FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: FRIENDS OF CORRINE BROWN - [illegible]
OFFICE OF GENERAL COUNSEL

On November 17, 1994, the Commission approved the [illegible] Audit Report on Friends of Corrine Brown. The [illegible] findings which meet the threshold for referral to [illegible]

II.A.1. Apparent Prohibited Contributions [illegible] from Corporations and Foreign Nationals

II.A.2. Apparent Prohibited Contributions - [illegible] Corporate Aircraft

II.C. Loans from the Candidate

II.F Recordkeeping for Disbursements

II.G. Disbursements [illegible]

II.H. 48 Hour [illegible]

Please note that on [illegible] Audit Report, Committee [illegible] negotiated refund checks [illegible] totaling $3,200, as well as [illegible] $1,750 were not from prohibited [illegible] response.

Should you have any questions [illegible] contact Wanda [illegible] available for your assistance.

Attachments:

1. Audit Report on Friends [illegible]
2. Committee's Response to [illegible]

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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REPORT OF THE AUDIT DIVISION ON FRIENDS OF CORRINE BROWN

I. Background

A. Overview

This report is based on an audit of Friends of Corrine Brown (the Committee), undertaken by the Audit Division of the Federal Election Commission in accordance with the provisions of the Federal Election Campaign Act of 1971, as amended (the Act). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The audit covered the period from June 10, 1992, the date of the Committee's first bank transaction, through December 31, 1992. The Committee reported a beginning cash balance of $0; total receipts for the period of $286,556; total disbursements for the period of $275,708; and an ending cash balance of $13,553 1/.

B. Campaign Organization

The Committee registered with the Clerk of the U.S. House of Representatives on July 23, 1992 as the principal campaign committee for Corrine Brown, Democratic candidate for the

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1/ These amounts are the calendar year to date totals reported on the 1992 Year End Report. The amounts do not foot due to a mathematical discrepancy of $2,705. The amounts as disclosed by report period total $289,261 for receipts and $275,708 for disbursements. All amounts are rounded to the nearest dollar.

3rd District, U.S. House of Representatives from the state of Florida. The Committee maintains its headquarters in Jacksonville, Florida.

The audit indicated that the Committee was financed through contributions from political committees ($147,363), contributions from individuals ($124,772), loans from the candidate($14,500), and transfers from the candidate's non-federal campaign ($2,326).

This report is based on documents and work papers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to the Commissioners and appropriate staff for review.

C. Key Personnel

The Treasurer during the period of the audit was Dr. Kenneth W. Jones. The current treasurer is Ms. Gloria Simmons.

D. Scope

The audit included testing of the following general categories:

1. The receipt of contributions or loans in excess of the statutory limitation;

2. the receipt of contributions from prohibited sources, such as those from corporations or labor organizations (Finding II.A.);

3. proper disclosure of contributions from individuals, political committees and other entities, to include the itemization of contributions when required, as well as, the completeness and accuracy of the information disclosed (Findings II.D, E and H);

4. proper disclosure of disbursements including the itemization of disbursements when required, as well as, the completeness and accuracy of the information disclosed (Finding II.D.);

5. the accuracy of total reported receipts, disbursements and cash balances as compared to campaign bank records (Finding II.B.);

6. adequate recordkeeping for campaign transactions (Finding II.F.);

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7. other audit procedures that were deemed necessary in the situation.

It should be noted that substantive testing of debts and obligations was not performed due to a lack of vendor generated documentation (such as invoices, receipted bills, etc.).

Unless specifically discussed below, no material non-compliance was detected. It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action.

II. Audit Findings and Recommendations

A. Apparent Prohibited Contributions

1. Contributions from Corporations and Foreign Nationals

Section 441b(a) of Title 2 of the United States Code states, in part, that it is unlawful for any corporation to make a contribution in connection with any election to federal office and further states that it is unlawful for any candidate, political committee or any other person knowingly to accept or receive any contribution prohibited by this section.

Section 441(e) of Title 2 of the United States Code states, in part, that it shall be unlawful for a foreign national directly or through any other person, to make any contribution of money or anything of value in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national.

Sections 103.3(b)(1) and (4) of Title 11 of the Code of Federal Regulations state, in part, that contributions that present genuine questions as to whether they were made by corporations or foreign nationals may be, within 10 days of the treasurer's receipt, either deposited into a campaign depository or returned to the contributor. If any such contribution is deposited, the treasurer shall make his or her best efforts to determine the legality of the contribution. If the contribution cannot be determined to be legal, the treasurer shall, within 30 days of receipt of the contribution, refund the contribution to the contributor. Any contribution which appears to be illegal and which is deposited into a campaign depository shall not be used for any disbursements by the political committee until the contribution has been determined to be legal. The political committee must either establish a separate account in a campaign depository for such contributions or maintain sufficient funds to make all such refunds.

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A review of the Committee's contributor records identified 17 contributions from corporations totaling $4,200 and 1 contribution drawn on the account of an apparent foreign national for $250. The corporate contributions were verified as such by the appropriate Secretary of State. Three of the corporate contributions totaling $1,250 were untimely refunded. No action was taken with regard to the remaining $3,200 ($2,950, corporate; $250 foreign national.)

The Committee did not establish a separate bank account for questionable contributions; however, during the campaign cycle, the balance maintained in the Committee's bank account was sufficient to make the refunds.

At the exit conference, the Committee was provided with a schedule of the apparent prohibited contributions. An official for the Committee stated that the Committee would submit evidence that the $250 contribution is not from a foreign national.

The interim audit report recommended that the Committee provide evidence that the contributions are not prohibited; or refund the contributions to the contributors and provide evidence of such refunds (copies of the front and back of the negotiated refund checks).

In response to the interim report, the Committee provided copies of refund checks in the amount of $3,200. ($2,950 corporate; $250 foreign national) However, copies of negotiated checks were provided for only 3 of the refunds, totaling $600. These three checks were issued in 1993 shortly after the conclusion of audit fieldwork. The remaining refund checks, totaling $2,600, were dated July 20, 1994 and July 25, 1994, just prior to and after the July 22, 1994 due date for the Committee's response. A Committee official stated that copies of the negotiated refund checks would be provided once they [illegible] by the bank.

2. <u>Use of Corporate Aircraft</u>

Section 114.9(e) of Title 11 of the Code of Federal Regulations states that a candidate, candidate's agent, or [illegible] traveling on behalf of a candidate who uses an airplane [illegible] owned or leased by a corporation or labor organization [illegible] a corporation of labor organization licensed to offer [illegible] services for travel in connection with a Federal [illegible] advance, reimburse the corporation or labor organization [illegible] case of travel to a city served by regularly scheduled [illegible] service, the first class air fare shall be used. [illegible] travel to a city not served by a regularly scheduled [illegible] service, the usual charter rate shall be used.

