly. This documentation consists of two letters to Germania Bank. (Attachment 1, pages 12-13). The first letter was from Joseph Mason as Finance Chairman for Margaret Kelly's campaign. (Attachment 1, page 12). The letter was on letterhead of the J.L. Mason Group, Inc. and was addressed to Edward Morris at Germania Bank. The purpose of the letter was to solicit a contribution from the Bank to help reduce the debt incurred during Margaret Kelly's campaign for Missouri State Auditor. The second letter, dated June 16, 1987, was from Margaret Kelly to Edward Morris. (Attachment 1, page 13). In this letter, Margaret Kelly thanked Edward Morris for his recent contribution in response to Joseph Mason's letter.

The third contribution for which the referral includes supporting documentation is the contribution to Citizens for Cosentino. This supporting documentation consists of two

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internal bank memoranda and copies of two canceled checks. (Attachment 1, pages 14-18). It is evident from this documentation that Germania Bank reimbursed Bernie Scanlan, a Bank employee, for a \$100 contribution which he made to Citizens for Cosentino on September 30, 1987. The first memorandum was dated July 6, 1987, and was from Bernie Scanlan to Edward Morris. (Attachment 1, page 14). In this memo Bernie Scanlan requested that Edward Morris authorize a \$200 contribution to Citizens for Cosentino from Germania Bank's "political fund." The memorandum had a notation at the bottom signed by Edward Morris: "Sandy, Pls authorize this." By memorandum dated November 11, 1987, a copy of a check from Bernie Scanlan to Citizens for Cosentino in the amount of \$100 was forwarded to Edward Morris. (Attachment 1, page 15). This memorandum requested that Bernie Scanlan receive a refund for the contribution to Citizens for Cosentino from "the political fund." Finally, also included in the referral materials was a copy of a check to Bernie Scanlan, dated November 16, 1987, in the amount of \$100. (Attachment 1, page 17). The check was drawn on the same Germania Bank account as was used to make the contribution to the Home Building Industry PAC. It appears that the check was signed by Edward Morris, and contains the notation "Citizens for Cosentino" on the memo line.

In conclusion, the referral materials demonstrate that the contributions from the political fund were authorized by Joseph Mason, Edward Morris, and Jimmie New. For these reasons, this Office recommends that the Commission find reason to

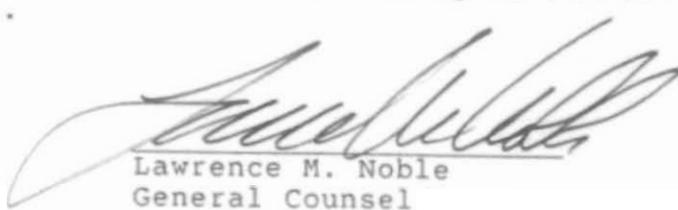
believe that Joseph L. Mason, Edward L. Morris, and Jimmie W. New violated 2 U.S.C. § 441b(a). This Office does not recommend any action against the recipient committees for violating 2 U.S.C. § 441b(a), as there is no evidence that these committee knowingly accepted a contribution in violation of that section of the Act, with the exception of the Home Building Industry PAC. This Office does not recommend that the Commission take any action against the Home Building Industry PAC at this time, considering the amount of the contribution and the length of time which has passed since the contribution was made.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Edward L. Morris and Jimmie W. New violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3), and 441b(b)(4)(A)(i).
3. Find reason to believe that Joseph L. Mason violated 2 U.S.C. § 441b(a).
4. Find reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i), and take no further action against Germania Bank, F.S.B. and close the file as to this Respondent.
5. Approve the attached factual and legal analyses and the appropriate letters.

Date

10/28/91

  
Lawrence M. Noble  
General Counsel

Attachments:

1. Referral Materials
2. Supplemental Materials from RTC
3. Factual and Legal Analyses (4)

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of  
Germania Bank, F.S.B.;  
Joseph L. Mason;  
Edward L. Morris;  
Jimmie W. New.

)  
)  
) Pre-MUR 241  
)  
)  
)

(MUR  
3446)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 31, 1991, the Commission decided by a vote of 5-0 to take the following actions in Pre-MUR 241:

1. Open a MUR.
2. Find reason to believe that Edward L. Morris and Jimmie W. New violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3), and 441b(b)(4)(A)(i).
3. Find reason to believe that Joseph L. Mason violated 2 U.S.C. § 441b(a).
4. Find reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i), and take no further action against Germania Bank, F.S.B. and close the file as to this Respondent.

(continued)

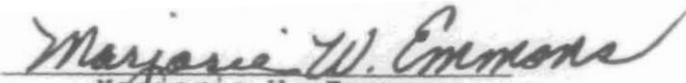
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5. Approve the factual and legal analyses, and the appropriate letters, as recommended in the General Counsel's Report dated October 28, 1991.

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

Attest:

10-31-91  
Date

  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Tues., Oct. 29, 1991 10:03 a.m.  
Circulated to the Commission: Tues., Oct. 29, 1991 4:00 p.m.  
Deadline for vote: Thurs., Oct. 31, 1991 4:00 p.m.

bjf

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 13, 1991

Thomas H. Jacobsen, President  
Mercantile Bank of St. Louis N.A.  
P.O. Box 524  
Tram 14-0  
St. Louis, MO 63166-0524

RE: MUR 3446  
Germania Bank, F.S.B

Dear Mr. Jacobsen:

On October 31, 1991, the Federal Election Commission found reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to Germania Bank, F.S.B. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Thomas H. Jacobsen, President  
Page 2

If you have any questions, please direct them to Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



John Warren McGarry  
Chairman

Enclosure  
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Germania Bank, F.S.B.

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act of 1971, as amended, by Germania Bank, F.S.B. This possible violation concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of several years.

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri.

According to the information ascertained by the Commission, Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032% of their salaries to the account and were told which Bank employees had contributed to the account.

Funds were disbursed from the account in the form of contributions to candidates for various state and federal offices, as well as other political committees. Germania Bank made the following contributions from 1980 through 1988:

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<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475
ISLPEC	1980-1986	\$1,825
SAPEC	1980-1986	\$1,275
Home Building Industry PAC	1986-1988	\$1,000
Senator Vince Demuzio	1980-1985	\$ 55
Citizens for Percy	1980-1985	\$ 225
Citizens for Jim Edgar	1986	\$ 150
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Citizens for Cosentino	1986-1988	\$ 425
Danforth for Senate	1987-1988	\$ 500
Friends of Karen Hasara	1986-1988	\$ 55
Missouri Governor Ashcroft	1980-1988	\$ 600
Friends of Margaret Kelly	1986-1988	\$ 350
John Shear Election Campaign	1987-1988	\$ 200
Houston for Mayor	1986-1988	\$ 80
Friends of Mike Henklaus	1987-1988	\$ 100
Citizens for Bill Webster	1987-1988	\$ 250
John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300
Banning Testimonial Committee	1986	\$ 200
	<b>Total</b>	<b>\$9,265</b>

Failure to Register a Political Committee

2 U.S.C. § 431(4)(A) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b(b) of the Act, the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization within 10 days after becoming a political committee. Political committees must file regular

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reports of receipts and disbursements. 2 U.S.C. § 434(a).

From the information received thus far, it appears that there is sufficient evidence to support a finding of reason to believe that Germania Bank violated 2 U.S.C. §§ 433(a) and 434(a) for failing to register, and file reports for, a political committee. Germania Bank officers collected monies from its employees for a "political fund" and made contributions from this political fund to both federal and non-federal committees. Contributions from the political fund totaled \$9,265 over an eight year period.

Germania Bank officers maintained several lists of names of Bank employees and the amounts which they had contributed to the Bank's political fund. It appears from these lists that the amounts which individual employees contributed to the Bank's political fund ranged from under \$5 to over \$200. On one list, the names of those employees who had not made a contribution to the Bank's political fund were highlighted in yellow.

Germania Bank officers generated several memoranda regarding the Bank's political fund. One memorandum, Memo # 85-35, dated February 26, 1985, solicited contributions from the Bank's employees to the political fund. "Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, in order for the Bank to reach its goal for 1985 of \$700.

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Another memorandum, Chairman's Memo # 86-29, dated April 23, 1986, was from W.G. Osborn to Jimmie New. The subject of this memorandum was the U.S. League PAC Manual. The memorandum begins with the following paragraph:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary

This memorandum also referred to a meeting of the Bank's management committee, in which the committee discussed "the advantages and disadvantages of a formally organized PAC and agreed to not form one." From this memorandum, it is evident that Germania Bank officials recognized the Commission's role in regulating political action committees, but chose not to register with the Commission as "a formally organized PAC."

A third memorandum which relates to the Bank's political fund was from Edward Morris to Brent Waxman. In this June 16, 1987 memorandum, Memo # 87-41, Edward Morris asked Brent Waxman to review the Bank's procedures for political action committees. The memorandum states that "My [Edward Morris] reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations." The memorandum concludes by asking Brent Waxman to determine whether Germania Bank is "following the guidelines and, if not, what procedures must be implemented for our committee to operate legally." It appears that a copy of this memorandum was sent to Jimmie New.

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The information ascertained by the Commission indicates that Germania Bank officers, acting on the Bank's behalf, solicited and collected contributions from Bank employees to a political fund. The political fund was established by Edward Morris and Jimmie New and was maintained by the Bank. The Bank used this political fund to make contributions totaling \$9,265 to various political committees over a period of eight years. The evidence indicates that Germania Bank decided not to register with the Commission and disclose the contributions from the fund. Therefore, there is reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a) and 434(a). At this time, however, the Commission has determined to take no further action against Germania Bank. The determination to take no further action against Germania Bank is based upon the fact that Germania Bank was transferred to the Resolution Trust Corporation subsequent to the events at issue in this matter. Although Germania Bank recently has been purchased by Mercantile Bank of St. Louis, the Commission has determined not to pursue Mercantile Bank as a successor in interest.

Solicitation of Contributions to the Fund

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform

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such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is defined to include a corporation. 2 U.S.C. § 431(11).

Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families.

It appears from the information ascertained by the Commission that Germania Bank also violated section 441b(b)(3) of the Act. The information suggests that employees were expected to contribute a fixed portion of their salaries to the fund. The Bank then maintained lists of the names of Bank employees who had contributed to the political fund. On one of these lists, the following notation is made: "Ed [Morris]: Those highlighted in yellow have not, as yet, made a political contribution." It appears that Jimmie New was also made aware of the names of those employees who had not contributed to the fund.

In addition, the memorandum dated February 26, 1985, which solicited contributions to the Bank's political fund, states that "we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, but did not inform the employee of his right to refuse to contribute without reprisal.

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Furthermore, it appears that Germania Bank also violated 2 U.S.C. § 441b(b)(4)(A)(i). Under this section of the Act, it is unlawful for a corporation or a separate segregated fund established by a corporation to solicit contributions from individuals outside the restricted class, except as provided under section 441b(b)(4)(B). It appears that Germania Bank, through its officers, solicited contributions from employees outside the restricted class. One list of employees who contributed to the Bank's political fund suggests that employees other than executive and administrative personnel were solicited to make contributions to the fund. This list indicates that lower level employees such as teller supervisors, a purchasing agent, and a training assistant were solicited to contribute to Germania Bank's political fund.

For these reasons, there is reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i). For the reasons stated earlier, however, the Commission has determined to take no further action against Germania Bank with respect to this finding.

Consenting to Prohibited Contributions

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with an election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. Furthermore, 2 U.S.C. § 441b(a) prohibits any

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candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

As stated earlier, Germania Bank was a federal savings and loan association. The Commission has held that federal savings and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the authority of a Federal statute, 12 U.S.C. § 1464(a), are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a).

The prohibition against contributions from national banks and corporations organized by authority of any law of Congress set forth in 2 U.S.C. § 441b(a) applies to contributions made in connection with an election to any political office. This prohibition is broader than that applicable to other corporations and labor organizations. The regulations make clear that the prohibition against contributions by national banks and corporations organized by authority of any law of Congress extends not only to federal elections, but to state and local elections as well. 11 C.F.R. § 114.2(a). Thus, the prohibition of section 441b(a) applies to the contributions from Germania Bank to candidates for state and local elections.

It appears that Germania Bank also violated 2 U.S.C. § 441b(a). Several of the contributions made from Germania Bank's political fund were made in the name of the Bank. From

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the information ascertained thus far, it is uncertain whether the money in Germania Bank's political fund consisted exclusively of contributions made to the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts. Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period. Therefore, there is reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. § 441b(a). The Commission has determined to take no further action against Germania Bank with respect to this finding, for the reasons stated earlier in this analysis.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 13, 1991

Jimmie W. New  
16371 Wilson Farm Drive  
Chesterfield, MO 63017

RE: MUR 3446  
Jimmie W. New

Dear Mr. New:

On October 31, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

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Jimmie W. New  
Page 2

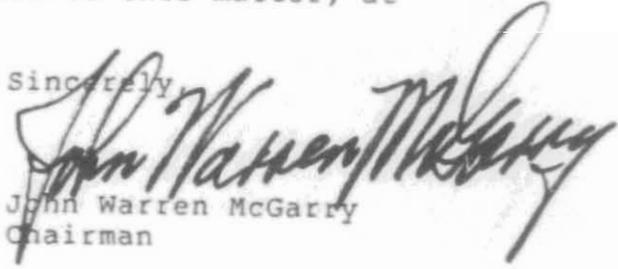
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

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: Jimmie W. New

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act by Jimmie W. New. This possible violation concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of several years.

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri.

According to the information ascertained by the Commission, Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032 $\frac{3}{4}$  of their salaries to the account and were told which Bank employees had contributed to the account.

Funds were disbursed from the account in the form of contributions to candidates for various state and federal offices, as well as other political committees. Germania Bank made the following contributions from 1980 through 1988:

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<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475
ISLPEC	1980-1986	\$1,825
SAPEC	1980-1986	\$1,275
Home Building Industry PAC	1986-1988	\$1,000
Senator Vince Demuzio	1980-1985	\$ 55
Citizens for Percy	1980-1985	\$ 225
Citizens for Jim Edgar	1986	\$ 150
Friends of Jim McPike	1980-1986	\$ 300
Citizens for Cosentino	1986-1988	\$ 425
Danforth for Senate	1987-1988	\$ 500
Friends of Karen Hasara	1986-1988	\$ 55
Missouri Governor Ashcroft	1980-1988	\$ 600
Friends of Margaret Kelly	1986-1988	\$ 350
John Shear Election Campaign	1987-1988	\$ 200
Houston for Mayor	1986-1988	\$ 80
Friends of Mike Henklaus	1987-1988	\$ 100
Citizens for Bill Webster	1987-1988	\$ 250
John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300
Banning Testimonial Committee	1986	\$ 200
	<b>Total</b>	<b>\$9,265</b>

Failure to Register a Political Committee

2 U.S.C. § 431(4)(A) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b(b) of the Act, the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization within 10 days after becoming a political committee. Political committees must file regular

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reports of receipts and disbursements. 2 U.S.C. § 434(a).

From the information received thus far, it appears that there is sufficient evidence to support a finding of reason to believe that Jimmie New violated 2 U.S.C. §§ 433(a) and 434(a) for failing to register, and file reports for, a political committee. Jimmie New collected monies from its employees for a "political fund" and made contributions from this political fund to both federal and non-federal committees. Contributions from the political fund totaled \$9,265 over an eight year period.

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Germania Bank officers maintained several lists of names of Bank employees and the amounts which they had contributed to the Bank's political fund. It appears from these lists that the amounts which individual employees contributed to the Bank's political fund ranged from under \$5 to over \$200. On one list, the names of those employees who had not made a contribution to the Bank's political fund were highlighted in yellow.

Germania Bank officers generated several memoranda regarding the Bank's political fund. One memorandum, Memo # 85-35, dated February 26, 1985, solicited contributions from the Bank's employees to the political fund. "Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, in order for the Bank to reach its goal for 1985 of \$700.

Another memorandum, Chairman's Memo # 86-29, dated

April 23, 1986, was from W.G. Osborn to Jimmie New. The subject of this memorandum was the U.S. League PAC Manual. The memorandum begins with the following paragraph:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

This memorandum also referred to a meeting of the Bank's management committee, in which the committee discussed "the advantages and disadvantages of a formally organized PAC and agreed to not form one." From this memorandum, it is evident that Germania Bank officials recognized the Commission's role in regulating political action committees, but chose not to register with the Commission as "a formally organized PAC."

A third memorandum which relates to the Bank's political fund was from Edward Morris to Brent Waxman. In this June 16, 1987 memorandum, Memo # 87-41, Edward Morris asked Brent Waxman to review the Bank's procedures for political action committees. The memorandum states that "My [Edward Morris] reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations." The memorandum concludes by asking Brent Waxman to determine whether Germania Bank is "following the guidelines and, if not, what procedures must be implemented for our committee to operate legally." It appears that a copy of this memorandum was sent to Jimmie New.

The information ascertained by the Commission indicates

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that Jimmie New, acting on behalf of Germania Bank, solicited and collected contributions from Bank employees to a political fund. The political fund was established by Edward Morris and Jimmie New and was maintained by the Bank. The Bank, through Jimmie New, used this political fund to make contributions totaling \$9,265 to various political committees over a period of eight years. The evidence indicates that Jimmie New decided not to register with the Commission and disclose the contributions from the fund. Therefore, there is reason to believe that Jimmie W. New violated 2 U.S.C. §§ 433(a) and 434(a)

Solicitation of Contributions to the Fund

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is defined to include a corporation. 2 U.S.C. § 431(11).

Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families.

It appears from the information ascertained by the

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Commission that Jimmie New also violated section 441b(b)(3) of the Act. The information suggests that employees were expected to contribute a fixed portion of their salaries to the fund. The Bank then maintained lists of the names of Bank employees who had contributed to the political fund. On one of these lists, the following notation is made: "Ed [Morris]: Those highlighted in yellow have not, as yet, made a political contribution." It appears that Jimmie New was also made aware of the names of those employees who had not contributed to the fund.

In addition, the memorandum dated February 26, 1985, which solicited contributions to the Bank's political fund, states that "we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, but did not inform the employee of his right to refuse to contribute without reprisal. Although the memorandum was from an individual named Jan Wickenhauser, it is probable that the memorandum was issued under the direction of Jimmie New, who controlled the political fund from which he authorized contributions to be made in the name of the Bank.

Furthermore, it appears that Jimmie New also violated 2 U.S.C. § 441b(b)(4)(A)(i). Under this section of the Act, it is unlawful for a corporation or a separate segregated fund established by a corporation to solicit contributions from

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individuals outside the restricted class, except as provided under section 441b(b)(4)(B). It appears that Jimmie New, acting on behalf of Germania Bank, solicited contributions from employees outside the restricted class. One list of employees who contributed to the Bank's political fund suggests that employees other than executive and administrative personnel were solicited to make contributions to the fund. This list indicates that lower level employees such as teller supervisors, a purchasing agent, and a training assistant were solicited to contribute to Germania Bank's political fund.

For these reasons, there is reason to believe that Jimmie New violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i).

Consenting to Prohibited Contributions

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with an election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. Furthermore, 2 U.S.C. § 441b(a) prohibits any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

As stated earlier, Germania Bank was a federal savings and loan association. The Commission has held that federal savings and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the

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authority of a Federal statute, 12 U.S.C. § 1464(a), are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a)

The prohibition against contributions from national banks and corporations organized by authority of any law of Congress set forth in 2 U.S.C. § 441b(a) applies to contributions made in connection with an election to any political office. This prohibition is broader than that applicable to other corporations and labor organizations. The regulations make clear that the prohibition against contributions by national banks and corporations organized by authority of any law of Congress extends not only to federal elections, but to state and local elections as well. 11 C.F.R. § 114.2(a). Thus, the prohibition of section 441b(a) applies to the contributions from Germania Bank to candidates for state and local elections.

It appears that Jimmie New also violated 2 U.S.C. § 441b(a) by consenting to any contributions made by Germania Bank in violation of that section of the Act. Several of the contributions made from Germania Bank's political fund were made in the name of the Bank. From the information ascertained thus far, it is uncertain whether the money in Germania Bank's political fund consisted exclusively of contributions made to the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee

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was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts. Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period. If bank funds were used to make contributions, it appears that Jimmie New, as an officer of the bank, consented to the contributions

Correspondence relating to contributions made from the Bank's political fund demonstrates Jimmie New's role in authorizing contributions from the fund. In 1986 and 1987, correspondence was generated regarding contributions from Germania Bank to the Home Building Industry PAC. From this correspondence, it appears that the Bank was a sponsor for two golf tournaments which the Home Building Industry PAC hosted in 1986 and 1987. By letter dated September 9, 1986, the Home Building Industry PAC requested payment from the Bank of a \$500 sponsorship fee. The following notation appears at the bottom of this letter: "O.K. to Pay". It appears that this notation was signed and dated by Jimmie New. A second letter from the Home Building Industry PAC, dated July 22, 1987, invited the Bank again to be a sponsor for the golf tournament. This letter contains the following notation written by Jimmie New: "Please advise Ed I will handle - contribution was requested by Mason last year." A third piece of correspondence relating to the contributions from Germania Bank to the Home Building Industry

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PAC was a letter from Jimmie New forwarding a check to the Committee in the amount of \$500. The check was made out to "HBI-PAC" and was signed by Edward Morris. The check bore the names of Edward L. Morris and Jimmie W. New, with Germania Bank's address and telephone number.

Correspondence was also generated regarding the contribution made to Friends of Margaret Kelly. One letter was from Joseph Mason as Finance Chairman for Margaret Kelly's campaign. The letter was on letterhead of the J.L. Mason Group, Inc. and was addressed to Edward Morris at Germania Bank. The purpose of the letter was to solicit a contribution from the Bank to help reduce the debt incurred during Margaret Kelly's campaign for Missouri State Auditor. Another letter, dated June 16, 1987, was from Margaret Kelly to Edward Morris. In this letter, Margaret Kelly thanked Edward Morris for his recent contribution in response to Joseph Mason's letter.

Another contribution for which documentation was generated concerns the contribution to Citizens for Cosentino. This documentation includes two internal bank memoranda and copies of two canceled checks. It is evident from this documentation that Germania Bank reimbursed Bernie Scanlan, a Bank employee, for a \$100 contribution which he made to Citizens for Cosentino on September 30, 1987. One memorandum was dated July 6, 1987, and was from Bernie Scanlan to Edward Morris. In this memo, Bernie Scanlan requested that Edward Morris authorize a \$200 contribution to Citizens for Cosentino from Germania Bank's "political fund." The memorandum had a notation at the bottom

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signed by Edward Morris: "Sandy, Pls authorize this." By memorandum dated November 11, 1987, a copy of a check from Bernie Scanlan to Citizens for Cosentino in the amount of \$100 was forwarded to Edward Morris. This memorandum requested that Bernie Scanlan receive a refund for the contribution to Citizens for Cosentino from "the political fund." A check was issued to Bernie Scanlan on November 16, 1987 in the amount of \$100. The check was drawn on the same Germania Bank account as was used to make the contribution to the Home Building Industry PAC. It appears that the check was signed by Edward Morris, and contains the notation "Citizens for Cosentino" on the memo line.

In conclusion, the information ascertained thus far demonstrates that contributions from the political fund were authorized by Jimmie New. Contributions from the political fund may have included Bank funds. Therefore, there is reason to believe that Jimmie W. New violated 2 U.S.C. § 441b(a)

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 13, 1991

Joseph L. Mason  
5020 Tamiami Trail North  
Suite 110  
Naples, FL 33940

RE: MUR 3446  
Joseph L. Mason

Dear Mr. Mason:

On October 31, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441b(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.

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Joseph L. Mason  
Page 2

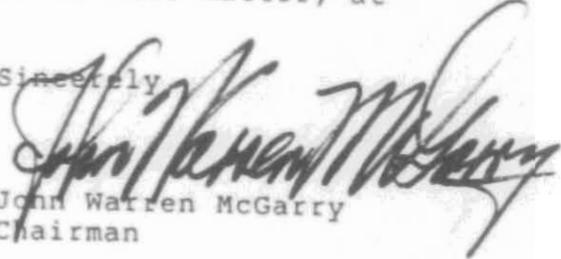
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

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: Joseph L. Mason

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act by Joseph L. Mason. This possible violation concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of several years

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri

According to the information ascertained by the Commission, Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032% of their salaries to the account and were told which Bank employees had contributed to the account. Joseph L. Mason, who became Germania Bank's Chief Executive Officer and Chairman of the Board of Directors sometime prior to 1987, appears to have been involved with the making of contributions from Germania Bank.

Funds were disbursed from the account in the form of

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contributions to candidates for various state and federal offices, as well as other political committees. Germania Bank made the following contributions from 1980 through 1988:

<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475
ISLPEC	1980-1986	\$1,825
SAPEC	1980-1986	\$1,275
Home Building Industry PAC	1986-1988	\$1,000
Senator Vince Demuzio	1980-1985	\$ 55
Citizens for Percy	1980-1985	\$ 225
Citizens for Jim Edgar	1986	\$ 150
Friends of Jim McPike	1980-1986	\$ 300
Citizens for Cosentino	1986-1988	\$ 425
Danforth for Senate	1987-1988	\$ 500
Friends of Karen Hasara	1986-1988	\$ 55
Missouri Governor Ashcroft	1980-1988	\$ 600
Friends of Margaret Kelly	1986-1988	\$ 350
John Shear Election Campaign	1987-1988	\$ 200
Houston for Mayor	1986-1988	\$ 80
Friends of Mike Henklaus	1987-1988	\$ 100
Citizens for Bill Webster	1987-1988	\$ 250
John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300
Banning Testimonial Committee	1986	\$ 200
	<u>Total</u>	<u>\$9,265</u>

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with an election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. Furthermore, 2 U.S.C. § 441b(a) prohibits any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

As stated earlier, Germania Bank was a federal savings and loan association. The Commission has held that federal savings

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and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the authority of a Federal statute, 12 U.S.C. § 1464(a), are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a)

The prohibition against contributions from national banks and corporations organized by authority of any law of Congress set forth in 2 U.S.C. § 441b(a) applies to contributions made in connection with an election to any political office. This prohibition is broader than that applicable to other corporations and labor organizations. The regulations make clear that the prohibition against contributions by national banks and corporations organized by authority of any law of Congress extends not only to federal elections, but to state and local elections as well. 11 C.F.R. § 114.2(a). Thus, the prohibition of section 441b(a) applies to the contributions from Germania Bank to candidates for state and local elections.

It appears that Joseph Mason also violated 2 U.S.C. § 441b(a) by consenting to any contributions made by Germania Bank in violation of that section of the Act. Several of the contributions made from Germania Bank's political fund were made in the name of the Bank. From the information ascertained thus far, it is uncertain whether the money in Germania Bank's political fund consisted exclusively of contributions made to

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the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts. Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period. If bank funds were used to make contributions, it appears that Joseph Mason, as an officer of the bank, consented to the contributions.

Correspondence relating to contributions made from the Bank's political fund demonstrates Joseph Mason's role in authorizing contributions from the fund. In 1986 and 1987, correspondence was generated regarding contributions from Germania Bank to the Home Building Industry PAC. From this correspondence, it appears that the Bank was a sponsor for two golf tournaments which the Home Building Industry PAC hosted in 1986 and 1987. By letter dated September 9, 1986, the Home Building Industry PAC requested payment from the Bank of a \$500 sponsorship fee. The following notation appears at the bottom of this letter: "O.K. to Pay". It appears that this notation was signed and dated by Jimmie New. A second letter from the Home Building Industry PAC, dated July 22, 1987, invited the Bank again to be a sponsor for the golf tournament. This letter contains the following notation written by Jimmie New: "Please

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advise Ed I will handle - contribution was requested by Mason last year." A third piece of correspondence relating to the contributions from Germania Bank to the Home Building Industry PAC was a letter from Jimmie New forwarding a check to the Committee in the amount of \$500. The check was made out to "HBI-PAC" and was signed by Edward Morris. The check bore the names of Edward L. Morris and Jimmie W. New, with Germania Bank's address and telephone number.

Correspondence was also generated regarding the contribution made to Friends of Margaret Kelly. One letter was from Joseph Mason as Finance Chairman for Margaret Kelly's campaign. The letter was on letterhead of the J.L. Mason Group, Inc. and was addressed to Edward Morris at Germania Bank. The purpose of the letter was to solicit a contribution from the Bank to help reduce the debt incurred during Margaret Kelly's campaign for Missouri State Auditor. Another letter, dated June 16, 1987, was from Margaret Kelly to Edward Morris. In this letter, Margaret Kelly thanked Edward Morris for his recent contribution in response to Joseph Mason's letter.

Another contribution for which documentation was generated concerns the contribution to Citizens for Cosentino. This documentation includes two internal bank memoranda and copies of two canceled checks. It is evident from this documentation that Germania Bank reimbursed Bernie Scanlan, a Bank employee, for a \$100 contribution which he made to Citizens for Cosentino on September 30, 1987. One memorandum was dated July 6, 1987, and was from Bernie Scanlan to Edward Morris. In this memo,

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Bernie Scanlan requested that Edward Morris authorize a \$200 contribution to Citizens for Cosentino from Germania Bank's "political fund." The memorandum had a notation at the bottom signed by Edward Morris: "Sandy, Pls authorize this." By memorandum dated November 11, 1987, a copy of a check from Bernie Scanlan to Citizens for Cosentino in the amount of \$100 was forwarded to Edward Morris. This memorandum requested that Bernie Scanlan receive a refund for the contribution to Citizens for Cosentino from "the political fund." A check was issued to Bernie Scanlan on November 16, 1987 in the amount of \$100. The check was drawn on the same Germania Bank account as was used to make the contribution to the Home Building Industry PAC. It appears that the check was signed by Edward Morris, and contains the notation "Citizens for Cosentino" on the memo line.

In conclusion, the information ascertained thus far demonstrates that contributions from the political fund were authorized by Joseph Mason. Contributions from the political fund may have included Bank funds. Therefore, there is reason to believe that Joseph L. Mason violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 13, 1991

Edward L. Morris  
2 Robin Hill Lane  
St. Louis, MO 63134

RE: MUR 3446  
Edward L. Morris

Dear Mr. Morris

On October 31, 1991, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

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

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Edward L. Morris  
Page 2

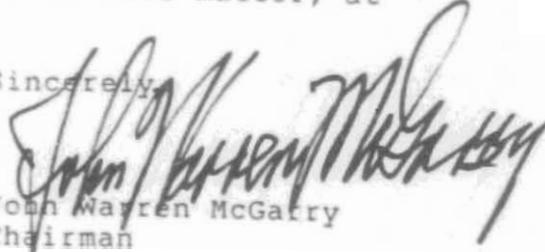
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

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: Edward L. Morris

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act by Edward L. Morris. This possible violation concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of several years.

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri.

According to the information ascertained by the Commission, Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032% of their salaries to the account and were told which Bank employees had contributed to the account.

Funds were disbursed from the account in the form of contributions to candidates for various state and federal offices, as well as other political committees. Germania Bank made the following contributions from 1980 through 1988:

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<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475
ISLPEC	1980-1986	\$1,825
SAPEC	1980-1986	\$1,275
Home Building Industry PAC	1986-1988	\$1,000
Senator Vince Demuzio	1980-1985	\$ 55
Citizens for Percy	1980-1985	\$ 225
Citizens for Jim Edgar	1986	\$ 150
Friends of Jim McPike	1980-1986	\$ 300
Citizens for Cosentino	1986-1988	\$ 425
Danforth for Senate	1987-1988	\$ 500
Friends of Karen Hasara	1986-1988	\$ 55
Missouri Governor Ashcroft	1980-1988	\$ 600
Friends of Margaret Kelly	1986-1988	\$ 350
John Shear Election Campaign	1987-1988	\$ 200
Houston for Mayor	1986-1988	\$ 80
Friends of Mike Henklaus	1987-1988	\$ 100
Citizens for Bill Webster	1987-1988	\$ 250
John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300
Banning Testimonial Committee	1986	\$ 200
	Total	\$9,265

Failure to Register a Political Committee

2 U.S.C. § 431(4)(A) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b(b) of the Act, the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization within 10 days after becoming a political committee. Political committees must file regular

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reports of receipts and disbursements. 2 U.S.C. § 434(a).

From the information received thus far, it appears that there is sufficient evidence to support a finding of reason to believe that Edward Morris violated 2 U.S.C. §§ 433(a) and 434(a) for failing to register, and file reports for, a political committee. Edward Morris collected monies from its employees for a "political fund" and made contributions from this political fund to both federal and non-federal committees. Contributions from the political fund totaled \$9,265 over an eight year period.

Germania Bank officers and directors maintained several lists of names of Bank employees and the amounts which they had contributed to the Bank's political fund. It appears from these lists that the amounts which individual employees contributed to the Bank's political fund ranged from under \$5 to over \$200. On one list, the names of those employees who had not made a contribution to the Bank's political fund were highlighted in yellow.

Germania Bank officers generated several memoranda regarding the Bank's political fund. One memorandum, Memo # 85-35, dated February 26, 1985, solicited contributions from the Bank's employees to the political fund. "Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, in order for the Bank to

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reach its goal for 1985 of \$700.

Another memorandum, Chairman's Memo # 86-29, dated April 23, 1986, was from W.G. Osborn to Jimmie New. The subject of this memorandum was the U.S. League PAC Manual. The memorandum begins with the following paragraph:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

This memorandum also referred to a meeting of the Bank's management committee, in which the committee discussed "the advantages and disadvantages of a formally organized PAC and agreed to not form one." From this memorandum, it is evident that Germania Bank officials recognized the Commission's role in regulating political action committees, but chose not to register with the Commission as "a formally organized PAC."

A third memorandum which relates to the Bank's political fund was from Edward Morris to Brent Waxman. In this June 16, 1987 memorandum, Memo # 87-41, Edward Morris asked Brent Waxman to review the Bank's procedures for political action committees. The memorandum states that "My [Edward Morris] reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations." The memorandum concludes by asking Brent Waxman to determine whether Germania Bank is "following the guidelines and, if not, what procedures must be implemented for our committee to operate legally." It appears that a copy of this

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memorandum was sent to Jimmie New.

The information ascertained by the Commission indicates that Edward Morris, acting on behalf of Germania Bank, solicited and collected contributions from Bank employees to a political fund. The political fund was established by Edward Morris and Jimmie New and was maintained by the Bank. The Bank, through Edward Morris, used this political fund to make contributions totaling \$9,265 to various political committees over a period of eight years. The evidence indicates that Edward Morris decided not to register with the Commission and disclose the contributions from the fund. Therefore, there is reason to believe that Edward L. Morris violated 2 U.S.C. §§ 433(a) and 434(a).

Solicitation of Contributions to the Fund

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is defined to include a corporation. 2 U.S.C. § 431(11)

Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any

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person other than its stockholders and their families and its executive or administrative personnel and their families.

It appears from the information ascertained by the Commission that Edward Morris also violated section 441b(b)(3) of the Act. The information suggests that employees were expected to contribute a fixed portion of their salaries to the fund. The Bank then maintained lists of the names of Bank employees who had contributed to the political fund. On one of these lists, the following notation is made: "Ed [Morris] Those highlighted in yellow have not, as yet, made a political contribution." It appears that other Bank officials also were made aware of the names of those employees who had not contributed to the fund.

In addition, the memorandum dated February 26, 1985, which solicited contributions to the Bank's political fund, states that "we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians." The memorandum suggested a minimum amount for the employee to contribute to the fund, but did not inform the employee of his right to refuse to contribute without reprisal. Although the memorandum was from an individual named Jan Wickenhauser, it is probable that the memorandum was issued under the direction of Edward Morris, who controlled the political fund from which he authorized contributions to be made in the name of the Bank.

Furthermore, it appears that Edward Morris also violated

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2 U.S.C. § 441b(b)(4)(A)(i). Under this section of the Act, it is unlawful for a corporation or a separate segregated fund established by a corporation to solicit contributions from individuals outside the restricted class, except as provided under section 441b(b)(4)(B). It appears that Edward Morris, acting on behalf of Germania Bank, solicited contributions from employees outside the restricted class. One list of employees who contributed to the Bank's political fund suggests that employees other than executive and administrative personnel were solicited to make contributions to the fund. This list indicates that lower level employees such as teller supervisors, a purchasing agent, and a training assistant were solicited to contribute to Germania Bank's political fund.

For these reasons, there is reason to believe that Edward L. Morris violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i).

Consenting to Prohibited Contributions

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with an election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. Furthermore, 2 U.S.C. § 441b(a) prohibits any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

As stated earlier, Germania Bank was a federal savings and

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loan association. The Commission has held that federal savings and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the authority of a Federal statute, 12 U.S.C. § 1464(a) are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a)

The prohibition against contributions from national banks and corporations organized by authority of any law of Congress set forth in 2 U.S.C. § 441b(a) applies to contributions made in connection with an election to any political office. This prohibition is broader than that applicable to other corporations and labor organizations. The regulations make clear that the prohibition against contributions by national banks and corporations organized by authority of any law of Congress extends not only to federal elections, but to state and local elections as well. 11 C.F.R. § 114.2(a). Thus, the prohibition of section 441b(a) applies to the contributions from Germania Bank to candidates for state and local elections.

It appears that Edward Morris also violated 2 U.S.C. § 441b(a) by consenting to any contributions made by Germania Bank in violation of that section of the Act. Several of the contributions made from Germania Bank's political fund were made in the name of the Bank. From the information ascertained thus far, it is uncertain whether the money in Germania Bank's

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political fund consisted exclusively of contributions made to the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts. Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period. If bank funds were used to make contributions, it appears that Edward Morris, as an officer of the bank, consented to the contributions

Correspondence relating to contributions made from the Bank's political fund demonstrates Edward Morris' role in authorizing contributions from the fund. In 1986 and 1987 correspondence was generated regarding contributions from Germania Bank to the Home Building Industry PAC. From this correspondence, it appears that the Bank was a sponsor for two golf tournaments which the Home Building Industry PAC hosted in 1986 and 1987. By letter dated September 9, 1986, the Home Building Industry PAC requested payment from the Bank of a \$500 sponsorship fee. The following notation appears at the bottom of this letter: "O.K. to Pay". It appears that this notation was signed and dated by Jimmie New. A second letter from the Home Building Industry PAC, dated July 22, 1987, invited the Bank again to be a sponsor for the golf tournament. This letter

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contains the following notation written by Jimmie New: "Please advise Ed I will handle - contribution was requested by Mason last year." A third piece of correspondence relating to the contributions from Germania Bank to the Home Building Industry PAC was a letter from Jimmie New forwarding a check to the Committee in the amount of \$500. The check was made out to "HBI-PAC" and was signed by Edward Morris. The check bore the names of Edward L. Morris and Jimmie W. New, with Germania Bank's address and telephone number.

Correspondence was also generated regarding the contribution made to Friends of Margaret Kelly. One letter was from Joseph Mason as Finance Chairman for Margaret Kelly's campaign. The letter was on letterhead of the J.L. Mason Group, Inc. and was addressed to Edward Morris at Germania Bank. The purpose of the letter was to solicit a contribution from the Bank to help reduce the debt incurred during Margaret Kelly's campaign for Missouri State Auditor. Another letter, dated June 16, 1987, was from Margaret Kelly to Edward Morris. In this letter, Margaret Kelly thanked Edward Morris for his recent contribution in response to Joseph Mason's letter.

Another contribution for which documentation was generated concerns the contribution to Citizens for Cosentino. This documentation includes two internal bank memoranda and copies of two canceled checks. It is evident from this documentation that Germania Bank reimbursed Bernie Scanlan, a Bank employee, for a \$100 contribution which he made to Citizens for Cosentino on September 30, 1987. One memorandum was dated July 6, 1987, and

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was from Bernie Scanlan to Edward Morris. In this memo, Bernie Scanlan requested that Edward Morris authorize a \$200 contribution to Citizens for Cosentino from Germania Bank's "political fund." The memorandum had a notation at the bottom signed by Edward Morris: "Sandy, Pls authorize this." By memorandum dated November 11, 1987, a copy of a check from Bernie Scanlan to Citizens for Cosentino in the amount of \$100 was forwarded to Edward Morris. This memorandum requested that Bernie Scanlan receive a refund for the contribution to Citizens for Cosentino from "the political fund." A check was issued to Bernie Scanlan on November 16, 1987 in the amount of \$100. The check was drawn on the same Germania Bank account as was used to make the contribution to the Home Building Industry PAC. It appears that the check was signed by Edward Morris, and contains the notation "Citizens for Cosentino" on the memo line.

In conclusion, the information ascertained thus far demonstrates that contributions from the political fund were authorized by Edward Morris. Contributions from the political fund may have included Bank funds. Therefore, there is reason to believe that Edward L. Morris violated 2 U.S.C. § 441b(a).

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JOSEPH L. MASON  
5020 Tamiami Trail North, Suite 110  
Naples, Florida 33940  
(813)-434-8200

Doc 3552

MUR 3448

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
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November 19, 1991

Federal Election Commission  
Attn.: Mr. John Warren McGarry  
Washington, D.C. 20463

Dear Mr. McGarry:

Please be advised that I am in receipt of your letter dated November 13, 1991 which I received on November 18, 1991. I am shocked and surprised by the letter and the attached legal analysis.

The factual and legal analysis attached has one glaring error which states that I was C.E.O. and Chairman of the Board sometime prior to 1987. At no time during the time frame of your investigation, 1980 - 1988, did I serve in either capacity.

Furthermore, I had no influence over, nor did I even understand what the mechanics were with respect to Germania Bank approving or funding political contributions. I had been led to believe there was in place a Political Action Committee which would consider requests for contributions. I further understood the requests were to be directed to Mr. Edward Morris and/or Mr. Jimmie New.

There were several occasions wherein I did so request approval for contributions, I emphatically deny the allegation that I played any role in the approval process and was in no way in a position to authorize anything. Please understand I did the request but in no way played any part in any approvals and was in no position to do so at any time.

The several requests I made to the Germania Political Action Committee were routine and part of a solicitation to hundreds of potential contributors and were in no way unusual.

It seems your misunderstanding that states I was the Chairman and C.E.O. at the time might lead you to conclusions which are without merit or fact. Nothing in your letter or analysis would otherwise suggest I played any part in approvals or funding of requests. Your own Factual and Legal Analysis state approvals were made by others.

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Page Two  
Federal Election Commission  
November 19, 1991

Finally, I would like to take whatever actions are necessary to resolve this matter immediately and will cooperate with you any way possible. Attached please find the Designation of Counsel form per your request.

Very Truly Yours,



Joseph L. Mason

enc.

cc: Mr. John Davidson, P.C.

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jabr\jlm\fedelect

STATEMENT OF DESIGNATION OF COUNSEL

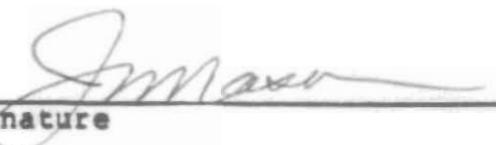
MUR

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**NAME OF COUNSEL:** John L. Davidson, P.C.  
**ADDRESS:** 10900 Manchester Road Suite 205  
St. Louis, Mo. 63122  
(314) 821-0300  
**TELEPHONE:** \_\_\_\_\_

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

November 19, 1991  
**Date**

  
**Signature**

**RESPONDENT'S NAME:** Joseph L. Mason  
**ADDRESS:** 5020 Tamiami Trail North  
Naples, Fl. 33940  
**HOME PHONE:** (813) 566-2853  
**BUSINESS PHONE:** (813) 434-8200

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Joseph L. Mason

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act by Joseph L. Mason. This possible violation concerns the making of contributions by Germania Bank totaling \$9,265 to candidates for various state and federal offices in Missouri and Illinois over a period of several years.

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri

According to the information ascertained by the Commission, Edward L. Morris, Germania Bank's former Chairman of the Board of Directors, and Jimmie W. New, President of Germania Bank, opened a bank account in their names at Germania Bank in 1976. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032% of their salaries to the account and were told which Bank employees had contributed to the account. Joseph L. Mason, who became Germania Bank's Chief Executive Officer and Chairman of the Board of Directors sometime prior to 1987, appears to have been involved with the making of contributions from Germania Bank

Funds were disbursed from the account in the form of

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ABSOLUTELY  
INCORRECT

contributions to candidates for various state and federal offices, as well as other political committees. Germania Bank made the following contributions from 1980 through 1988:

<u>Name</u>	<u>Year</u>	<u>Amount</u>
THRIFTPAC	1980-1986	\$1,475
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John Davidson Campaign	1986	\$ 100
Missouri Republican Party	1986	\$ 300
Banning Testimonial Committee	1986	\$ 200
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As stated earlier, Germania Bank was a federal savings and loan association. The Commission has held that federal savings

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and loan associations are regulated under section 441b(a) as corporations organized by authority of any law of Congress. "Federal savings and loan associations organized under the authority of a Federal statute, 12 U.S.C. § 1464(a), are covered by the [section 441b(a)] prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board." A.O. 1981-33. Therefore, Germania Bank falls within the scope of 2 U.S.C. § 441b(a).

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TRUE

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the fund by Bank employees. It is possible that the political fund also included funds from the Bank itself. Further, it is unclear whether each contribution made to a political committee was made from the account maintained in the names of Jimmie New and Edward Morris. It is also possible that Germania Bank made contributions to political committees from other accounts. Finally, Germania Bank may have violated the prohibition against corporate contributions by facilitating the contributions made to political committees over an eight year period.

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I WAS NOT AN OFFICER  
 93 REA 35510 36  
 ONLY SENT A REQUEST.

advise Ed I will handle - contribution was requested by Mason last year." A third piece of correspondence relating to the contributions from Germania Bank to the Home Building Industry PAC was a letter from Jimmie New forwarding a check to the Committee in the amount of \$500. The check was made out to "HBI-PAC" and was signed by Edward Morris. The check bore the names of Edward L. Morris and Jimmie W. New, with Germania Bank's address and telephone number.

Correspondence was also generated regarding the contribution made to Friends of Margaret Kelly. One letter was from Joseph Mason as Finance Chairman for Margaret Kelly's campaign. The letter was on letterhead of the J.L. Mason Group, Inc. and was addressed to Edward Morris at Germania Bank. The purpose of the letter was to solicit a contribution from the Bank to help reduce the debt incurred during Margaret Kelly's campaign for Missouri State Auditor. Another letter, dated June 16, 1987, was from Margaret Kelly to Edward Morris. In this letter, Margaret Kelly thanked Edward Morris for his recent contribution in response to Joseph Mason's letter.

Another contribution for which documentation was generated concerns the contribution to Citizens for Cosentino. This documentation includes two internal bank memoranda and copies of two canceled checks. It is evident from this documentation that Germania Bank reimbursed Bernie Scanlan, a Bank employee, for a \$100 contribution which he made to Citizens for Cosentino on September 30, 1987. One memorandum was dated July 6, 1987, and was from Bernie Scanlan to Edward Morris. In this memo,

93043503680

Bernie Scanlan requested that Edward Morris authorize a \$200 contribution to Citizens for Cosentino from Germania Bank's "political fund." The memorandum had a notation at the bottom signed by Edward Morris: "Sandy, Pls authorize this." By memorandum dated November 11, 1987, a copy of a check from Bernie Scanlan to Citizens for Cosentino in the amount of \$100 was forwarded to Edward Morris. This memorandum requested that Bernie Scanlan receive a refund for the contribution to Citizens for Cosentino from "the political fund." A check was issued to Bernie Scanlan on November 16, 1987 in the amount of \$100. The check was drawn on the same Germania Bank account as was used to make the contribution to the Home Building Industry PAC. It appears that the check was signed by Edward Morris, and contains the notation "Citizens for Cosentino" on the memo line.

In conclusion, the information ascertained thus far demonstrates that contributions from the political fund were authorized by Joseph Mason. Contributions from the political fund may have included Bank funds. Therefore, there is reason to believe that Joseph L. Mason violated 2 U.S.C. § 441b(a).

93043503681

Mercantile  
Bancorporation  
Inc.

Mercantile Tower  
P.O. Box 524  
St. Louis, MO 63166-0524



JON W. BILSTROM  
General Counsel  
314-425-8180

November 22, 1991

Mr. John Warren McGarry  
Chairman  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 3446  
Germania Bank, F.S.B.

Dear Mr. McGarry:

Your letter of November 13, 1991, to Thomas H. Jacobsen, President of Mercantile Bank of St. Louis National Association ("Mercantile"), relative to possible violations by Germania Bank, F.S.B. of certain provisions of the Federal Election Campaign Act of 1971, appears to be premised on the assumption that Mercantile has in some way affiliated itself with Germania Bank, F.S.B. ("Germania"). I want to take this opportunity to clarify the nature of Mercantile's involvement with Germania Bank.

On July 26, 1991, Mercantile entered into a Purchase and Assumption Agreement with Resolution Trust Corporation, whereunder Mercantile acquired certain assets and assumed certain deposit and other liabilities of Germania. Mercantile did not undertake to be accountable for, or assume any liabilities of Germania with respect to any activities and/or businesses conducted by Germania. Germania remains in receivership and all aspects of its prior operations are being handled by that office. All further matters pertaining to Germania should be directed to Mr. Bill Graham, Specialist in Charge, Resolution Trust Corporation, 701 Market Street, St. Louis, Missouri 63102.

I hope the foregoing explanation clarifies the nature of Mercantile's involvement in Germania matters. If you require anything further, please advise.

Sincerely,

cc: T. H. Jacobsen  
0192p/43

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
91 DEC -2 PM 4:13

93043503682

LA TOURETTE, SCHLUETER, EBLING & BYRNE

ATTORNEYS AT LAW

COMMERCE BANK BUILDING  
11 S. MERAMEC AVENUE, SUITE 1400  
ST. LOUIS, MISSOURI 63105-1793  
(314) 727-0777  
FAX (314) 727-9071

Dec 3592  
RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
91 DEC -2 AM 11:46

BRAINERD W. LATOURETTE, JR.\*  
ALBERT M. SCHLUETER  
SAMUEL C. EBLING  
KENNETH V. BYRNE  
JAMES D. RUSSELL\*\*

OF COUNSEL  
LAWRENCE C. SUMNER

BRAINERD W. LATOURETTE, III\*  
TERRANCE L. FARRIS\*  
PETER M. HAMILTON\*  
JAMES P. BICK, JR.

\*ALSO ADMITTED IN MINNESOTA  
\*ALSO ADMITTED IN ILLINOIS  
\*\*ALSO ADMITTED IN INDIANA

November 26, 1991

Ms. Mary P. Mastrobattista  
Federal Election Commission  
Washington, D.C. 20463

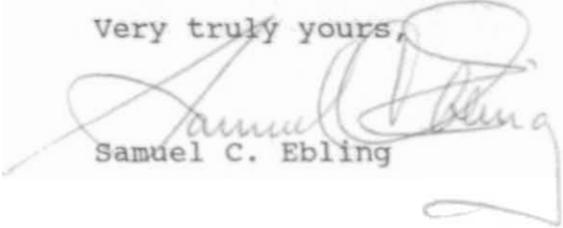
In Re: Your File MUR 3446  
Edward L. Morris

Dear Ms. Mastrobattista:

This will acknowledge receipt of your Chairman's letter dated November 13, 1991. I enclose my form Entry of Appearance on behalf of Mr. Morris. Due to the press of other legal business and the intervention of the holiday season, I respectfully request an extension of time until December 13, 1991, to respond to your factual and legal analysis. As you are undoubtedly aware, Mr. Morris is not now nor has he recently been employed by the Bank or a member of its Board. He, therefore, does not have access to papers and other factual material to which you refer.

I will investigate your allegations on behalf of my client and respond in such fashion as seems legally appropriate.

Very truly yours,

  
Samuel C. Ebling

SCE/pw

Enclosure

93043503683

91 DEC -2 PM 3:41

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL

STATEMENT OF DESIGNATION OF COUNSEL

MUR \_\_\_\_\_

NAME OF COUNSEL: Samuel C. Ebling

ADDRESS: LaTourette, Schlueter, Ebling & Byrne

11 S. Meramec

Commerce Bank Building, Suite 1400

TELEPHONE: St. Louis, MO 63105  
(314) 727-0777

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.

Nov 26, 1991  
Date

Edward L. Morris  
Signature

RESPONDENT'S NAME: Edward L. Morris

ADDRESS: 8112 Maryland Avenue

Suite 300

St. Louis, MO 63105

HOME PHONE: (314) 997-0669

BUSINESS PHONE: (314) 862-2703

93043503684



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 5, 1991

Samuel C. Ebling, Esq.  
LaTourette, Schlueter, Ebling & Byrne  
Commerce Bank Building  
11 S. Meramec Ave., Suite 1400  
St. Louis, MO 63105-1793

RE: MUR 3446  
Edward L. Morris

Dear Mr. Ebling:

This is in response to your letter dated November 26, 1991, which we received on December 2, 1991, requesting an extension until December 13, 1991 to respond to the Commission's notification of reason to believe. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 13, 1991.

If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Jonathan A. Bernstein  
Assistant General Counsel

93043503685

COUGHLIN & DAVIDSON  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

November 27, 1991

ATTORNEYS AT LAW  
10900 MANCHESTER ROAD, SUITE 205  
SAINT LOUIS, MISSOURI 63122

(314) 821-0300

Mary P. Mastrobattista, Esq.  
Federal Election Commission  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM  
DEC -2 AM 11:41

Re: MUR 3446

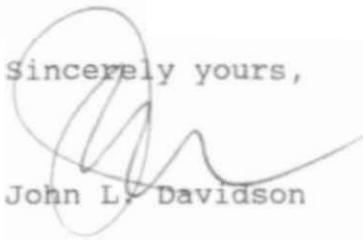
Dear Ms. Mastrobattista:

I noticed the name John Davidson appears on page 2 of your Factual and Legal Analysis. This should not be me. I have never run for office, nor did I have any connection with Germania in 1986.

However, so that I can be sure there is no problem, would you please give me what information you can regarding the identify of this candidate or contribution so that any remaining uncertainty can be immediately resolved.

Thank you for your help.

Sincerely yours,

  
John L. Davidson

jld/ahd

93043503686

EGC3594

**COUGHLIN & DAVIDSON**  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

November 27, 1991

ATTORNEYS AT LAW  
10900 MANCHESTER ROAD, SUITE 205  
SAINT LOUIS, MISSOURI 63122

(314) 821-0300

Mary P. Mastrobattista, Esq.  
Federal Election Commission  
Washington, DC 20463

Re: MUR 3446

Dear Ms. Mastrobattista:

Please consider this letter as my appearance on behalf of Mr. Joseph L. Mason.

Please call early next week.

Sincerely yours,

John L. Davidson

jld/ahd

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

91 DEC -2 PM 3:41

RECEIVED  
FEDERAL ELECTION COMMISSION  
GENERAL COUNSEL

91 DEC -2 AM 11:41

93043503687

OC 3625

LAW OFFICES

ROSENBLUM, GOLDENHERSH, SILVERSTEIN & ZAFFT, P.C.

FOURTH FLOOR

7733 FORSYTH BOULEVARD

ST. LOUIS, MISSOURI 63105-1812

(314) 726-6868

FACSIMILE (314) 726-6786

STANLEY M. ROSENBLUM  
ROBERT S. GOLDENHERSH  
MERLE L. SILVERSTEIN  
GENE M. ZAFFT  
CARL C. LANG  
RICHARD S. BENDER  
MICHAEL A. MARKENSON  
DAVID V. CAPES  
MARK E. GOODMAN  
PATRICIA D. GRAY  
JAY A. NATHANSON  
PAMELA D. PERDUE  
ROBERT E. QUICKSILVER  
RICHARD E. GREENBERG  
BENNETT S. KELLER

ROGER HERMAN  
LISA R. PERRY  
DONN H. HERRING, JR.  
THOMAS A. DUDA  
ADAM E. MILLER  
PAUL G. KLUG

December 2, 1991

FACSIMILE (202) 219-3923  
AND MAILED UNITED STATES MAIL

Ms. Mary P. Mastrobattista, Esq  
Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 3446  
Jimmie W. New

Dear Ms. Mastrobattista:

This letter is in reference to our telephone conversation this date and your letter of November 13, 1991 to Jimmie W. New. Enclosed please find Mr. New's signed Statement of Designation of Counsel dated November 18, 1991.

As indicated in our telephone conversation, Mr. New had signed the form in blank and forwarded it along with your letter and proposed analysis and a letter of his own to me sometime during the week of November 18, 1991. Due to my involvement in several other substantial matters over the past ten (10) days and the Thanksgiving holiday, these materials did not come to my attention until this morning. I indicated the situation to you in our telephone call and you suggested that I write this letter to request an extension of seven (7) days up to and including December 10, 1991 within which to file the requested response in this matter. Mr. New and I appreciate your consideration of this request and if you have further questions, please contact me at the number listed above.

Sincerely yours,  
*David V. Capes*  
David V. Capes

DVC/cpc  
Enclosure  
90637LE-4

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 DEC -5 PM 12:09

RECEIVED  
FEDERAL ELECTION COMMISSION  
91 DEC -5 AM 10:42

23043503688

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3446

NAME OF COUNSEL: David V. Capes

ADDRESS: Rosenblum, Goldenhersh,  
Silverstein & Zafft, P.C.

7733 Forsyth, 4th Floor

St. Louis, Missouri 63105

TELEPHONE: (314) 726-6868

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

11/18/91  
Date

Jimmie W. New  
Signature

RESPONDENT'S NAME: Jimmie W. New

ADDRESS: 16371 Wilson Farm Drive

Chesterfield, Missouri 63017

HOME PHONE: (314) 537-0609

BUSINESS PHONE: (314) 727-2900

93043503689



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 5, 1991

David V. Capes, Esq.  
Rosenblum, Goldenhersh, Silverstein & Zafft, P.C.  
Fourth Floor  
7733 Forsyth Blvd.  
St. Louis, MO 63105-1812

RE: MUR 3446  
Jimmie W. New

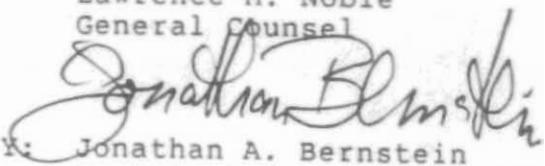
Dear Mr. Capes:

This is in response to your letter dated December 2, 1991, which we received on that same day, requesting an extension until December 10, 1991 to respond to the Commission's notification of reason to believe. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 10, 1991.

If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble  
General Counsel

  
BY: Jonathan A. Bernstein  
Assistant General Counsel

93043503690

66-3669

COUGHLIN & DAVIDSON

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

December 5, 1991

ATTORNEYS AT LAW

10900 MANCHESTER ROAD, SUITE 205

SAINT LOUIS, MISSOURI 63122

(314) 821-0300

Mary P. Mastrobattista, Esq.  
Federal Election Commission  
Washington, DC 20463

Re: MUR 3446

Dear Ms. Mastrobattista:

The only information on my desk about when Mr. Mason became an officer at Germania is a newspaper article from the May 13, 1989, St. Louis Post Dispatch. This Article reports that Mr. Jim New had become President, replacing Mr. Steve Gardner.

Sometime later in 1989 year Mr. Mason replaced Mr. Ed Morris as Chairman of the Board. Upon until that time Mr. Mason was a Shareholder and Director of the Bank, but not a officer. He may have had the title Vice Chairman of the Board.

Please call with any questions.

Sincerely yours,

John L. Davidson

jld/ahd

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

91 DEC -9 AM 3:11

23043503691

91 DEC -9 AM 11:54

RECEIVED  
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# BUSINESS

SATURDAY, MAY 13, 1989

## Germania Bank President Out In Sudden Management Shuffle

By Adam Goodman  
Of the Post-Dispatch Staff

Germania Bank abruptly announced late Friday afternoon that Steven M. Gardner, its president and chief executive of four months, has resigned.

Gardner apparently resigned under pressure from the savings bank's board of directors, but Germania officials were not providing many details Friday.

"We just made a change," said Germania Chairman Edward L. Morris. "The board accepted his resignation."

In a special meeting of Germania's board of directors, Jimmie W. New, Germania's executive vice president and chief financial officer, was named the savings bank's president and chief operating officer, Morris said.

Morris declined to say why the management changes were made. Gardner, reached by phone at home, declined to comment. Attempts to reach New were unsuccessful.

Gardner had only been the chief executive at Germania since January. He took over the top spot after Morris returned to Stifel Financial Corp. as its executive vice president. Morris



New

Gardner

had joined Germania in January 1986 at the urging of real estate developer Joseph L. Mason, who is the bank's largest shareholder.

Gardner joined Germania as its president and chief operating officer in May 1987. Before that he had been senior vice president of retail markets at Mark Twain Bank N.A.

New has been a director at Germania since 1985 and its chief financial officer since February 1988. He previously worked for Mason as vice president of corporate finance and a division president at J.L. Mason Realty and Investments Inc. Before that he had been chief financial officer at Roosevelt Federal Savings and Loan Association, which is now Roosevelt Bank.

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06C3736

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FEDERAL ELECTION COMMISSION  
MAIL ROOM

LAW OFFICES

ROSENBLUM, GOLDENHERSH, SILVERSTEIN & ZAFFT, P.C.  
FOURTH FLOOR  
7733 FORSYTH BOULEVARD  
ST. LOUIS, MISSOURI 63105-1812  
(314) 726-6868  
FACSIMILE (314) 726-6786

91 DEC 12 AM 11:37

ROGER HERMAN  
LISA R. PERRY  
DONN H. HERRING, JR.  
THOMAS A. DUGA  
ADAM E. MILLER  
PAUL G. KLUG  
GAIL I. BASS  
LYNN W. DIPROLO

SHULAMITH SIMON  
OF COUNSEL

2 PARK PLACE PROFESSIONAL CENTER  
P.O. BOX 188  
BELLEVILLE, ILLINOIS 62223  
16181234 3900  
1800154-9157

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

91 DEC 12 AM 3:53

December 10, 1991

STANLEY M. ROSENBLUM  
ROBERT S. GOLDENHERSH  
MERLE L. SILVERSTEIN  
GENE M. ZAFFT  
CARL C. LANG  
RICHARD S. BENDER  
MICHAEL A. MARKENSON  
DAVID V. CAPES  
MARK E. GOODMAN  
PATRICIA D. GRAY  
JAY A. NATHANSON  
ROBERT E. QUICKSILVER  
RICHARD E. GREENBERG  
BENNETT S. KELLER

FACSIMILE (202) 219-3880 AND  
MAILED UNITED STATES MAIL

Mr. Jonathan A. Bernstein  
Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 3446  
Jimmie W. New

Dear Mr. Bernstein:

The purpose of this letter is to respond to the allegations made against Mr. New as set forth in the factual and legal analysis provided with your letter of November 13, 1991.

Mr. New believes that a number of matters need to be clarified in connection with the allegations. To the best of his knowledge the procedures which you have questioned were employed by the prior management of Germania Bank since 1980. During the 1986-88 time frame it was Mr. New's belief that the program was administered by Mr. Edward Morris and the only reason Mr. New's name appeared on any checks was due to the fact that the Bank required two signatures for internal control procedures. Mr. New has noted that he was requested on an annual basis to contribute to a fund similar to the one at Germania while he was at Roosevelt Federal. He also notes that the program at Germania was reviewed by the Bank's counsel as of 1987 and that he was never advised of any problem or potential violation associated with the program. It is our understanding that information concerning the fund was readily available for any review and the fund was not maintained as any kind of secret slush fund of any nature or in any way. It is our further understanding that Mr. New had absolutely no idea that the maintenance of this fund violated any rule of the FEC nor was he aware of the rules which applied in this situation.

In addition, Mr. New disagrees with many of the statements contained in the material forwarded with your letter. In the

33043503693

Mr. Jonathan A. Bernstein  
December 10, 1991  
Page 2

first instance he was not president or chief executive officer at all the times indicated in your letter and finds it hard to believe that he could therefore be primarily responsible for many of the following statements attributed to him. The following are exemplary of incorrect factual information on the part of the Federal Election Commission:

1. Page 3, first full paragraph - This is supported by the fact that Mr. New believes Mr. Morris sent out the letters and that Mr. New made payments payable to Mr. Morris in 1986 and 1987. In addition, if the letter was sent over Mr. New's signature, this would have been at the direction of Mr. Morris.

2. Page 3, third paragraph - Written either by Mr. Osborn or Mr. Kilduff as Mr. Morris and Mr. New were not employed at Germania until 1986.

3. Page 5 - Mr. New strongly disagrees with the statement that the Bank, through Jimmie New, used this fund to make contributions totalling \$9,265 over a period of eight years. The facts will show that Mr. New was at Germania from 1986 through 1990 and held different positions during this period.

4. Page 6, second full paragraph - Again Mr. New was not even an employee of the bank in 1985

5. Page 8, last paragraph - We have no idea what point the FEC is trying to make as these claims are extremely general in nature and appear to be very broad, unsubstantiated statements in view of the information set forth above.

6. Page 9 - Mr. New authorized the payment to the HBA; however, it is our understanding that he assumed that such payment was no different from a normal charitable contribution, and further, it is our understanding that he would have cleared this payment with Mr. Morris before he signed the check.

7. Page 10 - This information does not appear to be applicable to Mr. New.

Mr. New has asked us to inform the Commission that he sought to insure that Germania at all times complied with the rules and regulations issued by the Federal Home Loan Bank Board and that he never tried to knowingly circumvent any rules of that agency or any agency of which he was aware. We believe that it is

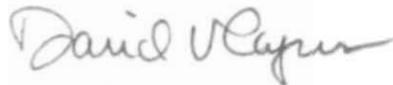
93043503694

Mr. Jonathan A. Bernstein  
December 10, 1991  
Page 3

significant that the bank had both inside and outside counsel during the entire time period of Mr. New's employment upon whom he relied to a large extent in carrying out many of his duties.

We hope this information is helpful to you and would be glad to discuss the matter further at your convenience.

Sincerely yours,



David V. Capes

DVC/cpc  
cc: Mr. Jimmie W. New  
47LE

93043503695

Doc 3774

LA TOURETTE, SCHLUETER, EBLING & BYRNE

ATTORNEYS AT LAW

COMMERCE BANK BUILDING  
11 S. MERAMEC AVENUE, SUITE 1400  
ST. LOUIS, MISSOURI 63105-1793  
(314) 727-0777  
FAX (314) 727-9071

BRAINERD W. LA TOURETTE, JR.\*  
ALBERT M. SCHLUETER  
SAMUEL C. EBLING  
KENNETH V. BYRNE  
JAMES D. RUSSELL\*\*

TERRANCE L. FARRIS\*  
PETER M. HAMILTON\*  
JAMES P. BICK, JR.

OF COUNSEL  
LAWRENCE C. SUMNER

\*ALSO ADMITTED IN MINNESOTA  
\*ALSO ADMITTED IN ILLINOIS  
\*\*ALSO ADMITTED IN INDIANA

December 13, 1991

FEDERAL EXPRESS

Ms. Mary P. Mastrobattista  
Federal Election Commission  
Washington, D.C. 20463

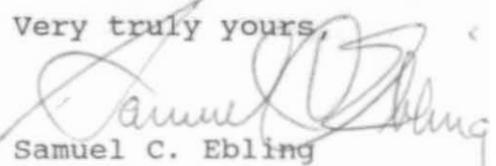
In Re: Your File MUR 3446  
Edward L. Morris

Dear Ms. Mastrobattista:

Pursuant to your gracious extension of time, I have now been able to investigate to the extent possible the allegations set forth in your charges of November 13. I believe our response adequately covers the matter in that a number of the allegations are purely conjecture by their very language while others simply did not occur because Mr. Morris wasn't employed at the bank at those times.

If you would be so good as to give us the benefit of copies of any of the documentary evidence which you claim supports any of the allegations, I will be more than happy to further respond.

Very truly yours,

  
Samuel C. Ebling

SCE/pw

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF LEGAL COUNSEL  
91 DEC 16 AM 11:09

93043503696

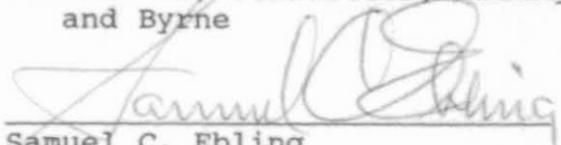
FEDERAL ELECTION COMMISSION  
RESPONSE OF EDWARD L. MORRIS

Mr. Morris first became active in the management of Germania in February, 1986. The solicitation of funds from bank officers was in place when Mr. Morris commenced his duties at that time. Allegations relating 1976 and 1985 are not correct. Mr. Morris served the Bank in a management position only until October 31, 1988. Mr. Morris presumed the bank to be in compliance with the existing law regarding political contributions and was never advised to the contrary by his inside legal counsel Brent Waxman or any of the outside counsel employed by the Bank. To the best of Mr. Morris' knowledge and belief none of the officers were coerced to contribute to the fund during his employment. To the best of Mr. Morris' knowledge and belief there was no solicitation of an improper classification of employees of the Bank during his employment.

Edward L. Morris has not violated 2 U.S.C. §433(a), 434(a), 441(b)(3) and 441(b)(4)(s)(i).

Respectfully submitted,

LaTourette, Schluetter, Ebling  
and Byrne

  
Samuel C. Ebling  
Attorneys for Edward L. Morris

Dated this 13th day of December, 1991.

93043503697

JOHN L. DAVIDSON, P.C.  
ATTORNEY AND COUNSELOR AT LAW  
MANCHESTER/270 OFFICE CENTER  
12444 POWERSCOURT DRIVE, SUITE 250  
ST. LOUIS, MISSOURI 63131  
314-965-2501  
FAX 314-965-3568

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

92 MAR -5 AM 10:17

March 2, 1992

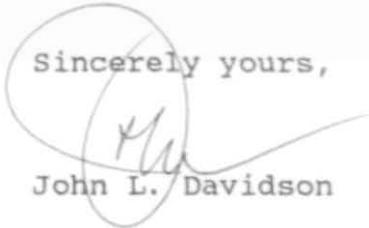
Mary P. Mastrobattista, Esq.  
Federal Election Commission  
Washington, D.C. 20463

MUR 3446

Dear Ms. Mastrobattista:

Please change your records to reflect my new address and telephone number.

Sincerely yours,

  
John L. Davidson

jld/ahd

92 MAR -5 PM 3:37

RECEIVED  
FEDERAL ELECTION COMMISSION  
MAIL ROOM

93043503698



Resolution Tot Corporation  
Chicago Consolidated Office

P.O. Box 867  
Elk Grove Village, IL 60009-0867  
Scott J. Hlavacek

25 Northwest Point Blvd  
Elk Grove Village, IL 60007  
(708) 290-7768  
(800) 284-8197  
(708) 806-7780 - FAX

March 10, 1992

Mary Mastrobattista  
Federal Election Commission  
Office of General Counsel  
999 E Street Northwest  
Washington, D.C. 20463

*mx 3446*

Dear Ms. Mastrobattista:

Enclosed please find copies of Jimmie New's file on the checking account used to disburse campaign contributions, and a copy of my chart detailing who the directors and senior officers were from 1984 to the RTC takeover.

If I can be of any service, or if you require additional information please feel free to give me a call at (708)-290-7768.

Sincerely,

*Scott J. Hlavacek*  
Scott J. Hlavacek  
Investigator

93043503699





ALTON • BELLEVILLE • CAHOKIA • DUPO • MT. VERNON • OFFALLON • SPRINGFIELD • BALLWIN • NORMANDY • DOWNTOWN ST. LOUIS

CHECKING ACCOUNT DEPOSIT RECEIPT

ACCOUNT NO. 10-0010303445	AMOUNT	BALANCE
4-27-87	1,175.60	3,981.44 023



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF

93043503701

POLITICAL CONTRIBUTIONS  
SUMMARY  
1987

Receipts				Disbursements	
		Balance Dec. 1,	\$126.27		
1-1-87	Interest	.78			
2-1-87	Interest	.58			
3-1-87	Interest	.51		3-9-87 Friends of Henkhaus	100.00
4-1-87	Interest	.25			
4-17-87	Officers Checks	2,777.45			
4-27	Officers Checks	1,175.60			
5-1-87	Interest	7.10			
		<hr/>			
		Balance May 1, 1987	\$3,988.54		

93043503702





93043503705

FOR THE ORDER OF  
CASS BANK & TRUST CO.  
FOR DEPOSIT ONLY  
MEMBERS OF COMMERCIAL BANKING

JUN 25 97

PAID TO THE ORDER OF  
CASS BANK & TRUST CO.  
ST. LOUIS, MO.  
63102

3555 10887  
MY '87 27  
P.E.G.  
CENTRE BANK, NA  
ST. LOUIS, MO  
PAY ANY BANK

45

JUN 1 1997  
JE '87 02  
PAY ANY BANK  
WATSON'S NATIONAL  
ST. LOUIS, MO.  
0810-0002-2

7117 40792

EDWARD L. MORRIS  
JIMMIE W. NEW  
543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

JA 213

5-13 87 70-7070/2810



Pay to the Order of Friends of Governor Ashcroft \$ 500.00

Five Hundred Dollars

~~DOLLARS~~



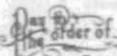
*Edward L. Morris*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0213 ⑈0000025000⑈

EDWARD L. MORRIS  
JIMMIE W. NEW  
543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

JA 214

5-13- 87 70-7070/2810



Pay to the Order of Friends of Margaret Kelly \$ 100.00

One Hundred & 00/100

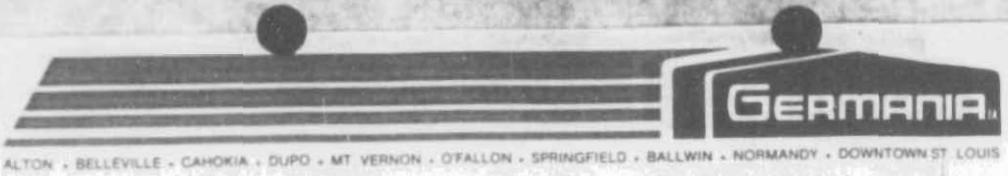
~~DOLLARS~~



*Edward L. Morris*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0214 ⑈0000010000⑈

93043503706



CHECKING ACCOUNT DEPOSIT RECEIPT

DATE  
ACCT-NBR 10-0010303445  
6-26-87

AMOUNT BALANCE  
94.50 2,963.24 027



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.

93043503707

DATE 6-19-87 GERMANIA FEDERAL SAVINGS & LOAN ASSOCIATION  
ALTON, ILLINOIS

DELUXE  
N 2300

BY J. McElroy  
Authorized

103-03445  
Account Number

WE CHARGE YOUR ACCOUNT

\$ 250.00

FOR To debit account for encoding error. Chk. No. 213

Edward Morris or Jimmie New

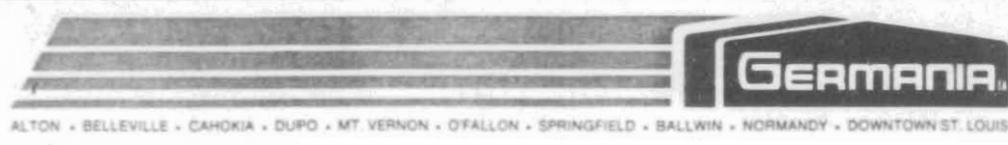
543 E. Broadway

Alton, IL 62002

DO NOT FAIL  
TO MAKE THIS  
ENTRY IN YOUR  
CHECKBOOK.

MISC. DEBIT

⑆281970700⑆



CHECKING ACCOUNT DEPOSIT RECEIPT

DATE  
ACCT-NBR 10-0010303445  
6-16-87

AMOUNT BALANCE  
198.50 3,148.74 027



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.









93043503712

John R. Hunt

Easton Wash DC 9

For Deposit

NOV 19 1981

3401 1981/2130

NOV 19 1981





EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

22 222

12/8 87 70-7070/2810

Pay to the order of John R. Shear Election Committee \$ 200.00

Two Hundred and no/100 ----- ~~DOLLARS~~



*Jimmie W. New*

⑆ 28 1070707⑆ 00103 0344 5⑆ 0222 ⑈0000020000⑈

93043503713







DATE 6-19-87 GERMA FEDERAL SAVINGS & LOAN ASSOCIATION ALTON, ILLINOIS DELUXE N 2300

BY J. McElroy 103-03445  
Authorized Account Number

WE CHARGE YOUR ACCOUNT \$ 250.00

FOR To debit account for encoding error. Chk. No. 213

Edward Morris or Jimmie New  
543 E. Broadway  
Alton, IL 62002

DO NOT FAIL  
TO MAKE THIS  
ENTRY IN YOUR  
CHECKBOOK.

MISC. DEBIT

⑆281970700⑆ 10303445⑈

93043503717

03 JUN 87 092259224207 #00620201654

FOR DEPOSIT ONLY  
SENATE  
DANFORTH FOR SENATE

For deposit only  
SPMRC  
PAY TO THE ORDER OF  
EXCHANGE NATIONAL BANK  
JEFFERSON CITY, MO.  
FOR DEPOSIT ONLY  
CITY NATIONAL SAVINGS & LOAN ASS'N.



4-5  
FRIENDS OF KAREN HASARA  
PAY TO THE ORDER OF  
MARINE BANK OF SPRINGFIELD  
359-5039  
CENTER ST. L. MO.

93043503718

93043503719


**EDWARD MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

215

6-1 87 70-7070/2810

Pay to the order of Wanforth for Senate Committee \$ 500.00  
Five hundred and 00/100 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

20. Johnson  
 ⑆ 28 1070707⑆ 00 103 0344 5⑆ 0215 ⑆0000050000⑆


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

216

6-2 87 70-7070/2810

Pay to the order of SAMPEC \$ 360.00  
Three hundred and 60/100 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

20. Johnson  
 ⑆ 28 1070707⑆ 00 103 0344 5⑆ 0216 ⑆0000036000⑆


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

217

6/8 87 70-7070/2810

Pay to the order of Friends of Karen Keasara \$ 30.00  
Thirty and 00/100 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

2 tickets  
20. Johnson  
 ⑆ 28 1070707⑆ 00 103 0344 5⑆ 0217 ⑆0000003000⑆









AG 37 00  
PAY TO  
ADDRESS  
CHICAGO ILLINOIS

I-100-60

JERRY COSENTINO  
CITIZENS COMMITTEE FOR  
FORGOTTEN ONLY  
AG 37 004 3  
PAY ANY BANK NEG.  
MERCHANTS NATIONAL BANK  
ST. LOUIS, MO.  
0810-0003-2

PAY ANY BANK NEG.  
MERCHANTS NATIONAL BANK  
ST. LOUIS, MO.  
0810-0003-2

333 63280

93043503724

93043503724



EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

218

July 8 1981 70-7070/2810

Pay to the order of Citizens for Cocentino \$ 200.00  
Two Hundred & no/100

~~DOLLARS~~



543 E. Broadway • Alton, IL 62002

Edward L. Morris

⑆ 28 ⑆ 070707 ⑆ 00 ⑆ 03 0344 5 ⑆ 02 ⑆ 8 ⑆ 0000020000 ⑆

93043503725




















**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY • 618-465-5543  
 ALTON, IL 62002

**PAID**      *223*  
 Feb. 8 1988      70-7070/2810  
 MAR 09 88

Pay to the order of Pride on Cahokia Party      \$ 140.00  
 One Hundred Forty and no/100 ~~DOLLARS~~

  
343 E. Broadway • Alton, IL 62002

*Edward L. Morris*

**Memo** \_\_\_\_\_

⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0223 ⑆0000014000⑆

93043503735

93043503736

NOV 7 83

0010-0180 2-8810  
 02770  
 CREDITED TO THE ACCOUNT  
 FILE WITHIN 10 DAYS  
 IN ACCORDANCE WITH FEDERAL RESERVE  
 REGULATION 101.10  
 MR 88 08  
 P.C. 1  
 ST. LOUIS, MO  
 PAY ANY BANK

MAGNA BANK OF COLUMBIA  
 COLUMBIA, ILLINOIS  
 PAY ANY BANK P.O.  
 MAGNA BANK  
 COLUMBIA, ILLINOIS  
 20-1202-610









EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

00550257 PY221

11-16 87 70-7070/2810

Pay to the order of Bernie Scanlan \$ 100.00

One Hundred and no/100----- ~~DOLLARS~~



~~Pay to~~ Citizens for Cosentino

*[Signature]*

⑆28⑆070707⑆ 00⑆03 0344 5⑆ 022⑆ ⑆00000⑆0000⑆

93043503740

*Devin Decker*

THE BANK OF AMERICA - SPRINGFIELD

FOR DEPOSIT ONLY--P.E.G.  
**GERMANIA, F. A.**  
2 810 70707

NOV 23 1981

SPRINGFIELD OFFICE  
2007 SOUTH McARTHUR BLVD.  
SPRINGFIELD, IL. 62704

9 3 0 4 3 5 0 3 7 4 1









93043503746


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

No. 219  
 Date 9-14 1987 70-7070/2610

Pay to the order of HBI-PAC \$ 500.00  
 Five Hundred and no/100-----

  
 543 E. Broadway • Alton, IL 62002

Signature: *Edward L. Morris*

MICR: ⑆ 28 1070707⑆ 00 103 0344 5⑈ 0219 ⑈0000050000⑈


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

No. 220  
 Date 9-14 1987 70-7070/2610

Pay to the order of Neutron for Mayer Committee \$ 30.00  
 Thirty and no/100-----

  
 543 E. Broadway • Alton, IL 62002

Signature: *Edward L. Morris*

MICR: ⑆ 28 1070707⑆ 00 103 0344 5⑈ 0220 ⑈0000003000⑈

MAX TWIN STATE BANK  
 BRIDGETON, NJ 08302  
 HOME BUILDING AND BLDG. SUPPLY  
 Account # 4900190  
 SEP 16 77

44 43 42 41 40 39 38 37 36 35 34 33 32 31 30 29 28 27 26 25 24 23 22 21 20 19 18 17 16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1  
 44 43 42 41 40 39 38 37 36 35 34 33 32 31 30 29 28 27 26 25 24 23 22 21 20 19 18 17 16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1  
 44 43 42 41 40 39 38 37 36 35 34 33 32 31 30 29 28 27 26 25 24 23 22 21 20 19 18 17 16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1

44 43 42 41 40 39 38 37 36 35 34 33 32 31 30 29 28 27 26 25 24 23 22 21 20 19 18 17 16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1  
 44 43 42 41 40 39 38 37 36 35 34 33 32 31 30 29 28 27 26 25 24 23 22 21 20 19 18 17 16 15 14 13 12 11 10 9 8 7 6 5 4 3 2 1

60938925

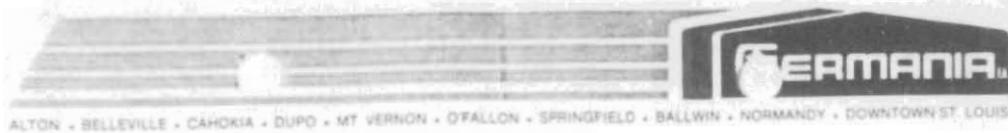
BANK OF  
 STANFIELD  
 70-26-9 70-26-9

1 8 SEP - 8 7

9 3 0 4 3 5 0 3 7 4 7







CHECKING ACCOUNT DEPOSIT RECEIPT

DATE  
ACCT-NBR 10-0010303445  
6-08-87

AMOUNT      BALANCE  
152.55      3,450.24 027



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.