During the review of the Committee's [illegible] the Audit staff identified payments to Florida [illegible]

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Inc., Aviation Department, totaling $4,111 for transportation services rendered to the Committee. According to the 1993 Edition of Standard & Poors Register, Florida Rock Industries, Inc. is a producer of building materials (e.g. ready mix concrete, concrete blocks, crushed limestone, building sand, etc.). Since Florida Rock Industries Inc. is not a corporation licensed to offer commercial service for travel, the Committee is required to make payment in advance for the services received.

Invoices related to the travel services are dated August 26, 1992 ($1,289) and October 13, 1992 ($2,823). The October 13, 1992 invoice indicates that the transportation services were rendered on September 23, 1992. The dates of the flights covered by the August invoice are not known. Payments on the invoices were made on the following dates:

12/17/92	$1,300
12/23/92	$2,500
2/22/93	$ 311

The Audit staff requested that the Committee provide the flight dates, a copy of the flight itineraries and passenger listings. An official for the Committee stated that she would obtain the requested information.

The interim audit report recommended that the Committee provide the requested information as well as an explanation of how the the cost of each flight was determined. In response to the interim report, Counsel for the Committee stated that:

> "...The Commission's regulations specifically provide for this practice. At the time the aircraft was used, the Campaign was not aware that advance payment was required. The trips were made under the pressure of the campaign and the staff was unfamiliar with any such requirement. The Committee, nevertheless, made the necessary payments when it discovered the omission."

Since none of the requested documentation was provided, the Committee has not complied with the interim report recommendation. Without the requested information it is clear only that the flights were not paid in advance, but it cannot be determined if the billings were correctly calculated.

B. Misstatement of Financial Activity

Sections 434(b)(1), (2) and (4) of Title 2 of the United States Code require a committee to report the amount of cash on hand at the beginning of each reporting period and the total amount of all receipts and disbursements for the reporting period and calendar year.

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The Audit staff performed a reconciliation of the Committee's reported financial activity to its bank activity for the period June 10, 1992 to December 31, 1992. The reconciliation disclosed the following misstatements:

1. Receipts

The Committee's reported receipts were understated by $12,325. The components of the misstatement are as follows:

1992 Reported Receipts		$289,261
Mathematical discrepancy between supporting Schedule A and the summary page total of the October Quarterly report.	$3,270	
In-kind contributions not reported	3,622	
Transfers from the Candidate's non-federal account not reported	2,326	
Unexplained difference	3,107	
Net Adjustment		12,325
Correct reportable receipts		$301,586

2. Disbursements

The Committee's reported disbursements were understated by a net amount of $24,480. The components of the misstatement are as follows:

1992 Reported Disbursements		$275,708
In-kind contributions not reported	3,622	
Bank Service Charges/Debits not reported	1,761	
Disbursements reported in error.2/	(20,491)	

2/ No documentation for these disbursements was present in the Committee's records (such as canceled checks or debits to bank accounts).

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Disbursements not reported	49,262	
Disbursements reported twice on Post General report.		
1. Refunds	(1,250)	
2. Loan Repayment	(6,000)	
Unexplained difference	(2,424)	
Net Adjustment		24,480
Correct reportable receipts		$300,188

3. Ending Cash on Hand Balance

The reported ending balance at December 31, 1992 was overstated by a net amount of $12,154, resulting from the misstatements detailed above. The correct ending balance was $1,399.

On August 4, 1993, the Committee filed amended reports for 1992 which materially corrected the misstatement of financial activity.

C. Loans from the Candidate

Section 431(8)(A)(i) of Title 2 of the United States Code defines the term "contribution" to include any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

Section 110.10(a) of Title 11 of the Code of Federal Regulations states that candidates for Federal office may make unlimited expenditures from personal funds.

Section 110.10(b) of Title 11 of the Code of Federal Regulations defines "personal funds" as any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest.

The Audit staff identified 5 loans from the Candidate to the Committee totaling $14,500. As of year end 1992, the Committee had repaid $11,000 to the Candidate in 4 installments leaving $3,500 outstanding. The loans were made to the Committee in the following form:

July 24, 1992 - $3,000 Cashier's check
July 31, 1992 - $3,000 Cashier's check

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August 28, 1992 - $2,000 Personal check (#3441)
August 28, 1992 - $5,000 Credit Memo
August 31, 1992 - $1,500 Currency

Documentation provided by the Committee consisted of copies of the cashier's checks, the Candidate's personal check and a deposit slip for a currency deposit of $1,500. Notations on the copy of the deposit slip indicate that the deposit is a loan from the Candidate. No documentation was provided for the $5,000 credit memo. However, a notation on the Committee's bank records indicate that it is a loan. Documentation to establish the Candidate's ownership of the funds used to make the loans was not provided.

At the exit conference, a Committee official stated that she would obtain further documentation regarding the source of the loans.

The interim audit report recommended that the Committee provide documentation that demonstrates that the loans were made using the Candidate's personal funds. The documentation should include but is not limited to:

1. Bank statements from the Candidate's personal checking account which show the deposits from which the $2,000 loan on August 28, 1992 was made, together with a description of the source of the deposits; and

2. A description of the source of the funds used to make the remaining $12,500 in loans together with documentation to establish that the funds were the Candidate's personal funds. The documentation should include, but is not limited to, bank statements, canceled checks, credit and/or debit memoranda, etc.

In response to the interim report, Counsel for the Committee stated:

> "...There is no indication in the report or otherwise that Representative Brown did not have the nominal personal funds to make this series of small loans. There is no cause shown by the Audit staff for making any additional showing on this point, certainly no justification for any production of all financial records of a public official who maintains some basic right to privacy in such matters."

None of the requested documentation was provided. Therefore, the Committee has not complied with the interim report recommendation and the source of the funds used by the candidate to make the loans to the Committee is still unknown.

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D. Itemization of Receipts and Disbursements

Sections 434(b)(3)(A) and (B) of Title 2 of the United States Code state that each report shall disclose the identification of each person (other than a political committee) who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of $200 within the calendar year, or in any lesser amount if the reporting committee should so elect, together with the date and amount of any such contribution. Each report shall also disclose any political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution.

Sections 434(b)(4)(A) and (5)(A) of Title 2 of the United States Code state that each report shall disclose for the reporting period and the calendar year, the total amount of all expenditures made to meet candidate or committee operating expenses; and the name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure.

1. Receipts

The Audit staff's review of the Committee's receipts identified 16 contributions from political committees/organzations totaling $14,000 that were not itemized as required. This represents 8.5% of the total amount of contributions from political committees/organizations.

2. Disbursements

The Audit staff's review of the Committee's disbursements identified more than 90 disbursements totaling $54,780 or 19.5% of the total amount requiring itemization, that were not itemized as required.

The findings noted above were presented to the Committee at the exit conference. On August 4, 1993, the Committee filed amended reports which materially corrected the itemization errors.