*Poli. Cont. file*

93043503750





93043503753

0.00 \*

135.00+

73.00+

52.65+

87.02+

56.70+

68.66+

100.00+

125.00+

91.00+

109.78+

97.20+

73.71+

229.50+

1,299.22 \*

9 3 0 4 3 5 0 3 7 5 4

0\*\*

0\*\*

- 51.30+✓
- 89.10+✓
- 170.10+✓
- 50.62+✓
- 63.45+✓
- 68.28+✓
- 59.40+✓
- 121.50+✓
- 300.00+✓
- 75.00+✓
- 75.13+✓
- 56.00+✓
- 135.00+✓
- 101.25+✓
- 62.10+✓
- 1,478.23\*

0\*\*



EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

209  
 3-9 17 70-7070/2810

Pay to the order of *Friends of Mick Henklaus* \$ *100.00*  
*One hundred & 00/100* DOLLARS



*Stickets - Germania*  
*Sherry Hamilton*

*[Signature]*

⑆ 28 1070707 ⑆ 00 103 0344 5 ⑈ 0209 ⑈ 000000 10000 ⑈

93043503755







Dear Friends,

For the last twenty-two years Mick has been working for you and all the taxpayers of Madison County. Mick has worked eleven years as Deputy Circuit Clerk, three years as County Administrator and the last eight years as your County Treasurer.

He has established a tremendous record of honesty, integrity and ability. As your County Treasurer Mick has worked very hard to improve and expand services to the public, while cutting costs and increasing earned interest on invested funds. But Mick does not want to stop there. He is constantly looking for ways to improve and update the Treasurer's Office.

His goal has always been his utmost priority — to serve the interest of the people first — whether it be as County Treasurer or Friend.

#### Friends of Mick

A copy of our report filed with the County Clerk, is (or will be) available for purchase from the County Clerk's Office, Edwardsville, Illinois 62025.



93043503759

For *Academy Martin & Sherry Hamilton*  
Please Join Us For A

Dear *Rita* -

The past eight years have been busy ones, to the point that often one does not have the opportunity to thank friends such as you who have been so financially and personally supportive.

Many of the activities and commitments of a public office holder are financially taxing, and this is why I am periodically required to call upon friends such as you for support to help reduce accumulated campaign debts. I appreciate your generosity, and value your friendship.

*Mick*

St. Patrick's Eve  
Cocktail Party

Hosted by

*Michael Stanton Henkhaus*

Madison County Treasurer

Monday, March 16, 1987

6:30 p.m. to 8:30 p.m.

Cocktails and Hors d'oeuvres

Rusty's

1201 North Main

Edwardsville, Illinois

Please Make Checks Payable to  
Friends of Mick Henkhaus

Donations: \$50.00 per person      RSVP March 12, 1987

93043503760

93043503761

EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

209  
 3-9 1987 70-7070/2810

Pay to the order of Friends of Mick Henkhaus \$ 100.00  
One hundred & 00/100 ~~DOLLARS~~

**GERMANIA**  
 543 E. Broadway • ALTON, IL 62002

*[Signature]*

⑆ 28 10707071 ⑆ 00103 0344 511 0209









POLITICAL CONTRIBUTIONS

SUMMARY

1986

RECEIPTS

DISBURSEMENTS

Balance on Hand, 1/1/86 \$ 138.83  
 Interest, 1-3-86 .62  
 Interest, 2-3-86 .62  
 Interest, 3-3-86 .57 \$140.64  
 Contributions, 3-10-86 851.55 \$992.19

3-14-86 Growth Association-Sam Vadalabene  
 \$942.19 Roast \$50.00

Contribution, 3-14-86 \$272.40  
 Contribution, 3-14-86 218.33  
 Contribution, 3-20-86 920.52  
 Contributions, 3-24-86 83.45  
 4-3-86 Interest 7.13

3-24-86 Friends of Margaret Kelly,  
 \$2,311.89 State Auditor, Missouri \$125.00

3-25-86 Charge for checks \$17.00  
 \$2,302.02

4-8-86 Contribution \$125.13

4-23-86 THRIFTPAC \$425.00  
 4-23-86 ISLPEC 225.00  
 SAPEC 225.00

5-2-86 Interest 10.08

\$1,562.23

5-8-86 Jimmie W. New-Reimbursement for  
 Contribution to Friends of  
 Margaret Kelly, State Auditor  
 of Missouri \$125.00

6-3-86 Interest 6.74

6-2-86 Bill DeMarco for Sheriff  
 (Springfield-ok'd by  
 Ron Vanata, requested  
 by Robin Loftus) 20.00

\$1,423.97

7-3-86 Interest 6.17

7-28-86 Citizens for Jim Edgar \$150.00

8-1-86 Interest 5.98

8-4-86 Com. to elect Jerry  
 Costello \$125.00

8-29-86 State Rep. Karen Hasara \$ 25.00

9-3-86 Interest \$6.31

9-11-86 Sen John Davidson  
 Campaign Fund \$100.00

9-11-86 Friends of Jim McPike \$100.00

9-16-86 HBI-PAC \$500.00

\$442.43

10-8-86 Interest \$3.95  
 11/3/86 Deposit \$200.00  
 11/10 Interest \$.94  
 12/11 Interest \$.40

9-26-86 Citizens for Houston \$50.00  
 10-8-86 MO Rep. Party \$300.00  
 10-28-86 Jerry Banning Apprec.  
 Nite \$200.00

\$97.72

666637043503766





93043503769


**EDWARD L. MORRIS** No. 203  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

Pay to the order of John Davidson Campaign Fund \$ 100.00  
One Hundred & 00/100 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

Memo: \_\_\_\_\_ Edward John

⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0203 ⑆ 00000 10000 ⑆


**EDWARD L. MORRIS** No. 207  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

Pay to the order of Missouri Republican Party \$ 300.00  
Three Hundred & 00/00 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

Memo: \_\_\_\_\_ Edward John

⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0207 ⑆ 00000 30000 ⑆


**EDWARD L. MORRIS** No. 210  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

Pay to the order of BANNING TESTIMONIAL Committee \$ 200.00  
Two Hundred And 00/100 **DOLLARS**

  
 543 E. Broadway • Alton, IL 62002

Memo: \_\_\_\_\_ Edward John

⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0210 ⑆ 00000 20000 ⑆

93043503770

0711 2294  
PAY ANY BANK  
FIRST NATIONAL BANK  
SPRINGFIELD, ILLINOIS 62781  
OCT 15 1975  
08 66

John A. Davidson  
CAMPAGN FUND  
0.00 for Deposit Only

PAY TO THE ORDER OF  
UNITED MISSOURI BANK  
JEFFERS N CITY, MO. 65101  
FOR DEPOSIT ONLY  
REPUBLICAN STATE COMMITTEE  
FEDERAL FUND ACCT. 006572

1111  
OCT 15 75  
UNITED MISSOURI BANK  
JEFFERS N CITY, MO. 65101  
FOR DEPOSIT ONLY  
REPUBLICAN STATE COMMITTEE  
FEDERAL FUND ACCT. 006572

6 13 86 03 3  
PAY ANY BANK P.E.O.  
FIRST NATIONAL BANK  
ST. LOUIS, MO.  
0810-0003-2

FOR DEPOSIT ONLY



ALTON • ALTON SQUARE • BELLEVILLE • DUPO • MT. VERNON • O'FALLON • SPRINGFIELD

**CHECKING ACCOUNT DEPOSIT RECEIPT**

DATE  
ACCT-NBR 10-0010303445  
11-03-86

AMOUNT      BALANCE  
200.00      278.38 075



**\*\* THANK YOU \*\***



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.

93043503771





93043503774

EDWARD L. MORRIS 3-86 109  
 W. OSBORN 38 18  
 543 E. BROADWAY 618-465-5543 Aug. 4 19 86 20537143  
 ALTON, IL 62002 70-7070/2810

PAY TO THE ORDER OF Committee to Elect Jerry Costello \$ 125.00

One Hundred Twenty Five & 00/100-----DOLLARS

  
 543 E. Broadway • Alton, IL 62002

MEMO Edward L. Morris

⑆28⑆070707⑆ ⑆03 0344 5⑆ 0⑆09 ⑆00000⑆12500⑆

EDWARD L. MORRIS 201  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543 Aug. 29 19 86 70-7070/2810  
 ALTON, IL 62002 ⑆002⑆ ⑆150530394

PAY TO THE ORDER OF Friends of Karen Hasara \$ 25.00

Twenty Five Dollars & 00/100 ----- ~~DOLLARS~~

  
 543 E. Broadway • Alton, IL 62002

MEMO Edward L. Morris

⑆28⑆070707⑆ ⑆00⑆03 0344 5⑆ 020⑆ ⑆000000⑆2500⑆

EDWARD L. MORRIS 204  
 JIMMIE W. NEW 38 18  
 543 E. BROADWAY 618-465-5543 9-17 19 86 70-7070/2810  
 ALTON, IL 62002 21232357

PAY TO THE ORDER OF Friends of Jim McBride \$ 100.00

One Hundred & 00/100 ----- ~~DOLLARS~~

  
 543 E. Broadway • Alton, IL 62002

MEMO OCT. 31 86 Edward L. Morris

⑆28⑆070707⑆ ⑆00⑆03 0344 5⑆ 020⑆ ⑆00000⑆10000⑆



93043503776


**EDWARD L. MORRIS**  
**JIMMIE W. NEW** 22 19  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

SEP 19 1986 205  
 9-16 86 70-7070/2810

Pay to the order of HBI-PAC \$ 500.00  
 Five Hundred and 00/00 ----- ~~DOLLARS~~

  
 543 E. Broadway • Alton, IL 62002

*Edward L. Morris*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0205 ⑈0000050000⑈


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

9-26 206  
 86 70-7070/2810

Pay to the order of Citizens for Houston \$ 50.00  
 Fifty & 00/00 ----- ~~DOLLARS~~

  
 543 E. Broadway • Alton, IL 62002

*Jimmie W. New*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0206 ⑈0000005000⑈











EDWARD L. MORRIS 34  
W. G. OSBORN

108

543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

7-28 19 86 70-7070/2810

PAY TO THE ORDER OF Citizens for Jim Edgar \$ 150.00  
One Hundred Fifty dollars & 00/100 DOLLARS



MEMO Draw

*[Signature]*

⑆ 28 1070707 ⑆ 03 0344 5 ⑆ 0 108 ⑆ 00000 15000 ⑆

EDWARD L. MORRIS  
JIMMIE W. NEW  
543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

20

9-11 19 86 70-7070/2810

~~Pay to the order of Jim McPike, Majority Leader \$ 100.00  
One Hundred & 00/100 DOLLARS~~



~~MEMO 10 tickets~~

~~*[Signature]*~~

~~⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0 202~~

93043503782

93043503783

FOR DEPOSIT ONLY  
CITIZENS FOR JIM EDGAR

11 AUG BANK

PAY TO THE ORDER OF

CITIZENS NATIONAL BANK  
ST. LOUIS, MO.  
0910-0003-2

AG 86 12 3  
ST. LOUIS, MO.  
0910-0003-2

0

12152106



DIRECT INQUIRIES TO: BOOKKEEPING DEPARTMENT  
 543 EAST BROADWAY  
 ALTON, ILL. 62002  
 618/465/5543

0

08/01 IS  
 10743Y

STATEMENT DATE: 08/01/86 3  
 ACCOUNT NUMBER: 10303445  
 SUC. SEC. NO: 337-36-1765

\*\*\*\*\* N.O.W. CHECKING ACCOUNT \*\*\*\*\*

NON-CHECK TRANSACTIONS

DATE	AMOUNT	DESCRIPTION
08/31	5.98	INTEREST PAID

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
08/01	1,436.12				

4 ACCOUNT SUMMARY

PREVIOUS STATEMENT DATE	BALANCE	+ DEPOSITS	INTEREST PAID	- WITHDRAWALS	SERVICE CHARGE	= ENDING BALANCE
07/05/86	1,430.14	.00	5.98	.00	.00	1,436.12

7 AVERAGE BALANCE: 1,430.14 MINIMUM BALANCE: 1,450.14

\*\*\*\*\*  
 \* TAKING A 7% INTEREST HOME IMPROVEMENTS? \*  
 \* TAKE ADVENTURE? CALLER'S RATE ON MASTERCARD/VISA - \*  
 \* 19.80% - CALL YOUR FINANCIAL CONSULTANT TODAY FOR AN APPLICATION \*  
 \*\*\*\*\*

3 0 4 3 5 0 3 7

~~| ACCT NUMBER | AT | AL | INT. RATE | TERM | PAY CITY | YR TO DT INT. REST |
|-------------|----|----|-----------|------|----------|--------------------|
| 100970981   | 40 |    |           |      |          |                    |

ACCT NUMBER	AT	BALANCE	DATE LAST PM	BALANCE	YR TO DT INTEREST	YR TO DT TAXES	YR TO DT INSURANCE
003001813	44	56,207.90	08/01/86	.00	1,210.54	.00	.00
00300100	29	131,903.02	08/01/86	1,405.93	4,365.91	.00	.00







EDWARD L. MORRIS  
W. G. OSBORN

543 E. BROADWAY 618-485-5543  
ALTON, IL 62002

10

June 2, 19 86 70-7070/2810

PAY TO THE ORDER OF: Bill DeMarco for Sheriff

\$ 20.00

Twenty and NO/100

DOLLARS



*Bill DeMarco*

MEMO

⑆ 28 1070707⑆ 103 0 5 0107 ⑈0000002000⑈

93043503788



EDWARD L. MORRIS 3-86  
W. G. OSBORN

543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

106

May 8 19 86 70-7070/2810

PAY TO THE ORDER OF Jimmie W. New

\$ 125.00

One Hundred Twenty Five and NO/100 DOLLARS



*Cashed SF*

Reimbursement of Political  
MEMO Contribution

*[Signature]*

⑆ 28 1070707⑆ 103 0344 5⑈ 0106

93043503790

*Jimmy W. New*

FOR DEPOSIT ONLY—P.E.G.  
**GERMANIA, F. A.**  
2810 70707

MAY 12 1986

ALTON BROADWAY OFFICE  
543 E. BROADWAY  
ALTON, IL 62002

93043503791





93043503794

EDWARD L. MORRIS 3-86 102  
 W. G. OSBORN  
 543 E. BROADWAY 618-465-5543 March 24, 19 86 70-7070/2810  
 ALTON, IL 62002

PAY TO THE ORDER OF Friends of Margaret Kelly \$ 125.00

One Hundred Twenty Five and NO/100-----DOLLARS

  
 543 E. Broadway • Alton, IL 62002

MEMO *Ed Osborn*

⑆ 28 1070707⑆ 103 0344 5⑈ 0102 ⑈0000012500⑈

EDWARD L. MORRIS 3-86 103  
 W. G. OSBORN  
 543 E. BROADWAY 618-465-5543 April 23, 19 86 70-7070/2810  
 ALTON, IL 62002

PAY TO THE ORDER OF THRIFTPAC \$ 425.00

Four Hundred Twenty Five and NO/100-----DOLLARS

  
 543 E. Broadway • Alton, IL 62002

MEMO Contribution *W. G. Osborn*

⑆ 28 1070707⑆ 103 0344 5⑈ 0103 ⑈0000042500⑈

EDWARD L. MORRIS 3-86 104  
 W. G. OSBORN  
 543 E. BROADWAY 618-465-5543 April 23 19 86 70-7070/2810  
 ALTON, IL 62002

PAY TO THE ORDER OF ISLPEC \$ 225.00

Two Hundred Twenty Five and NO/100-----DOLLARS

  
 543 E. Broadway • Alton, IL 62002

MEMO Contribution *W. G. Osborn*

⑆ 28 1070707⑆ 103 0344 5⑈ 0104 ⑈0000022500⑈



EDWARD L. MORRIS 3463085  
W. G. OSBORN

105

543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

April 23, 19 86 70-7070/2810

PAY TO THE ORDER OF SAPEC

\$ 225.00

Two Hundred Twenty Five and NO/100-----DOLLARS



MEMO Contribution

*W. G. Osborn*

⑆28⑆070707⑆ ⑆03 0344 5⑆ 0⑆05 ⑆0000022500⑆

93043503796

93043503797

0308 96633

FOR DEPOSITIONARY  
U.S. LEAGUE SAVINGS ASSOCIATION  
POLITICAL ELECTIONS COMMITTEE  
GEORGIA

MAR 29 03

TO: DIRECTOR, SECURITIES AND EXCHANGE COMMISSION  
FROM: U.S. LEAGUE SAVINGS ASSOCIATION  
RE: DEPOSITIONARY POLITICAL ELECTIONS COMMITTEE  
GEORGIA





March 6, 1986

Chairman's Memo #86-16

TO: Edward L. MORRIS

FROM: W. G. OSBORN

SUBJECT: POLITICAL CONTRIBUTIONS

Attached is an analysis of political contributions which were made from 1976 through 1985 with a proposed budget for 1986.

It is suggested that when there have been sufficient receipts to disburse fund requests that all requests be brought before the regular meeting of the Management Committee. Such requests should be brought by the individuals identified under the various categories: Corporate (Missouri and Illinois), Regional Branches (Alton, Belleville, Springfield, Mt. Vernon) and GFC (St. Louis).

93043503800

93043503801

Prepared By		
Approved By		

	1	2	3	4	5	6	7	8	9	10	11	12
Recipient	86	35	84	83	82	81	80	79	78	77	76	
	Proposed Management Committees			(NALPAC)								
1 Thrift Pac(Natl. Council)	550--	250--	200--	200--		200--	200--	200--	200--		200--	200--
2 ISLPEC(Illinois League)	225--	100--	300--	300--	200--	350--	250--	150--	325--	300--	200--	200--
3 SAPEC(U.S. League)	225--	1000--	100--	200--	200--	150--	200--	200--	200--		200--	200--
4 (Alton) Mayor Lenz Campaign Fund			100--									
5 (O'Fallon) Mayor MacKey Re-election			25--									
6 (Alton) Wuellner Campaign	Corporate		100--									
7 (Spfld) Houston For Mayor	Morris		100--	75--								
8 (Spfld) Mary Lamm for Recorder	Missouri	1000--	25--									
9 St. Clair County Republican Central Committee-Lincoln	Osborn-Illinois											
10 Day Dinner		1000--		20--	35--							
11 Citizens for Percy				200--					25--			
12 Senator Vince Demuzio	Regional			20--		15--	10--	10--		20--	20--	
13 Ashcroft '84 Committee	Branches			100--								
14 AMBPAC Campaign				50--	40--	70--	120--	120--				
15 Frank Watson for State Senator				50--								
16 Paul Simon Senate Committee	Stankus-Alton			150--								
17 Citizens for McPike	Kelley-Belleveville			100--		25--		30--	25--	30--		
18 Dixon for Senate				500--								20--
19 Madison County Republican Central Committee	Seaman-Springfield					30--	30--	30--	30--	25--	25--	
20 (Spfld) Langfelder Finance Committee				500--		25--						
21 States Attorney Bill Roberts						30--						
22 (Spfld) Friends of Dick Austin						50--						
23 Mel Price Testimonial Dinner						2500						
24 Mt.V. Bill Thackrey for Mayor							30--					
25 Salute to Senator Sam Vadalabene							35--	20--		25--		
26 Findley for Congress	Casey-Mt Vernon						50--	25--	35--		35--	25--
27 State Rep. Citizens for Bower												
28 Citizens for Horace Calvo		250--	1750--					100--				
29 49th District Campaign Comm. honoring Jim Reilly and A. C. Junie Bartulis	GFC-St. Louis							30--		20--		
30 Madison County Bd of Supv. Spence Campaign Fund	Walters							25--		20--		
31 Salute to Everett Steel			250--									25--
32 Citizens Comm. for Dwight Fuyle												30--
33 Citizens for Lucco												25--
34 Walter "Babe" McAvoy												20--
35 Madison County Democratic Committee												20--
36		5000--	800--	1990--	1035--	445--	1755--	1110--	845--	850--	465--	883--



ALTON - ALTON SQUARE - BELLEVILLE - DUPO - MT VERNON - OFALLON - SPRINGFIELD

CHECKING ACCOUNT DEPOSIT RECEIPT

DATE  
ACCT-NBR 10-0010303445  
4-08-86

AMOUNT      BALANCE  
125.13      2,552.15 076



\* THANK YOU \*\*

ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME YOUR DEPOSIT IS SUBJECT TO PROOF



93043503802

INTER-OFFICE MEMO

FROM Loretta DATE 3-24-86

TO ED TIME 12:06 P.M.

SUBJECT Up-date on political contributions--

Other officers requested to contribute who have made a contribution since my last report to you:  
Brenda Stroh - paid \$28.45

Other staff members making contributions:

David Sovanski - \$15.00

Charles McKean 25.00

Susanne Curtis 5.00

Kevin Kattelman 5.00

Patricia McGuigan 5.00

Previous Cont. \$2,387.80

Add-Up-date 83.45

Total contributions to date \$2,471.25

T-010 Rev 2/86 15M

93043503803

3-20-86

Ed:

Those highlighted in yellow have not, as yet, made a political contribution.

Loretta

93043503804

7 4 7

Suggested  
Effective  
Contributors

- Brombolich, Vickie . . . ~~115.42~~ \$50.00 Paid  
SSN 328-44-5291
- Burford, Charles . . . \$26.90 - Paid  
SSN 323-28-2525
- ~~Casey, John . . . ~~267.00~~ Resigned  
SSN 358-32-7187~~
- Crull, Margie . . . \$28.29 - Paid  
SSN 358-48-2237
- DeShong, Doug . . . \$36.86 - Paid  
SSN 049-44-6367
- Downs, Kenneth . . . \$68.91 . . .  
SSN 332-40-9772
- Dunham, Judy . . . \$45.15 - Paid  
SSN 321-42-9841
- Hatton, Kathy . . . ~~31.25~~ \$35.00 Paid  
SSN 325-54-6754
- Haynes, Richard . . . ~~61.00~~ - \$70.00 Paid  
SSN 495-50-0935
- Howes, Charles . . . \$71.31  
SSN 496-50-1692
- Kelley, Mike . . . \$63.45 - Paid  
SSN 336-50-8305
- Lewis, Linda . . . ~~47.24~~ - \$48.00 Paid  
SSN 338-38-1883
- Lewis, Paul . . . \$90.54 - Paid  
SSN 493-42-6640
- Loftus, Robin . . . \$43.90 - Paid  
SSN 282-56-0165
- Martin, Scott . . . ~~57.66~~ - \$34.00 Paid  
SSN 319-46-1975
- Morris, Edward L. . . \$108.33 - Paid  
SSN 337-36-1763
- New, Jimmie W. . . ~~171.24~~ - \$200.00 Paid  
SSN 499-48-2328
- Orr, Denise . . . \$28.05 - Paid  
SSN 341-48-4726
- Osborn, David . . . \$35.74 - Paid  
SSN 324-40-2391

93043503805

- Osborn, W. . . . \$176.28 Paid  
SSN 348-16-9539
- Pollaci, John . . . \$120.19 - Paid  
SSN 329-28-3721
- Pope, Paul . . . \$61.30 - Paid  
SSN 349-12-8547
- Raymond, MaryEllen . . . \$35.48 . . .  
SSN 336-50-8197
- Roberts, Robert . . . ~~70.91~~ - \$100.00 Paid  
SSN 429-88-2633
- Scanlan, Bernie . . . \$57.21 - Paid  
SSN 325-18-4463
- Schlecht, John . . . \$455 - Paid 4-8-86  
SSN 357-28-8101
- Schwartz, Stephen . . . \$60.58 Paid 4-8-86  
SSN 514-54-3200
- Shrout, Sandra . . . \$36.42 - Paid  
SSN 319-34-3523
- Stalcup, Kathy . . . \$36.28 - Paid  
SSN 347-44-9872
- Stankus, Donald . . . \$57.21 - Paid  
SSN 329-32-2004
- Stroh, Brenda . . . \$28.45 Paid  
SSN 360-52-9610
- Swartz, Lawrence . . . \$60.30 - Paid  
SSN 348-44-0023
- Tarpey, Cheryl . . . \$27.66 - Paid  
SSN 493-46-0738
- Valesano, Debbie . . . \$46.23 - Paid  
SSN 336-46-9930
- Vanata, Ron . . . \$89.74 - Paid  
SSN 334-28-0365
- Walters, Charles . . . \$67.63 - Paid  
SSN 352-20-8955
- Wathen, Timothy . . . ~~64.00~~ \$65.00 Paid 6/6/86  
SSN 317-58-3392
- Wickenhauser, Jan . . . \$52.89 - Paid  
SSN 347-44-9934
- Yeske, Paul . . . \$43.71 - Paid  
SSN 332-40-5097

\$2500.24

1986

39

93043503806

TO: William Osborn  
 FROM: Edward Morris  
 SUBJECT: Political Contributions  
 DATE: March 3, 1986

Once again this year, we need the cooperation of our officers to support the political committees of the various savings and loan leagues, as well as state and local politicians. Information regarding the key political committees is attached for your review. Also attached is a report of political contributions we made during 1985.

If you would make a minimum contribution in the amount of \$ 176.28, we can reach our goal this year of \$5,000. (You may be entitled to claim a portion of your contribution as a tax credit up to \$50 on an individual return, or up to \$100 on a joint return.) By being a "super leader", you can help the industry, Germania and yourself by supporting legislation that supports the savings and loan industry.

Please make your check payable to Edward L. Morris and return to Brenda Boone by March 20, 1986. Thank you for your cooperation and support.

W. G. OSBORN 2405

*Feb 3, 1986* 70-7070/2810

PAY TO THE ORDER OF *Thrift PAL* \$ *125.00*

*One hundred twenty five and 00/100* DOLLARS

  
 343 E. Broadway • Aton, IL 62002

MEMO *portion of Contrib Germania FA* *W Osborn*

⑆ 28 10 70 70 71 ⑆ 103 0050 4 ⑆ 2405 ⑆ 00000 12500 ⑆

W. G. OSBORN 2465

*Mar 10, 1986* 70-7070/2810

PAY TO THE ORDER OF *Edward L. Morris* \$ *51.28*

*Fifty one and 28/100* DOLLARS

  
 343 E. Broadway • Aton, IL 62002

MEMO *Political Contrib in add. to 2/25/86* *W Osborn*

*prior payment to National Savings*

⑆ 28 10 70 70 71 ⑆ 103 0050 4 ⑆ 2465



ALTON • ALTON SQUARE • BELLEVILLE • DUPO • MT VERNON • O'FALLON • SPRINGFIELD

CHECKING ACCOUNT DEPOSIT RECEIPT

DATE	AMOUNT	BALANCE
ACCT-NBR 10-0010303445		
3-14-86	218.33	1.482.92 072



\* THANK YOU \* \*

ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.



93043503807





GERMANIA

ALTON • ALTON SQUARE • BELLEVILLE • DUPO • MT. VERNON • O'FALLON • SPRINGFIELD

CHECKING ACCOUNT DEPOSIT RECEIPT

DATE	ACCT-NBR	AMOUNT	BALANCE
3-10-86	10-0010301112	140.64	.00 003

*Trans.*



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.

GERMANIA

ALTON • ALTON SQUARE • BELLEVILLE • DUPO • MT. VERNON • O'FALLON • SPRINGFIELD

CHECKING ACCOUNT DEPOSIT RECEIPT

DATE	ACCT-NBR	AMOUNT	BALANCE
3-10-86	10-0010303445	992.19	992.19 003

*+ Deposit =*



\*\* THANK YOU \*\*



ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.

93043503810



ALTON . ALTON SQUARE . BELLEVILLE . DUPO . MT. VERNON . O'FALLON . SPRINGFIELD

### CHECKING ACCOUNT DEPOSIT RECEIPT

<b>DATE</b>	<b>AMOUNT</b>	<b>BALANCE</b>
ACCT-NBR 10-0010303445	920.52	2 403 44 075
3-20-86		



**\*\* THANK YOU \***

ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR N.O.W. ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF



9 3 0 4 3 5 0 3 8 1 1

Executive

93043503812

Brombolich, Vickie . . . \$ 43.47  
 SSN 328-44-5291

Burford, Charles . . . \$ 20.70  
 SSN 323-28-2525

Casey, John . . . \$ 63.06  
 SSN 353-32-7487

Crull, Margie . . . \$ 28.29  
 SSN 358-48-2237

DeShong, Doug . . . \$ 36.86  
 SSN 049-44-6367

Downs, Kenneth . . . \$ 68.91  
 SSN 332-40-9772

Dunham, Judy . . . \$ 45.15  
 SSN 321-42-9841

Hatton, Kathy . . . \$ 31.25  
 SSN 325-54-6754

Haynes, Richard . . . \$ 64.10  
 SSN 495-50-0935

Howes, Charles . . . \$ 71.31  
 SSN 496-50-1692

Kelley, Mike . . . \$ 62.45  
 SSN 336-50-8305

Lewis, Linda . . . \$ 47.34  
 SSN 338-38-1883

Lewis, Paul . . . \$ 90.54  
 SSN 493-42-6640

Loftus, Robin . . . \$ 43.90  
 SSN 282-56-0165

Martin, Scott . . . \$ 33.66  
 SSN 319-46-1975

Morris, Edward L. . . \$ 208.33  
 SSN 337-36-1763

New, Jimmie W. . . \$ 152.24  
 SSN 499-48-2328

Orr, Denise . . . \$ 28.05  
 SSN 341-48-4726

Osborn, David . . . \$ 35.74  
 SSN 324-40-2391

Osborn, William . . . \$ 176.28  
 SSN 48-16-9539

Pollaci, John . . . \$ 120.19  
 SSN 329-28-3721

Pope, Paul . . . \$ 61.30  
 SSN 349-12-8547

Raymond, MaryEllen . . . \$ 35.48  
 SSN 336-50-5197

Roberts, Robert . . . \$ 90.94  
 SSN 429-88-2633

Scanlan, Bernie . . . \$ 57.21  
 SSN 325-18-4463

Schlecht, John . . . \$ 64.55  
 SSN 357-28-6101

Schwartz, Stephen . . . \$ 60.58  
 SSN 514-54-3253

Shrout, Sandra . . . \$ 36.42  
 SSN 319-34-3523

Stalcup, Kathy . . . \$ 36.28  
 SSN 347-44-9872

Stankus, Donald . . . \$ 57.71  
 SSN 329-32-2004

Stroh, Brenda . . . \$ 28.45  
 SSN 360-52-9610

Swartz, Lawrence . . . \$ 60.30  
 SSN 348-44-0023

Tarpey, Cheryl . . . \$ 37.66  
 SSN 493-46-0738

Valesano, Debbie . . . \$ 46.23  
 SSN 336-46-9930

Vanata, Ron . . . \$ 89.74  
 SSN 334-28-0365

Walters, Charles . . . \$ 67.63  
 SSN 352-20-8955

Wathen, Timothy . . . \$ 64.10  
 SSN 317-58-3392

Wickenhauser, Jan . . . \$ 52.89  
 SSN 347-44-9934

Yeske, Paul . . . \$ 43.70  
 SSN 332-40-5097

\$ 2500.24

06169

99

93043503813

0032  
32% of  
SALARY.

86.93+  
121.79+  
126.11+  
56.58+  
73.72+  
137.82+  
90.30+  
62.50+  
128.20+  
142.62+  
126.89+  
94.68+  
181.08+  
87.80+  
67.31+  
416.65+  
56.09+  
71.47+  
304.48+  
352.55+  
240.38+  
122.59+  
70.96+  
181.88+  
114.42+  
129.10+  
121.15+  
72.83+  
72.55+  
106.41+  
56.89+  
120.59+  
75.32+  
93.46+  
179.48+  
135.25+  
128.20+  
105.77+  
87.50+  
5,000.30\*

O f  
E f f e c t i v e f o r p

Brombolich, Vickie . . . . . 96.93  
 SSN 328-44-5291

Burford, Charles . . . . . 121.79  
 SSN 323-28-2525

Casey, John . . . . . 126.11  
 SSN 353-32-7487

Crull, Margie . . . . . 56.58  
 SSN 358-48-2237

DeShong, Doug . . . . . 73.72  
 SSN 049-44-6367

Downs, Kenneth . . . . . 137.82  
 SSN 332-40-9772

Dunham, Judy . . . . . 90.30  
 SSN 321-42-9841

Hatton, Kathy . . . . . 62.50  
 SSN 325-54-6754

Haynes, Richard . . . . . 128.20  
 SSN 495-50-0935

Howes, Charles . . . . . 142.62  
 SSN 496-50-1692

Kelley, Mike . . . . . 126.39  
 SSN 336-50-8305

Lewis, Linda . . . . . 94.68  
 SSN 338-38-1883

Lewis, Paul . . . . . 131.68  
 SSN 493-42-6640

Loftus, Robin . . . . . 87.80  
 SSN 282-56-0165

Martin, Scott . . . . . 67.31  
 SSN 319-46-1975

Morris, Edward L. . . . . 416.65  
 SSN 337-36-1763

Orr, Denise . . . . . 56.09  
 SSN 341-48-4726

Osborn, David . . . . . 71.47  
 SSN 324-40-2391

NEW, JIM

304.48

Osborn, William . . . . . 352.55  
 SSN 348-16-9539

Pollaci, John . . . . . 240.38  
 SSN 329-28-3721

Pope, Paul . . . . . 122.59  
 SSN 349-12-8547

Raymond, MaryEllen . . . . . 76.96  
 SSN 336-50-5197

Roberts, Robert . . . . . 81.88  
 SSN 429-88-2633

Scanlan, Bernie . . . . . 114.42  
 SSN 325-18-4463

Schlecht, John . . . . . 129.10  
 SSN 357-28-6101

Schwartz, Stephen . . . . . 121.15  
 SSN 514-54-3253

Shrout, Sandra . . . . . 72.83  
 SSN 319-34-3523

Stalcup, Kathy . . . . . 72.55  
 SSN 347-44-9872

Stankus, Donald . . . . . 106.41  
 SSN 329-32-2004

Stroh, Brenda . . . . . 56.87  
 SSN 360-52-9610

Swartz, Lawrence . . . . . 120.59  
 SSN 348-44-0023

Tarpey, Cheryl . . . . . 75.32  
 SSN 493-46-0738

Valesano, Debbie . . . . . 93.46  
 SSN 336-46-9930

Vanata, Ron . . . . . 179.48  
 SSN 334-28-0365

Walters, Charles . . . . . 135.25  
 SSN 352-20-8955

Wathen, Timothy . . . . . 128.20  
 SSN 317-58-3392

Wickenhauser, Jan . . . . . 105.77  
 SSN 347-44-9934

Yeske, Paul . . . . . 87.50  
 SSN 332-40-5097

TOTAL 5,900.30

9 3 0 4 3 5 0 3 8 1 4



ALTON - ALTON SQUARE - BELLEVILLE - DUPO - MT. VERNON - OFALLON - SPRINGFIELD

### CHECKING ACCOUNT DEPOSIT RECEIPT

DATE	AMOUNT	BALANCE
ACCT-NBR 10-0010303445		
3-24-86	83.45	2,486.89 005



\*\* THANK YOU \*\*

ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR NOW ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.



93043503815



DIRECT INQUIRIES TO: BOOKKEEPING DEPARTMENT  
 543 EAST BROADWAY  
 ALTON, ILL. 62002  
 618/465/5543

WM G OSBORN DR  
 DAVID C KILDUFF  
 543 E BROADWAY  
 ALTON IL 62002

STATEMENT DATE: 03/03/86 3  
 ACCOUNT NUMBER: 10301112  
 SOC. SEC. NO: 348-16-9539

\*\*\*\*\* N.O.W. CHECKING ACCOUNT \*\*\*\*\*

NON-CHECK TRANSACTIONS

DATE	AMOUNT	DESCRIPTION
03/03	.57	INTEREST PAID

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
03/03	140.64				

ACCOUNT SUMMARY

DATE	PREVIOUS STATEMENT BALANCE	+	DEPOSITS	+	INTEREST PAID	-	WITHDRAWALS	-	SERVICE CHARGE	=	ENDING BALANCE
02/03/86	140.07		.00		.57		.00		.00		140.64

AVERAGE BALANCE: 140.07      MINIMUM BALANCE: 140.07

9  
3  
0  
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DIRECT INQUIRIES TO:

BOOKKEEPING DEPARTMENT  
543 EAST BROADWAY  
ALTON, ILL 62002  
618/465/5543

Mr. C. JOSEPH JR.  
DAVID C. KILBOFF  
543 E. BROADWAY  
ALTON, ILL 62002

STATEMENT DATE: 02/03/86 3  
ACCOUNT NUMBER: 10301112  
SOC. SEC. NO: 348-16-9539

\*\*\*\*\* N.O.W. CHECKING ACCOUNT \*\*\*\*\*

NON-CHECK TRANSACTIONS		DESCRIPTION
DATE	AMOUNT	
02/03	.62	INTEREST PAID

DAILY BALANCE SUMMARY		DATE	BALANCE	DATE	BALANCE
02/03	140.07				

ACCOUNT SUMMARY		INTEREST			SERVICE	ENDING	
PREVIOUS STATEMENT	DATE	BALANCE	+ DEPOSITS	+ PAID	- WITHDRAWALS	- SERVICE CHARGE	= BALANCE
02/03/86	139.45	.00	.62	.00	.00		140.07

AVERAGE BALANCE: 139.45      MINIMUM BALANCE: 139.45

9304350





DIRECT INQUIRIES TO: BOOKKEEPING DEPARTMENT,  
543 EAST BROADWAY  
ALTON, ILL. 62002  
618/465/5543

WM G OSBORN OR  
DAVID C KILDUFF  
543 E BROADWAY  
ALTON IL 62002

STATEMENT DATE: 01/03/86 3  
ACCOUNT NUMBER: 10301112  
SOC. SEC. NO: 348-16-9539

\*\*\*\*\* N.O.W. CHECKING ACCOUNT \*\*\*\*\*

NON-CHECK TRANSACTIONS

DATE	AMOUNT	DESCRIPTION
01/03	.62	INTEREST PAID

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE
01/03	139.45		

ACCOUNT SUMMARY

PREVIOUS STATEMENT DATE	BALANCE	+ DEPOSITS	INTEREST + PAID	- WITHDRAWALS	SERVICE - CHARGE	= ENDING BALANCE
12/03/85	138.83	.00	.62	.00	.00	139.45

AVERAGE BALANCE: 138.83      MINIMUM BALANCE: 138.83

\*\*\* TOTAL INTEREST EARNED FOR THE YEAR 1985 WAS 13.24  
THIS STATEMENT IS IN LIEU OF A FORM 1099

930435

01/03/86



WM. G. OSBORN  
DAVID C. KILDUFF  
543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

*close-out*  
*[Signature]*

149

March 10, 19 86

70-7070  
2619

PAY TO THE ORDER OF Germania, F.A.

\$ 140.64

One Hundred Forty and 64/100----- DOLLARS



GERMANIA FEDERAL  
SAVINGS AND LOAN ASSOCIATION  
543 E. BROADWAY, ALTON, ILLINOIS 62002

MEMO

*10363445 PK*

*Wm G Osborn*

⑆ 28 1970700⑆ 103 0111 2⑈ 0149

93043503822

FOR DEPOSIT ONLY—P.E.G.