E. Omission of Disclosure Information for Receipts

Section 434(b)(3)(A) of Title 2 of the United States Code states, in part, that each report shall disclose the identity of all persons who make a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of $200 within the calendar year together with the date and amount of any such contribution.

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Section 434(b)(3)(B) of Title 2 of the United States Code states that each report under this section shall disclose the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and the amount of any such contribution.

Sections 431(13)(A) and (B) of Title 2 of the United States Code defines "identification" to mean, in the case of any individual, the name, mailing address, and the occupation of such individual, as well as the name of his or her employer; and in the case of any other person, the full name and mailing address of such person.

Section 104.3(a)(4) of Title 11 of the Code of Federal Regulations requires that in addition to the above, the aggregate year-to-date total for such contributor be reported.

Section 102.9(d) of Title 11 of the Code of Federal Regulations states, in part, that in performing recordkeeping duties, the treasurer or his or her authorized agent shall use his or her best efforts to obtain, maintain and submit the required information and shall keep a complete record of such efforts.

Section 104.7(a) and (b) of Title 11 of the Code of Federal Regulations states that when the Treasurer of a political committee shows that best efforts have been used to obtain, maintain, and submit the information required by the Act for the political committee, any report of such committee shall be considered in compliance with the Act. Best efforts will not be deemed to have been exercised if the treasurer has not made at least one effort per solicitation either by a written request or by an oral request documented in writing to obtain such information from the contributor.

The Audit staff reviewed the Committee's reports and identified entries for 27 contributions from individuals totaling [illegible] and 57 contributions from political committees/organizations totaling $60,350 that were missing either the name, the address, the aggregate year-to-date amount or the date of receipt. These amounts represent 39% and 40%, respectively, of the total amount of contributions for which the information was required.

In addition, the Audit staff identified 27 contributions from individuals totaling $10,450, which represents 31% of the dollar amount of contributions requiring itemization, that were missing the occupation and/or name of employer.

The Committee provided the Audit staff with a copy of a contributor response card. The card contained a request for all of the required information except name of employer. In addition, the Committee did not present evidence that demonstrated which if

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any of the contributors received the card. None of the response cards returned by contributors were available for review by the Audit staff. Therefore, the Audit staff is unable to determine whether the Treasurer exercised "best efforts" to obtain the required information.

At the exit conference the Committee was informed of the reporting problems. On August 4, 1993, the Committee filed amended reports which materially corrected the disclosure errors.

F. Recordkeeping for Disbursements

Section 432(c)(5) of Title 2 of the United States Code states, in part, that the treasurer of a political committee shall keep an account of the name and address of every person to whom any disbursement is made, the date, amount, and purpose of the disbursement, and the name of the candidate and the office sought by the candidate, if any, for whom the disbursement was made, including a receipt, invoice, or canceled check for each disbursement in excess of $200.

Section 102.9(b)(i)(iv) states that "purpose" has the same meaning given the term at 11 CFR 104.3(b)(3)(i)(A), which is "a brief statement or description of why the disbursement is made.

The Audit staff reviewed the Committee's disbursements records and identified 117 disbursements, totaling $46,962, for which the Committee had inadequate documentation. The disbursements records maintained by the Committee generally included a canceled check with a purpose recorded on the memo line and/or a check stub on which the purpose was recorded. However, for the disbursements noted above, the documentation contained either no purpose or an inadequate purpose. The majority of the checks were made payable to individuals or to cash.

The finding was presented to the Committee at the exit conference. The Committee had no comment.

The interim audit report recommended that the Committee provide documentation for the $46,962 in disbursements noted above, including but not limited to, receipted bills, invoices or canceled checks.

In the response to the interim audit report, Counsel for the Committee stated that the Audit staff's listing contained several errors:

Counsel stated that the Committee is required to maintain receipts, invoices or canceled checks only for disbursements over $200; however, 2 U.S.C. §432(c)(5) states that Treasurers must keep an account of all disbursements, including the name and address of every person to whom any disbursement is made, date, amount, and purpose of the disbursement. As stated above, for the disbursements noted, the Committee's documentation

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contained either no purpose or an inadequate purpose or were made payable to cash.

The response details 6 disbursements totaling $808.18 for which the payees are listed as unknown. The Committee submitted check copies for 4 of the disbursements totaling $428.18 showing the payees. However, the check copies do not include an adequate purpose and no additional documentation, which describes the purpose for the disbursements, was included. The Committee did not provide any documentation for the 2 remaining disbursements totaling $380.00. The Committee's response does not demonstrate that the Committee satisfied the recordkeeping requirements of the Act and regulations.

For disbursements totaling $13,089.31, Counsel stated:

> "A majority of the expenditures listed on Attachment 2 are for campaign workers and get-out-the-vote efforts for which no documentation of the nature requested by the audit staff [exists] other than canceled checks. No invoice or receipt would have been available for these disbursements. They went to pay individuals working on the campaign both part-time and on an occasional basis right around an election day. There are also disbursements for campaign workers expenses. Campaign workers will frequently have nominal expenses for local travel, food and other purchases that are not the sort for which a receipt would be available. These workers often played a brief, but central, role in the campaign and were sporadic at best in their attention to recordkeeping requirements."

The Committee submitted check copies and check stubs for the disbursements. However, these records do not include an adequate purpose and no additional documentation which describes the purpose for the disbursements was included. The Committee's response does not demonstrate that the Committee satisfied the recordkeeping requirements of the Act and regulations.

Finally, Counsel provided evidence that 7 disbursements totaling $6,250 were adequately documented.

Notwithstanding the above adjustments, the Committee has not maintained adequate records for disbursements totaling $40,711.73.

G. <u>Disbursements Made Payable to Cash</u>

Section 434(b)(5)(A) of Title 2 of the United States Code states that each report under this section shall disclose the

name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure.

Section 103.3(a) of Title 11 of the Code of Federal Regulations states, in part, that a committee shall make all disbursements by check or similar drafts drawn on an account at its designated campaign depository, except for expenditures of $100 or less made from a petty cash fund pursuant to 11 CFR 102.11

Section 102.11 of Title 11 of the Code of Federal Regulations states that a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of $100 to any person per purchase or transaction. If a petty cash fund is maintained, it shall be the duty of the treasurer of the political committee to keep and maintain a written journal of all disbursements. This written journal shall include the name and address of every person to whom any disbursement is made, as well as the date, amount, and purpose of such disbursement. In addition, if any disbursement is made for a candidate, the journal shall include the name of that candidate and the office (including State and Congressional district) sought by such candidate.

During the review of the Committee's disbursements, the Audit staff identified 46 checks totaling $26,833 made payable to cash. Only one of the disbursements for $25 was identified as petty cash. The remaining disbursements were for purposes described on the check stubs as GOTV, field workers, travel expense, etc. The Committee did not report or itemize $20,047 of the disbursements on the disclosure reports initially filed (see Finding II.D.2.). However, on the amended reports filed on August 4, 1992, the payees of the disbursements are disclosed as cash.