**GERMANIA, F. A.**

2 810 70707

MAR 12 1986

ALTON BROADWAY OFFICE

543 E. BROADWAY

ALTON, IL. 62002

9 3 0 4 3 5 0 3 8 2 3



DIRECT INQUIRIES TO: BOOKKEEPING DEPARTMENT  
 543 EAST BROADWAY  
 ALTON, ILL 62002  
 618/465/5543

1  
 WM J OSBORN JR  
 DAVID C KILDUFF  
 543 E BROADWAY  
 ALTON IL 62002

STATEMENT DATE: 04/03/86 3  
 ACCOUNT NUMBER: 10301112  
 SOC. SEC. NO: 348-16-9539

\*\*\*\*\* N.O.W. CHECKING ACCOUNT \*\*\*\*\*

CHECKS IN ORDER (READ ACROSS)

DATE	NUMBER	AMOUNT	DATE	NUMBER	AMOUNT
03/10	149	140.64			

DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
03/10	.00				

ACCOUNT SUMMARY

PREVIOUS STATEMENT	DATE	BALANCE	+	DEPOSITS	INTEREST	+ PAID	-	WITHDRAWALS	-	SERVICE CHARGE	=	ENDING BALANCE
03/03/86		140.64		.00	.00			140.64		.00		.00

AVERAGE BALANCE: .00      MINIMUM BALANCE: 140.64

\*\*\*\*\*  
 \* THERE IS STILL TIME TO COMPLETE YOUR IRA CONTRIBUTION FOR 1985 OR \*  
 \* GET AN EARLY START ON 1986 IRA CONTRIBUTIONS. GERMANIA OFFERS A \*  
 \* WIDE VARIETY OF IRA PLANS. PLEASE CALL OR STOP BY AND TALK TO \*  
 \* ONE OF OUR FRIENDLY FINANCIAL COUNSELORS FOR DETAILS. \*  
 \*\*\*\*\*

93043503824



POLITICAL CONTRIBUTIONS

SUMMARY

1985

93043503826

RECEIPTS

DISBURSEMENTS

RECEIPTS	DISBURSEMENTS
Balance on Hand, 1/1/85 \$ 113.15	2-21-85 Mayor Lenz Campaign Fund \$ 100.00
Interest, 1-3-85 .50	3-1-85 Committee to Re-elect Mayor Mackey (O'Fallon Mayor) 25.00
Interest, 2-1-85 .48	4-22-85 Wuellner Campaign Committee 100.00
Contributions - 2/27/85 76.51	5-17-85 THRIFTPAC 250.00
Interest, 3-1-85 .49	→ National Council of Savings Institutions
Contributions, 3-4-85 151.76	5-20-85 ISLPEC 100.00
Contributions, 3-5-85 33.33	Illinois Savings & Loan Political Education Committee
Contributions, 3-7-85 86.84	5-20-85 SAPEC 100.00
Contributions, 3-14-85 66.85	U.S. League -Savings Associations Political Education Committee
Contributions, 3-21-85 95.70	5-20-85 Houston For Mayor Committee 100.00 (Springfield)
Contributions, 3-26-85 83.69	
Interest, 4-3-85 2.09	
Contributions, 4-10-85 159.57	
Contributions, 4-11-85 4.20	
Contributions, 4-22-85 28.99	
Interest, 5-3-85 3.08	
Interest, 6-3-85 2.70	
Interest, 7-3-85 .87	
Interest, 8-2-85 .59	
Interest, 9-3-85 .63	
Interest, 10-3-85 .59	
Interest, 11-1-85 .58	
Interest, 12-3-85 .64	

\$ 775.00

\$ 913.83

*Handwritten notes:*  
 1/21/85  
 1/22/85  
 1/23/85



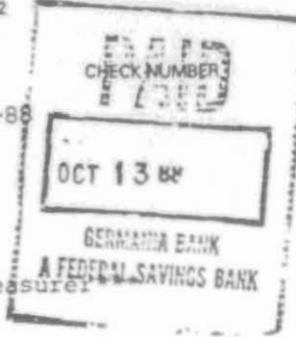
GERMANIA  
FINANCIAL  
CORPORATION

501 E. BROADWAY ALTON, IL 62002

9191

70-7070/2810

DATE  
9-27-88



PAY EXACTLY  
\$100.00

PAY \*\*\*One Hundred Dollars and 00/100\*\*\*

TO  
THE  
ORDER  
OF

\*\*\*The Committee for Jerry Cosentino For Treasurer

LCW



⑈00919⑈ ⑆281070707⑆ 00131 0104 1⑈

*[Signature]*  
⑈0000010000⑈

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PAY TO THE ORDER OF  
THE METROPOLITAN NATIONAL BANK  
OF CHICAGO  
CHICAGO, IL 60610  
⑈071001200⑆ 04990  
FOR DEPOSIT ONLY  
CITIZENS COMMITTEE  
FOR JERRY COSENTINO  
⑈100850551⑈

07 88 13  
091000258

11/11/88  
11/11/88  
11/11/88  
11/11/88  
11/11/88  
11/11/88  
11/11/88  
11/11/88

Germania Mortgage Corporation

11442407

014235

70-7070/2810

*h*

DATE 1/27/88 CHECK NUMBER 014235 PAY EXACTLY \$ 250.00

1/27/88 014235 \*\*\*\*\*250.00

PAY EXACTLY \*\*\*\*\*250.00 DOLLARS AND 00 CENTS

PAY

TO THE ORDER OF

03405 THE COMMITTEE

A FEDERAL SAVINGS BANK

*250.00*

GERMANIA BANK A FEDERAL SAVINGS BANK

⑆014235⑆ ⑆281070707⑆ 00131 0104 1⑆ ⑆0000025000⑆

93043503829

11-07-88071100224

▷2810-70707-4  
GERMANIA BANK, A.F.S.B.  
NOV 08 1988  
643 E. LINCOLN, ALTON, IL 62002  
AT SPRINGFIELD REG. OFFICE

*For Deposit Only  
To the Committee*

Memo #87-41

TO: Brent Waxman  
FROM: Ed Morris   
DATE: June 16, 1987  
SUBJECT: Political Action Committee

Would you please review our procedures for political action committees? My reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations. Please determine whether or not we are following the guidelines and, if not, what procedures must be implemented for our committee to operate legally.

93043503030

ELM/slg  
cc: Jim New

## ¶ 10,373

## #T 67-5c AMENDMENTS TO REGULATION D RESERVE REQUIREMENTS

[Editor's Note: FHLBB Memoranda #T 67-3 and #T 67-4 have been incorporated into the following memorandum.]

February 3, 1986

[EDITOR'S NOTE: The purpose of this memorandum is to describe the change in the amount of transaction accounts subject to a three percent reserve requirement from \$29.8 million to \$31.7 million recently implemented by the Federal Reserve Board. The Monetary Control Act requires an annual increase in the amount of transaction accounts subject to a three percent reserve requirement to reflect the increase of total net transaction accounts from June 30, 1984 to June 30, 1985.

A second change also was made by the Federal Reserve Board to adjust the amount exempt from reserve requirements. Growth in total reservable liabilities was 9.1 percent from June 30, 1984 to June 30, 1985, requiring an increase in the reserve requirement exemption from \$2.4 million to \$2.6 million.

The above adjustments take effect for all depository institutions with the reserve maintenance period beginning January 2, 1986. Memorandum #T 67-5b is hereby rescinded.]

**Modification of reserve requirements.** The FRB regulation provides that nonpersonal time deposits with original maturities of one and one-half years or more will be subject to a reserve requirement ratio of zero percent. Nonpersonal time deposits with original maturities of less than one and one-half years will continue to be subject to a three percent reserve requirement ratio.

The Reserve Requirement Ratios required by 204.9(a)(1) of Regulation D which are to be used by all depository institutions are as follows:

Category	Reserve requirement
Net transaction accounts	
\$0-\$31.7 million . . . . .	3% of amount
Over \$31.7 million . . . . .	\$951,000 plus 12% of amount over \$31.7 million
Nonpersonal time deposits	
By original maturity (or notice period):	
less than 1½ years . . . . .	3%
1½ years or more . . . . .	0%
Eurocurrency liabilities . . . . .	3%

**Exemption from reserve requirements.** Each depository institution, Edge or Agreement Corporation, and U.S. branch or agency of a foreign bank is subject to a zero percent reserve requirement on \$2.6 million of its transaction accounts subject to the low reserve tranche (\$31.7 million). Section 204.3(a)(3) outlines the method for allocations of exemptions from reserve requirements.

March, 1985

## ¶ 10,380

## #T 68 PROHIBITIONS ON POLITICAL CONTRIBUTIONS OR EXPENDITURES BY SAVINGS ASSOCIATIONS

June 8, 1981

1. **Federally-chartered associations.** The Office of Examinations and Supervision, after consultation with legal staff of the Federal Election Commission, has prepared this Memorandum to describe and to emphasize the prohibitions on contributions or expenditures by federal savings and loans in connection with any election to any political office or in connection with any primary election or political convention or caucus held to select candidates for public office. These prohibitions of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. Section 441b, apply to federal, state and local elections. A "contribution or expenditure", within the meaning of the Act, includes:

"any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value (except a loan of money by a national or state bank made in accordance with the applicable laws and regulations and in the ordinary course of business) to any candidate, campaign committee, or political party or organization in connection with any election . . ." (2 U.S.C. Section 441b(b)(2)(1976)).

The statute also makes it unlawful for any officer or director of a federal savings and loan association to consent to any contribution or expenditure (2 U.S.C. Section 441b(a) (1976)). The exception to when a loan of money, by a federally chartered depository institution, or a depository institution the deposits or accounts of which are insured by the Federal Savings and Loan Insurance Corporation, is not a contribution is found in 2 U.S.C. 431(8)(B)(vii).

**POLITICAL ADVERTISING.** The Federal Election Commission has advised that prohibitions of the Act extend to all forms of political advertising by federal savings and loans including, but not limited to, the purchase of political dinner tickets and advertisements in political literature such as political party newsletters and political party convention programs.

**BONA FIDE LOANS.** The term "contribution or expenditure" does not include a bona fide loan of money by a federal savings and loan made in accordance with applicable laws and regulations in the ordinary course of business. The current regulations on loans by a federal savings and loan under the Federal Election Campaign Act are 11 CFR 114.1(a) and 100.7(b)(ii). Associations involved in making these loans should be advised to review carefully these sections to ensure compliance.

**POLITICAL ACTION COMMITTEES.** Federal savings and loans are not permitted to make contributions to a separate segregated fund (frequently referred to as Political Action Committees) to be used for political purposes. However, the prohibitions do not apply to the payment by a federal savings and loan of expenses incurred for the establishment, administration, and solicitation of contributions to a fund of that same federal savings and loan. (2 U.S.C. Section 441b(b)(2)(C) and 11 CFR 114.1(a)(2)(iii) and 114.1(b).

#T 67-5c ¶ 10,373

93043503831

**ENFORCEMENT OF THE ACT.** The Act gives the Federal Election Commission exclusive jurisdiction with respect to civil enforcement of its provisions. (2 U.S.C. Section 437c(b)(1) (1980)). The Federal Election Commission is empowered to seek civil penalties of up to \$5,000 or the amount of the violation, whichever is greater, or if the violation is knowing and willful, up to \$10,000 or double the amount of the violation, whichever is greater. If there is probable cause to believe that a violation is knowing and willful, the Federal Election Commission may refer the cases to the United States Attorney General for criminal prosecution (2 U.S.C. Section 437g(a)(5)(C) (1980)). Examiners who discover a political contribution or expenditure by an insured institution, should report this fact in the comment section of the examination report for consideration of a referral to the Federal Election Commission, and the Bank Board may also require the insured institution to demand reimbursement from the recipient of any illegal contribution or expenditure. If the Supervisory Agent determines that reimbursement is in order, the Agent's recommendation should be sent to the Regional Director.

**ADVISORY OPINIONS.** In an opinion dated October 20, 1980, the Office of General Counsel, of the Federal Home Loan Bank Board, stated that "The Commission has exclusive jurisdiction with respect to civil enforcement of the Act. (2 U.S.C. Section 437c(b)(1) (1980)). As such, the Commission has issued comprehensive implementing regulations, 11 C.F.R. Section 100.1 *et seq.* (1980), which apply to federal savings and loan associations. While violations of the Act and regulations may involve both civil and criminal penalties, the Commission has authority to issue advisory opinions with respect to their interpretation and application (*id.* Part 112 (1980)). Section 112.5 of these regulations provides that anyone who relies upon an advisory opinion issued by the Commission and 'who acts in good faith in accordance with . . . (such) opinion' shall not be subject to any sanction provided by the Act. Hence, while this Office may express an opinion with respect to the legality of an association's particular activity, such an opinion would not be binding upon the Commission, and would not relieve the association from whatever liability that might result should the opinion prove to be wrong."

Thus, if association management inquires regarding the application of the Act, the Supervisory Agent or the examiner should advise the association that requests for advisory opinions may be submitted in writing concerning application of the Act, chapter 95 or chapter 96 of the Internal Revenue Code of 1954, or a rule or regulation prescribed by

the Commission to a specific transaction or activity in which the requestor is involved or is acting as agent for a party involved. (2 U.S.C. Section 437f). All requests for advisory opinions should be directed to:

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

The Federal Election Commission provides a telephone information service which can be reached via its toll-free number—800/424-9530.

**2. State-chartered associations.** While the comments set forth above apply to federally-chartered associations in federal, state, and local elections, the same restrictions apply to state-chartered associations only with respect to federal elections. (2 U.S.C. 441b(a) (1976)). Since neither the Bank Board nor the Federal Savings and Loan Insurance Corporation has adopted any regulation relating to the political activities of state-chartered associations in connection with state and local elections, these subjects are governed solely by the laws of their chartering states.

#### ¶ 10,381

#### #T 68-1 POLITICAL CONTRIBUTIONS BY SUBSIDIARIES OF FEDERAL ASSOCIATIONS

November 23, 1981

On March 4, 1980, the Federal Election Commission issued opinion number AO 1980-7 for a federal savings and loan association and its wholly owned subsidiary service corporation. [Text of the advisory opinion follows this memorandum.] The opinion stated, "Although 2 U.S.C. Section 441b prohibits a federally chartered corporation from making contributions or expenditures in connection with an election for any political office, there is no language in the statute indicating that the prohibition extends to subsidiary corporations which are not themselves federally chartered corporations." The opinion further stated that the service corporation would not be subject to the prohibition governing federally chartered corporations unless the parent and subsidiary corporation are one entity. Under section 112.5(a)(2) of the Federal Election Commission's current regulations, "any person involved in a specific transaction or activity which is indistinguishable in all its material respects from the transaction or activity with respect to which such advisory opinion is rendered" may rely on this advisory opinion. Accordingly, if a service corporation is a distinct legal entity apart from its parent, has a legitimate business function, does not exist solely for the

[The next page is 3070.1.]

93043503832

purpose of making political contributions, and is not materially different with respect to its transactions or activities from the criteria used in the Federal Election Commission's opinion, then the service corporation may make such contributions.

One important limitation set forth in the opinion is that the service corporation must not be acting as "an agent, instrumentality, or alter ego" of its parent federal association. If savings and loans request guidance in determining if the service corporation is a distinct legal entity, Supervisory Agents may refer them to a legal treatise entitled *18 American Jurisprudence 2d, Corporations Section 17*.

Examiners should check associations' procedures and actions and comment on any improper contributions in the examination report. The supervisory agent should then take appropriate action. In addition, since federal law prohibits any corporation from making political contributions to federal candidates, service corporations may only contribute to candidates for state and local office.

**Advisory opinion 1980-7**

Mr. Michael Roster  
McKenna & Fitting  
3435 Wilshire Boulevard  
Los Angeles, California 90010

Dear Mr. Roster:

This responds to your letter of January 16, 1980, requesting an advisory opinion on behalf of your clients the California Savings and Loan League,

Central Federal Savings and Loan Association ("Central Federal"), and Central Capital Corporation ("Central Capital") regarding application of the Federal Election Campaign Act of 1971, as amended (the "Act"), to a wholly owned subsidiary of a federally chartered association.

According to your request, Central Federal is a federally chartered association organized and operating under Federal law. Central Capital is a state-chartered corporation. It is a wholly owned subsidiary of Central Federal. You state that state-chartered corporations, including state-chartered banks and savings and loan associations, are permitted under California law to make contributions to candidates for State and local political office. You also acknowledge that pursuant to 2 U.S.C. § 441b, a corporation organized by authority of any law of Congress, such as a federally chartered savings and loan association or a national bank, is prohibited from making contributions or expenditures in connection with any election for any political office, whether Federal, state, or local.

In light of 2 U.S.C. § 441b you ask two questions. First, does the prohibition of 2 U.S.C. § 441b regarding the inability of a federally chartered corporation, in this situation Central Federal, to make a contribution or expenditure in connection with any election for political office apply to a wholly or partially owned subsidiary of such corporation, such as Central Capital. Second, "is a holding company

[The next page is 3071.]

93043503833

which controls a Federal savings and loan association subject to the prohibitions of 2 U.S.C. § 441b regarding a federal corporation? Would a subsidiary of such a holding company be subject to such prohibitions?"

As previously mentioned, as a state-chartered corporation Central Capital is allowed under California law to make contributions to candidates for state and local political office. Although 2 U.S.C. § 441b prohibits a federally chartered corporation from making contributions or expenditures in connection with an election for any political office, there is no language in the statute indicating that the prohibition extends to subsidiary corporations which are not themselves federally chartered corporations.

Generally, a subsidiary corporation is considered a distinct legal entity, an entity in its own right, apart from its parent. However, where circumstances are such that one corporation is merely an agent, instrumentality, or alter ego of another corporation the notion of separate corporate existence of parent and subsidiary will not be recognized. See *18 Am. Jur. 2d, Corporations* § 17 for a discussion of parent and subsidiary corporations.

In view of the general rule regarding parent-subsidiary corporations, and the Act's failure to expressly extend the prohibitions on federally chartered corporations to their state chartered subsidiary corporations, the Commission concludes that absent circumstances which would result in characterizing Central Capital (the subsidiary state-chartered corporation) and Central Federal (the parent federally chartered corporation) as one entity, Central Capital would not be subject to the prohibition of § 441b governing federally chartered corporations. See the Commission's response to Advisory Opinion Request 1976-19, copy enclosed. Of course, Central Capital is still subject to the general prohibition in § 441b that applies to "any corporation whatever".

The Commission may not issue an opinion regarding your second question since it is not apparent that the question concerns a specific transaction or activity by the requesting parties.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. § 437f.

Sincerely yours,

[Signed] Robert O. Tiernan  
Chairman for the  
Federal Election Commission

¶ 10,382

# T 68-2 DONATIONS BY FEDERAL ASSOCIATIONS TO LOCAL POLITICAL CLUBS AFFILIATED WITH DEMOCRATIC AND REPUBLICAN PARTIES

December 16, 1981

On September 21, 1981, the Federal Election Commission issued Advisory Opinion 1981-33. This opinion was in response to a question regarding donations by federally chartered savings and loan associations to local political clubs affiliated with the

Democratic and Republican parties. The following information is taken from the opinion:

"Specifically, the donations requested include 'table favors', raffle prizes or journal ads that would be given to local political party clubs. The table favors include items such as key rings, sponges, pot holders and sewing kits, which cost (the association) approximately 15 to 25 cents each and contain (the association) logo. These items would be donated to the club for later distribution by the club at a specific club function. The raffle premiums or gifts would be given to the clubs for use in raffles held to raise funds for the clubs' treasuries. Usually only one item (such as a hairdryer or Corningware) per raffle function would be given, and the value would be approximately \$10 to \$20 per item. Journal ads costing (the association) \$25 to \$100 would be placed in club publications used for an anniversary party or political rally. The proceeds received from (the association) would be deposited in the club's general treasury. You state your belief that the funds raised by the clubs in the foregoing activities 'would not be channeled into federal campaigns, but mainly for local politics.' You ask whether (the association) is prohibited by the Act or Commission regulations from donating the described items and advertisements to local political party clubs in the circumstances set forth.

"It is the Commission's opinion that the donation of table favors, raffle premiums or journal ads by (the association) would constitute a contribution prohibited by the Act. Pursuant to 2 U.S.C. Section 441b(a), 'any corporation organized by authority of any law of Congress' is prohibited from making 'a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office.' Federal savings and loan associations, organized under the authority of a Federal statute, 12 U.S.C. Section 464(a)(1), are covered by this prohibition since they become corporations once they receive charters from the Federal Home Loan Bank Board. See 12 CFR 543 and 544.

"For purposes of 2 U.S.C. Section 441b the term 'contribution or expenditure' includes any 'direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value to any candidate, campaign committee, or political party or organization . . . ' 2 U.S.C. Section 441b(b)(2). Commission regulations similarly state that a contribution under Section 441b includes the gift of 'anything of value'. 11 CFR 114.1(a)(1). Items offered to a political organization by a Federal savings and loan association without charge or at less than the usual charge would thus be in-kind contributions. See 11 CFR 100.7(a)(1)(iii). Accordingly, the Commission concludes that the donation of the table favors to the clubs for their future distribution when they so desire would be contributions to the clubs within the meaning of 2 U.S.C. Section 441b(a). (The association is prohibited from making such donations under 2 U.S.C. Section 441b.)

"In regard to the raffle prizes and journal advertisements, the Commission similarly concludes that 2 U.S.C. Section 441b prohibits (the association) from donating raffle premiums to the political clubs or paying for ads in those club's journals. Both raffle

# T 68-2 ¶ 10,382

93043503834

Ted has <sup>we</sup>  
don't need  
tickets

Ed:

They are having the  
March Rally this night (3/22)  
from 6:30-9:30 at the Collisville  
Hilton. You had asked me to  
hold up on the attached pending  
the Rally. If we don't need tickets,  
I have to let Lynn at Mason's know.  
Pl. advise. E.

CHECK REQUEST

Date 2/19/88

Payable to Missourians for Gov. Ashcroft

Drawn on Germania Financial Corp.  
(bank)

For 2 tickets for announcement sale for 3/22/88.

Amount \$500.00

Requested by Sandy Gore

Approved by [Signature]

Acct. No.	Amt.
_____	_____
_____	_____
_____	_____
_____	_____

93043503835

Please return check to  
S. Gore for transmittal.

INTER-OFFICE MEMO

FROM Ed DATE \_\_\_\_\_  
TO \_\_\_\_\_ TIME \_\_\_\_\_  
SUBJECT \_\_\_\_\_

Brent said this was  
okay to come out  
of GPC.

Prepare  
an authorization  
for two  
tickets

XGEN-003

93043503836

FACT SHEET FOR ANNOUNCEMENT GALA  
FOR GOVERNOR JOHN ASHCROFT  
(As of January 19, 1988)

Event Chairman

Raymond F. Bentele

Dinner Co-Chairmen

Clarence C. Barksdale  
August A. Busch III  
George E. Capps  
Jay Henges  
Charles F. Knight

Richard J. Mahoney  
Joseph L. Mason  
Joseph O. Morrissey  
Donald Schnuck  
Harold E. Thayer

Date

Tuesday, March 22, 1988

Time

Private Reception begins at 6:30 p.m.  
General Reception begins at 6:45 p.m.  
Dinner begins at 7:30 p.m.

Place

Adam's Mark Hotel  
4th & Chestnut  
St. Louis, MO 63102  
314-241-7400

Private Reception will be in the Rose Garden Room.  
General Reception will be in the Foyer - St. Louis Room.  
Dinner will be in the St. Louis Ballroom.

Entertainment

Russ David and his orchestra will perform at the event.

Ticket Information

Private Reception and dinner - \$500 per person.  
General Reception and dinner - \$250 per person.  
Table - \$2,500 for 10 tickets.

Table assignments will be available at the General Reception after 6:30 p.m.

NOTE: All checks should be made payable to "Missourians for Governor Ashcroft" committee. Corporate, business, or personal checks are acceptable under Missouri election laws in any amount. Checks and ticket stubs should be mailed to: "Missourians for Governor Ashcroft," Attn: Alan Franklin, P. O. Box 1988, Jefferson City, MO 65102.

If you have any questions, you may contact Ray Bentele at 314-895-1116 or Alan Franklin at 314-635-1540.

314 20

93043503837



GOVERNOR

RECEIVED JUL 09 1987

Route To

- Morris
- Gardner
- New
- Homer
- Pollack
- Waxman
- Wickhsr
- \_\_\_\_\_

Return To Sandy Gora

John Ashcroft

July 7, 1987

*PAC Fee*

Edward Morris  
543 E. Broadway  
Alton, IL 62002

Dear Ed:

Thank you for your generous donation of \$500.00 for the Birthday Gala in St. Louis and in support of my political committee, the "Friends of Governor Ashcroft". I am grateful for your support.

Your decision to support this record breaking event is a vote of confidence in my policies and leadership and I want you to know I appreciate it.

I know why my Administration has been successful in passing important initiatives, making the tough decisions on state spending, and creating jobs. It's because I've had the support of people like you.

You see what needs to be done. You believe in what we are doing. And you get in and help do it.

We can't take anything for granted as we lay the groundwork for the 1988 elections.

Your support of the St. Louis Birthday Gala makes you a member of the "Friends of Governor Ashcroft".

As a member of the "Friends", you will receive our newsletter and members-only bulletins.

Again, thank you for your generous support and for your friendship.

Sincerely,

John Ashcroft

P.O. Box 1988, Jefferson City, Missouri 65102

93043503838

Sincerely - to go file etc. I am sure you will pass unless  
someone approaches us who we can't say no to.

RECEIVED JUL 24 1987



- Adams
- Gardner
- New
- Hornor
- Return to: \_\_\_\_\_

*SD*

"Strengthening the Housing Industry through Political Action"

July 22, 1987

Mr. Jim New  
Germania Federal  
543 E. Broadway  
Alton, IL 62002

*Please advise what I will  
be able to contribute  
was requested by  
person last year.  
Jim*

Dear Jim:

We hope you will again support the HBI-PAC Golf Tournament at Norwood Hills by sponsoring a green, tee, or hole, as you did last year. The event is attended by the top home builders' leadership and is important for supporting pro-building political candidates.

Last year you sponsored 1 hole for a contribution of \$500.

We wanted to give you first opportunity for sponsorship at our second tournament and preference for placement of your signs recognizing your support.

We hope you will continue your commitment to a first-class event. Your sponsorship entitles you to join us for dinner, drinks, prizes and festivities in the evening at Norwood Hills.

Please contact John Stephens at 994-7700 by July 29 to guarantee your preferential sponsorship.

We look forward to hearing from you.

*DF*

Dave Forrest, HBI-PAC  
Chairman

*GBV*

Gregory B. Vatterott, HBA  
President

*John L. Gutmann*

John L. Gutmann, HBA  
Executive Vice President

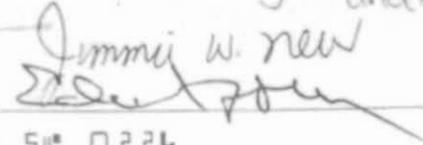
93043503839


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-485-5543  
 ALTON, IL 62002

224  
 10-12-88 70-7070/2810

Pay to the Order of Cash \$ 1949.27  
 One thousand nine hundred and forty ~~five~~ <sup>nine</sup> ~~Dollars~~ <sup>and 27/100</sup>

  
 343 E. Broadway • Alton, IL 62002

to close  
 Jimmie W. New  


⑆ 28 1070707 ⑆ 00 103 0344 5 ⑆ 0224

93043503840

93043503841

900 L. BROADWAY ALTON, N. CAROLINA  
AT CREDIT BANK

OCT 13 1988

GERMANIA BANK, A.F.S.B.  
▶2810-7070◀

*Sierra*  
*James W. New*





If a political contribution is wanted,  
prepare a check request for

Germanis Financial Corporation

Acct. # 2320-00610-0

93043503844  
Have an officer of GFA sign

(i.e., Ed Morris<sup>or</sup> Jim New preferably).  
(for controlling of funds.)

Keep track of balance

CLOSED ACCT. # 0010303445

10-12-88

ND CO P0	332
ID* C	2.13
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COO C	1,949.27-
#0047	

93043503845



543 E. BROADWAY • ALTON, IL. 62002

13- 936426030

10-12-88

PAY

\*\*\*\*\*1,949.27 CTS

TO  
THE  
ORDER  
OF

GERMANIA FINANCIAL CORPORATION

2320550130  
EDWARD MORRIS AND JIMMIE NEW

\*\*\*\*\*1,949.27

*[Handwritten Signature]*  
**NOT NEGOTIABLE**  
 CITICORP SERVICES INC.

93043503846

O-F  
Effective for

Prombolich, Vickie . . . . . 286.93  
 ESN 328-44-8291  
 Burford, Charles . . . . . 121.79  
 SSN 323-28-2525  
 Casey, John . . . . . 126.11  
 SSN 353-32-7487  
 Crull, Margie . . . . . 56.55  
 SSN 358-48-2237  
 DeShong, Doug . . . . . 73.72  
 SSN 049-44-6367  
 Downs, Kenneth . . . . . 137.82  
 SSN 332-40-9772  
 Dunham, Judy . . . . . 90.50  
 SSN 321-42-9841  
 Hatton, Kathy . . . . . 62.50  
 SSN 325-54-6754  
 Haynes, Richard . . . . . 123.20  
 SSN 495-50-0935  
 Howes, Charles . . . . . 142.62  
 SSN 496-50-1692  
 Kelley, Mike . . . . . 126.39  
 SSN 336-50-8305  
 Lewis, Linda . . . . . 94.68  
 SSN 338-38-1883  
 Lewis, Paul . . . . . 111.68  
 SSN 493-42-6640  
 Loftus, Robin . . . . . 87.10  
 SSN 282-56-0165  
 Martin, Scott . . . . . 67.31  
 SSN 319-46-1975  
 Morris, Edward L. . . . . 416.65  
 SSN 337-36-1763  
 Orr, Denise . . . . . 56.69  
 SSN 341-48-4726  
 Osborn, David . . . . . 71.47  
 SSN 324-40-2391

NEW, JIM

284.48

Osborn, William . . . . . 352.55  
 SSN 348-16-9539  
 Pollaci, John . . . . . 240.38  
 SSN 329-28-3721  
 Pope, Paul . . . . . 122.59  
 SSN 349-12-8547  
 Raymond, MaryEllen . . . . . 70.96  
 SSN 336-50-5197  
 Roberts, Robert . . . . . 111.88  
 SSN 429-88-2633  
 Scanlan, Bernie . . . . . 114.42  
 SSN 325-18-4463  
 Schlecht, John . . . . . 129.10  
 SSN 357-28-6101  
 Schwartz, Stephen . . . . . 121.15  
 SSN 514-54-3253  
 Shrout, Sandra . . . . . 72.53  
 SSN 319-34-3523  
 Stalcup, Kathy . . . . . 72.55  
 SSN 347-44-9872  
 Stankus, Donald . . . . . 106.41  
 SSN 329-32-2004  
 Stroh, Brenda . . . . . 56.89  
 SSN 360-52-9610  
 Swartz, Lawrence . . . . . 120.59  
 SSN 348-44-0023  
 Tarpey, Cheryl . . . . . 75.32  
 SSN 493-46-0738  
 Valesano, Debbie . . . . . 93.46  
 SSN 336-46-9930  
 Vanata, Ron . . . . . 179.48  
 SSN 334-28-0365  
 Walters, Charles . . . . . 135.25  
 SSN 352-20-8955  
 Wathen, Timothy . . . . . 128.20  
 SSN 317-58-3392  
 Wickenhauser, Jan . . . . . 105.77  
 SSN 347-44-9934  
 Yeske, Paul . . . . . 87.50  
 SSN 332-40-5097

TOTAL 5,000.30



March 6, 1986

Chairman's Memo #86-16

TO: Edward L. MORRIS

FROM: W. G. OSBORN

SUBJECT: POLITICAL CONTRIBUTIONS

Attached is an analysis of political contributions which were made from 1976 through 1985 with a proposed budget for 1986.

It is suggested that when there have been sufficient receipts to disburse fund requests that all requests be brought before the regular meeting of the Management Committee. Such requests should be brought by the individuals identified under the various categories: Corporate (Missouri and Illinois), Regional Branches (Alton, Belleville, Springfield, Mt. Vernon) and GFC (St. Louis).

93043503648





PRIVILEGED ATTORNEY-CLIENT MATERIAL

file  
PAC

Legal Memo #88-06

March 3, 1988

To: Edward L. Morris

From: Brent R. Waxman *BW*

Re: Federal Savings Institutions/  
Prohibitions on Political Contributions or Expenditures

The following memorandum details the relevant legal issues with regard to the propriety of political contributions or expenditures by federal savings institutions and their subsidiaries

The Federal Election Campaign Act of 1971

The Federal Election Campaign Act of 1971 (the "Act") prohibits political contributions or expenditures by federally chartered savings institutions. The Act makes it unlawful for any federal savings institution to make a contribution or expenditure in connection with any election to any political office or in connection with any primary election or political convention or caucus held to select candidates for public office. A "contribution or expenditure" within the meaning of the Act includes:

"any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value (except a loan of money by a national or state bank made in accordance with the applicable laws and regulations and in the ordinary course of business) to any candidate, campaign committee, or political party or organization in connection with any election..."

The Act also makes it unlawful for any officer or director of a federal savings institution to consent to any political contribution or expenditure.

The Act further prohibits a federal savings institution from making a contribution or expenditure to a separate segregated fund, frequently referred to as a Political Action Committee ("PAC"), to be used for political purposes. These prohibitions of the Act apply to federal, state and local elections.

93043503851

The Act gives the Federal Election Commission (the "FEC") exclusive jurisdiction with respect to civil enforcement of its provisions. The FEC may seek both civil penalties and injunctive relief against continuing or future violations of federal election law. Civil penalties usually may not exceed the greater of \$5,000 or an amount equal to the contribution or expenditure involved in the alleged violation. However, if the FEC establishes that the violation was knowing and willful, the court can impose a penalty up to the greater of \$10,000 or an amount that is twice the contribution or expenditure involved in the violation.

#### Political Action Committees

Although the Act prohibits a federal savings institution from making contributions or expenditures in connection with an election for any political office, a federal savings institution may lawfully sponsor a federal-level PAC with respect to federal elections, and may pay the establishment, administrative and solicitation costs of the PAC. For state and local elections, a federal savings institution is permitted to operate a state-level PAC if the PAC is operated in accordance with all of the requirements of both federal and state election law. The operation of a federal-level PAC is governed by the Act. The operation of a state-level PAC in Missouri and Illinois is governed by the Missouri Campaign Finance Disclosure Law of 1985 and the Illinois Campaign Disclosure Law of 1974, respectively.

The Act requires that a federal-level PAC register with the FEC within 10 days of its establishment and that the PAC appoint a treasurer for purposes of federal election law compliance. The treasurer of the PAC is responsible for the accurate and timely filing with the FEC of certain periodic disclosure reports and is also responsible that certain recordkeeping obligations are fulfilled.

A federal savings institution PAC must adopt a set of by-laws for PAC operations. Legal and financial audits of the PAC records must be conducted on a periodic basis. In order to insure that corporate goals are being realized, a written procedure must be established which sets forth the PAC's candidate selection process and the criteria to be weighed.

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A PAC is only permitted to solicit contributions from specified groups of individuals and is required to make certain disclosures in all of its solicitations. The key objective is to insure that every contribution to the PAC is voluntarily made without any element of coercion. A federal savings institution PAC may generally only solicit contributions from its executive and administrative personnel and its stockholders, as well as the immediate families of both groups. The term "executive and administrative personnel" means individuals who are paid on a salary rather than hourly basis and who have policy-making, managerial, professional or supervisory responsibilities.

While a federal savings institution PAC may only solicit certain groups of people for contributions, it may accept unsolicited gifts from others. A PAC may contribute up to \$5,000 per calendar year to another PAC. Cash contributions and anonymous contributions to a PAC are limited to \$100 and \$50, respectively.

In order to insure that all contributions are voluntary, a federal savings institution PAC is required to disclose on each of its solicitations that it participates in federal elections and that an employee has the right to refuse to contribute without any reprisal

If a federal savings institution PAC has been in existence for six months, has received contributions from more than fifty people, and has made donations to at least five federal candidates, it may contribute up to \$5,000 per election to a federal candidate. Otherwise, the PAC faces the same contribution limitations as an individual (e.g., \$1,000 per election per candidate).

The state election laws in Missouri and Illinois, which govern the operation of a state-level PAC, establish additional registration requirements and periodic disclosure and recordkeeping obligations.

#### Political Contributions by Subsidiaries

Although the Act prohibits a federal savings institution from making contributions or expenditures in connection with an election for any political office, there is no language in the Act indicating that the prohibition extends to subsidiary corporations which are not themselves federally chartered corporations. Accordingly, a state-chartered service corporation subsidiary of a federal savings institution may make political contributions and expenditures, if the service corporation is a distinct legal entity apart from its parent, has a legitimate business function and does not exist solely for the purpose of making political contributions. A service corporation may only contribute to candidates for state and local office, since federal law prohibits any corporation from making political contributions to federal candidates.

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Summary

- The Act makes it unlawful for Germania Bank, A Federal Savings Bank (the "Bank"), or for any officer or director of the Bank, to make a contribution or expenditure in connection with any election to any political office or in connection with any primary election or political convention or caucus held to select candidates for public office. The Act further prohibits the Bank from making a contribution or expenditure to a federal-level or state-level PAC to be used for political purposes. These prohibitions of the Act apply to federal, state and local elections.
- The Bank may, however, lawfully sponsor a federal-level PAC with respect to federal elections, and may lawfully pay the establishment, administrative and solicitation costs of the federal-level PAC. For state and local elections, the Bank is permitted to operate a state-level PAC if the PAC is operated in accordance with all of the other requirements of both federal and the Missouri and Illinois election laws. The federal and state election laws establish certain registration, disclosure and recordkeeping requirements.
- As a state-chartered service corporation subsidiary of a federal savings institution, Germania Financial Corporation may make contributions to candidates for state and local office.

BRW/mmr

cc: Steven M. Gardner  
Jimmie W. New

93043503854

PERSONNEL MEMO # 85-35

TO: Sandy Young  
FROM: Jan Wickenhauser  
SUBJECT: Political Contribution  
DATE: February 26, 1985

Once again this year, we need the cooperation of our officers and exempt staff to voluntarily support the political committees of the various savings and loan leagues, as well as state and local politicians.

If you would make a minimum contribution in the amount of \$4.20, we can reach our goal this year of \$700.00. (You are entitled to claim one-half of your contribution as a tax credit up to \$50.00 on an individual return, or up to \$100.00 on a joint return.) By being a "Super Leader", you can help the industry, Germania and yourself by supporting legislation that supports the savings and loan industry.

Please make your check payable to William G. Osborn and return to me by March 22, 1985.

Thank you for your cooperation and support.

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● ● ● INTER-OFFICE MEMO ● ● ●

FROM Loretta DATE 3-24-86

TO ED TIME 12:06 P.M.

SUBJECT Up-date on political contributions--

Other officers requested to contribute who have  
made a contribution since my last report to you:  
Brenda Stroh - paid \$28.45

Other staff members making contributions:

David Sovanski - \$15.00

Charles McKean 25.00

Susanne Curtis 5.00

Kevin Kattelman 5.00

Patricia McGuigan 5.00

Previous Cont. \$2,387.80

Add-Up-date 83.45

T-010 Rev 2/86 15M

Total contributions to date \$2,471.25

3-20-86

Ed:

Those highlighted in yellow have  
not, as yet, made a political  
contribution.

Loretta

93043503856

Supplemental  
Contributor

93043503857

- Brombolich, Vickie <sup>\$ 73.42</sup> \$50.00 Paid  
SSN 328-44-5291
- Burford, Charles <sup>\$ 20.90</sup> - Paid  
SSN 323-28-2525
- ~~Casey, John~~ <sup>\$ 23.00</sup> Resigned  
~~SSN 353-32-7487~~
- Crull, Margie <sup>\$ 28.29</sup> - Paid  
SSN 358-48-2237
- DeShong, Doug <sup>\$ 36.86</sup> - Paid  
SSN 049-44-6367
- Downs, Kenneth <sup>\$ 68.91</sup>  
SSN 332-40-9772
- Dunham, Judy <sup>\$ 45.15</sup> - Paid  
SSN 321-42-9841
- Hatton, Kathy <sup>\$ 31.25</sup> \$35.00 Paid  
SSN 325-54-6754
- Haynes, Richard <sup>\$ 64.00</sup> - \$70.00 Paid  
SSN 495-50-0935
- Howes, Charles <sup>\$ 70.31</sup>  
SSN 496-50-1692
- Kelley, Mike <sup>\$ 63.45</sup> - Paid  
SSN 336-50-8305
- Lewis, Linda <sup>\$ 47.34</sup> - \$48.00 Paid  
SSN 338-38-1883
- Lewis, Paul <sup>\$ 90.54</sup> - Paid  
SSN 493-42-6640
- Loftus, Robin <sup>\$ 43.90</sup> - Paid  
SSN 282-56-0165
- Martin, Scott <sup>\$ 33.66</sup> - \$34.00 Paid  
SSN 319-46-1975
- Morris, Edward L. <sup>\$ 108.33</sup> - Paid  
SSN 337-36-1763
- New, Jimmie W. <sup>\$ 122.24</sup> - \$200.00 Paid  
SSN 499-48-2328
- Orr, Denise <sup>\$ 28.05</sup> - Paid  
SSN 341-48-4726
- Osborn, David <sup>\$ 35.74</sup> - Paid  
SSN 324-40-2391

- Osborn, W. <sup>\$ 176.28</sup> Paid  
SSN 328-16-9539
- Pollaci, John <sup>\$ 120.19</sup> - Paid  
SSN 329-28-3721
- Pope, Paul <sup>\$ 61.30</sup> - Paid  
SSN 349-12-8547
- Raymond, MaryEllen <sup>\$ 35.48</sup>  
SSN 336-50-5197
- Roberts, Robert <sup>\$ 90.74</sup> - \$100.00 Paid  
SSN 429-88-2633
- Scanlan, Bernie <sup>\$ 57.21</sup> - Paid  
SSN 325-18-4463
- Schlecht, John <sup>\$ 64.55</sup>  
SSN 357-28-6101
- Schwartz, Stephen <sup>\$ 60.58</sup>  
SSN 514-54-3253
- Shrout, Sandra <sup>\$ 36.42</sup> - Paid  
SSN 319-34-3523
- Stalcup, Kathy <sup>\$ 36.28</sup> - Paid  
SSN 347-44-9872
- Stankus, Donald <sup>\$ 57.21</sup> - Paid  
SSN 329-32-2004
- Stroh, Brenda <sup>\$ 28.45</sup>  
SSN 360-52-9610
- Swartz, Lawrence <sup>\$ 60.30</sup> - Paid  
SSN 348-44-0023
- Tarpey, Cheryl <sup>\$ 37.66</sup> - Paid  
SSN 493-46-0738
- Valesano, Debbie <sup>\$ 46.23</sup> - Paid  
SSN 336-46-9930
- Vanata, Ron <sup>\$ 89.74</sup> - Paid  
SSN 334-28-0365
- Walters, Charles <sup>\$ 67.63</sup> - Paid  
SSN 352-20-8955
- Wathen, Timothy <sup>\$ 64.10</sup> \$65.00 Paid 06/16/94  
SSN 317-58-3392
- Wickenhauser, Jan <sup>\$ 52.89</sup> - Paid  
SSN 347-44-9934
- Yeske, Paul <sup>\$ 43.71</sup> - Paid  
SSN 332-40-5097

\$ 2500.24

1986

39

April 23, 1986

Chairman's Memo #86-29

TO: JIMMIE W. NEW

FROM: W. G. OSBORN

SUBJECT: U. S. LEAGUE PAC MANUAL

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

At one of our early Management Committee meetings, we discussed the advantages and disadvantages of a formally organized PAC and agreed to not form one. It was requested that the U. S. League PAC Manual information be referred to Jan Wickenhauser for her review. The updated forms received from the U.S. League on April 11, 1986 have been referred to Jan.

CC: Jan Wickenhauser  
Ed Morris ✓

93043503858

• • • INTER-OFFICE MEMO • • •

FROM W Ren DATE 2/19/86  
TO Ed Morris TIME \_\_\_\_\_  
SUBJECT attached

- (1) One tiled picture @ 50.<sup>00</sup>
- (2) of recommended a \$1,000  
fund based on new employee  
increase

93043503859

To: J. DeBORN  
From: R. Vanata

MC

MEMO

TO: RON VANATA  
FROM: MIKE KELLEY  
SUBJECT: RECEPTION FOR SECRETARY OF STATE JIM EDGAR  
DATE: JANUARY 7, 1986

Bell, the year <sup>(2)</sup> is a  
major political year. We  
need to discuss our  
fund

Sam Gilley, the Alderman for West Belleville, dropped off two (2) tickets to Secretary of State Jim Edgar's fund raiser to be held at Fischer's Restaurant, Belleville, on February 20th.

The price of the tickets are \$50.00 <sup>(1)</sup> each. I recommend we buy two (2) tickets.

Please forward to me a check for \$100.00 payable to Secretary of State Jim Edgar Re-election Committee.

↓  
Ron  
What was done  
on this  
Ed from

93043503860

*Robert  
C. Johnson  
He*



**National Council of Savings Institutions**

**Adam D. Schwartz**  
Associate Director of  
Political Affairs

April 5, 1988

RECEIVED APR 11 1988

- Photo To:
- Morris
  - Gardner
  - New
  - Homer
  - Hoynes
  - Pelled
  - Wasson
  - Wickher
  - Mueller
  - Cheation
- Return to: Sandy Gere

Mr. Edward L. Morris  
Chairman of the Board & CEO  
Germania Bank, a Federal Savings Bank  
701 Market Street, Suite 201  
Saint Louis, MO 63101

Dear Mr. Morris:

About two months ago, we sent you a letter requesting that you renew your authorization for THRIFTPAC to conduct a solicitation in your institution. Since the election is just over seven months away, it is extremely important to our efforts that you renew your commitment to THRIFTPAC as soon as possible.

Enclosed is a copy of the list we originally sent you. It includes all the employees and directors from your institution that the Council has on file. With your permission, THRIFTPAC will mail the solicitation to your employees and directors. Or, if you prefer, just employees, just directors or some combination thereof.

Please scan the list and simply cross off those individuals who you do not want to receive information about THRIFTPAC. If you need to make any additional changes such as titles or add employees, this would be a good opportunity to make those corrections.

There is also another way to conduct a THRIFTPAC solicitation; it's called the THRIFTPAC Company Campaign. If you choose to conduct a company campaign, we will send you a packet of materials and you will direct the entire solicitation process. We have found this to be a most effective method of raising funds. If this interests you, please check the appropriate line on the enclosed authorization brochure or contact the Political Affairs department on our new toll free hotline at 1-800-346-8689.

*see attached*

We sincerely hope that you will renew your commitment to THRIFTPAC, the political action committee representing your interests. In addition, your personal contribution to our efforts is urgently needed. The 1988 elections are extremely important. We need to voice our concerns to the policy makers.

Thank you and if you have any questions, please call me.

Sincerely,  
*Adam Schwartz*  
Adam D. Schwartz

Enclosures

93043503861

Germania Bank, A Federal SB  
P.O. Box 557  
Alton IL 62002  
Solicitation thru 1987

Page 1

Germania Bank, a Federal Savin  
P.O. Box 557  
Alton IL 62002

Elizabeth L Bishop  
Germania Bank, a Federal Savin  
543 E Broadway  
Alton IL 62002

Donald Joehl  
Treasurer  
Germania Bank, a Federal Savin  
543 E Broadway  
Alton IL 62002

Branch Manager  
Germania Bank, a Federal Savin  
4201 W. Broadway  
Mt Vernon IL 62864

Edward L. Morris  
Chairman of the Board & CEO  
Germania Bank, a Federal Savin  
701 Market Street, Suite 201  
Saint Louis MO 63101

Doug DeShong  
AVP/Trust Officer  
Germania Bank, a Federal Savin  
701 Market Street; #201  
St. Louis MO 63101

Branch Manager  
Germania Bank, a Federal Savin  
P.O. Box 5066  
Springfield IL 62705

James O. Buehrig  
Director  
Germania Bank  
1819 clarkson Road Suite 200  
Chesterfield MO 63017

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Germania Bank, A Federal SB  
P.O. Box 557  
Alton IL 62002  
Solicitation thru 1987

Page 2

Norman Drey  
Germania Bank, a Federal Savin  
543 E Broadway  
Alton IL 62002

Brent R. Waxman  
Assistant Vice President  
Germania Bank, a Federal Savin  
543 E. Broadway  
Alton IL 62002

Hilda Osborn  
Po Box 22  
Alton IL 62002

Paul E. Lewis  
Senior Vice President  
Germania Finanical Corporation  
535 E. Broadway  
Alton IL 62002

Donald Stankus  
Vice President/Office Manager  
Germania Bank, a Federal Savin  
543 E. Broadway  
Alton IL 62002

John Pollaci  
Sr. Vice Pres./Sr. Loan Off.  
Germania Bank, a Federal Savin  
543 E. Broadway  
Alton IL 62002

Charles J. Burford  
Vice President  
Germania Bank, a Federal Savin  
543 E. Broadway  
Alton IL 62002

Jerome K. Chautin  
Mortgage Officer  
Germania Bank, a Federal Savin  
7730 Roswell Road, #212  
Atlanta GA 30338

93043503863

Germania Bank, A Federal SB  
P.O. Box 557  
Alton IL 62002  
Solicitation thru 1987

Page 3

Jimmie W. New  
Executive Vice President  
Germania Bank, a Federal Savin  
701 Market Street  
St. Louis MO 63101

Stephen Schwartz  
Vice President  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

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John Barlow  
Consumer Lending Manager  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

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Steven M. Rull  
Senior VP & CFO  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

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4  
Janice M. Wickenhauser  
Vice President  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

9  
Janice M. Wickenhauser  
Vice President  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

Ronald M. Vanata  
Senior Vice President  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

Ronald M. Vanata  
Senior Vice President  
Germania, F.A.  
P.O. Box 557  
Alton IL 62002

Germania Bank, A Federal SB  
P.O. Box 557  
Alton IL 62002  
Solicitation thru 1987

Page 4

Accounts Payable Department  
Germania Bank, a Federal Savin  
543 E. Broadway  
Alton IL 62001

93043503865

## THE HISTORIC 100TH CONGRESS

The Historic 100th Congress will be debating many issues of major concern to the thrift industry. Members in both the House and Senate chambers will be debating FSLIC recapitalization, expanded banking powers, non-bank bank legislation, and many other items of great concern to our industry.

To assure that you are well represented, the National Council of Savings Institutions legislative staff members are on Capitol Hill every day talking to members of Congress and their legislative assistants about issues of vital concern to the industry. Our Council staff members have spent a great deal of time building their credibility with these members. They have briefed members of Congress on issues of concern to our industry, invited them to various Council functions so that they could see first-hand what our industry is about, and testified before them in various committee meetings.

Supporting the Council staff in their legislative endeavors requires a great deal of effort on the part of everyone involved with the Council. That includes not only the Council staff, but the general membership as well. Our legislative effort needs the support of Council members in three distinct ways. First, from time to time, Council members are invited to testify before various Congressional committees on behalf of the industry. Second, Council members are urged to write, call, or visit their Congressmen and Senators to let them know the industry's position on various issues. Finally, Council members are urged to participate financially in the Council's Political Action Committee—THRIFTPAC.

## 9 3 0 4 3 5 0 3 8 6 6 THRIFTPAC—THE SILENT LOBBYIST

THRIFTPAC is the separate segregated fund established by the National Council of Savings Institutions. Its sole purpose is to support those candidates for Congress who have shown their willingness to support continued de-regulation of the savings and thrift industry. These individuals may not always support the Council's legislative position, but are willing to listen to our story.

In 1986, THRIFTPAC raised over \$75,000 from the employees of Council member institutions. These contributions were used to support the campaigns of 108 candidates for the U.S. House of Representatives and Senate. Ninety-eight of these candidates were successful in their efforts and will be serving in the 100th Congress.

## THRIFTPAC—YOUR OPPORTUNITY TO HELP SHAPE POLICY

THRIFTPAC provides the employees of Council member institutions with an opportunity to be involved in the political and legislative process. This involvement is through their financial support of THRIFTPAC. By pooling our financial resources, we are able to have a greater impact on the election process. It is very difficult for many of us to make the maximum individual contribution of \$1,000 to a candidate. However, by pooling our resources, THRIFTPAC is in a position to make that contribution. This means greater visibility for our industry.

Your THRIFTPAC contribution helps elect people to Congress. And those elected pass the legislation that allows our member institutions

to operate effectively. THRIFTPAC contributions are made to those people who believe in the free—enterprise, market oriented system. Thus your THRIFTPAC contribution does help shape policy.

## THRIFTPAC—ARE YOU WILLING TO HELP?

THRIFTPAC needs your help if it is going to effectively support the Council's legislative efforts. We must continue to elect people to Congress who feel the same way we do about our industry. Your contribution to THRIFTPAC will help us do that.

Important Information: The Federal Election Commission requires that the CEO or other designated officer of your institution give THRIFTPAC approval to ask you for a THRIFTPAC contribution. Without their authorization, you could not be asked to participate in our efforts. Your CEO thought THRIFTPAC was important enough to the industry that you should be allowed to make your own decision whether or not to contribute to THRIFTPAC.

All contributions to THRIFTPAC are voluntary and have no bearing on one's position in the industry. The decision to contribute is yours and yours alone. Nobody can make that decision for you. The future of the thrift industry is good. But it is not without many problems. And many of these problems will have to be solved by Congress. The question is "Will the solutions to our industry's problems make things better or worse?"

Your contribution to THRIFTPAC will help assure that the solutions to our problems will bring positive results.

9 3 0 4 3 5 0 3 8 6 7

## HOW MUCH SHOULD I CONTRIBUTE?

How much you contribute is a personal decision. Some people contribute one-half of one percent of their annual salary. Some people contribute according to their ability to give. Contributions to THRIFTPAC range all the way from \$1 to \$1,000. No contribution is too large or too small. Every dollar helps.

Why not complete the attached contribution reply card right now. Then mail it to our THRIFTPAC office today, along with your check for \$250, \$100, \$50, \$25 or whatever you feel you can afford. Your contribution will go a long way to helping make our Legislative staff's job a little easier.

## IT'S THAT EASY?

Yes, it's that easy. All you have to do is make your decision to contribute, write your check and send it to:

THRIFTPAC  
c/o National Council of  
Savings Institutions  
1101-15th St., NW  
Suite 400  
Washington, D.C. 20005

believe all of us involved in the thrift industry should support THRIFTPAC. Enclosed is my contribution of:

\_\_\_\_\_ \$250.00      \_\_\_\_\_ \$100.00      \_\_\_\_\_ \$50.00      \_\_\_\_\_ \$25.00      \_\_\_\_\_ (other)

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_

Name of Institution: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Return to: THRIFTPAC, NCSI, 1101-15th St., N.W., Suite 400, Washington, D.C. 20005.



# Your Voice in the 100th Congress



*National Council of  
Savings Institutions*  
1101 15th Street, N.W.  
Washington, D.C. 20005

Sandy - for you file

- no -

82

93043503868

JOHN  
**Archer**  
Public Safety

519 North Fourth Street  
Springfield, Illinois 62702



C

RECEIVED AUG - 6 1987



**Public Safety**

519 North Fourth Street  
Springfield, Illinois 62702  
528-8428

Route To:

- Morris
- Gardner
- New
- Hornor

- Pollock
- Waxman
- Wickler
- \_\_\_\_\_

Return to: \_\_\_\_\_

July 31, 1987

Dear Friend:

Now that the \$2,000,000 Voting Law Suit is behind us, John Archer has announced his intention to run for the Office of Public Safety. John is a life-long resident of Springfield and has been a successful businessman in the City for 25 years. John feels that it is time to get this city moving forward again under new leadership. He believes we need a "business approach to government."

Friends of John Archer have organized a fund-raiser to help John offset the expenses of running a campaign. We are holding the fund-raiser at Baur's Opera House on August 24, 1987, between 5:00 p.m. and 8:00 p.m. We hope you can join us. Tickets are \$15 per person, or a John Archer sponsor for \$100.

John needs your financial support -- and most of all, he needs your vote on September 22. With your help, we can't loose. We hope we can count on you.

Thank you in advance for your support!

Friends of John Archer

Please reserve \_\_\_\_\_ tickets at \$15.00 each for Friends of John Archer Reception on August 24, 1987.

Please reserve \_\_\_\_\_ tickets at \$100.00 each to be a John Archer Sponsor.

Enclosed is my check for \$ \_\_\_\_\_.

I will not attend but would like to contribute \$ \_\_\_\_\_.

Send tickets to:

Name \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Home Phone \_\_\_\_\_ Business Phone \_\_\_\_\_

**Make Checks Payable to: Friends of John Archer, 519 N. 4th Street, Springfield, Illinois 62702**

Tickets will be held at the door for reservations received after Friday, August 21.

A copy of our report filed with the Sangamon County Clerk is (or will be) available from the County Clerk, Springfield, IL.

93043503869

RECEIVED JUN 24 1987

Collection Memo:

TO: Sandy Gore  
FROM: Bob DiQuattro  
SUBJECT: Political Action Committee

Please find enclosed my contribution of \$94.50 to the Political Action Committee.

93043503870

#28-87

June 1, 1987

TO: Ed Morris

FROM: Tom Fahnestock 

RE: Political Action Committee 

For over two years now, I have been treasurer of the "Citizens for Churchich." This committee successfully elected Bob Churchich as Sheriff of Madison County. Through this committee, I have met the treasurer of Madison County and the treasurer of the State of Illinois. I feel that this involvement is better than a monetary commitment. I have invested, and continue to invest, many hours of my time in service to this committee.

93043503871

FILED

APR 20 1987

PROHIBITED CONTRIBUTIONS IN STATUTES  
OTHER THAN THE  
ILLINOIS CAMPAIGN FINANCING ACT

EVELYN M. BOWLES  
MADISON COUNTY CLERK

A) INSURANCE COMPANIES (Illinois Revised Statutes, Chapter 73, Paragraph 762)

Insurance and Surety Companies doing business in Illinois (which include by definition: corporations, companies, partnerships, associations, societies, orders or an individual or aggregation of individuals engaging in any type of insurance or surety business) are prohibited from paying or using any money or property for or in aid of any political party, committee, organization, corporation, joint stock or other association organized or maintained for political purposes or for or in aid of any candidate for political office or for nomination for such office, or for any other political purposes whatsoever or for the reimbursement or indemnification of any person for money or property so used.

The statute specifically excludes companies which own an insurance or surety company which are not itself authorized to engage in any kind of insurance or surety business from making political contributions. (i.e. Sears Roebuck which owns Allstate Insurance Co.)

PENALTY

Violation of this Section is a Class A Misdemeanor.

B) NATIONAL BANKS (2 U.S.C., Section 441(b) and F.E.C. Regulation 114.2)

Prohibits any National Bank organized by authority of any law of Congress from making a contribution or expenditure in connection with any election to any political office or any primary election or political convention or caucus held to select candidates for any political office.

Illinois Chartered Banks are prohibited from contributing to federal candidates but there is no provision which prohibits an Illinois Chartered Bank from making contributions or expenditures to or on behalf of state and local candidates.

93043503872



RE-ELECT  
**John A. Davidson**

RECEIVED DEC 10 1986

REPUBLICAN CANDIDATE  
50th DISTRICT

718 MYERS BUILDING ■ SPRINGFIELD, ILL. 62701 ■ 544-9415 544-9416

*File Edward  
Morris*

PLEASE ROUTE TO:

- MORRIS
- NEW
- RULL
- PULLI
- ROBERTS
- VANATA
- RETURN TO BRENDA

December 9, 1986

Edward L. Morris  
543 E. Broadway  
Alton, IL 62002

Dear Ed:

Thank you so much for the generous contribution towards my campaign.

Your attendance and participation to the Davidson Golf Day and/or dinner was greatly appreciated, for without you, this day would have not been such a success.

I am looking forward to the next Davidson Golf Day that is to be in July 1987 and I hope that you will be able to join us.

Again, many thanks.

Sincerely,

*John A. Davidson*

John A. Davidson

JAD/kms

93043503873



Edward L. Morris  
President  
Chief Executive Officer

543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

December  
8  
1986

Mr. Bob Yeckel  
Savings Association Missouri Political  
Elections Committee  
P. O. Box 1246  
Jefferson City, MO 65102

Dear Bob:

I'm sorry to inform you that we have no funds to contribute to SAMPEC in 1986.  
We will start supporting SAMPEC in 1987. Thank you.

Sincerely,

*Edward L. Morris*

Edward L. Morris

ELM/bb

93043503874

11-24-86

Dear Jimmy :

RECEIVED NOV 25 1986

The Missouri legislative effort on behalf of the STL industry relies heavily on STAMPEC. Is there anyway you can help?

Bob Yeckel

PLEASE ROUTE TO:  
MORRIS  
NEW  
RULL  
POLLACK  
ROBERT  
VANATJ  
RETURN TO AGENDA

93043503875

# SAMPEC

Savings Association Missouri Political Elections Committee



March 10, 1986

MISSOURI LEAGUE of SAVINGS INSTITUTIONS

P.O. Box 1246

Jefferson City, MO 65102

Robert C. Carroll, President

Phone: 636-5255

to: Jimmy W. New, Executive Vice President  
Germania, F. A.  
543 East Broadway  
Alton, IL 62002

SAMPEC BASE	\$ 250.00
\$ 1.00 per million of assets as of June 30, 1985	59.00
TOTAL AMOUNT DUE	\$ 309.00

\*\*PLEASE MAKE CHECKS PAYABLE TO "SAMPEC"\*\*

In cases of contributions from individuals (i.e. officers & directors) please furnish the home office of each contributor to aid the League in completing the campaign disclosure reports required by law.

93043503876

THE JERRY D. BANNING TESTIMONIAL COMMITTEE  
 Cordially Invites You to the  
 JERRY D. BANNING RETIREMENT DINNER  
 Honoring the President of the  
 General Teamsters/Professional and Technical Local Union No. 916  
 affiliated with the  
 International Brotherhood of Teamsters  
 For 30 Years of Service to Organized Labor  
 THURSDAY, DECEMBER 4, 1986  
 Reception 6:00 p.m. - Dinner 7:00 p.m.

Ramada Renaissance Hotel 701 East Adams  
 Springfield

\$50 per person

Chairmen

Gary J. Sullivan

William K. Cavanagh, Jr.

**COMMITTEE**

**Honorary Chairman**

Honorable James R. Thompson  
 Governor  
 State of Illinois  
 Jackie Presser  
 General President  
 International Brotherhood of  
 Teamsters  
 Louts F. Peick  
 Vice President  
 International Brotherhood of  
 Teamsters  
 President, Joint Council No. 25

**Testimonial Committee**

Jack B. Yager  
 National Director of Freight  
 International Brotherhood of  
 Teamsters  
 Robert C. Sansone  
 President, Missouri-Kansas  
 Conference of Teamsters and  
 Teamsters Joint Council  
 No. 13  
 Marshall McDuffy  
 President, Ill. Conference of  
 Teamsters and Joint Council  
 No. 65  
 Wilbur Freitag  
 Vice President  
 Laborers International Union  
 of North America

Alan J. Dixon  
 United States Senator  
 Richard J. Durbin  
 Representative in Congress  
 Twentieth District  
 Jim Edgar  
 Secretary of State  
 State of Illinois  
 John A. Davidson  
 Senator, State of Illinois  
 Fiftieth District  
 James "Pate" Philip  
 Senate Minority Leader  
 State of Illinois  
 Twenty-third District  
 Philip J. Rock  
 Senate President  
 State of Illinois  
 Eighth District  
 William F. Cellini  
 President, New Frontier  
 Development  
 Ill. Asphalt Pavement Assn.  
 Irv Smith, Chairman  
 Sangamon County Republican  
 Central Committee  
 Todd Renfrow  
 Past President, Illinois  
 Democratic County  
 Chairmans Association

J. Michael Houston  
 Mayor  
 City of Springfield  
 John P. Clarke  
 Publisher  
 The State Journal-Register  
 Lincoln Courier  
 Elvin "Hawk" Hughes  
 President Emeritus, Ill.  
 Conference of Teamsters and  
 Joint Council No. 65  
 Guy T. Long  
 President Emeritus, General  
 Teamsters/Professional &  
 Technical Local Union 916

**Chairmen**

Gary J. Sullivan  
 Secretary-Treasurer  
 General Teamsters/Professional  
 & Technical Local Union 916  
 William K. Cavanagh, Jr.  
 General Counsel  
 Illinois Conference of  
 Teamsters and Joint  
 Council No. 65

93043503677

9 3 0 4 3 5 0 3 8 7 8


 EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 616-465-5543  
 ALTON, IL 62002

No. 210  
 Date *Oct. 28* 19*56* 70-7070/2810

In the Order of *BANNING TESTIMONIAL COMMITTEE* \$ *200.00*  
*Two Hundred And No*


 2102009

⑆ 28 1070707 ⑆ 00 103 0344 51⑈ 0210

RECEIVED OCT 31 1986



PLEASE ROUTE TO:  
MORRIS  
NEW  
RULL  
POLLACK  
ROBERTS  
VANATA  
RETURN TO BRENDA

H

Citizens for Houston  
2144 South MacArthur  
Springfield, Illinois 62704  
217/522-MIKE (6453)

October 29, 1986

Mr. Edward Morris  
Jimmie New  
543 East Broadway  
Alton, IL 62002

*Brenda*  
*For you* *file*

Dear Mr. Morris:

Thank you for your generous contribution to my campaign. As you know, running a statewide campaign is both difficult and expensive, and your help and support is deeply appreciated.

There is no question that if I can get my message and vision of the State Treasurer's Office out to the people of Illinois, I will be victorious on November 4th.

Again, thank you for the commitment you have demonstrated. Your support is very important to me.

Sincerely,

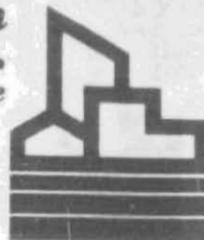
*Mh*

MIKE HOUSTON  
MAYOR OF SPRINGFIELD AND REPUBLICAN CANDIDATE  
FOR STATE TREASURER

93043503879

RECEIVED OCT 3 1986

**The J.L. Mason  
Group, Inc.**  
Corporate Office



1215 Fern Ridge Parkway  
Suite 200  
St. Louis, MO 63141  
314-434-4100

JOSEPH L. MASON  
President,  
Chief Executive Officer

MORRIS   
NEW   
RULL   
POLLACK   
ROBERTS   
VANATA   
RETURN TO BRENDA

September 30, 1986

Mr. Edward Morris  
President  
Germania Federal Savings and Loan  
543 East Broadway  
Alton, Illinois 62002

Dear Ed:

The elections of 1986 are soon to be history. A great deal of work remains to assure the election of Kit Bond and Margaret Kelly. The direction taken by the Federal and State governments will continue to increase in importance to us as individuals, as well as our businesses. We must assure the election of competent representatives of our views.

"Victory Tour '86" will stop in St. Louis on Monday, October 13, 1986. Congressman Jack Kemp will be our guest speaker.

We need your help!

We must be certain of electing Kit Bond and Margaret Kelly. We cannot afford to leave anything to chance.

You have by now probably received a separate invitation and have, hopefully, responded with your commitment. If not, please do it today. Your help is critical. Corporate and/or personal checks are acceptable.

Thank you for your support.

Most sincerely,

  
Joseph L. Mason  
Dinner Chairman

JLM/Ls1  
Enclosures

93043503880





"VICTORY TOUR '86"

Dear Fellow Republican:

"Victory Tour '86" will make a stop in St. Louis on Monday, October 13, with Congressman Jack Kemp as our special guest and we want you to participate.

"Victory Tour '86" is a series of events being held throughout the state of Missouri designed to highlight the important races to be decided on November 4, 1986. It will go to all corners of the state telling people that we must support our Republican candidates and the Missouri Republican Party.

Telling people that Kit Bond needs our support so he can continue President Reagan's programs that have made our country stronger.

Telling people that Margaret Kelly needs our support so she can continue her professional approach to the Auditor's job.

Above all, telling people the Missouri Republican Party needs our financial support so it can turn out voters on election day, provide expert advice on strategy and tactics to our candidates and provide direct cash contributions where needed.

"Victory Tour '86" is so important that each one of us has made a commitment to each other to attend each stop.

United as one, we will tell our story. We know if people hear our message it will bring victory in 1986 as it did in 1984.

Please attend on Monday, October 13 at the Adam's Mark Hotel.

We will have a private reception beginning at 6:30 p.m. Tickets for the reception are \$1,000 per couple and include the dinner following and an opportunity to be photographed with Congressman Kemp.

The Dinner will begin at 7:30 p.m. and Congressman Kemp will speak following Dinner. Tickets are \$150 per person.

You may make your reservations by completing the enclosed form and returning it in the envelope provided. Your check should be made payable to Missouri Republican Party.

*John Cochran* *Margaret Kelly* *William R. Webster*  
*Roy D. Hunt* *Woodell Butler* *Richard B. Lee*

P.S. The Missouri Republican Party needs your financial support now if they are to fund the programs our candidates need for victory. Please send in your reservation and check today.

9 3 0 4 3 5 0 3 8 8 2



EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

MA 203  
 9-11 11/86 70-7070/2810

Pay to the order of John Davidson Campaign Fund \$ 100.00  
One Hundred & 00/100 ~~DONOR~~



*Edward L. Morris*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0203

9 3 0 4 3 5 0 3 8 8 3  
 Please send tickets to:  
 Bernie Scanlan  
 Germania, F.A.  
 2007 S. MacArthur  
 Springfield, IL 620704

Enclosed is my check for golf day \$ \_\_\_\_\_ for \_\_\_\_\_ tickets.  
 Enclosed is my check for dinner \$ 100 for 2 tickets.  
 I cannot attend but am enclosing \$ \_\_\_\_\_

DAVIDSON GOLF DAY ENTRY FORM  
 FOR ONE TO FOUR PERSONS

1. Name \_\_\_\_\_ Handicap \_\_\_\_\_  
 Address \_\_\_\_\_ Phone \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

2. Name \_\_\_\_\_ Handicap \_\_\_\_\_  
 Address \_\_\_\_\_ Phone \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

3. Name \_\_\_\_\_ Handicap \_\_\_\_\_  
 Address \_\_\_\_\_ Phone \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

4. Name \_\_\_\_\_ Handicap \_\_\_\_\_  
 Address \_\_\_\_\_ Phone \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

SCRAMBLE FORMAT

Senator John A. Davidson's  
**GOLF DAY**

Wednesday, September 24, 1986

Early receipt of entry form will guarantee position for the first 128 golfers.

WIN A NEW PONTIAC · CHEVROLET · OLDSMOBILE OR MAZDA

With a hole-in-one on any one of four holes.  
 Shotgun start at 12:30 p.m.

**DONATION \$100**

Includes Greens Fee · Riding Cart · Lunch 11 a.m. to 12 noon ·  
 Hors d'Oeuvres 5:30 p.m. · Dinner 6 p.m. · Refreshments

**DONATION \$50**

Includes Hors d'Oeuvres 5:30 p.m. · Dinner 6 p.m.

**SHOTGUN START at 12:30 p.m.**

Entry fee must be received with golf entry request form to guarantee position.

93043503884


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

No. 204  
 9-17 1986 70-7070/2810

Pay to the order of Friends of Jim McBike \$ 100.00  
One Hundred & 00/100 **DOLLARS**

  
543 E. Broadway • Alton, IL 62002

Edward L. Morris

⑆281070707⑆ 00103 0344 51⑆ 0204

Handwritten marks on the right margin, including a vertical line and a checkmark.

93043503885

EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

9-26 86 70-7070/2810

Citizens for Houston \$ 50.00

Fifty & 00/100 ~~DOLLARS~~

**GERMANIA**  
 543 E. Broadway • Alton, IL 62002

*Jimmie W. New*

⑆ 28 1070707⑆ 00103 0344 5⑆ 0206



ADMIT ONE  
to a  
RECEPTION  
for



# MAYOR MIKE HOUSTON

REPUBLICAN CANDIDATE FOR STATE TREASURER

Thursday, October 2, 1986

in the  
Lincoln-Ford Room

Holiday Inn East, Springfield, Illinois

5:30 - 7:30 p.m.

Contribution: \$25.00 per person

Please make checks payable to: Citizens for Houston

Paid for by Citizens for Houston, P.O. Box 161, Springfield, Illinois 62705.  
A copy of our report is (or will be) available for purchase from the State Board of Elections.

MIKE HOUSTON FOR STATE TREASURER  
 Thursday, October 2, 1986  
 Holiday Inn East, Springfield, Illinois

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ Zip \_\_\_\_\_

Please make checks payable to:  
 Citizens for Houston  
 P. O. Box 161  
 Springfield, Illinois 62705

Brenon...

Please Send \$50.<sup>00</sup>, 2 @  
\$25 each For Bonnie per  
Mgt. Committee

(RW)

93043503886

RECEIVED SEP 22 1986

# Houston STATE TREASURER

✓  
With Bonn. e

PLEASE ROUTE TO:

- MORRIS
- NEW
- FULL
- POLLACK
- ROBERTS
- VANATA
- RETURN TO BRENDA

Citizens for Houston  
2144 South MacArthur  
Springfield, Illinois 62704  
217/522-MIKE (6453)

David Kilduff  
543 E. Broadway  
Alton, IL. 62002

September 19, 1986

Dear David,

Our campaign for State Treasurer is rapidly drawing to a conclusion. The race has been an interesting and challenging experience that I have thoroughly enjoyed. The combination of aggressive campaigning and the tremendous support of our volunteers has placed us in position to win this election. One key element of our campaign that remains to be implemented is a successful statewide media blitz which will boost our name recognition.

I realize there has been a lot of pressure for financial support in this election. However, I need to ask your help to ensure that we are able to present an effective media campaign. Your continued support is vital to the success of our campaign, and it means a great deal to Carolyn and myself. We look forward to seeing you October 2nd, and again at the Victory Party on November 4th.

Sincerely,

MIKE HOUSTON  
MAYOR OF SPRINGFIELD AND  
CANDIDATE FOR STATE TREASURER

93043503887

93043503888


**EDWARD L. MORRIS**  
**JIMMIE W. NEW**  
 543 E. BROADWAY 618-485-5543  
 ALTON, IL 62002

Sta. 202

9-11 1986 70-7070/2810

Order of Jim McPike, Majority Leader \$ 100.00  
One Hundred & 00/100 DOLLARS

  
 543 E. BROADWAY • ALTON, IL 62002

Order 10 tickets Edouard Jhon

⑆ 28 6070707 ⑆ 00 603 0344 5 ⑆ 0202

A party hosted by \_\_\_\_\_

**JIM McPIKE**  
 Majority Leader  
 Illinois House of Representatives

No. 1256

FRIDAY, OCTOBER 3, 1986 8:00-12:00 P.M.  
 BETHALTO KNIGHTS OF COLUMBUS HALL  
 Free Beer and Hors D'oeuvres Cash Bar (Set-ups Available)  
 MUSIC BY PHOENIX — Bob Kuban Entertainment

A copy of our report filed with the State Board of Elections is available for purchase from the State Board of Elections, Springfield, Illinois.

6/0.00

529-6226

EDWARD L. MORRIS  
 JIMMIE W. NEW  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

PA 201  
 Aug. 29 1986 70-7070/2810

Pay to the order of Friends of Karen Hasara \$ 25.00

Twenty Five Dollars & 00/100 ~~DOLLARS~~

**GERMANIA**  
 543 E. BROADWAY • ALTON, IL 62002

*Edward L. Morris*

⑆ 28 1070707⑆ 00 103 0344 5⑈ 0201

*Send ticket to Bernie 9-8 + sent check to Bernie*

**Friends of KAREN HASARA**  
 P.O. Box 968, Springfield, IL 62705

Bernie Scanlan  
 Name  
 Germania, F.A.  
 2007 MacArthur  
 Address  
 Springfield, IL  
 217-793-3550  
 Phone

Check  Cash

Sold By \_\_\_\_\_

**RECEPTION**  
 for  
**State Representative**  
**KAREN HASARA**

**THE LAKE CLUB**  
 2840 FOX BRIDGE ROAD  
 FRIDAY, SEPTEMBER 5, 1986 5:00-7:00 P.M.  
 \$25.00 Donation

A copy of our report is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.

93043503889

# KAREN HASARA

STATE REPRESENTATIVE

P.O. Box 966 Springfield, Illinois 62705

August 10, 1986

Bernie Scanlan  
3231 S Spring  
Springfield, IL 62703

Dear Bernie:

It's hard to believe that we're nearing election day 1986. We, of course, are making our final campaign plans. In order to have a winning multi-media advertising campaign, I need your support at my upcoming fundraiser.

I am hosting a reception on Friday, September 5th, from 5:00 to 7:00 p.m. at the Lake Club, 2840 Fox Bridge Road in Springfield. My volunteers have developed a great reputation for preparing a delicious buffet. I promise this will be a fun get-together.

After my first six months as State Representative, my commitment to this office and to serving all of you is even greater. I hope you have been pleased with my first legislative session's record. I know I have conscientiously worked to best represent you and to gain your respect.

Sincerely,

*Karen*

Karen Hasara  
State Representative

*OK*  
*One ticket*  
*\$25.00*  
*Paul [unclear]*

P.S. I look forward to seeing you on September 5th.

93043503890

93043503891

109

EDWARD L. MORRIS 3-86  
 W. G. OSBORN  
 543 E. BROADWAY 618-465-5543  
 ALTON, IL 62002

Aug. 4 19 86 70-7070/2810

PAY TO THE ORDER OF Committee to Elect Jerry Costello \$ 125.00

One Hundred Twenty Five & 00/100-----DOLLARS

  
543 E. BROADWAY • ALTON, IL 62002

MEMO \_\_\_\_\_ 

⑆ 28 1070707⑆ 103 0344 5⑈ 0109

### Cocktail Party

for

JERRY F. COSTELLO

*Chairman of the  
St. Clair County Board*

FISCHER'S RESTAURANT

THURSDAY, AUGUST 28, 1986

6:00 P.M. to 9:00 P.M.

Donation: \$125 Per Person

No 1967

"A copy of our report filed with the County Clerk is (or will be) available for purchase from the County Clerk, 10 Public Square, Belleville, Illinois."



93043503892

# Golf Outing

Secretary of State

# Jim Edgar



**Tamarack Country Club • O'Fallon-Shiloh Road**  
**Thursday, July 31, 1986**

Lunch 11:45 to 12:45, Shotgun Start 1:00 p.m., Cocktails &  
Hors d'oeuvres 6:00-7:00 p.m., Dinner 7:00 p.m. - Golf Prizes - Door Prizes  
\$150 Donation Per Person

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois

Name Mike Kelley, V.P. Regional Mgr  
Germania, F.A.  
Address 6201 W. Main Street  
City Belleville IL Zip 62223

CIRCLE ONE: CHECK CASH

Please make checks payable to:  
Citizens for Jim Edgar

EDWARD L. MORRIS 3-86		108
W. G. OSBORN		
543 E. BROADWAY 618-465-5543		7-28 19 86 70-7070/2810
ALTON, IL 62002		
PAY TO THE ORDER OF	<i>Citizens for Jim Edgar</i>	\$ 150.00
	<i>One Hundred Fifty dollars &amp; 00/100</i>	DOLLARS
MEMO: <i>Draw</i>		<i>Edward Morris</i>
GERMANIA 543 E. Broadway • Alton, IL 62002		
⑆ 28 1070707⑆ 103 0344 5⑈ 0108		

INTER-OFFICE MEMO

FROM Robin Toftus - Spfld. Bra. DATE 5/28/86

TO Ron Vanata TIME 12:06 PM

SUBJECT Request political donation

Bill DeMarco for Sheriff  
Republican

Incumbent - Use them for  
check forgeries

\$20.00

Approved

dm

XGEN-003

93043503893

cc: Ron Vanata

EDWARD L. MORRIS 3-86  
W. G. OSBORN  
543 E. BROADWAY 818-485-5543  
ALTON, IL 62002

107

June 2, 19 86 70-7070/2810

PAY TO THE ORDER OF Bill DeMarco for Sheriff \$ 20.00

Twenty and NO/100-----DOLLARS



*W. G. Osborn*

MEMO  
⑆ 28 107070707⑆ 103 0344 5⑈ 0107

● ● ● INTER-OFFICE MEMO ● ● ●

FROM Robin Loftus - Spfld. Bra DATE 5/28/86

TO Ron Vanata TIME 12:06 PM

SUBJECT Request political donation

Bill DeMarco for Sheriff  
Republican

Incumbent - Use them for  
check forgery  
\$20.00

Approved

*(Signature)*

XGEN-003

93043503894

*WIC*

EDWARD L. MORRIS 3-86		106
W. G. OSBORN		
543 E. BROADWAY 618-465-5543	May 8, 19 86	70-7070/2810
ALTON, IL 62002		
PAY TO THE ORDER OF Jimmie W. New		\$ 125.00
One Hundred Twenty Five and NO/100----- DOLLARS		
 <small>543 E. Broadway • Alton, IL 62002</small>		
Reimbursement of Political Contribution		<i>[Signature]</i>
⑆ 28 1070707⑆ 103 0344 5⑈ 0106		

93043503895

*Dist \$125.00  
on 4-1-86*

YOU ARE INVITED TO A  
RECEPTION FOR MARGARET KELLY  
STATE AUDITOR OF MISSOURI

Monday, April 7, 1986  
Racquet Club East

6 p.m. to 8 p.m.  
476 N. Kingshighway  
361-2100

HONORED GUEST: GOVERNOR JOHN D. ASHCROFT

\$125 per person

Tables of 8 \$1,000

A SPECIAL THANK YOU TO JOE MASON - EVENT CHAIRMAN

Paid for by Friends of Margaret Kelly; Greg Goller, CPA,  
Treasurer, P.O. Box 1083, Jefferson City, MO 65102

**GERMANIA**<sup>IA</sup>

543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

U. S. League - SAPEC  
1709 New York Ave., N.W.  
Suite 801  
Washington, D.C. 20006-9920

Gentlemen:

On behalf of the officers and staff members of Germania, F.A., who make voluntary contributions toward political candidates, we enclose our check number 105 in the amount of \$225 in support of SAPEC.

Sincerely,



Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

93043503896

730435031097

105

EDWARD L. MORRIS 3-86  
 W. G. OSBORN  
 543 E. BROADWAY 618-485-5543  
 ALTON, IL 62002

April 23, 19 86 70-7070/2810

PAY TO THE ORDER OF SAPEC \$ 225.00

Two Hundred Twenty Five and NO/100-----DOLLARS

  
 543 E. Broadway - Alton, IL 62002

MEMO Contribution *W. G. Osborn*

⑆ 28 1070707⑆ 103 0344 5⑈ 0105

DATE	CHARGES AND CREDITS	BALANCE	
	BALANCE FORWARD →		
	1986 ISLPEC GOAL	\$1,110	00
	* To conform to current reporting requirements contributions must be received prior to July-31-1986		
A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois		Thank You PAY LAST AMOUNT IN THIS COLUMN	

US League-  
**SAPEC**

MEMORANDUM

January 23, 1986

U.S. League—  
Savings Association  
Political Elections  
Committee

Tom B. Scott, Jr.  
Chairman  
Jackson, MS

John P. Farry  
Vice Chairman  
Rochester, MN

John A. Hardin  
Vice Chairman  
Rock Hill, SC

Paul W. Prior  
Treasurer  
New Castle, IN

John H. Randolph  
Assistant Treasurer  
Richmond, VA

Rollin D. Barnard  
Denver, CO

Lloyd S. Bowles, Sr.  
Dallas, TX

Edwin B. Brooks, Jr.  
Richmond, VA

Stuart Davis  
Beverly Hills, CA

Richard G. Gilbert  
Ganton, OH

John W. Stadler  
Washington, DC

Andrea G. Hotsenpiller  
Assistant Treasurer-  
Administrative Officer  
Washington, DC

TO: William G. Osborn

FROM: Tom B. Scott, Jr., Chairman

SUBJECT: SAPEC

Among the many other things which 1986 will bring are the federal elections in November. On that first Tuesday in November, every member of the House of Representatives and one-third of the United States Senate will be up for re-election.