At the exit conference, the Committee was provided with a schedule of the cash disbursements.

The interim audit report recommended that the Committee file amended Schedules B (Itemized Disbursements) for those cash disbursements noted above which require itemization and disclose the identity of the persons who ultimately received the cash disbursements.

In response to the interim report, Counsel for the Committee stated that:

> "The Committee's cash disbursements reflect the large number of expenditures that a volunteer campaign must make day-to-day and a lack of familiarity with the petty cash rules under the FECA..."

The Committee's response did not include amended Schedules B. Therefore, the Committee has not complied with the recommendation of the interim report.

H. 48 Hour Notice Filings

Section 104.5(f) of Title 11 of the Code of Federal Regulations requires that any authorized committee of a candidate that receives any contribution of $1,000 or more after the 20th day, but more than 48 hours, before 12:01 AM of the day of the election notify the Clerk of the House within 48 hours of receipt of the contribution. The notification shall be in writing and shall include the name of the candidate and office sought, the identification of the contributor and the date of receipt and amount of the contribution. The notification shall be in addition to the reporting of these contributions on the post-election report.

The dates of the elections in the state of Florida were as follows:

September 1, 1992	Primary election
October 1, 1992	Run off election
November 3, 1992	General election

The Committee was required to notify the Clerk of the House of Representatives of any contributions of $1,000 or more received during the following periods:

August 13, 1992	through	August 29, 1992
September 12, 1992	through	September 28, 1992
October 15, 1992	through	October 31, 1992

During the periods noted above the Committee received 45 contributions of $1,000 or more totaling $80,870 for which 48 hour notices were not filed.

At the exit conference, Counsel for the Committee stated that Corrine Brown was a first time candidate and her staff was inexperienced with the federal campaign laws and requirements. The Committee was provided with a schedule of the 45 contributions.

The interim audit report recommended that the Committee provide any evidence which demonstrates that it has complied with 11 C.F.R. §104.5(f).

The Committee's response to the interim report was silent regarding this issue.

I. Transfer from Candidate's Nonfederal Committee

11 C.F.R. §110.3(c)(6) states that a candidate's nonfederal campaign committee may transfer funds to his or her authorized federal committee provided that the funds transferred are not composed of contributions that would be in violation of the Act. If a candidate's nonfederal campaign committee transfers more than $1,000 to the candidate's authorized federal committee, the nonfederal committee becomes a political committee pursuant to 11 CFR 100.5(a) and must register as such within 10 days after making the transfer and file at least one report disclosing the source(s) of its cash on hand balance and the amount transferred to the federal campaign committee.

The Committee received a transfer of $2,326 from the Candidate's nonfederal committee. The transfer was not itemized on the Committee's reports initially filed. In addition, the nonfederal committee did not register with the Commission as a political committee as required.

The Audit staff reviewed copies of the Campaign Treasurer's Reports filed by the nonfederal committee with the state of Florida and determined that the nonfederal committee's cash on hand contained sufficient permissible funds to make the transfer. The transfer was subsequently itemized on amended reports filed after the audit fieldwork. The amended report contained a memo Schedule A (Schedule of Itemized Receipts) which disclosed the source of the contributions contained in the transfer.

In response to this finding, Counsel for the Committee stated that "they [the Committee] were not aware of the requirement to register the state legislative committee at the time of the transfer. They understood that disclosure on the Committee's report was sufficient to inform the public and comply with federal law."

Since the funds used to make the transfer were permissible and the source of the funds was disclosed, the Audit staff recommends no further Committee action with regard to this matter.

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(202) 628-6600 • FACSIMILE (202) 434-1690

November 30, 1994

Ms. Wanda J. Thomas
Audit Division - Room 725
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Friends of Corrine Brown

Dear Ms. Thomas:

This letter responds to the Final Audit Report on Friends of Corrine Brown and provides additional information and documentation regarding the auditor's findings related to "contributions from corporations and apparent foreign nationals". The Final Auditor Report indicates that Friends of Corrine Brown ("the Committee") had not provided the Audit Division with copies of negotiated checks for all of the refunds of alleged corporate contributions. Enclosed as Exhibit A you will find copies of negotiated checks for the following refunds:

Rumberger, Kirk and Caldwell
AAA Construction School, Inc.
Kenneth W. Jones, M.D., P.A.
Ossi and Butler, P.A.
Fred Jackson & Associates
Ossi's Apothecary, Inc.
Saleh & Lepely Psychiatric Associations, Inc.
Southern Wine and Spirits of America, Inc.
Drs. Barrack & Liane, P.A.
Fred A. Akel, D.D.S., P.A.
International Interiors, Inc.
Rand Management Company
Bahri Construction
C.D. Moody Construction Company
Gary M. Akel, O.D., P.A.

ANCHORAGE • BELLEVUE • HONG KONG • LOS ANGELES • PORTLAND • SEATTLE • SPOKANE • TAIPEI • WASHINGTON, D.C.
STRATEGIC ALLIANCE: RUSSELL & DEMOLEN, VANCOUVER, B.C.

In addition, the Committee has received written confirmation that Louisa Beck Hatanaka is not a foreign national. She is a United States citizen. See Exhibit B. The Committee also received confirmation that the contribution from Florida Electric Cooperative Association was issued by the Action Committee for Rural Electrification, a federally registered multi-candidate political action committee since 1967. See Exhibit C. We request that this additional documentation be placed on the public record along with the Final Audit Report.

Sincerely,

B. Holly Schadler
Counsel to Friends of Corrine Brown

Attachments

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Exhibit A

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CONNIE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
[illegible] NANCY ST., [illegible]
JACKSONVILLE, FL [illegible]

C 01 CORP 0567

Mar 31 [illegible]

PAY TO THE ORDER OF Rumberger, Kirk and Caldwell $ 250.00

Two Hundred Fifty and No DOLLARS

FIRST UNION
First Union National Bank
of Florida
Jacksonville, Florida [illegible]

FOR [illegible]

⑈0056⑆ ⑆063000028⑆ 6 6 500 236923⑈ ⑈0000025000⑈

9 7 0 4 3 8 4 0 4 4 5

063000047 [illegible]
07 002010 [illegible]
10 108813 [illegible]

⑈22825826

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
3416 NANCY ST. PH. 904-355-1700
JACKSONVILLE, FL 32209

0566

C 01 CORP

Nov. 24 19 92

PAY TO THE ORDER OF AAA Construction School 096 $ 500.00

Five Hundred and 00/100 DOLLARS

FIRST UNION First Union National Bank of Florida Jacksonville, Florida 32202

NOV 10 4 1992

COMMUNITY FIRST BANK

FOR

Gloria Simmons, Campaign Treas

⑈000566⑈ ⑆063000236⑆ 11500236923⑈ ⑈0000050000⑈

9.704384.0446

0630-0019-9
1195773803 01-05-93
3366 01/04/93 0001

COMMUNITY
FIRST BANK
JACKSONVILLE, FL
(904) 356-4162
263089790

E22650390

AAA Construction School
For Deposit Only
#164529

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
[illegible] MARY ST. PO. BOX [illegible]
JACKSONVILLE, FL 32203

C 04 CORP 0585

Nov. 24 [illegible]

PAY TO THE ORDER OF [illegible] $ 500.00

[illegible] DOLLARS

FIRST UNION
[illegible]

FOR [illegible]

⑈000585⑈ ⑆063000026⑆11500236923⑈ ⑈0000050000⑈

97043840044

DE W 02
[illegible]
[illegible]
[illegible]

[illegible]

COMMON SENSE CONGRESS FUND
FOR U.S. HOUSE OF REPRESENTATIVES
11407 LONGWOOD HOV DR. W.
JACKSONVILLE, FL 32218

1245

July 20, 94

PAY TO THE ORDER OF Kenneth W. Jones MD PA $ 150.00

One Hundred and Fifty and 0/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1012

FIRST UNION

FOR Contribution Refund

Gloria Simmons, Treas.

⑈001245⑈ ⑆063000236⑆216500236923⑈ ⑈0000015000⑈

970438404448

01001 001 0094010665 BARNETT JAX
083000047 800-5239498>063000047<
03 011301 1365 08-04 JAX FL
03 011301 08-04 00184110

122065194

Kenneth W. Jones MD PA
2100 Gulf Life Dr.
Jacksonville, FL 32207

CORRINE BROWN CAMPAIGN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11407 LONGWOOD HIT DR. W.
JACKSONVILLE, FL 32218

1239

July 20, 19 94

PAY TO THE ORDER OF Fred Jackson & Associates $ 100.00

One Hundred and 0/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-726-1012

FOR Contribution Refund

Gloria Simmons Campbell

⑈001239⑈ ⑆063000216⑆ 2115002369234⑈ ⑈0000010000⑈

97043840449

AG 09
SUNBANK N.A.
2201 PRESNER BLVD
ORLANDO, FL

AUG -9 94

02233215

12233704 1

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
11607 LONGWOOD HGY DR. W.
JACKSONVILLE, FL 32218

6-92

1235

July 20, 19 94

PAY TO THE ORDER OF Ossi's Apothecary, Inc. $ 100.00

One Hundred and 0/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-725-1012

FOR Contribution Refund

Gloria Simmons, Campaign Treas.

⑈001238⑈ ⑆063000021⑆ 2115002369234⑈ ⑈0000010000⑈

97043840450

JY 29

JUTHEAST BANK N.A.
DEERWOOD BANKING CENTER
JACKSONVILLE, FLORIDA
OSSI'S APOTHECARY, INC

COMMITTEE ENERGY CHAIRMAN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11407 LONGWOOD WAY DR. W.
JACKSONVILLE, FL 32210

1230

July 20, 19 94

63-2/630
0150

PAY TO THE ORDER OF Saleh & Legaly Psychiatric Association, Inc. $ 100.00

One Hundred and 0/100 DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1012

63-544 014437* 07 634
0430 5-2400
031 *100.00 CC

FOR Contrib. Refund

⑈001230⑈ ⑆063000021⑆ 2115002369234⑈ ⑈0000010000⑈

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14253280

U.S. JP

10298108 04

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
3416 NANCY ST. PH. [illegible]
JACKSONVILLE, FL [illegible]

0701

August 27, 19 93

PAY TO THE ORDER OF Southern Wine & Sprits of America, Inc. $ 200.00

Two Hundred and 0/100 DOLLARS

FIRST UNION First Union National Bank of Florida Jacksonville, Florida 32202 950-9530

FOR Refund for corporate contribution

Gloria Simmons, Camp. Treas.

⑈000701⑈ ⑆063000021⑆11500236923⑈ ⑈0000020000⑈

9704384045 2

PAY TO THE ORDER OF
NCNB NATIONAL BANK OF FLORIDA
MIAMI, FL 33101
⑆063000021⑆
FOR DEPOSIT ONLY
SOUTH FLORIDA LIQUOR DISTRIBUTORS, INC.
SOUTHERN WINE & SPIRITS
COASTAL MERCHANT SVCS
DEPOSIT 08/30/93

TCA

⑈15402926 ⑈12342228

1244

PAY TO THE ORDER OF Barrack & Ziann PA $ 300.00

Three Hundred and 0/100 DOLLARS

FIRST UNION

Contribution Refund

FOR

⑈001244⑈ ⑆063000216⑆211500236923⑆ ⑈0000030000⑈

9704384040453

CORRINE BROWN CAMPAIGN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11607 LONGWOOD KEY DR. W.
JACKSONVILLE, FL 32218

1243

July 20, 19 94

63-2/630
00150

PAY TO THE ORDER OF Fred A. Akel, DDS PA $ 200.00

Two Hundred and 0/100 ---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1912

FIRST UNION

FOR Contribution Refund

Gloria Simmons, Camp Treas.

⑈001243⑈ ⑆063000026⑆ 2165002369234⑈ ⑈0000020000⑈

Fred Akel refund for deposit only #1617901968811

AG 94 17
FINAL
CORR INTERNATIONAL 917
JACKSONVILLE, FLORIDA
0630
00021

9704384045 4

22483511

CORRINE BROWN CAMPAIGN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11607 LONGWOOD KEY DR. W.
JACKSONVILLE, FL 32218

1241

July 20, 19 94

PAY TO THE ORDER OF International Interiors, Inc. $ 200.00

Two Hundred and 0/100 ---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1012

FOR Contribution Refund

Gloria Simmons, Campaign

⑈001241⑈ ⑆063000021⑆ 2165002369234⑈ ⑈0000020000⑈

01018 001 2182311014 BARNETT JAX
063000047 800-5239498>063000047<
09 200031 2017 07-25 JAX FL
09 200031 07-25 01801510

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
3416 NANCY ST. PH. 904-355-1700
JACKSONVILLE, FL 32209

6-92

0705

Sept. 8, 19 93

63-2/630
Branch 150

PAY TO THE ORDER OF Rand Management Company $ 250.00

Two Hundred and Fifty and 0/100---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FIRST UNION

FOR Reimbursement for corporate cont.

Gloria Simmons, Camp. Tre

⑈000705⑈ ⑆063000021⑆ 1150023 6923⑈ ⑈0000250 00⑈

for deposit only

063000047 153001028 BARNETT JAX
52 052008 800-5234945>063000047K
05 117737 1574 05-14 JAX(FL

CORRINE BROWN CAMPAIGN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11607 LONGWOOD KEY DR. W.
JACKSONVILLE, FL 32218

1240

July 20, 19 94

PAY TO THE ORDER OF Bahri Construction $ 100.00

One Hundred and 0/100 ---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1012

FOR Contribution Refund

Gloria Simmons, Cmp Treas.