This election year will be a critical one for us in the savings institution business, and one in which we all must take part.

Because of the support of just over 600 savings institutions nationwide, SAPEC raised \$282,000 in 1985 which we used to support over 200 candidates for the House and Senate.

Before we can ask you to join with these 600+ s&ls which helped us in 1985, we need to have your signed permission allowing us to send you, your executive and administrative employees and directors information about SAPEC.

Therefore, I have enclosed prior approval forms for the years 1986, 1987, and 1988. By signing this brochure now, you will be granting SAPEC permission to solicit you, your employees and directors for these three years, all at one time, and thus alleviating you from having to sign these approvals year after year.

I hope that you will take the time to read the enclosed material about SAPEC, and to sign our multi-year prior approval forms. For your convenience, I have enclosed a postage-paid envelope in which to return to SAPEC your signed forms.

If you have any questions about what SAPEC is, and why it needs your participation in 1986 and beyond, please contact SAPEC's Administrative Officer, Andrea G. Hotsenpiller at the U.S. League's Washington Office (202-637-8935).

I am looking forward to hearing from you by February 15th.

*W. G. Osborn*

RECEIVED JAN 27 1986

ROUTE TO:

- D. Filouff
- W. Osborn
- R. Roberts
- R. Vannata
- K. Downs
- E. Rush
- J. Pollock

- D. Starnes
- D. Scovenski
- D. Velasquez
- D. Osborn
- J. Wickhammer
- P. Lewis
- C. Turpey

RETURN TO LORETTA CLAYTON

93045

93043503899

RECEIVED APR 30 1986

April 29, 1986

*MD*



Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, Illinois 62705

W.G. Osborn  
543 East Broadway  
Alton, IL 62002

Thank you for your \$ 225.00 contribution to the Illinois Savings and Loan Political Education Committee. ISLPEC helps support candidates for office who believe in a strong savings and loan environment for both the customer and the thrift business.

*Margaret M. Osborn*  
For the Committee

Individual taxpayers may elect to take a credit or deduction for federal income tax purposes for political contributions under present federal law.

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.



543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, IL 62705

Gentlemen:

On behalf of the officers and staff members of Germania, F.A., who make voluntary contributions toward political candidates, we enclose our check number 104 in the amount of \$225 in support of ISLPEC.

Sincerely,

Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

*BC Edmonds*

93043503900

EDWARD L. MORRIS 3-86

104

W. G. OSBORN

543 E. BROADWAY 618-465-5543  
ALTON, IL 62002

April 23 19 86 70-7070/2810

PAY TO THE ORDER OF ISLPEC

\$ 225.00

Two Hundred Twenty Five and NO/100-----DOLLARS



MEMO Contribution

*W. G. Osborn*

⑆ 28 1070707⑆ 103 0344 5⑈ 0104

93043503901



Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, Illinois 62705

STATEMENT

DATE	FEB 1986
NUMBER	Dist # 112

TO: William G. Osborn  
Chairman of the Board  
Germania, F.A.  
543 East Broadway Box 557  
Alton, IL 62002

TERMS: Due Upon Receipt

PLEASE RETURN WITH YOUR REMITTANCE

\$ 225.00



Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, Illinois 62705

## ROUTE TO:

( ) D. Kilduff ( ) D. Stankus  
 ( ) W. Osborn ( ) D. Savanski  
 ( ) R. Roberts ( ) D. Valeriano  
 ( ) R. Vanata ( ) D. Osborn  
 ( ) K. Downs ( ) J. Wickenhauer  
 ( ) S. Rush ( ) P. Lewis  
 ( ) J. Pollard ( ) C. Tarpey  
 ( ) RETURN TO LORETTA CLAYTON

February 1, 1986

Dear Executive Officer:

Due-on-Sale, Usury, Truth-in-Lending and Forebearance are all very common subjects to the Savings and Loan business, but not necessarily to the Illinois legislator or candidate for public office. This is where your political "PAC" -- ISLPEC -- bridge this information gap. ISLPEC has helped provide the catalyst for the bi-partisan election of legislators who are concerned with our business and will help contribute to its economic growth in Illinois. Since its inception, it has slowly grown to become a strong, effective and respected voice for you in state government. Our success with positive programs are directly attributable to this educational program.

This letter officially initiates our 1986 ISLPEC Drive. In 1985, 109 individual associations said "yes" and worked toward our 1985 results. As with all team efforts, however, we need everyone's help

Our goal is again computed at two dollars per million of assets, or a minimum of \$25.00. A statement of your association's goal is attached.

Make this a year for achieved goals! Encourage your officers, managers, directors and employees to be a part of this ISLPEC goal and truly a complete part of the Illinois savings and loan business. Your "PAC" record speaks for itself

Sincerely,

Lawrence Avril  
Chairman of the Board & Chief Executive Officer  
Hinsdale Federal Savings & Loan  
Chairman, 1986 ISLPEC Committee

LA:mmm

Attachment

9 3 0 4 3 5 0 3 9 0 3



### WHAT IS ISLPEC?

ISLPEC is the Illinois Savings and Loan Political Education Committee. It is a voluntary, not-for-profit committee organized by persons engaged in the savings and loan business to provide a voice in state government for people in the savings and loan business. Its purpose is to encourage employees of savings and loan associations to support with contributions candidates who have demonstrated their belief and support for the private enterprise system.

### HOW IS ISLPEC ORGANIZED?

Members of ISLPEC are individuals who largely are active in the savings and loan business, and who believe that they should have a voice in American politics. The business affairs of ISLPEC are directed by its Executive Committee.

### WHY ISLPEC?

Every employee of a savings and loan association may be affected by legislation and especially by legislation resulting in the supervision and regulations of the savings and loan business. It is impossible to separate the welfare of the employee from the welfare of the business. Hence, each one has a significant stake and deep personal involvement in legislation that touches the savings and loan business. Thus, ISLPEC can be effective both through contributions and personal participation.



# ISLPEC

Enclosed is my *personal check* (or money order) in the amount of \$ \_\_\_\_\_, payable to ISLPEC, as my contribution to the Illinois Savings and Loan Political Education Committee for this year.

Date \_\_\_\_\_

P. O. Box 5091  
Springfield, Illinois 62705

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

My association is \_\_\_\_\_

*A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.*

### CAN THIS BE DONE BY ASSOCIATIONS?

The Federal Corrupt Practices Act of 1925, sometimes called the "Hatch Act," prohibits financial institutions, such as savings and loan associations and not-for-profit tax exempt trade associations from making contributions in connection with elections to federal office. Contributions should be made by individuals from personal funds. Internal Revenue Service allows a personal deduction or tax credit to individuals for political contributions. Contributions are not tax deductible for Illinois income tax purposes. ISLPEC's political action and support funds are derived solely from individuals on a voluntary basis. This is why your participation is so important.

### HOW ARE ISLPEC FUNDS USED?

ISLPEC's assistance is largely at the state level and in those areas of political action where state and local support is difficult to secure.

Financial assistance is given to support candidates who can provide a favorable climate for the savings and loan business. The decision to endorse and financially support candidates for the Legislature are made by the Executive Committee of ISLPEC. Approval is given only if the Committee believes the candidate favors the programs and goals of the savings and loan business.

Contributions to candidates are made without regard to party affiliation. The uses of ISLPEC funds not only meet all legal requirements but the uses are governed by high ethical standards and in accordance with state law.

## HOW DOES ISLPEC FUNCTION?

The objectives of ISLPEC are two-fold:

### 1. Political education:

ISLPEC is engaged in a program of education to acquaint savings and loan people with the full scope of legislative processes. Special emphasis is placed upon the need for personal participation in political activity at the local and state levels. ISLPEC encourages the study of candidates and issues. It urges its members to encourage others in their circle of influence to become equally interested and involved in political activities.

### 2. Political action:

ISLPEC encourages savings and loan people to become active in the campaigns of candidates most likely to support principles and philosophies which will result in a growing, vigorous thrift and home ownership business.

ISLPEC is NOT a lobbying organization. It does not take a position on political parties or specific items of legislation. It does suggest, however, that its members register to vote, campaign and contribute funds to provide financial support for selected candidates for the Illinois General Assembly... and vote.

## HOW MUCH SHOULD BE CONTRIBUTED?

This, of course, is a personal decision. The following schedule is suggested as a guide:

- Contributing member, \$10.00 or less annually
- Sustaining member, \$25.00 annually
- Principle member, \$100.00 annually
- Executive member, \$1,000.00 annually

9 3 0 4 3 5 0 3 9 0 4  
All contributions of \$150 or more must be reported by ISLPEC to the State Board of Elections in its periodic reports.

## ARE ISLPEC CONTRIBUTIONS TAX DEDUCTIBLE?

Contributions to ISLPEC qualify as either a deduction or credit for federal income tax purposes, subject to limitations that depend on individual circumstances.

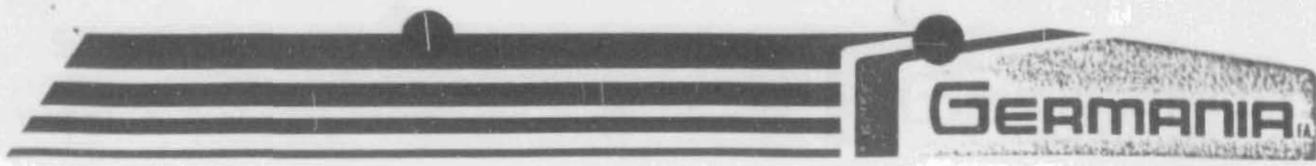
## HOW ARE CONTRIBUTIONS MADE?

Your contribution should be by PERSONAL CHECK OR MONEY ORDER and made payable to ISLPEC. It should be accompanied by the contribution form in this brochure.

# Illinois Savings and Loan Political Education Committee

## Your Voice in State Government





543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

THRIFTPAC  
National Council of Savings Institutions  
1101 Fifteenth Street, N.W. - Suite 400  
Washington, D.C. 20005-5070

Gentlemen:

On behalf of the officers and staff members of Germania, F.A. who make voluntary contributions toward political candidates, we enclose our check number 103 in the amount of \$425.00 in support of THRIFTPAC. Please note that this is in addition to the \$125.00 individual contribution by me February 3, 1986, check number 2405 (copy attached).

Our total contribution of \$550.00 to THRIFTPAC in 1986 is consistent with the suggested goal of one dollar per million of assets for each Council member.

Sincerely,

Wm. G. Osborn  
Chairman

WGO:lmc

Enclosures

PC: Ed No

93043503905

THRIFTPAC  
National Council of Savings  
Institutions  
1101 Fifteenth Street, N.W.  
Suite 400  
Washington, D.C. 20005-5070

93043503906

EDWARD L. MORRIS 3-86		103
W. G. OSBORN		
543 E. BROADWAY 618-485-5543	April 23, 19 86	70-7070/2810
ALTON, IL 62002		
PAY TO THE ORDER OF	THRIFTPAC	\$ 425.00
Four Hundred Twenty Five and NO/100-----DOLLARS		
 343 E. Broadway - Alton, IL 62002		
MEMO	Contribution	<i>W. G. Osborn</i>
⑆ 281070707⑆ 103 0344 5⑈ 0103		

G. OSBORN

2405

Feb 7, 1986

70-7070/2810

PAY TO THE ORDER OF

Thrift PAC

CS 15

\$ 125.00

One hundred twenty five and 00/100 DOLLARS



343 E. Broadway • APO, IL 61602

part of Conting. Germania FA. office staff

G. Osborn

⑆ 28 1070707⑆ ⑆ 103 0050 ⑆ ⑆ 2405 ⑆ 0000012500 ⑆

93043503907

## Financial Services Options

Competition in the financial services market is good for consumers, and the technological advances now being made in the delivery of financial services should be allowed to enhance that competitive environment.

For this reason, efforts to reregulate financial institutions and return to the days of government-mandated specialization simply won't work and would only serve to deny consumers the efficiencies and options offered by new technologies. Broadened powers in insurance, securities and real estate should be available to all depository institutions.

*Interstate Banking*—One of the most obvious examples of technology straining traditional banking policy is interstate banking. The Council supports the trend toward full interstate banking for both thrift institutions and commercial banks and supports the formation of regional compacts as a step in that direction.

*Dual Banking System*—The National Council is proud to represent both state-chartered and federally chartered thrift institutions. Business opportunities offered by charter options are a major source of innovation that ensures the vitality of our banking system. Efforts to weaken state authority through a federal override of state powers must be resisted.

## Tax Reform Legislation

The National Council supports the goals of the current tax reform initiative which seeks to lower corporate tax rates and simplify the tax code. However, the bill, H.R. 3838, as passed by the House of Representatives, will have a substantial adverse impact on the tax status of thrift institutions. Improvements to be sought in the Senate version include:

1. Securing a transition rule for carryforward of net operating losses (NOLs) of thrifts which would allow an additional three-year (eight total) carryforward for losses incurred between 1980 and 1985.
2. Clarifying and improving language relating to thrift bad debt reserve methods to make clear that the experience method of reserves continues to be available to thrift institutions without imposition of asset test requirements; assuring that existing asset test requirements are broadened to reflect modern thrift operations.
3. Continuing the current tax-free treatment of FSLIC assistance in supervisory mergers and tax-free treatment of reorganizations of troubled thrifts; extending similar treatment to FDIC assistance.

4. Deleting the language of H.R. 3838 that limits Individual Retirement Account (IRA) contributions for individuals who participate in a tax-deferred savings plan, such as a 401(k) plan.
5. Assuring that effective dates of provisions affecting thrifts in the legislation begin in 1987 or later.

## Deposit Insurance

The viability of the nation's deposit insurance system, particularly the Federal Savings and Loan Insurance Corporation (FSLIC), has been questioned in the aftermath of recent, highly publicized bank and thrift failures. In the wake of the Ohio and Maryland crises, public confidence in all financial institutions has been shaken. The issue now before Congress and the regulatory agencies is how to strengthen the deposit insurance system and continue to ensure the public's confidence in this system.

In undertaking this difficult task, the National Council urges Congress and the regulators to look more closely at the origin of the problem. Close examination of the evidence shows that the recent problems have not been caused by the use of newly acquired powers but by the abuse or imprudent use of longstanding powers. In fact, prudent exercise of these newly acquired powers has contributed to the record-breaking year for earnings enjoyed by many, though not all, thrifts in 1985. These increased earnings have made a substantial contribution toward rebuilding the industry's net worth.

Increased earnings alone, however, cannot solve all the problems that beset the FSLIC. The National Council, in anticipating the emergence of this important issue, has formed a Task Force to evaluate the insurance system. Although the Task Force on Alternatives to Reregulation has not yet completed its deliberations, it has recommended that the following steps be implemented to achieve increased stability at FSLIC:

1. Adopt risk-based capital requirements based on the overall risk posed by the institution as a whole rather than on the powers, state or federal, that it utilizes.
2. Gear the frequency and intensity of examinations directly to an institution's capital position relative to its risk-based requirement.
3. Establish a specific timetable for dealing with institutions approaching insolvency so that regulatory action is taken promptly while some value remains in the institutions.
4. Permit any responsible party with adequate capital to acquire a failing thrift—in recognition of the need for additional capital in the industry.
5. Establish special-purpose corporations in each of the Federal Home Loan Bank Districts, where needed, to provide, under the control of the local District Bank, for the least-cost liquidation of institutions for whom no acquirer can be found.

**Key Contacts at  
The National Council**  
**Call (202) 857-3100**

**Kenneth F.X. Albers**  
Chairman

**Robert S. Gaiswinkler**  
First Vice Chairman

**John H. Rousselot**  
President

**George Hanc**  
Executive Vice President and  
Chief Operating Officer

**James J. Butera**  
Group Vice President for  
Legislative and Regulatory Policy

**Jim Cousins**  
Vice President and Director,  
Congressional Affairs

**Beth Neese**  
Associate Director,  
Congressional Affairs

**Peter E. Knight**  
Vice President and Director,  
Mortgage Finance

**Maggy H. Ralbovsky**  
Legislative Assistant,  
Mortgage Finance

**J. Ballard Everett**  
Director of Political Affairs

**Rebecca H. Laird**  
Vice President and General Counsel

**Harding deC. Williams**  
Vice President and  
Legislative Counsel

**Wendy S. Schonman**  
Assistant Counsel and  
Tax Associate

**John A. Tuccillo**  
Vice President and Director,  
Research and Economics

**James F. Carroll, Jr.**  
Vice President of Corporate  
Development and State Relations

**Joseph D. Hutnyan**  
Vice President and  
Director of Communications

**James A. Eberle**  
Vice President and  
Director of Public Relations

*National Council of  
Savings Institutions*



**Representing the nation's progressive  
savings banks and savings and  
loan associations.**

---

**What the National Council  
Stands For**

The National Council of Savings Institutions—based in Washington, D.C.—is dedicated to the principle that depository institutions should be able to compete effectively and fairly in the rapidly changing financial services marketplace. The Council is committed to completing the process of deregulation so that savings institutions can provide their customers with a full range of financial services.

Launched in November 1983, the Council is the result of the consolidation of the National Association of Mutual Savings Banks and the National Savings and Loan League. The National Council now represents approximately 600 savings institutions nationwide with assets approaching \$450 billion.

The cornerstone of the Council's philosophy is that it will not advocate restrictions on competitors, but will work to relieve restrictions on all depository institutions to achieve competitive equity at the highest level. This will enable savings institutions to participate fully in the marketplace of the future and to provide consumers and other customers with a full range of financial services.

---

**National Council of Savings Institutions**  
1101 Fifteenth Street, N.W., Washington, D.C. 20005

*ae*

# THRIFTPAC

National Council of Savings Institutions

Suite 400, 1101 Fifteenth Street, N.W., Washington, D.C. 20005 • Phone (202) 857-3100

**Chairman**

**William F. Olson**

President  
Peoples Westchester  
Savings Bank  
Hawthorne, New York

**Vice Chairman**

**Douglas E. Peters**

President  
Occidental/Nebraska  
Federal Savings Bank  
Omaha, Nebraska

**Treasurer**

**Norwick R. Goodspeed**

Chairman  
People's Bank  
Bridgeport, Connecticut

January 27, 1986

Mr. William G. Osborn  
Chairman and CEO  
Germania, F.A.  
543 East Broadway  
Alton, IL 62002

Dear Bill:

THRIFTPAC needs your help today. The 1986 Campaigns for the U.S. House of Representatives and Senate are heating up rapidly. Many friends of our industry need early funding to help assure their re-election in November.

THRIFTPAC is the major vehicle the Council has to help these members with their campaign finances. And you are the only people we can turn to to help raise the funds THRIFTPAC needs to participate in the election process.

Federal law prevents us from asking for your financial help unless we have a signed authorization, from you, allowing us to do so. An authorization allowing THRIFTPAC to solicit you and your administrative, executive, and professional personnel is enclosed with this letter.

Please grant us the authorization today and return it in the enclosed envelope. Your authorization is not a commitment to make a contribution, it only allows THRIFTPAC an opportunity to present its case to you. Then, you make your decision as to whether or not you contribute.

THRIFTPAC is planning a special fundraising breakfast at the February Government Affairs Conference. Senator Slade Gorton (R-WA), a member of both the Senate Banking and Budget committees, will be our special guest at this THRIFTPAC fundraising breakfast.

Since you are registered for the Conference, I am sure you will be interested in learning more about this event. Once we have your authorization, we can provide you with more details and formally invite you to participate in the event.

We look forward to hearing from you by January 22nd.

Kind regards,

John H. Rousselot  
President  
National Council of Savings  
Institutions

93043503910

TO: THRIFTPAC  
National Council of Savings Institutions  
Suite 400  
1101 Fifteenth Street, N.W.  
Washington, D.C. 20005

(Please Type or Print)

I \_\_\_\_\_  
(Name and Title)

give permission\* on behalf of the \_\_\_\_\_

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(City)

\_\_\_\_\_  
(State)

\_\_\_\_\_  
(Zip)

for THRIFTPAC to solicit the officers of this institution for voluntary contributions to candidates for election to FEDERAL office. The solicitation permission is valid for the years:

// 1986

// 1987

// 1988

// All of the above

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\* Under federal law, a corporation may grant permission for a solicitation of its officers to only one federal PAC sponsored by a trade association per year. This limitation applies to a solicitation for federal campaign contributions, not solicitations for contributions to state and local elective office.

93043503911



Illinois Savings and Loan  
 Political Education Committee  
 Post Office Box 5091  
 Springfield, Illinois 62705

RECEIVED APR 4 1986

ROUTE 2  
 MORRIS       ROBERTS   
 NEW               LEWIS   
 VANATA       WICKENHAUSER   
 POLLACI       OSBORN  *OS*  
 RETURN TO BRENDA

Dear Managing Officer:

..... please accept this notice as a reminder of our urgent need for your continuing support of ISLPEC this year. That's why our trustees were concerned about not hearing from you. Please consider your association's goal ..... We are counting on your support.

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.

\$1,110  
 Association Goal

93043503912

FEB 1986

Dist # 112

William G. Osborn  
Chairman of Board  
Germania, F. A.  
543 East Broadway, Box 557  
Alton, IL 62002

93043503913

RECEIVED MAR 14 1986



627 E. BROADWAY

ALTON, ILLINOIS

62002

PHONE (618) 465-4451

Thank- Bill.

Please make the check out to:

Growth Association

and mail to me.

5 tickets at \$10.00

\$50.00

March 13, 1986

93043503914

1-826

*The Difference Between a House and a Home . . . Since 1883*

EDWARD L. MORRIS 3-86		101
W. G. OSBORN		
543 E. BROADWAY 618-465-5543	March 14, 19 86	70-7070/2810
ALTON, IL 62002		
PAY TO THE ORDER OF	Growth Association	\$ 50.00
Fifty and NO/100-----DOLLARS		
343 E. Broadway, Alton, IL 62002		
Sam Vadalabene Roast		
MEMO 4/11/86-\$10/person		
⑆28⑆070707⑆ ⑆03 0344 5⑈ 0⑆0⑆		

TO: Staff Members  
FROM: Edward Morris, President  
SUBJECT: Political Contributions  
DATE: March 3, 1986

Once again this year, we need the cooperation of our staff to support the political committees of the various savings and loan leagues, as well as state and local politicians. Information regarding the key political committees is attached for your review. Also attached is a report of political contributions we made during 1985.

If you could make a contribution of whatever amount you feel appropriate, we can hopefully reach our goal this year of \$5,000. (You may be entitled to claim a portion of your contribution as a tax credit up to \$50 on an individual return, or up to \$100 on a joint return.) By being a "super leader", you can help the industry, Germania and yourself by supporting legislation that supports the savings and loan industry.

Please make your check payable to Edward L. Morris and return to Brenda Boone by March 20, 1986. Thank you for your cooperation and support.

93043503915

1985 RECIPIENTS OF POLITICAL CONTRIBUTIONS:

AMOUNT

\$ 250.00	THRIFTPAC - National Council's Political Action Committee
100.00	ISLPEC - Illinois S & L Political Education Committee
100.00	SAPEC - U. S. League Political Education Committee
100.00	Houston for Mayor Committee (Springfield)
100.00	Wuellner Campaign Committee (Alton)
100.00	Mayor Lenz Campaign Fund (Alton)
<u>25.00</u>	Committee to Re-elect Mayor Mackey (O'Fallon Mayor)
<u>\$ 775.00</u>	

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SAPEC is a Federal level PAC, which makes contributions to candidates for Federal office (primarily, the Senate and House of Representatives). SAPEC operates in full compliance with Federal laws and regulations.

Every dollar of your personal contribution is used by SAPEC in support of candidates for federal office.

Candidates who receive SAPEC support are those who have shown an understanding of the concerns of our business and a favorable view toward our legislative programs.

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RECEIVED JAN 30 1986

*ace*



# THRIFTPAC

National Council of Savings Institutions  
Suite 400, 1101 Fifteenth Street, N.W., Washington, D.C. 20005 • Phone (202) 857-3100

January 27, 1986

**Chairman**  
William F. Olson  
President  
Peoples Westchester  
Savings Bank  
Hawthorne, New York

**Vice Chairman**  
Douglas E. Peters  
President  
Occidental/Nebraska  
Federal Savings Bank  
Omaha, Nebraska

**Treasurer**  
Norwick R. Goodspeed  
Chairman  
People's Bank  
Bridgeport, Connecticut

Mr. William G. Osborn  
Chairman and CEO  
Germania, F.A.  
543 East Broadway  
Alton, IL 62002

Dear Bill:

THRIFTPAC needs your help today. The 1986 Campaigns for the U.S. House of Representatives and Senate are heating up rapidly. Many friends of our industry need early funding to help assure their re-election in November.

THRIFTPAC is the major vehicle the Council has to help these members with their campaign finances. And you are the only people we can turn to to help raise the funds THRIFTPAC needs to participate in the election process.

93043503918

**Key Contacts at  
The National Council  
Call (202) 857-3100**

**Kenneth F.X. Albers**  
Chairman

**Robert S. Gaiswinkler**  
First Vice Chairman

**John H. Rousselot**  
President

**George Hanc**  
Executive Vice President and  
Chief Operating Officer

**James J. Butera**  
Group Vice President for  
Legislative and Regulatory Policy

**Jim Cousins**  
Vice President and Director,  
Congressional Affairs

**Beth Neese**  
Associate Director,  
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**Peter E. Knight**  
Vice President and Director,  
Mortgage Finance

**Maggy H. Ralbovsky**  
Legislative Assistant,  
Mortgage Finance

**J. Ballard Everett**  
Director of Political Affairs

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Assistant Counsel and  
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Vice President and Director,  
Research and Economics

**James F. Carroll, Jr.**  
Vice President of Corporate  
Development and State Relations

**Joseph D. Hutnyan**  
Vice President and  
Director of Communications

**James A. Eberle**  
Vice President and  
Director of Public Relations



*Representing the nation's progressive  
savings banks and savings and  
loan associations.*

---

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Stands For**

The National Council of Savings Institutions—based in Washington, D.C.—is dedicated to the principle that depository institutions should be able to compete effectively and fairly in the rapidly changing financial service marketplace. The Council is committed to completing the process of deregulation so that savings institutions can provide their customers with a full range of financial services.

Launched in November 1983, the Council is the result of the consolidation of the National Association of Mutual Savings Banks and the National Savings and Loan League. The National Council now represents approximately 600 savings institutions nationwide with assets approaching \$450 billion.

The cornerstone of the Council's philosophy is that it will not advocate restrictions on competitors, but will work to relieve restrictions on all depository institutions to achieve competitive equity at the highest level. This will enable savings institutions to participate fully in the marketplace of the future and to provide consumers and other customers with a full range of financial services.

---

**National Council of Savings Institutions**  
1101 Fifteenth Street, N.W., Washington, D.C. 20005

## Financial Services Options

Competition in the financial services market is good for consumers, and the technological advances now being made in the delivery of financial services should be allowed to enhance that competitive environment.

For this reason, efforts to reregulate financial institutions and return to the days of government-mandated specialization simply won't work and would only serve to deny consumers the efficiencies and options offered by new technologies. Broadened powers in insurance, securities and real estate should be available to all depository institutions.

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**Dual Banking System**—The National Council is proud to represent both state-chartered and federally chartered thrift institutions. Business opportunities offered by charter options are a major source of innovation that ensures the vitality of our banking system. Efforts to weaken state authority through a federal override of state powers must be resisted.

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The National Council supports the goals of the current tax reform initiative which seeks to lower corporate tax rates and simplify the tax code. However, the bill, H.R. 3838, as passed by the House of Representatives, will have a substantial adverse impact on the tax status of thrift institutions. Improvements to be sought in the Senate version include:

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3. Continuing the current tax-free treatment of FSLIC assistance in supervisory mergers and tax-free treatment of reorganizations of troubled thrifts; extending similar treatment to FDIC assistance.

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In undertaking this difficult task, the National Council urges Congress and the regulators to look more closely at the origin of the problem. Close examination of the evidence shows that the recent problems have not been caused by the use of newly acquired powers but by the abuse or imprudent use of longstanding powers. In fact, prudent exercise of these newly acquired powers has contributed to the record-breaking year for earnings enjoyed by many, though not all, thrifts in 1985. These increased earnings have made a substantial contribution toward rebuilding the industry's net worth.

Increased earnings alone, however, cannot solve all the problems that beset the FSLIC. The National Council, in anticipating the emergence of this important issue, has formed a Task Force to evaluate the insurance system. Although the Task Force on Alternatives to Reregulation has not yet completed its deliberations, it has recommended that the following steps be implemented to achieve increased stability at FSLIC:

1. Adopt risk-based capital requirements based on the overall risk position of the institution as a whole rather than on the powers, state or federal, that it utilizes.
2. Gear the frequency and intensity of examinations directly to an institution's capital position relative to its risk-based requirement.
3. Establish a specific timetable for dealing with institutions approaching insolvency so that regulatory action is taken promptly while some value remains in the institutions.
4. Permit any responsible party with adequate capital to acquire a failing thrift—in recognition of the need for additional capital in the industry.
5. Establish special-purpose corporations in each of the Federal Home-Loan Bank Districts, where needed, to provide, under the control of the local District Bank, for the least-cost liquidation of institutions for whom no acquirer can be found.

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The objectives of ISLPEC are two-fold:

### 1. *Political education:*

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ISLPEC encourages savings and loan people to become active in the campaigns of candidates most likely to support principles and philosophies which will result in a growing, vigorous thrift and home ownership business.

ISLPEC is NOT a lobbying organization. It does not take a position on political parties or specific items of legislation. It does suggest, however, that its members register to vote, campaign and contribute funds to provide financial support for selected candidates for the Illinois General Assembly... and vote.

## HOW MUCH SHOULD BE CONTRIBUTED?

This, of course, is a personal decision. The following schedule is suggested as a guide:

Contributing member, \$10.00 or less annually  
Sustaining member, \$25.00 annually  
Principle member, \$100.00 annually  
Executive member, \$1,000.00 annually

All contributions of \$150 or more must be reported by ISLPEC to the State Board of Elections in its periodic reports.

## ARE ISLPEC CONTRIBUTIONS TAX DEDUCTIBLE?

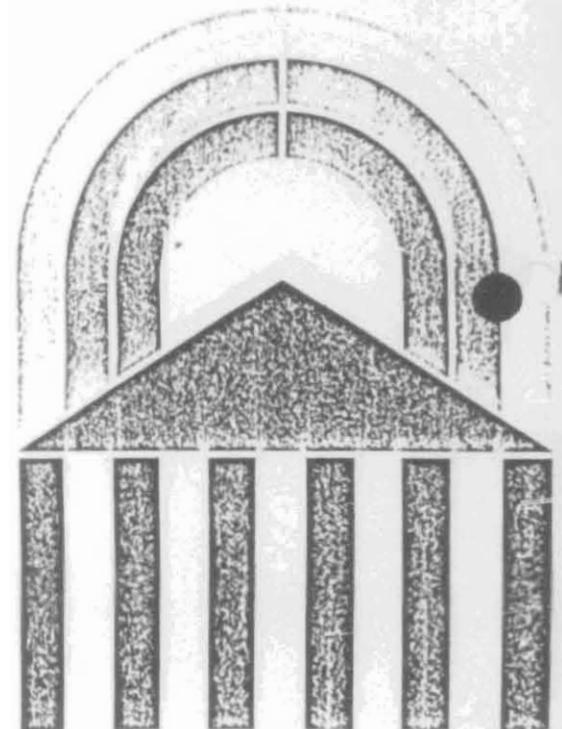
Contributions to ISLPEC qualify as either a deduction or credit for federal income tax purposes, subject to limitations that depend on individual circumstances.

## HOW ARE CONTRIBUTIONS MADE?

Your contribution should be by PERSONAL CHECK OR MONEY ORDER and made payable to ISLPEC. It should be accompanied by the contribution form in this brochure.

# Illinois Savings and Loan Political Education Committee

## Your Voice in State Government



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#### WHAT IS ISLPEC?

ISLPEC is the Illinois Savings and Loan Political Education Committee. It is a voluntary, not-for-profit committee organized by persons engaged in the savings and loan business to provide a voice in state government for people in the savings and loan business. Its purpose is to encourage employees of savings and loan associations to support with contributions candidates who have demonstrated their belief and support for the private enterprise system.

#### HOW IS ISLPEC ORGANIZED?

Members of ISLPEC are individuals who largely are active in the savings and loan business, and who believe that they should have a voice in American politics. The business affairs of ISLPEC are directed by its Executive Committee.

#### WHY ISLPEC?

Every employee of a savings and loan association may be affected by legislation and especially by legislation resulting in the supervision and regulations of the savings and loan business. It is impossible to separate the welfare of the employee from the welfare of the business. Hence, each one has a significant stake and deep personal involvement in legislation that touches the savings and loan business. Thus, ISLPEC can be effective both through contributions and personal participation.

#### CAN THIS BE DONE BY ASSOCIATIONS?

The Federal Corrupt Practices Act of 1925, sometimes called the "Hatch Act," prohibits financial institutions, such as savings and loan associations and not-for-profit tax exempt trade associations from making contributions in connection with elections to federal office. Contributions should be made by individuals from personal funds. Internal Revenue Service allows a personal deduction or tax credit to individuals for political contributions. Contributions are not tax deductible for Illinois State income tax purposes. ISLPEC's political action and support funds are derived solely from individuals on a voluntary basis. This is why your participation is so important.

#### HOW ARE ISLPEC FUNDS USED?

ISLPEC's assistance is largely at the state level and in those areas of political action where state and local support is difficult to secure.

Financial assistance is given to support candidates who can provide a favorable climate for the savings and loan business. The decision to endorse and financially support candidates for the Legislature are made by the Executive Committee of ISLPEC. Approval is given only if the Committee believes the candidate favors the programs and goals of the savings and loan business.

Contributions to candidates are made without regard to party affiliation. The uses of ISLPEC funds not only meet all legal requirements but the uses are governed by high ethical standards and in accordance with state law.



# ISLPEC

POST OFFICE BOX 5091  
OLYMPIA FIELD ILL 62705  
P. O. Box 5091  
Springfield, Illinois 62705

Enclosed is my *personal check* (or money order) in the amount of \$ \_\_\_\_\_, payable to ISLPEC, as my contribution to the Illinois Savings and Loan Political Education Committee for this year.

Date \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

My association is \_\_\_\_\_

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.

*Ed. Morris*  
*Is this B*

TO:  
FROM: Edward Morris  
SUBJECT: Political Contributions  
DATE: March ~~12~~<sup>17</sup> 198~~6~~<sup>7</sup>

Once again this year, we need the cooperation of our officers to support the political committees of the various savings and loan leagues, as well as state and local politicians. ~~Information regarding the key political committees is attached for your review. Also attached is a report of political contributions we made during 1985:~~

If you would make a minimum contribution in the amount of \$ \_\_\_\_\_, we can reach our goal this year of \$5,000. (You may be entitled to claim a portion of your contribution as a tax credit up to \$50 on an individual return, or up to \$100 on a joint return.) By being a "super leader", you can help the industry, Germania and yourself by supporting legislation that supports the savings and loan industry.

Please make your check payable to Edward L. Morris and return to Brenda Boone by ~~FRIDAY~~  
March 20, 1986. Thank you for your cooperation and support.  
*March 17, 1987.*

93043503923

1985 RECIPIENTS OF POLITICAL CONTRIBUTIONS:

AMOUNT

\$ 250.00	THRIFTPAC - National Council's Political Action Committee
100.00	ISLPEC - Illinois S & L Political Education Committee
100.00	SAPEC - U. S. League Political Education Committee
100.00	Houston for Mayor Committee (Springfield)
100.00	Wuellner Campaign Committee (Alton)
100.00	Mayor Lenz Campaign Fund (Alton)
<u>25.00</u>	Committee to Re-elect Mayor Mackey (O'Fallon Mayor)
<u>\$ 775.00</u>	

93043503924



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© 1988 U.S. LEAGUE OF SAVINGS INSTITUTIONS

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*die*



# THRIFTPAC

National Council of Savings Institutions  
Suite 400, 1101 Fifteenth Street, N.W., Washington, D.C. 20005 • Phone (202) 857-3100

January 27, 1986

**Chairman**  
William F. Olson

President  
Peoples Westchester  
Savings Bank  
Hawthorne, New York

**Vice Chairman**  
Douglas E. Peters

President  
Occidental/Nebraska  
Federal Savings Bank  
Omaha, Nebraska

**Treasurer**  
Norwick R. Goodspeed

Chairman  
People's Bank  
Bridgeport, Connecticut

Mr. William G. Osborn  
Chairman and CEO  
Germania, F.A.  
543 East Broadway  
Alton, IL 62002

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93043503926

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Call (202) 857-3100**

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Chairman

**Robert S. Gaiswinkler**  
First Vice Chairman

**John H. Rousselot**  
President

**George Hanc**  
Executive Vice President and  
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Associate Director,  
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**Maggy H. Ralbovsky**  
Legislative Assistant,  
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**J. Ballard Everett**  
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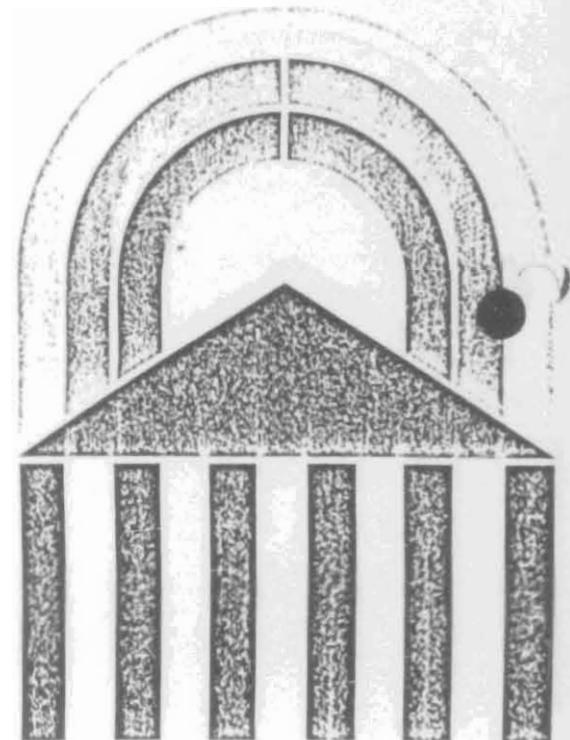
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# Illinois Savings and Loan Political Education Committee

## Your Voice in State Government



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**CAN THIS BE DONE BY ASSOCIATIONS?**

The Federal Corrupt Practices Act of 1925, sometimes called the "Hatch Act," prohibits financial institutions, such as savings and loan associations and not-for-profit tax exempt trade associations from making contributions in connection with elections to federal office. Contributions should be made by individuals from personal funds. Internal Revenue Service allows a personal deduction or tax credit to individuals for political contributions. Contributions are not tax deductible for Illinois State income tax purposes. ISLPEC's political action and support funds are derived solely from individuals on a voluntary basis. This is why your participation is so important.

**HOW ARE ISLPEC FUNDS USED?**

ISLPEC's assistance is largely at the state level and in those areas of political action where state and local support is difficult to secure.

Financial assistance is given to support candidates who can provide a favorable climate for the savings and loan business. The decision to endorse and financially support candidates for the Legislature are made by the Executive Committee of ISLPEC. Approval is given only if the Committee believes the candidate favors the programs and goals of the savings and loan business.

Contributions to candidates are made without regard to party affiliation. The uses of ISLPEC funds not only meet all legal requirements but the uses are governed by high ethical standards and in accordance with state law.

**WHAT IS ISLPEC?**

ISLPEC is the Illinois Savings and Loan Political Education Committee. It is a voluntary, not-for-profit committee organized by persons engaged in the savings and loan business to provide a voice in state government for people in the savings and loan business. Its purpose is to encourage employees of savings and loan associations to support with contributions candidates who have demonstrated their belief and support for the private enterprise system.

**HOW IS ISLPEC ORGANIZED?**

Members of ISLPEC are individuals who largely are active in the savings and loan business, and who believe that they should have a voice in American politics. The business affairs of ISLPEC are directed by its Executive Committee.

**WHY ISLPEC?**

Every employee of a savings and loan association may be affected by legislation and especially by legislation resulting in the supervision and regulations of the savings and loan business. It is impossible to separate the welfare of the employee from the welfare of the business. Hence, each one has a significant stake and deep personal involvement in legislation that touches the savings and loan business. Thus, ISLPEC can be effective both through contributions and personal participation.



**ISLPEC**

Enclosed is my *personal* check (or money order) in the amount of \$ \_\_\_\_\_, payable to ISLPEC, as my contribution to the Illinois Savings and Loan Political Education Committee for this year.

STATE BOARD OF ELECTIONS  
101 W. WASHINGTON ST.  
SPRINGFIELD, ILLINOIS 62705

P.O. Box 5091  
Springfield, Illinois 62705

Date \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

My association is \_\_\_\_\_

A copy of our report filed with the State Board of Elections is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois.

PERSONNEL MEMO # 86-71

TO: Ron Vanata  
FROM: Jan Wickenhauser  
SUBJECT: Political Action Committee  
DATE: February 27, 1986

As we discussed in the Management Meeting Tuesday, could you provide me with brochures we can distribute with the solicitation letter to officers.

9304335039

Jan

To: Ed  
From: Bill

2-12-86

Corp Check

Fed Chartered Inst.  
under Fed law cannot make  
Political Contributions  
Service Corps formed  
under State law can  
make Corporate checks to  
Political's

Source: Ron Hoffman atty, Legislative Rep.  
W Ill League of Savings Inst.

cc: Management Committee

93043503932

MEMO #86-38

March 28, 1986

TO: Ron Vanata

FR: Don Stankus

RE: Political Year 1986

In reply to your memo of March 17 I've covered this subject with Scott, Kathy and some of our staff. At this point we have not been approached by any candidates for political contributions. We will coordinate any potential, future contacts and advise you should they occur.

*Bull OSBORN*

93043503933



MEMO #86 - 67

TO: ALL BRANCH MANAGERS  
FROM: RON VANATA  
SUBJECT: POLITICAL YEAR ... 1986  
DATE: MARCH 17, 1986

Each of us are aware of the solicitation of monies by candidate for election or re-election to the office of choice.

Please provide me your projected needs for your assigned branch area BY MARCH 24TH.

Also, each of us will need to observe that a candidate or incumbent may solicit each of your offices for the same function.

The format I would like to be used is:

BRANCH 09

LOCAL ELECTION

STATE ELECTION

NATIONAL ELECTION

93043503935

- \* 1. Event/Date Jerry Costello, ST. Clair Cty Chairman / Unknown  
Dollars Belleville, Il. \$100.00
- \* 2. Event/Date Sen. Alan Dixon, US Senator / Unknown  
Dollars Belleville, Il. \$100.00
- 3. Event/Date Rep. Melvin Price, US House of Representatives / Unknown  
Dollars \$50.00
- 4. Event/Date  
Dollars
- 5. Event/Date  
Dollars
- 6. Event/Date  
Dollars
- 7. Event/Date Democratic Fund Raiser / 10-86  
Dollars \$100.00

TOTAL DOLLARS

\* These 2 are a must to support.  
Very powerful in local, state and national politics.

GRAND TOTAL \$ 350.00

cc: B. Osborn  
J. New

Clally

POLITICAL CONTRIBUTIONS

SUMMARY

1985

RECEIPTS

DISBURSEMENTS

Balance on Hand, 1/1/85	\$ 113.15	2-21-85	Mayor Lenz Campaign Fund	\$ 100.00
Interest, 1-3-85	.50	3-1-85	Committee to Re-elect Mayor	
Interest, 2-1-85	.48		Mackey (O'Fallon Mayor)	25.00
Contributions - 2/27/85	76.51	4-22-85	Wuellner Campaign Committee	100.00
Interest, 3-1-85	.49	5-17-85	THRIFTPAC	250.00
Contributions, 3-4-85	151.76		National Council of Savings	
Contributions, 3-5-85	33.33		Institutions	
Contributions, 3-7-85	86.84	5-20-85	ISLPEC	100.00
Contributions, 3-14-85	66.85		Illinois Savings & Loan Political	
Contributions, 3-21-85	95.70		Education Committee	
Contributions, 3-26-85	83.69	5-20-85	SAPEC	100.00
Interest, 4-3-85	2.09		U.S. League -Savings Associations	
Contributions, 4-10-85	159.57		Political Education Committee	
Contributions, 4-11-85	4.20	5-20-85	Houston For Mayor Committee	100.00
Contributions, 4-22-85	28.99		(Springfield)	
Interest, 5-3-85	3.08			\$ 775.00
Interest, 6-3-85	2.70			
Interest, 7-3-85	.87			
Interest, 8-2-85	.59			
Interest, 9-3-85	.63			
Interest, 10-3-85	.59			
Interest, 11-1-85	.58			
Interest, 12-3-85	.64			
	\$ 913.83			

93043503936

93043503937

00

0.00+

Deposits

Cont. 3/10/86 851.55+  
" 3/14/86 272.40+  
" 3/14/86 218.33+  
" 3/20/86 920.52+  
" 3/24/86 83.45+  
" 4/8/86 125.13+

00

2471.380

Interest 7.13+

1985 Carry-over 40.64+

Payouts

2619.150

Vadalabene -50.00-

Margaret Kelly 125.00-

Cost for checks -17.00-

11

Balance — 2427.13\*

on Hand

4/8/86

Ed,

'456

Political Con -  
tributions for

1986 as of

7/28/86 = \$1,345.00

cc: Vandata

93043503938



543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

Illinois Savings and Loan  
Political Education Committee  
Post Office Box 5091  
Springfield, IL 62705

Gentlemen

On behalf of the officers and staff members of Germania, F.A., who make voluntary contributions toward political candidates, we enclose our check number 104 in the amount of \$225 in support of ISLPEC.

Sincerely,

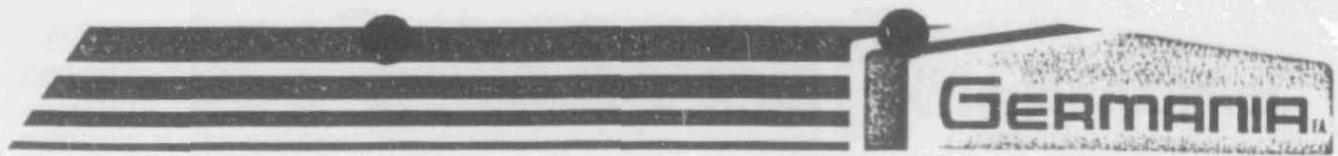
Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

BC: Ed Morris

93043503939



543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

U. S. League - SAPEC  
1709 New York Ave., N.W.  
Suite 801  
Washington, D.C. 20006-9920

Gentlemen:

On behalf of the officers and staff members of Germania, F.A.,  
who make voluntary contributions toward political candidates,  
we enclose our check number 105 in the amount of \$225 in  
support of SAPEC.

Sincerely,

Wm. G. Osborn  
Chairman

WGO:lmc

Enclosure

BC: Ed Morris

93043503940



543 East Broadway  
P.O. Box 557  
Alton, IL 62002  
618-465-5543  
314-355-0700

April  
23  
1986

THRIFTPAC  
National Council of Savings Institutions  
1101 Fifteenth Street, N.W. - Suite 400  
Washington, D.C. 20005-5070

Gentlemen:

On behalf of the officers and staff members of Germania, F.A. who make voluntary contributions toward political candidates, we enclose our check number 103 in the amount of \$425.00 in support of THRIFTPAC. Please note that this is in addition to the \$125.00 individual contribution by me February 3, 1986, check number 2405 (copy attached)

Our total contribution of \$550.00 to THRIFTPAC in 1986 is consistent with the suggested goal of one dollar per million of assets for each Council member.

Sincerely,

Wm. G. Osborn  
Chairman

WGO:lmc

Enclosures

BC: Ed Morris

93043503941

MANAGEMENT COMMITTEE MEETING  
March 12, 1986 - 7:30 A.M.

Agenda

1. Old Business - All
2. Political Contribution Budget - Osborn
3. GFC Insurance Mailing in June - Osborn
4. Review of Kroger Contract - Morris
5. Washington First Federal Conversion - Lewis
6. Review of February Financial Results - Roberts
7. Discussion of Management Committee Planning Retreat - Morris
8. FHLB of Chicago - Unclaimed Property - New

9. *Ron Vanata*

93043503942

cc: ~~Morris~~  
New  
Osborn  
Vanata  
Roberts  
Wickenhauser  
Pollaci  
Lewis

# Bulletin

Federal Home Loan Bank  
of Chicago

RECEIVED MAR 10 1986

ROUTE TO:

- |  |   |
|--|---|
| <input type="checkbox"/> D. Kilduff                | <input type="checkbox"/> D. Stanlun     |
| <input type="checkbox"/> W. Osborn                 | <input type="checkbox"/> D. Sovanski    |
| <input type="checkbox"/> R. Roberts                | <input type="checkbox"/> D. Veleena     |
| <input type="checkbox"/> R. Vanata                 | <input type="checkbox"/> D. Osborn      |
| <input type="checkbox"/> K. Downs                  | <input type="checkbox"/> J. Wickenhauer |
| <input type="checkbox"/> B. Rush                   | <input type="checkbox"/> P. Lewis       |
| <input type="checkbox"/> J. Pollard                | <input type="checkbox"/> C. Tarpey      |
| <input type="checkbox"/> RETURN TO LORETTA CLAYTON |   |

No. 86-03  
March 5, 1986

TO ALL MEMBERS:

Re: Unclaimed Property

The Federal Home Loan Bank of Chicago is notifying our member institutions of the following incident regarding unclaimed property information that has been requested by telephone.

A certain person or persons have been contacting various organizations holding unclaimed financial assets for Illinois residents and purporting to represent the Department of Financial Institutions. When calling, the individual requests the organizations to supply financial information over the telephone regarding unclaimed owners.

The Department in all cases requests financial information regarding unclaimed owners in writing, on Department stationery and approved forms.

If you receive an inquiry for anyone seeking unclaimed property information for Illinois owners, in the name of the Department of Financial Institutions, ask them to identify themselves, or get their telephone number, if possible.

If you have any questions regarding telephone inquiries, please call Michael A. Goldman, Administrator (312) 917-5140 or Joseph J. Temperelli, Assistant Supervisor (217) 782-8463.

Sincerely,

*Florence B. Paulinski*

(Mrs.) Florence B. Paulinski  
Assistant Vice President  
Administrative Services

93043503943



93043503945

MARGARET KELLY, CPA STATE AUDITOR OF MISSOURI  
INVITES YOU TO JOIN  
THE HONORABLE JOHN D. ASHCROFT  
GOVERNOR OF MISSOURI

Monday April 7 1986 6pm to 8pm  
Racquet Club East 476 N. Kingshighway  
361-0000  
\$125 per person Tables of 8 \$1000

Please make personal, corporate, or PAC checks payable to:  
"FRIENDS OF MARGARET KELLY"

For questions call Sherri Durb.  
Finance Director 344-075-8030

(Put on dotted line and mail response and check  
in enclosed envelope)

Name: Edward L. Morris, President  
Germania, F.A.  
Address: 543 East Broadway, Alton, IL 62002  
Phone: 618-465-5543  
Amount Enclosed: \$125.00  
If the card you are unable to attend, please  
mail your contribution in the return envelope

EDWARD L. MORRIS 3-86	102
W. G. OSBORN	
542 E. BROADWAY 618-465-5543	March 24, 19 86
ALTON, IL 62002	10-100-0810
PAY TO THE ORDER OF Friends of Margaret Kelly	\$ 125.00
One Hundred Twenty Five and NO/100-----DOLLARS	
	
⑆28⑆070707⑆ ⑆03 0344 5⑈ 0⑆02	

Margaret Kelly Reception  
c/o Fred Steinbach  
237 S. Greentrails Dr.  
Chesterfield, MO 63017

Others making contributions

Mike Drury	\$ 25.00
Ann Guthrie	25.00
Keith Kassel	15.00
Branda Boone	5.00
Sharon Hamilton	10.00
Debbie Higgins	20.00
Carol Witt	10.00
Rita Schumacher	10.00
Janice Terrell	5.00
Nancy Zagar	10.00
Kim Anderson	5.00
Loretta Clayton	10.00
John Groves	5.00
Steve Klingbeil	35.00
Bethany Miller	10.00
Kathy Scoggins	5.00
	<hr/>
	205.00

Total to date paid by officers \$ 2,182.80

Add other staff contributions 205.00

---

Total 1986 contributions \$ 2,387.80  
As of 3/20/86

93043503946

Officers

Brownell, Vickie  
Office, Dupo Office  
Current pay \$ 22850.00/year  
Current job: Assistant Vice P

Burford, Charles  
Office, Alton-Corporate  
Current pay \$ 31000.00/year  
Current job: Assistant Vice P

Covey, John  
Office, Mt. Vernon Office  
Current pay \$ 24820.00/year  
Current job: Vice President, OI

Crull, Margie  
Office, Alton-Corporate  
Current pay \$ 16500.00/year  
Current job: Assistant Secy

Dowd, Kenneth  
Office, Alton-Corporate  
Current pay \$ 40300.00/year  
Current job: Vice President, OI

Dunham, Judy  
Office, Alton-Corporate  
Current pay \$ 26860.00/year  
Current job: Assistant Secy

Hartman, Chuck  
Office, Alton-Corporate  
Current pay \$ 23500.00/year  
Current job: Assistant Vice P

Kelley, Mike  
Office, Belleville Office  
Current pay \$ 32100.00/year  
Current job: Vice President

Kilguff, David  
Office, Alton-Corporate  
Current pay \$ 28000.00/year  
Current job: Executive Vice P

Krantz, Phil  
Office, Alton-Corporate  
Current pay \$ 23630.00/year  
Current job: Treasurer

Lewis, Linda  
Office, Alton-Corporate  
Current pay \$ 22100.00/year  
Current job: Assistant Vice P

Levit, Paul  
Office, Germanis Financial  
Current pay \$ 33000.00/year  
Current job: Senior Vice Pres

Loffler, Robin  
Office, Springfield Office  
Current pay \$ 23250.00/year  
Current job: Assistant Vice P

Madroski, Gertrude  
Office, Dupo Office  
Current pay \$ 24815.00/year  
Current job: Vice President

McBarn, David  
Office, Germanis Financial  
Current pay \$ 20900.00/year  
Current job: Assistant Vice P

Osborn, William  
Office, Alton-Corporate  
Current pay \$ 100000.00/year  
Current job: President Street

Pallack, John  
Office, Alton-Corporate  
Current pay \$ 28000.00/year  
Current job: Senior Vice Pres

Poppe, Paul  
Office, Germanis Financial  
Current pay \$ 36000.00/year  
Current job: Assistant Vice P

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Raymond, Dan  
Office, Alton-Corporate  
Current pay \$ 46300.00/year  
Current job: Assistant Vice P

Roberts, Robert  
Office, Alton-Corporate  
Current pay \$ 33500.00/year  
Current job: Senior Vice Pres

Rush, Ed  
Office, Alton-Corporate  
Current pay \$ 30400.00/year  
Current job: Assistant Vice

Saack, Bernie  
Office, Springfield Office  
Current pay \$ 22000.00/year  
Current job: Vice President

Schleicher, John  
Office, Alton-Corporate  
Current pay \$ 38000.00/year  
Current job: Vice President O

Stewart, Stephen  
Office, Alton-Corporate  
Current pay \$ 35000.00/year  
Current job: Assistant Vice P

Strout, Sandra  
Office, Alton-Corporate  
Current pay \$ 22000.00/year  
Current job: Assistant Secy

Strom, Kathy  
Office, Alton Square  
Current pay \$ 20940.00/year  
Current job: Assistant Vice P

Strom, Donald  
Office, Alton-Broadway  
Current pay \$ 29425.00/year  
Current job: Vice President

Strom, Brenda  
Office, Springfield Office  
Current pay \$ 16250.00/year  
Current job: Assistant Secy

Strom, Lawrence  
Office, Springfield Office  
Current pay \$ 22000.00/year  
Current job: Vice President O

Tarpe, Cheryl  
Office, Alton-Corporate  
Current pay \$ 21750.00/year  
Current job: Assistant Secy

Therrell, Debbie  
Office, Alton-Corporate  
Current pay \$ 27000.00/year  
Current job: Vice President, I

Vaneta, Ron  
Office, Alton-Corporate  
Current pay \$ 50000.00/year  
Current job: Senior Vice P

Walters, Charles  
Office, OTC - West County  
Current pay \$ 40000.00/year  
Current job: Vice President

Werner, Timothy  
Office, Alton-Corporate  
Current pay \$ 22700.00/year  
Current job: Vice President

Wickenhauser, Jan  
Office, Alton-Corporate  
Current pay \$ 30000.00/year  
Current job: Vice President P

Witt, James  
Office, O'Fallon Office  
Current pay \$ 21800.00/year  
Current job: Assistant Vice P

Witte, Paul  
Office, O'Fallon Office  
Current pay \$ 26000.00/year  
Current job: Vice President O

7-71

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3/12/2012

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Total requested - 700

93043503947

93043503948

**Report**  
 Responses on which this report is based  
 Select this employee's current work site

~~Aitkens, Mark~~ Office - O'Fallon  
 Current pay \$ 3000.00/year  
 Current job: Appraiser **5/23 3-6**

~~Arnes, Anthony~~ Office - Alton-Broadway  
 Current pay \$ 14000.00/year  
 Current job: Indirect Lending **5/23 3-21**

~~DeSoto, Dave~~ Office - Alton-Corporate  
 Current pay \$ 19000.00/year  
 Current job: Trust Officer **7/17 4-4**

~~Drury, Michael~~ Office - Duo Office  
 Current pay \$ 19000.00/year  
 Current job: Senior Financial **7/17 2-28**

~~Dunlap, Sara~~ Office - Alton-Corporate  
 Current pay \$ 13000.00/year  
 Current job: Purchasing **5/23 5-10 4-22**

~~Eck, Linda~~ Office - O'Fallon Office  
 Current pay \$ 13600.00/year  
 Current job: Operations Manager **5/23 3-5**

~~Kaehler, Mark~~ Office - Mt. Vernon Office  
 Current pay \$ 14775.00/year  
 Current job: Senior Financial **5/23 4-4**

~~Fink, Jere~~ Office - Alton-Corporate  
 Current pay \$ 11000.00/year  
 Current job: Accounting Analyst **7/17 4-8**

~~Fox, Thomas~~ Office - Springfield Office  
 Current pay \$ 24300.00/year  
 Current job: Senior Financial **4/17 10-28 2-28**

~~Fulkerson, Angela~~ Office - Mt. Vernon Office  
 Current pay \$ 10250.00/year  
 Current job: Teller Supervisor **7/17 4-22**

~~Gefterwecker, Sharon~~ Office - Mt. Vernon Office  
 Current pay \$ 12500.00/year  
 Current job: Senior Financial **4/17 3-11**

~~Green, Ronny~~ Office - Mt. Vernon Office  
 Current pay \$ 14800.00/year  
 Current job: Operations Manager **5/23 3-21**

~~Harmon, Joe~~ Office - O'Fallon County  
 Current pay \$ 18000.00/year  
 Current job: Loan Officer **6-26 609 ck 87 change 4-2**

~~Wattson, Sharon~~ Office - Alton-Broadway  
 Current pay \$ 13600.00/year  
 Current job: Senior Financial **7/17 3-22**

~~Katzen, Devin~~ Office - Alton-Broadway  
 Current pay \$ 10000.00/year  
 Current job: Assistant Loan **6-00 4/4**

~~Kingsbill, Steven~~ Office - Alton-Corporate  
 Current pay \$ 13000.00/year  
 Current job: Training Assis **4/17 15.00 3-7**

~~Lajunen, Jeff~~ Office - Alton-Broadway  
 Current pay \$ 18400.00/year  
 Current job: Operations Manager **5/23 2-26 15.00**

~~Compton, Ray~~ Office - Springfield Office  
 Current pay \$ 14100/year  
 Current job: Senior Financial **5/23 3-20**

~~Love, Nancy~~ Office - Alton-Broadway  
 Current pay \$ 14000.00/year  
 Current job: Teller Supervisor **5/23 2-27**

~~MANARD, Diane~~ Office - Alton-Corporate  
 Current pay \$ 17200.00/year  
 Current job: Loan Closing **4/18 4-4**

~~Wheeler, Scott~~ Office - Alton-Broadway  
 Current pay \$ 18000.00/year  
 Current job: Sales Marketing **7/17 15.00 3-22**

~~McKen, Charlie~~ Office - Germania Financial  
 Current pay \$ 10845.00/year  
 Current job: Programmer/Anal **7/17 3-26**

~~Kittler, Becky~~ Office - Springfield Office  
 Current pay \$ 13500.00/year  
 Current job: Senior Financial **4/17 3-4**

~~Dr. Seiler~~ Office - Duo Office  
 Current pay \$ 14400.00/year  
 Current job: Operations Manager **7/17 2-28**

~~Phillips, David~~ Office - Alton-Broadway  
 Current pay \$ 20700.00/year  
 Current job: Indirect Lending **7/17 3-5**

~~Wass, Cheryl~~ Office - Alton-Corporate  
 Current pay \$ 14700/year  
 Current job: Training Manager **5/23 3-13**

~~Winters, Patty~~ Office - O'Fallon Office  
 Current pay \$ 13000.00/year  
 Current job: Senior Financial **4/17 3-19**

~~Wenacker, Rita~~ Office - Alton-Broadway  
 Current pay \$ 14100/year  
 Current job: Senior Financial **5/23 3-21**

~~Wiggins, Betty~~ Office - Germania Financial  
 Current pay \$ 15000.00/year  
 Current job: Assistant Manager **5/23 3-22**

~~Wink, Charles~~ Office - Alton-Broadway  
 Current pay \$ 21000.00/year  
 Current job: Loan Service M **7/17 3-19**

~~Wonski, David~~ Office - Alton-Corporate  
 Current pay \$ 21200.00/year  
 Current job: Internal Auditor **7/17 3-15**

~~Wassner, Judy~~ Office - Belleville Office  
 Current pay \$ 14000/year  
 Current job: Senior Financial **4/17 4-5**

~~Waltbrandt, Sara~~ Office - O'Fallon Office  
 Current pay \$ 12000.00/year  
 Current job: Teller Supervisor **4/17**

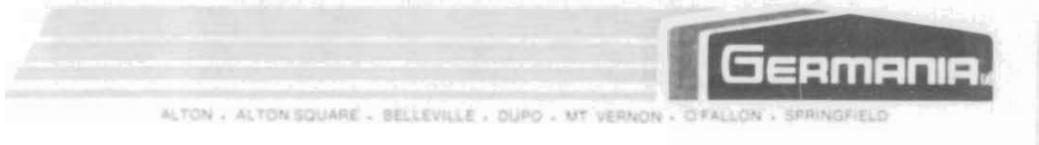
~~Young, Sandy~~ Office - Springfield Office  
 Current pay \$ 11175.00/year  
 Current job: Teller Supervisor **4/17 4-10**

590,47600

14

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7



ALTON • ALTON SQUARE • BELLEVILLE • DUPO • MT VERNON • O'FALLON • SPRINGFIELD

**CHECKING ACCOUNT DEPOSIT RECEIPT**

DATE  
ACCT-NBR 10-0010303445  
3-14-86

AMOUNT      BALANCE  
272.40      1,264.59 003



**\*\* THANK YOU \*\***

ITEMS RECEIVED FOR DEPOSIT OR COLLECTION ARE ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE RULES OF CLASS FOR NOW ACCOUNTS NOW IN EFFECT OR AS MAY BE AMENDED FROM TIME TO TIME. YOUR DEPOSIT IS SUBJECT TO PROOF.



93043503949

Others making contributions

Mike Drury	\$ 25.00
Ann Guthers	25.00
Keith Kassel	15.00
Branda Boone	5.00
Sharon Hamilton	10.00
Debbie Higgins	20.00
Carol Witt	10.00
Rita Schumacher	10.00
Janice Terrell	5.00
Nancy Zager	10.00
Kim Anderson	5.00
Loretta Clayton	10.00
Jo Ann Groves	5.00
Steve Klingbeil	35.00
Bethany Miller	10.00
Kathy Scoggins	5.00
	<hr/>
	205.00

Total to date paid by officers \$ 2,182.80  
Add other staff contributions 205.00  

---

Total 1986 contributions \$ 2,387.80  
As of 3/20/86

93043503950

RECEIVED  
F.E.C.  
SECRETARIAT

87 DEC 29 PM 12:11

BEFORE THE FEDERAL ELECTION COMMISSION

**SENSITIVE**

In the Matter of	)	
	)	
Joseph L. Mason	)	
Edward L. Morris	)	MUR 3446
Jimmie W. New	)	
William Osborn	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 31, 1991, the Commission found reason to believe Edward Morris and Jimmie New violated 2 U.S.C. §§ 433(a) 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i). On that same date, the Commission also found reason to believe Joseph Mason violated 2 U.S.C. § 441b(a).<sup>1</sup>

Subsequent to the Commission's reason to believe findings, the RTC forwarded additional materials to this Office. (Attachment 1). The respondents were notified of the Commission's reason to believe findings on November 13, 1991 and submitted timely responses. (Attachment 2). For the reasons set forth below, this Office intends to proceed to the next stage of the enforcement process with respect to Joseph Mason, Edward Morris and Jimmie New. In addition, this Office recommends that the Commission find reason to believe that William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i), and that William Osborn knowingly and

1. The Commission also found reason to believe that Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3) and 441b(b)(4)(A)(i). Because Germania Bank was transferred to the RTC subsequent to the events at issue in this matter, however, the Commission determined to take no further action and closed the file as to this respondent.

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willfully violated 2 U.S.C. §§ 433(a), 434(a) and 441b(a).

II. ANALYSIS

A. Introduction

This matter was referred to the Commission by the Resolution Trust Corporation ("RTC"). The referral concerned the making of contributions from a political contribution fund established at Germania Bank. According to the referral contributions totaling \$9,265 had been made from the fund to candidates for various state and federal offices from 1980 through 1988. The referral indicated that the fund was established and maintained by Germania Bank officers.

Supplemental material received from the RTC has clarified the positions held by the individual respondents at Germania Bank from 1984 to 1990. William Osborn was Chairman of the Board of Directors of Germania Bank from January of 1984 to June of 1986. William Osborn was also Chief Executive Officer and President of Germania Bank from January of 1984 to January of 1986. Edward Morris served as Germania Bank's Chairman of the Board of Directors from June of 1986 to October of 1989. Edward Morris also was the Chief Executive Officer from January of 1986 to January of 1989 and President from January of 1986 to May of 1987. Jimmie New served as Germania Bank's Chief Executive Officer from May of 1989 to October of 1989. He served as President from May of 1989 to June of 1990. Joseph Mason became majority shareholder of Germania Bank in 1984. He served as a director from 1986 to 1990. Joseph Mason was Chairman of the Board of Directors and Chief Executive

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Officer from 1989 to 1990. A chart of Germania Bank officers prepared by the RTC is attached to this report. (Attachment 1, page 253).

The investigation into this matter revealed that the political contribution fund was controlled by William Osborn, Edward Morris and Jimmie New from 1984 through 1990. The information in the referral originally indicated that contributions from the fund were made from 1980 through 1988. Supplemental information received from the RTC, however, indicates that contributions were made as early as 1976.<sup>2</sup> The following chart sets forth the total amount of contributions made from 1976 through 1988.

<u>Year</u>	<u>Total Contributions</u>
1976	\$ 883
1977	\$ 465
1978	\$ 850
1979	\$ 845
1980	\$ 1,110
1981	\$ 1,255
1982	\$ 445
1983	\$ 1,035
1984	\$ 1,390
1985	\$ 775
1986	\$ 2,745
1987	\$ 2,620
1988	\$ 740
Total	\$15,158

The contributions were made from an account maintained at Germania Bank. The referral indicates that an account in the names of William Osborn and David Kilduff was closed in March of

2. This Office does not possess information regarding the names of those individuals who controlled the political contribution fund at Germania Bank from 1976 to 1984. This issue will be explored through further investigation

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1986. That same month, a new account was opened in the names of Edward Morris and William Osborn. In December of 1986, a second account was opened in the names of Edward Morris and Jimmie New. This last account was closed in October of 1988.

The first section of this report examines the respondents' liability for failure to register and report as a political committee. The second section of this report addresses the respondents' liability for consenting to contributions in violation of section 441b(a) of the Act. Finally, this report examines the respondents' liability for improper solicitation of bank employees.

B. Failure to Register and Report as a Political Committee

2 U.S.C. § 431(4)(B) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b of the Act, the term "contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization no later than 10 days after establishment. Political committees must file regular reports of receipts and disbursements. 2 U.S.C. § 434(a)

The evidence available in this matter demonstrates that

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William Osborn, Edward Morris and Jimmie New knowingly and willfully violated 2 U.S.C. §§ 433(a) and 434(a) by failing to register and report as a political committee. These three respondents operated a political contribution fund from which contributions were made to federal, state and local candidates. Contributions to the political contribution fund were collected from Germania Bank employees. Contributions totaling \$15,158 were made to candidates and committees over a twelve year period. Materials from the RTC included checks used to make contributions from the political contribution fund account in 1986, 1987 and 1988. These contribution checks were signed by William Osborn, Edward Morris and Jimmie New. Checks that were collected from Germania Bank employees for contributions to the political contribution fund in 1986 and 1987 were made payable to Edward Morris. (See, e.g., Attachment 1, pages 57-65, 114-116, and 258-273). The following notations appear on several of the checks from Germania Bank employees: "P.A.C. committee", "PACO" and "PAC". (Attachment 1, pages 3, 58, 59 and 122). Thus, it appears that Germania Bank employees were under the impression that they were contributing to a political action committee.

In addition, the evidence indicates that Jimmie New was reimbursed from the political contribution fund on at least one

occasion.<sup>3</sup> On May 8, 1986, Jimmie New received a check in the amount of \$125 from the political contribution fund for a contribution he had made to Friends of Margaret Kelly, a local candidate. (Attachment 1, page 204)

The supplemental material received from the RTC included several documents referring to the prohibitions against the making of contributions by federal savings and loan associations. A handwritten memo dated February 12, 1986 to Edward Morris stated that "Fed chartered Inst. under Fed law cannot make political contributions. Service corps formed under State law can make corporate checks to politicals." (Attachment 1, page 240). A copy of this memo was sent to Germania Bank's management committee. The RTC material also included a memorandum dated April 23, 1986 from William Osborn to Jimmie New. In this memorandum, William Osborn stated:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

(Attachment 1, page 171)

In Chairman's Memo # 87-41, dated June 16, 1987, Edward Morris asked for a review of Germania Bank's "political

3. Jimmie New also was a respondent in Pre-MUR 236. According to the referral in Pre-MUR 236, Jimmie New was reimbursed by Germania Bank in 1989 for a \$1,500 contribution to a candidate for a local election. The reimbursement was in the form of a Germania Bank check and does not appear to be from the political contribution fund.

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action committee". The text of the memorandum is as follows:

Would you please review our procedures for political action committees? My reading of the regulations are such that if the contributions are made through the service corporation they are within the guidelines of the regulations. Please determine whether or not we are following the guidelines and, if not, what procedures must be implemented for our committee to operate legally.

(Attachment 1, page 143). Attached to the memorandum were materials copied from a United States League of Savings Institutions manual. (Attachment 1, pages 143-147). These materials included Federal Home Loan Bank Board ("FHLBB") Memorandum # T 68 (Prohibitions on Political Contributions or Expenditures by Savings Associations), FHLBB Memorandum # T 68-1 (Political Contributions by Subsidiaries of Federal Associations), and FHLBB Memorandum # T 68-2 (Donations by Federal Associations to Local Political Clubs Affiliated with Democratic and Republican Parties). The first memorandum, FHLBB Memorandum # T 68, clearly set forth the prohibitions of 2 U.S.C. § 441b(a). The memorandum begins with the following statement:

The Office of Examinations and Supervision, after consultation with legal staff of the Federal Election Commission, has prepared this Memorandum to describe and to emphasize the prohibitions on contributions or expenditures by federal savings and loans in connection with any election to any political office or in connection with any primary election or political convention or caucus held to select candidates for public office.

(Attachment 1, page 144). The memorandum went on to address enforcement of the Act and the advisory opinion process.

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FHLBB Memorandum # T 68-1 addressed A.O. 1980-7 and the making of contributions through service corporations of federal savings and loan associations. (Attachment 1, pages 145-147). The third memorandum, FHLBB Memorandum # T 68-2 addressed A.O. 1981-33 and contributions by federal savings and loan associations to local political clubs. (Attachment 1 page 147).

Furthermore, the supplemental information from the RTC also included a memorandum dated March 3, 1988 to Edward Morris that specifically detailed "the relevant legal issues with regard to the propriety of political contributions or expenditures by federal savings institutions and their subsidiaries."<sup>4</sup> (Attachment 1, pages 164-167). This memorandum expressly set forth the prohibitions of section 441b(a) of the Act, and explained the Commission's authority to enforce the Act. The memorandum went on to explain the requirements of the Act regarding political committees:

The Act requires that a federal-level PAC register with the FEC within 10 days of its establishment and that the PAC appoint a treasurer for purposes of federal election law compliance. The treasurer of the PAC is responsible for the accurate and timely filing with the FEC of certain periodic disclosure reports and is also responsible that certain recordkeeping obligations are fulfilled.

(Attachment 1, page 165). The memorandum also addressed the requirements regarding the solicitation of contributions to a separate segregated fund. The memorandum did not express an

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4. A copy of the memorandum was sent to Jimmie New

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opinion, however, on the propriety of the political contribution fund maintained by Germania Bank officers.

The foregoing memoranda demonstrate that Germania Bank officers were informed, on several occasions, of the requirements of the Act regarding political contributions by federal saving and loan associations, as well as the registration and reporting requirements for political committees. Nevertheless, the officers of Germania Bank continued to make contributions from the political contribution fund and to solicit contributions to the fund from bank employees. The political contribution fund account that was maintained in the names of Edward Morris and Jimmie New was closed in October of 1988. The funds remaining in the account were transferred to the Germania Financial Corporation on October 12, 1988. Apparently, political contributions made after October of 1988 were made through Germania Financial Corporation, Germania Bank's service corporation. Included with the materials from the RTC was a handwritten memo stating: "If a political contribution is wanted, prepare a check request for Germania Financial Corporation Acct. # 2320-00610-0 Have an officer of GFC sign. (i.e., Ed Morris, or Jim New preferably)." (Attachment 1, page 157).

As stated, the evidence in this matter indicates that William Osborn, Edward Morris and Jimmie New knowingly and willfully violated 2 U.S.C. §§ 433(a) and 434(a) by failing to register and report as a political committee. Accordingly, this Office recommends that the Commission find reason to believe

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that William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a) and 434(a). Neither Edward Morris nor Jimmie New has requested pre-probable cause conciliation. Therefore, this Office intends to proceed to the next stage of the enforcement process and make similar recommendations in the probable cause briefs for Edward Morris and Jimmie New.

C. Corporate Facilitation

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. This broad prohibition extends to "anything of value" given to any candidate or campaign. 2 U.S.C. § 441b(b)(2). Germania Bank was a federal savings and loan association. As such, Germania Bank falls within the scope of 2 U.S.C. § 441b(a) as a corporation organized by authority of any law of Congress. A.O. 1981-33.

Although national banks and corporations are prohibited from making any such contribution, the Act exempts a corporation's internal communications with its executive and administrative personnel. 2 U.S.C. § 441b(b)(2)(A).<sup>5</sup> The Commission's regulations permit a corporation to make partisan

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5. Elaboration of the class of corporate employees that fall within this exception is found at 2 U.S.C. § 441b(b)(7) and 11 C.F.R. § 114.1(c) of the Commission's regulations.

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communications to its restricted class, including endorsing candidates and urging their support. 11 C.F.R. § 114.3(a)(1), (c)(1); A.O. 1987-29, 1982-2. The Commission has repeatedly made clear, however, that corporations may not step beyond the line of "communication" to actually collecting contribution checks or otherwise facilitating the making of contributions to a federal candidate. See A.O. 1987-29, 1986-4, 1982-2, and 1977 Explanation and Justification (describing permissible corporate communication)

In summary, where fundraising activities involve the use of corporate resources and facilities and such activities are beyond the safe harbor of the Act and regulation's exceptions, the corporation has contributed something "of value" to the beneficiary candidate, in violation of section 441b.

The Commission's reason to believe finding that Edward Morris, Jimmie New and Joseph Mason violated 2 U.S.C. § 441b(a) was based on evidence which suggested that these officers consented to prohibited contributions from Germania Bank, either in the form of contributions made with bank funds or under the theory of corporate facilitation. The investigation has not revealed evidence which indicates that Germania Bank funds were used to make contributions to political candidates or committees. The investigation does, however, support the theory of corporate facilitation.

The information available indicates that Germania Bank's officers allowed the use of corporate facilities, personnel and other resources for the purpose of making contributions from the

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political fund. In Chairman's Memo # 86-16, dated March 6, 1986 to Edward Morris, William Osborn forwarded an analysis of political contributions made from 1976 through 1985, and a proposed budget for 1986. (Attachment 1, pages 111-112). In this memorandum, William Osborn suggests that requests for disbursements from the political contribution fund account be brought before the regular meeting of Germania Bank's management committee. The memorandum indicates that requests for disbursements were made from Germania Bank's corporate offices, regional branches, and Germania Financial Corporation. An agenda of Germania Bank's management committee meeting of March 12, 1986 included the following entry: "Political Contribution Budget - Osborn." (Attachment 1, page 251). In addition, the materials from the RTC also included a memorandum dated March 17, 1986 to Germania Bank's branch managers. (Attachment 1, pages 242-243). In this memorandum, Germania Bank's branch managers were requested to provide their "projected needs" for contributions for local, state and federal elections. The memorandum also set forth the preferred format for requests for contributions. A copy of this memorandum was sent to William Osborn and Jimmie New.

Furthermore, the investigation indicates that Germania Bank's officers used the bank's facilities, personnel and other resources for the purpose of soliciting contributions to the political fund. The materials from the RTC included several memoranda to Germania Bank employees soliciting contributions to the political fund. Memo # 85-35, dated February 26, 1985,

requested that checks be made payable to William Osborn. (Attachment 1, page 168). A second memorandum, dated March 3, 1986, requested that checks be made payable to Edward Morris. (Attachment 1, page 223). Additionally, it appears that Edward Morris received periodic updates on the progress of contributions to the political fund from Germania Bank employees by inter-office memos and other handwritten notes. (Attachment 1, pages 169-170 and 246-247).

In his response to the Commission's reason to believe notification, Joseph Mason denies that he violated 2 U.S.C. § 441b(a) by consenting to prohibited contributions. Joseph Mason states that he did not become an officer of Germania Bank until 1989. (Attachment 2, page 11). Joseph Mason was, however, a director of Germania Bank from 1986 to 1990. Furthermore, Joseph Mason fails to state that he was Germania Bank's majority shareholder from 1984 to 1989. During this time, Joseph Mason made several requests for contributions from the political fund. (Attachment 1, pages 152, 192 and 204). Thus, Joseph Mason's claim that he did not "play any role in the approval process and was in no way in a position to authorize anything" is doubtful. (Attachment 2, page 1).

In conclusion, it appears that Germania Bank facilitated the making of contributions to federal, state and local candidates and political committees from the political contribution fund. The information available indicates that the officers of Germania Bank used the bank's facilities, personnel and other resources to make contributions from the political

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fund to federal, state and local candidates and committees, and to solicit contributions to the political fund. Therefore, this Office recommends that the Commission find reason to believe William Osborn knowingly and willfully violated 2 U.S.C.

§ 441b(a). This Office intends to make similar recommendations in the probable cause briefs for Edward Morris, Jimmie New and Joseph Mason.

D. Solicitation of Contributions

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is defined to include a corporation. 2 U.S.C. § 431(11). Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families.

The Commission's reason to believe findings that Edward Morris and Jimmie New violated 2 U.S.C. § 441b(b)(3) were based upon information which suggested that Germania Bank employees were expected to contribute a fixed portion of their

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salaries to the political contribution fund. Furthermore, Germania Bank employees were not informed of their right to refuse to contribute to the political contribution fund without reprisal. Edward Morris and Jimmie New have presented no information in their responses to the reason to believe notifications to refute the Commission's findings.<sup>6</sup>

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It appears that contributions to the political contribution fund were solicited by memoranda from Germania Bank officers. By Personnel Memo # 85-35, dated February 26, 1985, contributions to the political contribution fund were solicited from Germania Bank's officers and "exempt staff." (Attachment 1, page 168). The memorandum suggested a minimum amount for the employee to contribute, and directed the employee to make a check payable to William Osborn. By memorandum dated March 3, 1986 to Germania Bank staff members, Edward Morris requested "the cooperation of our staff to support the political committees of the various savings and loan leagues, as well as state and local politicians." (Attachment 1, page 223). This memorandum directed employees to make checks payable to Edward Morris. Also included in the materials from the RTC was another memorandum dated March 3, 1986 from Edward Morris to William Osborn. (Attachment 1, page 120). It appears that this

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6. This Office believes that the evidence in this matter does not support a finding that Edward Morris, Jimmie New and William Osborn knowingly and willfully violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i). Accordingly, this Office does not recommend that the Commission make knowing and willful findings against these respondents in connection with the violations of sections 441b(b)(3) and 441b(b)(4)(A)(i) of the Act.

memorandum was sent to Germania Bank's officers. This memorandum also suggested a minimum amount for the officer to contribute, and directed the Germania Bank officer to make a check payable to Edward Morris.