⑈001240⑈ ⑆063000021⑆ 211500236923 4⑈ ⑈0000010000⑈

Credited to account of within named payee
Absence of endorsement guaranteed
First Union National Bank of Florida
Memorial Hospital Office

JY '94 27

0630
00021

9/0435445457

#22206833

CORRINE BROWN CAMPAIGN FUND 6-92
FOR U.S. HOUSE OF REPRESENTATIVES
11607 LONGWOOD NAV DR. W.
JACKSONVILLE, FL 32218

1242

July 20, 19 94

PAY TO THE ORDER OF C.D. Moody Construction Co. $ 100.00

One Hundred and 0/100 ---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida
24 Hour Information Service
1-800-735-1012

FOR Contribution Refund

⑈001242⑈ ⑆063000021⑆ 21150023692 34⑈ ⑈0000060000⑈

AG '94 01

08100003

PAY TO THE ORDER OF
NationsBank of Georgia, N.A.
ATLANTA, GEORGIA
061000052
FOR DEPOSIT ONLY
C.D. MOODY CONSTRUCTION COMPANY
0010688 7558

08/01/94 063100277
NATIONSBANK OF FLORIDA
TAMPA, FLORIDA
01585786
⑆146210 62

⑆12635435

9 7 0 4 3 8 4 0 4 5 8

CORRINE BROWN CAMPAIGN FUND
FOR U.S. HOUSE OF REPRESENTATIVES
3416 NANCY ST. PH. 904-355-1700
JACKSONVILLE, FL 32209

6-92

0716

September 23, 19 93

63-2/630
Branch 150

PAY TO THE ORDER OF Gary M. Akel, O.D., P.A. $ 150.00

One Hundred and Fifty and 0/100 ---------- DOLLARS

FIRST UNION — First Union National Bank of Florida, Jacksonville, Florida 32202

FOR refund for 11/30/92

Gloria Simmons, Camp. Treas.

⑈000716⑈ ⑆063000216⑆ 1500236923⑈ ⑈0000015000⑈

9704384045 9

OT '93 01
SUNBANK N.A.
2228 PREMIER ROW
ORLANDO FL

0631
02152

0010 2346

0 1 0 1 6 2 5 8

2 2 7 0 9 1 7 9

Exhibit B

9/04534046C

Address change

Nakadai 3-27-E1005
Itabashi-ku
Tokyo 174, JAPAN
August 13, 1994

Dear Gloria Simmons,

I am, have always been, and will always be a citizen of the United States. My husband is Japanese, but my heart and citizenship stay home. I return your check.

Sincerely yours,
Louisa Beck Hatanaka

9/0435345461

Exhibit C

9 7 0 4 3 8 4 0 4 6 2

ACTION COMMITTEE FOR RURAL ELECTRIFICATION
1800 MASSACHUSETTS AVE., N.W.
WASHINGTON, D.C. 20036
(202) 857-9535

August 22, 1994

Ms. Gloria Simmons, Treasurer
Corrine Brown Campaign Fund
c/o Friends of Congresswoman Corrine Brown
1248 West Edgewood Avenue, Suite 2-CB
Jacksonville, FL 32208

Dear Ms. Simmons:

I am delighted to return your check # 1246 in the amount of $1,000, and further delighted that the Federal Election Commission auditor has correctly determined that our original check, #3000 in the amount of $1,000 was indeed issued by the Action Committee for Rural Electrification (ACRE), a federally registered (since 1967) multi-candidate political action committee (FEC no. C00002972).

The contribution to Representative Brown's campaign was recommended by members of the Florida Electric Cooperative Association and endorsed by the 15,000 rural electric employees, managers and members nationwide who contribute an average of $31 each to support our political action committee. The criterion for contributions to candidates is demonstrated support for rural electrification.

I apologize for any inconvenience this apparent misidentification of our check as corporate has caused you, the campaign or your campaign workers. In my seven years as the director of ACRE, this is the first time--ever--that such has occurred.

Please call me if there should be any further questions. And, of course, those of us in the rural electric family wish Rep. Brown and you the very, very best in your coming election campaign.

Cordially,

Robert M. Dawson, Director

cc -- Honorable Corrine Brown, U. S. House of Representatives
Dick Wilson, Florida Electric Co-op Association
Michael Whelan, ACRE Administrator
Angus Hastings, NRECA Florida Director

9704350463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

MAY 15 11 26 AM '96

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Wash'ngton, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 4160
Staff Member: Matthew J. Tanielian

SOURCE: AUDIT REFERRAL

RESPONDENTS: Friends of Corrine Brown and Gloria Simmons, as treasurer
Corrine Brown

RELEVANT STATUTES:
2 U.S.C. § 431(8)(A)(i)
2 U.S.C. § 432(c)(5)
2 U.S.C. § 432(h)(1)
2 U.S.C. § 432(h)(2)

2 U.S.C. § 434(a)(6)(A)
2 U.S.C. § 434(a)(6)(B)
2 U.S.C. § 434(b)(5)(A)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b(a)
2 U.S.C. § 441e
2 U.S.C. § 441f
2 U.S.C. § 441g
11 C.F.R. § 100.7(a)(1)(i)(A)
11 C.F.R. § 102.9(b)(1)(ii)
11 C.F.R. § 102.9(b)(2)
11 C.F.R. § 102.11
11 C.F.R. § 104.3(b)(4)(A)
11 C.F.R. § 104.5(f)
11 C.F.R. § 110.4(c)
11 C.F.R. § 110.9(a)
11 C.F.R. § 110.10(a)

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11 C.F.R. § 110.10(b)
11 C.F.R. § 114.9(e)

INTERNAL REPORTS CHECKED: Disclosure Reports, Audit Documents

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This General Counsel's Report addresses Matters Under Review ("MURs") regarding Friends of Corrine Brown ("Committee") that originated from Representative Corrine Brown's 1992 race for the House of Representatives, 3rd District for the State of Florida.[1]

MUR 4160 was generated by an audit undertaken in accordance with 2 U.S.C. § 438(b). The treasurer during the period of the audit was Dr. Kenneth W. Jones. The current treasurer is

[1] Corrine Brown won the 1992 general election with 59% of the vote and won the 1994 election with 58% of the vote.

Ms. Gloria Simmons. MUR 4160 was referred to this Office from the Audit Division on December 7, 1994, following an audit of the Committee covering the period from June 10, 1992 through December 31, 1992.

On November 30, 1994, the Committee submitted a response to the Final Audit Report regarding the findings of contributions from corporations and contributions from apparent foreign nationals. *See* Attachment 1 at 17-38.

In addition, this Office recommends that the Commission find no reason to believe with respect to the Audit finding of an apparent contribution from a foreign national. However, the Office of General Counsel recommends that the Commission make reason to believe findings with respect to the remaining audit findings: apparent receipt of prohibited contributions from corporations; use of corporate aircraft; loans from the candidate; recordkeeping for disbursements; disbursements made payable to cash; and the Committee's failure to file 48-Hour Notices.

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II. MUR 4160

A. PROHIBITED CONTRIBUTIONS

1. Contributions from Foreign Nationals

It is unlawful for a foreign national to make any contribution of money or anything of value in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national. 2 U.S.C. § 441e.

An Audit Division review of the Committee's contributor records identified a $250 contribution drawn on the account of an apparent foreign national. On November 30, 1994, after the Final Audit Report was approved by the Commission, the Committee submitted documentation that the contributor is a citizen of the United States who is married to a Japanese citizen and resides in Japan. *See* Attachment 1 at 36.

Therefore, the Office of General Counsel recommends that the Commission find no reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441e.

2. Contributions from Corporations

The Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"), prohibits any corporation from making a contribution in connection with a federal election. 2 U.S.C. § 441b(a). A candidate or political committee may not knowingly accept such a contribution. *Id.*

The Audit Division's review of the Committee's contributor records identified sixteen contributions from corporations totaling $3,200 in amounts ranging from $100 to $500.[2] Of the

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[2] The Committee's response to the Final Audit Report provided documentation of a $1,000 check from the Florida Electric Cooperative Association that the Committee had refunded based on the recommendation of the

total prohibited corporate contributions, three contributions totaling $1,250 had been untimely refunded at the time of the audit fieldwork. *See* Attachment 1 at 5. The remaining prohibited contributions totaling $1,950 were not refunded until over twenty-four months after the contributions were accepted by the Committee: three checks totaling $600 were refunded in August and September 1993, following the audit fieldwork; and nine checks totaling $1,350 were refunded in July 1994, following issuance of the Interim Audit Report. *See id.*[3]

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a).

3. Use of Corporate Aircraft

It is unlawful for any corporation to make a contribution in connection with a federal election, or for any candidate or political committee to knowingly accept such a contribution. 2 U.S.C. § 441b(a). The Commission's regulations provide that a candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation that is not licensed to offer commercial services for travel in connection with a federal election must reimburse the corporation in advance. 11 C.F.R. § 114.9(e). The amount of the reimbursement shall be the first class airfare for travel to a city served by regularly scheduled commercial service or the usual charter rate for travel to a city not served by a regularly scheduled commercial service. *Id.*

Interim Audit Report, but which had been properly issued by the Action Committee for Rural Electrification, a multi-candidate political action committee. *See* Attachment 1 at 38. The documentation establishes that this contribution was permissible, and therefore, it has been eliminated from the referral.

[3] The Committee provided demonstration demonstrating that all prohibited contributions have been refunded.

During the review of the Committee's disbursements, the Audit staff identified payments to Florida Rock Industries, Inc., Aviation Department, totaling $4,111 for transportation services rendered to the Committee. Invoices related to the travel services are dated August 26, 1992, for $1,289 and October 13, 1992, for $2,823. The August 26th invoice does not indicate the date of transportation.[4] The October 13th invoice indicates that transportation services were rendered on September 23, 1992. The Committee paid Florida Rock Industries, Inc. $1,300 on December 17, 1992; $2,500 on December 23, 1992; and $311 on February, 22, 1993. *See* Attachment 1 at 6. In response to the Interim Audit Report, the Committee stated that at the time the aircraft was used, the campaign was not aware that advance payment was required and payments were made when the mistake was discovered. Attachment 2 at 3.

Because the Committee did not reimburse the corporation in advance for the air travel as required by 11 C.F.R. § 114.9(e), the Committee received a prohibited corporate contribution in violation of 2 U.S.C. § 441b(a). While the Committee made the necessary payments, the payments did not begin until December 17, 1992, four months after the first travel date occurred and the invoice was received. Complete payment was not made until February, 22, 1993, six months after the travel occurred. *See* MUR 3309 (Dole for President Committee, General Counsel's Report, August 27, 1991 at 18-21).

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e).

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[4] For purposes of this analysis, it is assumed the transportation covered by the August 26, 1992 invoice occurred during August 1992.

9 7 0 4 5 3 4 0 4 3 6 7

B. LOANS FROM THE CANDIDATE

An individual may not make any contributions to a candidate or his or her authorized committees, with respect to any election for federal office which, in the aggregate, exceed $1,000. 2 U.S.C. § 441a(a)(1)(A). In addition, the FECA provides that no person may make contributions of currency which, in the aggregate, exceed $100 for any election. 2 U.S.C. § 441g; 11 C.F.R. § 110.4(c). A loan is a contribution at the time it is made. 2 U.S.C. § 431(8)(A)(i). A loan which exceeds the contribution limits is unlawful whether or not it is repaid. 11 C.F.R. § 100.7(a)(1)(i)(A). Candidates and political committees may not knowingly accept any contributions or make any expenditures in violation of the limitations. 2 U.S.C. § 441a(f); 11 C.F.R. § 110.9(a).

The limitations on contributions and expenditures do not apply to the candidate's use of his or her personal funds. 11 C.F.R. § 110.10(a); *see Buckley v. Valeo*, 424 U.S. 1, 54 (1976). "Personal funds" include any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest. 11 C.F.R. § 110.10(b). However, a candidate who makes a contribution or expenditure from funds that are not his or her personal funds is subject to the limitations of the Act, and thus such a contribution is limited to $1,000. 2 U.S.C. § 441a(a)(1)(A); *see* 11 C.F.R. § 110.10(a).

97043840470

During the period from July 24, 1992 through August 31, 1992, [illegible]

the following five loans from the candidate to the Committee [illegible]

Date	Type of Transaction	Amount
July 24, 1992	cashier's check	$ [illegible]
July 31, 1992	cashier's check	$ [illegible]
August 28, 1992	personal check	$ [illegible]
August 28, 1992	credit memo	$ [illegible]
August 31, 1992	cash	$ [illegible]
TOTAL:		$14,[illegible]

The only documentation provided by the Committee regarding these [illegible] cashier's checks, the candidate's personal check, and the deposit slip for [illegible] Notations on the cash deposit slip indicate that the deposit is a loan from [illegible] documentation for the $5,000 credit memo is a notation on the Committee [illegible] indicating that it is a loan. No documentation was provided to demonstrate [illegible] originated from the candidate's personal funds.

The Interim Audit Report recommended the Committee provide [illegible] candidate's personal checking account from which [illegible] description of the source of funds used [illegible] did not provide the requested information [illegible] candidate possessed sufficient funds to make the [illegible]

There is insufficient evidence that the [illegible] candidate's and the Committee's personal [illegible] bank statements or descriptions of the [illegible]

9704384047 1

made, creates the adverse inference that the loans were not made from the candidate's personal funds.[9] Consequently, the funds used for the loans are subject to the limitations of the FECA. *See* 11 C.F.R. § 110.10(a).