None of the memoranda soliciting contributions to the political contribution fund informed Germania Bank's employees of the right to refuse to contribute without reprisal. In fact, the materials from the RTC included a memorandum from one employee who apparently felt compelled to justify his refusal to contribute. (Attachment 1, page 183). Furthermore, the available information indicates that Germania Bank officers maintained lists of the names of bank employees who had contributed to the political fund, and those who had not contributed. (Attachment 1, pages 117-119).

With respect to the Commission's findings that Edward Morris and Jimmie New violated 2 U.S.C. § 441b(b)(4)(A)(i), the available information indicates that contributions to the political contribution fund were solicited from individuals outside the restricted class. The information from the RTC suggests that solicitations to the political contribution fund were not limited to Germania Bank's stockholders, executive or administrative personnel and their families. One list of employees who contributed to the political contribution fund included lower level employees such as a purchasing agent and a training assistant. (Attachment 1 pages 256-257). It appears that employees were asked to contribute specific amounts to the political fund, depending on

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salary. The list indicates that the suggested contribution for one employee, a teller supervisor, was \$3.89. (Attachment 1, page 257). Furthermore, the information from the RTC contains several references to contributions from "other staff" as being separate and distinct from contributions from Germania Bank officers. (Attachment 1, pages 117 and 255).

In summary, the investigation in this matter indicates that Edward Morris, Jimmie New and William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i). Therefore, this Office recommends that the Commission find reason to believe William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i). In addition, this Office intends to proceed to the next stage of the enforcement process with respect to Edward Morris and Jimmie New.

E. Subpoena and Order

Attached for Commission approval is a proposed subpoena and order to William Osborn seeking information in connection with the political contribution fund. At this point in the investigation, several questions remain unanswered because the other respondents in this matter have not provided this Office with any information concerning the political contribution fund. Thus, the only information concerning the political contribution fund has come from the RTC. Given the seriousness of the violations, this Office requests that the Commission authorize the attached subpoena and order to William Osborn so that we may gain more information in connection with the findings in this matter.

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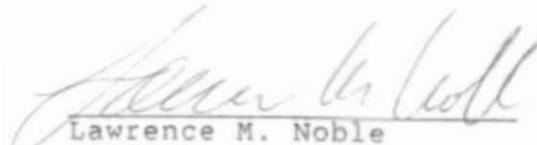
III. RECOMMENDATIONS

1. Find reason to believe William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a).

2. Find reason to believe William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i).

3. Approve the attached factual and legal analysis, subpoena and order, and the appropriate letter.

12/29/92  
Date

  
Lawrence M. Noble  
General Counsel

Attachments

1. Supplemental materials from RTC
2. Respondents' responses
3. Factual and Legal Analysis
4. Subpoena and Order to William Osborn

Staff assigned: Mary P. Mastrobattista

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

MEMORANDUM

TO: LAWRENCE NOBLE  
GENERAL COUNSEL

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

DATE: JANUARY 6, 1993

SUBJECT: MUR 3446 - GENERAL COUNSEL'S REPORT  
DATED DECEMBER 24, 1992

The above-captioned document was circulated to the Commission on MONDAY, DECEMBER 28, 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 XXX
- Commissioner McDonald \_\_\_\_\_
- Commissioner McGarry \_\_\_\_\_
- Commissioner Potter \_\_\_\_\_
- Commissioner Thomas \_\_\_\_\_

This matter will be placed on the meeting agenda for TUESDAY, JANUARY 12, 1993

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 )  
Joseph L. Mason; ) MUR 3446  
Edward L. Morris; )  
Jimmie W. New; )  
William Osborn )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on January 12, 1993, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3446:

1. Find reason to believe William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a).
2. Find reason to believe William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i).
3. Approve the factual and legal analysis, subpoena and order, and the appropriate letter as recommended in the General Counsel's report dated December 24, 1992.

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

Attest:

1-13-93  
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 19, 1993

William Osborn  
5650 Northeast 20th Ave.  
Ft. Lauderdale, FL 33308

RE: MUR 3446  
William Osborn

Dear Mr. Osborn:

On January 12, 1993, the Federal Election Commission ("the Commission") found that there is reason to believe you violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). On that same date, the Commission also found that there is reason to believe you knowingly and willfully violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a). The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 30 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

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William Osborn  
Page 2

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 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 enclosed a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Mary P. Mastrobattista, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Subpoena and Order

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FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS

RESPONDENT: William Osborn

MUR: 3446

In the normal course of carrying out its supervisory responsibilities, the Commission ascertained that there was a possibility of a violation of the Federal Election Campaign Act by William Osborn. This possible violation concerns the making of contributions through Germania Bank to candidates for various state and federal offices in Missouri and Illinois over a period of several years.

Germania Bank was a federal savings and loan association based in Alton, Illinois. Germania Bank's corporate headquarters and executive offices were located in St. Louis, Missouri

According to the information ascertained by the Commission, the Chairman and President of Germania Bank opened a bank account in their names at Germania Bank in 1975. Germania Bank officers solicited contributions to the account from Germania Bank employees. Germania Bank officers requested that employees contribute .0032% of their salaries to the account and were told which Bank employees had contributed to the account. The

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following chart sets forth the total amount of contributions made from 1976 through 1988.

<u>Year</u>	<u>Total Contributions</u>
1976	\$ 883
1977	\$ 465
1978	\$ 850
1979	\$ 845
1980	\$ 1,110
1981	\$ 1,255
1982	\$ 445
1983	\$ 1,035
1984	\$ 1,390
1985	\$ 775
1986	\$ 2,745
1987	\$ 2,620
1988	\$ 740
Total	\$15,158

The contributions were made from an account maintained at Germania Bank in the names of the Bank's officers.

William Osborn was Chairman of the Board of Directors of Germania Bank from January of 1984 to June of 1986.

William Osborn was also Chief Executive Officer and President of Germania Bank from January of 1984 to January of 1986. An account in the names of William Osborn and David Kilduff was closed in March of 1986. That same month, a new account was opened in the names of Edward Morris and William Osborn. In December of 1986, a second account was opened in the names of Edward Morris and Jimmie New.

Failure to Register and Report as a Political Committee

2 U.S.C. § 431(4)(B) defines the term "political committee" to include any separate segregated fund established under the provisions of section 441b(b) of the Act. 2 U.S.C. § 441b(b)(2) provides that for purposes of section 441b of the Act, the term

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"contribution or expenditure" shall not include the establishment, administration, and solicitation of contributions to a separate segregated fund to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock. 2 U.S.C. § 433(a) requires separate segregated funds established under the provisions of section 441b(b) of the Act to file a statement of organization no later than 10 days after establishment. Political committees must file regular reports of receipts and disbursements. 2 U.S.C. § 434(a)

The information ascertained by the Commission demonstrates that William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a) and 434(a) by failing to register and report as a political committee. William Osborn and other Germania Bank officers operated a political contribution fund from which contributions were made to federal, state and local candidates. Contributions to the political contribution fund were collected from Germania Bank employees. Contributions totaling \$15,158 were made to candidates and committees over a twelve year period. Checks used to make contributions from the political contribution fund account were signed by William Osborn. The following notations appear on several of the checks from Germania Bank employees: "P.A.C. committee", "PACO" and "PAC". Thus, it appears that Germania Bank employees were under the impression that they were contributing to a political action committee.

In addition, the information indicates that Jimmie New,

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another Germania Bank officer, was reimbursed from the political contribution fund on at least one occasion. On May 8, 1986, Jimmie New received a check in the amount of \$125 from the political contribution fund for a contribution he had made to Friends of Margaret Kelly, a local candidate. This reimbursement check was signed by William Osborn.

Germania Bank officers generated memoranda regarding the Bank's political contribution fund and the prohibitions against the making of contributions by federal savings and loan associations. A handwritten memo dated February 12, 1986 to Edward Morris stated that "Fed chartered Inst. under Fed law cannot make political contributions. Service corps formed under State law can make corporate checks to politicals." A copy of this memo was sent to Germania Bank's management committee.

In addition, in a memorandum dated April 23, 1986 from William Osborn to Jimmie New, William Osborn stated:

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

The foregoing memoranda demonstrate that Germania Bank officers, including William Osborn, were informed of the requirements of the Act regarding political contributions by federal saving and loan associations, as well as Commission regulations for political committees. Nevertheless, William Osborn and other officers of Germania Bank continued to

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make contributions from the political contribution fund and to solicit contributions to the fund from bank employees.

Therefore, there is reason to believe that William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a) and 434(a) by failing to register and report as a political committee.

Corporate Facilitation

Under 2 U.S.C. § 441b(a) it is unlawful for a national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office. 2 U.S.C. § 441b(a) also makes it unlawful for an officer or director of a corporation or national bank to consent to such a contribution or expenditure. This broad prohibition extends to "anything of value" given to any candidate or campaign. 2 U.S.C. § 441b(b)(2). Germania Bank was a federal savings and loan association. As such, Germania Bank falls within the scope of 2 U.S.C. § 441b(a) as a corporation organized by authority of any law of Congress. A.O. 1981-33.

Although national banks and corporations are prohibited from making any such contribution, the Act exempts a corporation's internal communications with its executive and administrative personnel. 2 U.S.C. § 441b(b)(2)(A).<sup>1</sup> The Commission's regulations permit a corporation to make partisan communications to its restricted class, including endorsing

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1. Elaboration of the class of corporate employees that fall within this exception is found at 2 U.S.C. § 441b(b)(7) and 11 C.F.R. § 114.1(c) of the Commission's regulations.

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candidates and urging their support. 11 C.F.R. § 114.3(a)(1), (c)(1); A.O. 1987-29, 1982-2. The Commission has repeatedly made clear, however, that corporations may not step beyond the line of "communication" to actually collecting contribution checks or otherwise facilitating the making of contributions to a federal candidate. See A.O. 1987-29, 1986-4 and 1982-2.

In summary, where fundraising activities involve the use of corporate resources and facilities and such activities are beyond the safe harbor of the Act and regulation's exceptions, the corporation has contributed something "of value" to the beneficiary candidate, in violation of section 441b.

The information ascertained by the Commission indicates that Germania Bank's officers allowed the use of corporate facilities, personnel and other resources for the purpose of making contributions from the political fund. In Chairman's Memo # 86-16, dated March 6, 1986 to Edward Morris, William Osborn forwarded an analysis of political contributions made from 1976 through 1985, and a proposed budget for 1986. In this memorandum, William Osborn suggests that requests for disbursements from the political contribution fund account be brought before the regular meeting of Germania Bank's management committee. The memorandum indicates that requests for disbursements were made from Germania Bank's corporate offices, regional branches, and Germania Financial Corporation. An agenda of Germania Bank's management committee meeting of March 12, 1986 included the following entry: "Political Contribution Budget - Osborn." In addition, a memorandum dated

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March 17, 1986 requested that Germania Bank's branch managers provide their "projected needs" for contributions for local, state and federal elections. The memorandum also set forth the preferred format for requests for contributions. A copy of this memorandum was sent to William Osborn.

Furthermore, Germania Bank's officers used the Bank's facilities, personnel and other resources for the purpose of soliciting contributions to the political fund. Apparently, Germania Bank's officers solicited contributions to the political fund from Bank employees by memorandum. Memo # 85-35, dated February 26, 1985, requested that checks be made payable to William Osborn. A second memorandum, dated March 3, 1986, requested that checks be made payable to Edward Morris.

In conclusion, it appears that Germania Bank facilitated the making of contributions to federal, state and local candidates and political committees from the political contribution fund. The information ascertained indicates that William Osborn, acting as an officer of Germania Bank, used the Bank's facilities, personnel and other resources to make contributions from the political fund to federal, state and local candidates and committees, and to solicit contributions to the political fund. Therefore, there is reason to believe William Osborn knowingly and willfully violated 2 U.S.C. § 441b(a).

Solicitation of Contributions

2 U.S.C. § 441b(b)(3)(A) provides that it shall be unlawful for a separate segregated fund to make a contribution or

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expenditure by utilizing money or anything of value secured by dues, fees, or other moneys required as a condition of employment. 2 U.S.C. § 441b(b)(3)(C) provides that it shall be unlawful for any person soliciting an employee for a contribution to a separate segregated fund to fail to inform such employee, at the time of such solicitation, of his right to refuse to so contribute without reprisal. The term "person" is defined to include a corporation. 2 U.S.C. § 431(11). Under 2 U.S.C. § 441b(b)(4)(A)(i), it shall be unlawful for a corporation, or a separate segregated fund established by a corporation, to solicit contributions to such a fund from any person other than its stockholders and their families and its executive or administrative personnel and their families.

Contributions to the political contribution fund were solicited by memoranda from Germania Bank officers. By Personnel Memo # 85-35, dated February 26, 1985, contributions to the political contribution fund were solicited from Germania Bank's officers and "exempt staff." The memorandum suggested a minimum amount for the employee to contribute and directed the employee to make a check payable to William Osborn. By memorandum dated March 3, 1986 to Germania Bank staff members, Edward Morris requested "the cooperation of our staff to support the political committees of the various savings and loan leagues, as well as state and local politicians." This memorandum directed employees to make checks payable to Edward Morris. Another memorandum dated March 3, 1986 was from Edward Morris to William Osborn. It appears that this

memorandum was sent to Germania Bank's officers. This memorandum also suggested a minimum amount for the officer to contribute, and directed the Germania Bank officer to make a check payable to Edward Morris.

None of the memoranda soliciting contributions to the political contribution fund informed Germania Bank's employees of the right to refuse to contribute without reprisal. Furthermore, Germania Bank officers maintained lists of the names of bank employees who had contributed to the political fund, and those who had not contributed. Therefore, there is reason to believe William Osborn violated 2 U.S.C. § 441b(b)(3).

With respect to the prohibition of 2 U.S.C. § 441b(b)(4)(A)(i), the information ascertained by the Commission indicates that contributions to the political contribution fund were solicited from individuals outside the restricted class. The information suggests that solicitations to the political contribution fund were not limited to Germania Bank's stockholders, executive or administrative personnel and their families. One list of employees who contributed to the political contribution fund included lower level employees such as a purchasing agent and a training assistant. It appears that employees were asked to contribute specific amounts to the political fund, depending on salary. The list indicates that the suggested contribution for one employee, a teller supervisor, was \$3.89. Furthermore, there are several

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references to contributions from "other staff" as being separate and distinct from contributions from Germania Bank officers. Therefore, there is reason to believe William Osborn violated 2 U.S.C. § 441b(b)(4)(A)(i).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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)  
)

MUR 3446

SUBPOENA TO PRODUCE DOCUMENTS  
ORDER TO SUBMIT WRITTEN ANSWERS

TO: William Osborn  
5650 Northeast 20th Ave.  
Ft. Lauderdale, FL 33308

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

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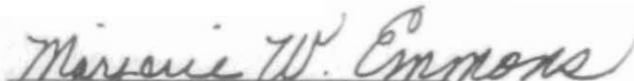
MUR 3446 - Subpoena and Order  
William Osborn  
Page 2

WHEREFORE, the Chairman of the Federal Election Commission  
has hereunto set his hand in Washington, D.C. on this  
15<sup>th</sup> , day of *January* , 1993.



Scott E. Thomas  
Chairman  
Federal Election Commission

ATTEST:

  
Marjorie W. Emmons  
Secretary to the Commission

Attachments  
Document Request  
Questions

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1976 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

1. State your name, address and current employment.
2. State whether you have ever held a position, either as an employee, officer or director, at Germania Bank. If so, for each such position held by you, state the title of the position and time period during which you held each position. Provide a detailed description of the duties and responsibilities of each position.
3. Identify all Germania Bank officers for each year from the period of 1976 through 1988.
4. Regarding Germania Bank's political contribution fund described in the Factual and Legal Analysis:
  - a. describe in detail the process by which contributions to the fund were solicited from Germania Bank officers, directors or employees;
  - b. describe in detail the process by which requests for disbursements from the fund were approved; and
  - c. describe in detail the process by which disbursements from the fund were made.
5. Identify each Germania Bank officer, director or employee involved in the solicitation of contributions to the political contribution fund.
6. Identify each Germania Bank officer, director or employee involved in the making of contributions from the political contribution fund.
7. Identify each Germania Bank officer, director or employee involved in the approval of requests for disbursements from the political contribution fund.
8. Identify each Germania Bank officer, director or employee who had authority to approve or reject requests for disbursements from the political contribution fund.
9. State whether requests for disbursements from the political contribution fund were ever discussed at meetings of Germania Bank's Board of Directors. If so, describe in detail the substance of such discussions.

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10. State whether Germania Bank's Board of Directors ever voted on, or otherwise approved or rejected, requests for disbursements from the political contribution fund.
11. State whether requests for disbursements from the political contribution fund were ever discussed at meetings of Germania Bank's officers, managers or employees. If so, describe in detail the substance of such discussions
12. State the date on which the political contribution fund was instituted at Germania Bank.
13. Identify the individual(s) who instituted the political contribution fund at Germania Bank.
14. Identify the individual(s) in whose names the political contribution fund account was held at Germania Bank for each year from the period of 1976 to 1988.
15. State the date on which the political contribution fund was dissolved at Germania Bank. Explain the reason(s) why the political contribution fund was dissolved.
16. Identify the individual(s) who dissolved the political contribution fund.
17. Describe in detail your actions in the establishment of the political contribution fund, making of contributions from the political contribution fund, and/or the solicitation of contributions to the political contribution fund from Germania Bank officers, employees or directors.
18. Describe in detail Edward Morris' actions in the establishment of the political contribution fund, making of contributions from the political contribution fund, and/or the solicitation of contributions to the political contribution fund from Germania Bank officers, employees or directors.
19. Describe in detail Jimmie New's actions in the establishment of the political contribution fund, making of contributions from the political contribution fund, and/or the solicitation of contributions to the political contribution fund from Germania Bank officers, employees or directors.

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20. Describe in detail Joseph Mason's actions in the establishment of the political contribution fund, making of contributions from the political contribution fund, and/or the solicitation of contributions to the political contribution fund from Germania Bank officers, employees or directors.
21. State whether Germania Bank funds were ever used to make contributions to any federal, state or local candidate for political office or to any political committee. If so, list the dates, amount and recipient of each such contribution.
22. Identify each class of Germania Bank employee that was solicited to contribute to the political contribution fund for each year from the period of 1976 through 1988.
23. State whether Germania Bank employees were informed, in writing, of the right to refuse to contribute to the political contribution fund without reprisal. If so, identify the documents by which Germania Bank employees were informed of the right to refuse to contribute without reprisal.
24. Describe the relationship between Germania Bank and the Germania Financial Corporation.
25. Produce each and every document identified in response to the above interrogatories.
26. Produce each and every document concerning, relating or pertaining to the political contribution fund established at Germania Bank including, but not limited to:
- a. all written notes, memoranda or correspondence relating to the making of contributions from the political contribution fund or the solicitation of contributions to the political contribution fund from Germania Bank officers, directors or employees;
  - b. all written notes, memoranda or correspondence relating to any meetings held at Germania Bank to discuss the political contribution fund; and
  - c. copies of all Germania Bank manuals, procedures, instructions or other written guidance concerning the political contribution fund.

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MUR 3446 - Subpoena and Order  
William Osborn  
Page 8

27. Identify any person (other than counsel) who was consulted or otherwise assisted in the preparation of answers to these questions and document request.

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FEDERAL ELECTION COMMISSION MAIL ROOM

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TELEPHONE (314) 726-1000  
TELECOPIER (314) 725-6592

CHAIM H. ZIMBALIST

PROFESSIONAL CORPORATION

ATTORNEY AND COUNSELOR AT LAW

FIFTH FLOOR

150 NORTH MERAMEC

ST. LOUIS (CLAYTON), MISSOURI 63105

OF COUNSEL TO  
DANNA, SORAGHAN, STOCKENBERG,  
& SHAW, P.C.

CERTIFIED - RETURN RECEIPT REQUESTED

February 18, 1993

Ms. Mary P. Mastrobattista  
FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR3446  
William Osborn

Dear Ms. Mastrobattista:

In accordance with our telephone conversation of today, enclosed herein please find duly executed Statement of Designation of Counsel, formally designating me as Attorney for the above-referenced Respondent in the referenced matter.

Please consider this letter as my formal Entry of Appearance on behalf of said Respondent.

Given the fact that my Client (whom I have not as yet met in person) lives in Ft. Lauderdale, Florida, and the scope of the matter under review covers a twelve-year period, beginning 1976 through 1988, it will be necessary for this office to use due diligence in investigating the true facts and determining the nature of the Pleadings, if any, to be filed on behalf of the Respondent. Therefore, I respectfully request that the time to respond to the Supoena to Produce Written Documents and Order to Submit Written Answer to Interrogatories and Request for Production of Documents be extended for twenty (20) days, up to and including March 16, 1993. My client received the letter signed by Scott E. Thomas, Chairman, dated January 19, 1993, on January 25, 1993.

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Federal Election Commission  
February 18, 1993  
Page Two

I thank you in advance for your cooperation

Yours truly,

*Chaim H. Zimbalist*  
CHAIM H. ZIMBALIST

CHZ:jw

Enclosure

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OGC 8489

FEDERAL ELECTION  
COMMISSION  
MAIL ROOM

CHAIM H. ZIMBALIST

PROFESSIONAL CORPORATION  
ATTORNEY AND COUNSELOR AT LAW  
FIFTH FLOOR  
150 NORTH MERAMEC  
ST. LOUIS (CLAYTON), MISSOURI 63105

FEB 26 11 37 AM '93

TELEPHONE (314) 726-1000  
TELECOPIER (314) 725-6592

OF COUNSEL TO  
DANNA, SCRAGHAN, STOCKENBERG,  
& SHAW, P.C.

CERTIFIED - RETURN RECEIPT REQUESTED

February 22, 1993

Ms. Mary P. Mastrobattista  
FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR3446  
William Osborn

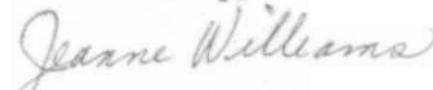
Dear Ms. Mastrobattista:

Mr. Zimbalist is out of the office until Wednesday, February 24th.

Pursuant to your telephone conversation with Mr. Zimbalist and our letter of February 18, 1993, enclosed please find Statement of Designation of Counsel in the above matter, and I assume our time extention in which to file pleadings will follow.

Thanks so much for your kind assistance.

Yours truly,



JEANNE WILLIAMS  
Legal Assistant

CHZ:jw

Enclosure

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STATEMENT OF DESIGNATION OF COUNSEL

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MUR 3496

NAME OF COUNSEL: CHAIM H. ZIMBALIST, P.C.

ADDRESS: DANNA, SORAGHAN, STOCKENBERG & SHAW, P.C.

150 NORTH MERAMEC  
FIFTH FLOOR

SAINT LOUIS, MISSOURI 63105-3907

TELEPHONE: (314) 726-1000 FACSIMILE (314) 725-6592

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.

February 15, 1993  
Date

*William G. Osborn*  
Signature

RESPONDENT'S NAME: WILLIAM G. OSBORN

ADDRESS: 5650 N.E. 20th Avenue

Ft. Lauderdale, Florida 33308-2404

HOME PHONE: (305) 771-6750

BUSINESS PHONE: \_\_\_\_\_

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 23, 1993

Chaim H. Zimbalist  
150 North Meramec  
St. Louis, Missouri 63105

RE: MUR 3446  
William Osborn

Dear Mr. Zimbalist:

This is in response to your letter dated February 18, 1993, which we received by facsimile on February 17, 1993, requesting an extension of 20 days to respond to the Subpoena and Order issued to your client. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on March 16, 1993.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

A handwritten signature in cursive script, reading "Mary P. Mastrobattista", is written over a rectangular background.

Mary P. Mastrobattista  
Attorney

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8dc 8657

CHAIM H. ZIMBALIST

PROFESSIONAL CORPORATION

ATTORNEY AND COUNSELOR AT LAW

FIFTH FLOOR

150 NORTH MERAMEC

ST. LOUIS (CLAYTON), MISSOURI 63105

OF COUNSEL TO  
DANNA, SORAGHAN, STOCKENBERG,  
& SHAW, P.C.

TELEPHONE (314) 726-1000  
TELECOPIER (314) 725-6592

BY FEDERAL EXPRESS

March 15, 1993

Ms. Mary P. Mastrobattista  
FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 3446  
William Osborn

Dear Ms. Mastrobattista:

In accordance with your letter of February 23, 1993, I submit herein, on behalf of the above-named Respondent, ten copies of ANSWERS TO INTERROGATORIES and REQUEST FOR PRODUCTION OF DOCUMENTS.

I respectfully request that you further consider this letter as a letter to the General Counsel, in accordance with 11 C.F.R. Section 111.18(d), indicating the interest of my client in pursuing Pre-Probable Cause Conciliation.

Thank you for your cooperation and prompt attention to this matter.

Yours truly,  
*Chaim H. Zimbalist*  
CHAIM H. ZIMBALIST

CHZ:jw

Enclosures

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RECEIVED  
FEDERAL ELECTION COMMISSION  
93 MAR 16 PM 3:31

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
WILLIAM OSBORN )

MUR 3446

ANSWERS TO INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Comes now Respondent, WILLIAM G. OSBORN, and for his ANSWERS TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS states as follows:

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Interrogatory  
Number

Answer

1. William G. Osborn  
5650 N.E. 20th Avenue  
Fort Lauderdale, Florida 33308  
  
I am currently unemployed.
2. Yes, I have. From and after January 1, 1976, I held the following positions:  
  
1976-1982 Chief Executive Officer  
1982-1986 Chief Executive Officer, President,  
Chairman of Board of Directors  
1986-1987 Director (advisory capacity only  
after May 1, 1987)  
  
The Chief Executive Officer reports to the Board of Directors and, in accordance with policies and directives of the Board of Directors, has the duties of planning, developing, establishing and furthering the policies and objectives of the Bank.
3. I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of all Germania Bank officers for each year from the period of 1976 through 1988. I have been advised that perhaps the Resolution Trust Corporation, in conjunction with other legal proceedings involving Germania Bank, might have such information.

My attorney has advised me that he has (a) contacted Ms. Tracy Bauer of the Office of Thrift Supervision in Chicago, Illinois, who told him that these records are institutional records which should be in the hands of the Receiver of Germania Bank; and (b) spoken with Mr. Michael A. Vitale, the attorney for the Receiver of Germania Bank, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition to be readily available to the public at this time.

4. (a) Germania Bank encouraged its officers, directors and employees to participate in Community Relations activity and Community Redevelopment activity for the betterment of the communities that the bank serviced. They were also encouraged to be involved in National organizations, such as the National Council of Savings Institutions, which serviced the industry nationwide. At hiring interviews, prospective employees were informed that the Bank engaged in Community Relations activity and that if tendered the position, they could, if they desired, voluntarily contribute funds for such activities. The emphasis was placed on "voluntarily," and they were told that a contribution was not compulsory. The process for officers and high level supervisors placed more emphasis on suggestions from national organizations and these persons knew the importance of voluntary contributions. (b) Usually, after receiving national and state communications, or by word of mouth, in an informal manner, after receiving the views of our officers and high-level supervisors, I would approve requests and (c) checks were written as directed in the literature
5. Since I do not have the records, I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of each Germania Bank officer, director or employee involved in the solicitation of contributions. From 1976 until my termination in 1986, I state that only bank officers and high level supervisors were involved. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
6. Because I do not have the records, I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of each Germania

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Bank officer, director or employee involved in the solicitation of contributions. From 1976 until my termination in 1986, I state that only bank officers and high level supervisors were involved. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.

- 9 3 0 4 3 5 0 3 9 9 9
7. Since I do not have the records, I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of each Germania Bank officer, director or employee involved in the approval of requests for disbursements. From 1976 until my termination in 1986, I state that only bank officers and high level supervisors were involved. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
  8. Because I do not have the records, I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of each Germania Bank officer, director or employee who had authority to approve or reject requests for disbursements. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
  9. To the best of my memory, such requests for disbursements were not ever discussed at meetings of Germania Bank's Board of Directors.
  10. To the best of my memory, Germania Bank's Board of Directors did not ever vote on or otherwise approve or reject requests for such disbursements.
  11. To the best of my memory, such requests for disbursements were not discussed at meetings of Germania Bank's officers, managers or employees. However, in 1986 (most likely after my termination) there exists the possibility that a management committee meeting might have reviewed or considered such requests.

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12. I believe that, commencing in 1976, voluntary contributions were received. However, I do not have records in my possession which would enable me to confirm that date
- 13 William G. Osborn, 5650 N.E. 20th Avenue, Fort Lauderdale, Florida 33308, currently unemployed, instituted the Community Relations Activity Fund. I do not recall whether or not others were involved, and I do not, at this time, have in my possession records from which I could make this determination.
- 14 Because I do not have the records, I cannot, at this time, state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of the individual(s) in whose names the account was held at Germania Bank. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
15. I have no independent knowledge of the facts, no records in my possession, and therefore cannot state the date of dissolution, if any.
16. I have no independent knowledge of the facts, no records in my possession, and therefore cannot identify such individuals who might have participated in the dissolution, if any.
17. My best recollection is that it most likely was started by a personal contribution from me; however, as stated in my answer to Interrogatory 13, I do not recall whether or not others were involved. I believe that, during the period of time that I had authority to write checks, I might well have signed checks after receiving the views of our officers and high level supervisors. Because I do not have the records, I cannot, at this time, be more specific with regard to the number of checks or to the recipients of such checks. Regarding the solicitation of contributions, I encouraged officers and high level supervisors to be involved in national trade organizations, such as the National Council of Savings Institutions. At hiring interviews, when I did the interviewing, I informed prospective employees that the Bank engaged in Community Relations activity and that if tendered the position, the employee could, if he/she desired, voluntarily contribute funds for such activities. I told each such person that a contribution was not compulsory. Since the process for officers and high

level supervisors placed more emphasis on suggestions from national organizations, and officers and high level supervisors already understood the importance of voluntary contributions, I merely kept them abreast of communications received from those organizations.

18. I have no independent knowledge of the facts which would enable me to describe in detail Edward Morris' actions. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
19. I have no independent knowledge of the facts which would enable me to describe in detail Jimmie New's actions. However, it is possible that I did receive information which led me to believe that he had been solicited by Friends of Margaret Kelly for a contribution. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
20. I know nothing about Joseph Mason's actions in this regard and I could neither influence nor control his actions in any manner.
21. Germania Bank funds were not ever used to make contributions to any federal, state or local candidate for political office or to any political committee.
22. My best recollection is that from 1976 until my termination in 1986, only bank officers and high level supervisors and administrators were solicited. After my termination, I have neither knowledge of the facts nor records in my possession which would enable me to more fully answer this interrogatory. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.
23. Since I do not have the records, I cannot, at this time, state whether Germania Bank employees were informed, in writing, of the right to refuse to contribute without reprisal. I have been advised that perhaps the Receiver of Germania Bank might have this information and that my attorney spoke with the

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attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public.

- 24. Germania Financial Corporation was a wholly owned subsidiary of Germania Bank
- 25. None
- 26. There are only two such documents which I am able to produce. They are (a) Memo #86-29, dated April 23, 1986, and (b) Memo 86-16, dated March 6, 1986. I have been advised that perhaps the Receiver of Germania Bank might have other such requested documents and that my attorney spoke with the attorney for the Receiver, who informed him that whatever records the Receiver has may or may not be complete and are not in a condition now to be readily available to the public
- 27. No one

STATE OF FLORIDA            )  
   ) SS.  
 COUNTY OF BROWARD        )

WILLIAM G. OSBORN, having been duly sworn upon his oath, states that the facts set forth in the above and foregoing ANSWERS TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS are true and correct according to the best of his knowledge, information and belief.

*William G. Osborn*  
 \_\_\_\_\_  
 WILLIAM G. OSBORN

Subscribed and sworn to before me, a Notary Public, on this 12th day of March, 1993

*[Signature]*  
 \_\_\_\_\_  
 NOTARY PUBLIC

My Commission expires:

*Antonio J. Conover*  
 CC102129

Notary Public State of Florida  
 My Commission Expires 10/22/1995  
 #102129

93043504002

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
                          )  
WILLIAM OSBORN     )

MUR 3446

Documents Produced Pursuant to Interrogatory 26

93043504003

April 23, 1986

Chairman's Memo #86-29

TO: JIMMIE W. NEW

FROM: W. G. OSBORN

SUBJECT: U. S. LEAGUE PAC MANUAL

The voluntary political contributions by Germania officers and staff have been handled and reported in an individual capacity instead of under the regulations emanating from the Federal Election Commission. I have been overseeing our political contributions and will continue to do so until advised to the contrary.

At one of our early Management Committee meetings, we discussed the advantages and disadvantages of a formally organized PAC and agreed to not form one. It was requested that the U. S. League PAC Manual information be referred to Jan Wickenhauser for her review. The updated forms received from the U.S. League on April 11, 1986 have been referred to Jan.

CC: Jan Wickenhauser  
Ed Morris

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Have you been holding the  
in the part? If not please  
advise on the committee is  
responsible for administering the  
Jim  
4/21/85

March 6, 1986

Chairman's Memo #86-16

TO: Edward L. MORRIS

FROM: W. G. OSBORN

SUBJECT: POLITICAL CONTRIBUTIONS

Attached is an analysis of political contributions which were made from 1976 through 1985 with a proposed budget for 1986.

It is suggested that when there have been sufficient receipts to disburse fund requests that all requests be brought before the regular meeting of the Management Committee. Such requests should be brought by the individuals identified under the various categories: Corporate (Missouri and Illinois), Regional Branches (Alton, Belleville, Springfield, Mt. Vernon) and GFC (St. Louis).

93043504006

Prepared By	Initials	Date
Approved By		

Recipient	86	85	84	83	82	81	80	79	78	77	76	
Proposed Management Committee				(NATPAC)								
Thrift Pac(Natl. Council)	550--	250--	200--	200--		200--	200--	250--	200--		200--	
ISLPEC(Illinois League)	225--		300--	300--	200--	350--	250--	350--	325--	100--	200--	
SAPEC(U.S. League)	225--	1000--	300--	200--	50--	200--	200--	200--	200--		200--	
(Alton) Mayor Lenz Campaign Fund			100--									
(O'Fallon) Mayor MacKey Re-election			25--									
(Alton) Wuellner Campaign	Corporate		100--									
(S) Houston For Mayor	Morris		100--	75--								
(S) Mary Lemm for Recorder	Missouri	1000--	25--									
St. Clair County Republican Central Committee-Lincoln	Gaborn											
Day Dinner	Illinois	1000--	1000--	20--	35--							
Citizens for Percy			200--									
Senator Vince Demuzio	Regional		20--			15--	10--	10--	25--	20--	20--	
Ashcroft '84 Committee	Branches		100--									
AMBAC Campaign			50--	40--	70--	20--	120--					
Frank Watson for State Senator			50--									
Paul Simon Senate Committee	Stankov-Aitoo		150--									
Citizens for McPike	Keiser		100--			25--		30--	25--	30--		
Dixon for Senate	Deville	500--		50--							20--	
Madison County Republican Central Committee	Scanlon			30--		30--	30--		30--	25--	25--	
(Spfld) Langfelder Finance Committee	Springfield			25--								
States Attorney Bill Roberts	500--			30--								
(S) Friends of Dick Austin				50--								
Mel Price Testimonial Dinner					2500--							
Mt. Bill Thackrey for Mayor						30--						
Salute to Senator Sam Vadalabene						35--	20--		25--			
Findley for Congress	Cassey					50--	25--	35--		35--	25--	
State Citizens for Bower	Mt. Vernon											
Citizens for Horace Calvo		250--	1750--									
49th District Campaign Comm. honoring Jim Reilly and A. C. Junie Bartulis	GFC-St. Louis						30--		20--			
Madison County Bd of Supv. Spence Campaign Fund	Walters						25--					
Salute to Everett Steel		250--	250--					20--			25--	
Citizens Comm. for Dwight Kyle										25--		
Citizens for Lucco										30--	128--	
Walter "Babe" McAvoy											20--	
Madison County Democratic Committee											20--	
		5000--	800--	1390--	1035--	880--	1255--	1110--	845--	850--	465--	883--



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3446<sup>I</sup>

DATE FILMED 11-9-93 CAMERA NO. 2

CAMERAMAN JM14

93043504008



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

Microfilm  
 Public Records  
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3446.

12/10/93

93043542592

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS  
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

93043542593



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Scott J. Hlavacek  
Resolution Trust Corporation  
P.O. Box 867  
Elk Grove Village, IL 60009-0867

RE: MUR 3446

Dear Mr. Hlavack:

This is in reference to the matter involving Germania Bank, F.S.B. which your office referred to the Federal Election Commission on March 4, 1991. On October 31, 1991, the Commission found reason to believe that Edward Morris, Jimmie New and Germania Bank, F.S.B. violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3), and 441b(b)(4)(A)(i). On that same date, the Commission found reason to believe that Joseph Mason violated 2 U.S.C. § 441b(a). On January 12, 1993, the Commission found reason to believe that William Osborn violated 2 U.S.C. §§ 441b(b)(3) and 441b(b)(4)(A)(i). Furthermore, the Commission found reason to believe that William Osborn knowingly and willfully violated 2 U.S.C. §§ 433(a), 434(a) and 441b(a).

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Edward Morris, Jimmie New, Joseph Mason, William Osborn and Germania Bank, F.S.B. The Commission has, however, admonished William Osborn to take steps to ensure future compliance with 2 U.S.C. §§ 433(a), 434(a) and 441b(a).

Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

We appreciate your cooperation in helping the Commission meet its enforcement responsibilities under the Federal Election Campaign Act of 1971, as amended.

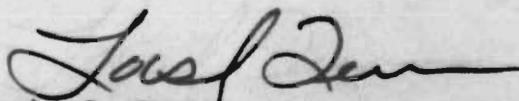
93043542594

Scott Hlaveck  
Page 2

If you have any questions, please contact Karen White, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble  
General Counsel



BY: Lois G. Lerner  
Associate General Counsel

Date the Commission voted to close the file: DEC 09 1993

93043542595



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Samuel C. Ebling, Esquire  
LaTourette, Schlueter, Ebling & Byrne  
11 S. Meramec Avenue  
Commerce Bank Building, Suite 1400  
St. Louis, MO 63105

RE: MUR 3446  
Edward L. Morris

Dear Mr. Ebling:

On November 13, 1991, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3), and 441b(b)(4)(A)(i). On December 16, 1991, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Edward Morris. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional

93043542596

Samuel C. Ebling  
page 2

materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Karen White*

Karen White  
Paralegal

Date the Commission voted to close the file: DEC 09 1993

93043542597



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

David V. Capes, Esquire  
Rosenblum, Goldenhersh,  
Silverstein & Zafft, P.C.  
7733 Forsyth Blvd, 4th Floor  
St. Louis, MO 63105

RE: MUR 3446  
Jimmie W. New

Dear Mr. Capes:

On November 13, 1991, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. §§ 433(a), 434(a), 441b(a), 441b(b)(3), and 441b(b)(4)(A)(i). On December 12, 1991, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Jimmie New. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional

93043542598

David V. Capes  
page 2

materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Karen White*

Karen White  
Paralegal

Date the Commission voted to close the file: DEC 09 1993

93043542599



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1993

Chaim H. Zimbalist, P.C.  
Danna, Soraghan,  
Stockenberg & Shaw P.C.  
150 North Meramec Avenue  
St. Louis, MO 63105

RE: MUR 3446  
William G. Osborn

Dear Mr. Chaim:

On January 19, 1993, your client was notified that the Federal Election Commission had found reason to believe he knowingly and willfully violated 2 U.S.C. §§ 433(a), 434(a), and 441b(a). Furthermore, the Commission found reason to believe he violated 2 U.S.C. §§ 441b(b)(3), and 441b(b)(4)(A)(i). On March 16, 1993, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against William Osborn. Accordingly, the Commission closed its file in this matter.

The Commission reminds your client, however, that 2 U.S.C. § 433(a) provides that authorized campaign committees file a statement of organization no later than 10 days after designation pursuant to section 432(e)(1). The Commission also reminds your client that 2 U.S.C. § 434(a) provides that treasurers of political committees file the required receipts and disbursements with the Commission. Lastly, the Commission reminds your client that 2 U.S.C. § 441b(a) prohibits corporations from making contributions or expenditures in connection with any election to any political office. Therefore, your client should take steps to ensure future compliance with these statutory provisions.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional

93043542600

Chaim H. Zimbalist  
page 2

materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,  
*Karen White*  
Karen White  
Paralegal

Date the Commission voted to close the file: DEC 09 1993

93043542601



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

John L. Davidson, P.C.  
12444 Powerscourt Drive  
Suite 250  
St. Louis, MO 63131

RE: MUR 3446  
Joseph L. Mason

Dear Mr. Davidson:

On November 13, 1991, your client was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441b(a). On November 27, 1991, your client submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Joseph Mason. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional

93043542602

John L. Davidson  
page 2

materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Karen White*

Karen White  
Paralegal

Date the Commission voted to close the file: DEC 09 1993

93043542603



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DEC 10 1992

Thomas H. Jacobsen, President  
Mercantile Bank of St. Louis N.A.  
P.O. Box 524  
Tram 14-0  
St. Louis, MO 63166-0524

RE: MUR 3446  
Germania Bank, F.S.B.

Dear Mr. Jacobsen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Karen White*

Karen White  
Paralegal.

93043542604