Based on the adverse inference that the loans were not made from the candidate's personal funds, it appears that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by knowingly accepting excessive contributions of $13,500 in the form of candidate loans from other than the candidate's personal funds. *See* 11 C.F.R. § 110.10. Likewise, it can be inferred that the candidate violated 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.9(a) by making loans from other than her personal funds in excess of the contribution limitations. *See* 11 C.F.R. § 110.10.

The Office of General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a). This Office also recommends the Commission find reason to believe that Corrine Brown violated 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.9(a).

As previously stated, the candidate's August 31, 1992 loan to the Committee was made in [illegible] funds.[6] The documentation of this transaction provided by the C[illegible]

[illegible] rule provides "that where a party has adverse evidence [illegible] gives rise to an inference that the evidence is unfavorable [illegible] *Aerospace and Agricultural Implement Workers of America (UAW) v.* [illegible] (D.C. Cir. 1973). This rule applies even were there is no subpoena compelling [illegible] to introduce evidence within the his or her control that [illegible] inference rule plays a vital role in preventing the [illegible] "allow the commonsense inference that if the evidence [illegible] would work ill." *Id.* at 1339. This inference is of [illegible]

[illegible] candidate's personal funds. Compare [illegible]

[illegible] that the cash loan was made on August 31, one day before [illegible]

solely of a bank slip for a $1,500 cash deposit. The bank slip had a notation indicating that the deposit was a loan from the candidate. The use of cash to make the loan makes verification of the actual source of the funds extremely difficult and provides inadequate information for proper disclosure of the contribution. The Act prohibits cash contributions in excess of $100. 2 U.S.C. § 441g. There is no exception in the Act or the Commission's regulations for contributions from candidates.

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Corrine Brown violated 2 U.S.C. § 441g by making a cash contribution in excess of $100.

Because the Committee has not provided necessary information requested by the Commission, further investigation will be necessary to determine the parties involved and the complete extent of the violations. Subsequent investigation of the transactions may reveal additional violations relating to the making and accepting of excessive or prohibited contributions, as well as contributions made in the name of another. *See* 2 U.S.C. §§ [illegible], 441b, and 441f.[7]

C. RECORDKEEPING FOR DISBURSEMENTS

[illegible] political committee shall keep an account of [illegible] any person to whom any disbursement is made, and the date, amount and [illegible] disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1)-(2). If the disbursement [illegible] amount of $200, the record must include a receipt, invoice, or canceled check [illegible] [illegible] The Audit staff reviewed the Committee's disbursements [illegible]

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[7] At this time, the Office of General Counsel makes no recommendations [illegible]

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117 disbursements totaling $46,962 for which there was inadequate documentation. The Committee's records of disbursements generally consisted of a canceled check with the purpose recorded on the memo line or the check stub or both. For the noted 117 disbursements, however, the checks gave no name or address, or gave no adequate indication of the purpose of the disbursements. *See* Attachment 1 at 11.

The Interim Audit Report recommended that the Committee provide sufficient documentation for the $46,962 in disbursements, including but not limited to, receipts, invoices, or canceled checks. The Committee provided evidence that seven disbursements totaling $6,250 for contributor refunds and candidate reimbursements were adequately documented, adjusting the total for inadequate records for disbursements to $40,712. Regarding the $40,712 remainder, the Committee stated that "many of the expenditures listed in the Interim Audit Report are less than $200 and, therefore, the Committee was not required to maintain such records."[8] Attachment 2 at 4.

The Committee's response to the Interim Audit Report reflects a misunderstanding of the requirements of 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b). While a receipt, invoice, or canceled check is required only for disbursements in excess of $200, *see* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b), the FECA and Commission regulations require that records be maintained of the name and address of every person to whom *any* disbursement is made, as well as the date, amount, and purpose of that disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. § 102.9(b)(1). Thus, the Committee was required to keep at least the name, address, amount, and

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[8] For 30 disbursements totaling $13,089 of the $40,712, the Committee responded that no documentation exists other than the canceled checks. It explained that these disbursements went to pay individuals working part-time and for campaign workers' expenses, noting that "[t]hese workers often played a brief, but critical role in the campaign and were sporadic at best in their attention to recordkeeping requirements." Attachment 2 at 4.

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purpose of the disbursement even when the amount was under $200. The Committee failed to maintain sufficiently these records.

Therefore, the Office of the General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5) by failing to maintain adequate records for disbursements.

D. DISBURSEMENTS MADE PAYABLE TO CASH

1. Cash Disbursements in Excess of $100

Disbursements by a political committee must be made by check or similar draft drawn on an account established as a designated depository. 2 U.S.C. § 432(h)(1). The sole exception to this requirement is for disbursements of $100 or less made from a petty cash fund pursuant to 2 U.S.C. § 432(h)(2) and 11 C.F.R. § 102.11. Under this exception, a committee may maintain a petty cash fund for expenditures of $100 or less. 2 U.S.C. § 432(h)(2). If a petty cash fund is maintained, the treasurer must keep a written journal of all disbursements, including name and address of persons to whom the disbursements are, as well as the date, amount and purpose of such disbursement. 11 C.F.R. § 102.11.

Between August 13, 1992 and December 18, 1992, the Committee wrote thirty-six checks made payable to "Cash" in amounts over $100.[9] The checks to "Cash" totaled [illegible], twelve of the checks being for $1,000 or more. Based on the large dollar amounts of the checks, the purposes noted on the Committee's check stubs ("fieldworkers," "Senior GOTV," and names of campaign workers), and the fact that many of the checks appear to have been endorsed by the

[9] An additional 10 checks, totaling $653, were for amounts of $100 or less. While the Committee did not maintain a formal petty cash journal, the Committee's check stubs provide information regarding these disbursements.

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Committee, it appears the funds were subsequently distributed in the form of cash. *See* MUR 3974. No further documentation of these disbursements has been provided. This practice undermined the reporting and disclosure purposes of the FECA and violated the check disbursement requirement of 2 U.S.C. § 432(h)(1).

In its response to the Interim Audit Report, the Committee noted its lack of familiarity with the petty cash rules under the FECA and stressed the large number of daily cash expenditures involved in a volunteer campaign. *See* Attachment 2 at 6. However, only ten of the committee's checks made payable to "Cash" were disbursements of $100 or less, and these would have been permissible under the petty cash rules of 2 U.S.C. § 432(h)(2). *See supra* footnote 9. Furthermore, the Committee offered no explanation why it would be necessary to write thirty-six checks in amounts greater than $100 payable to "Cash."

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1).

2. Reporting of Disbursements Made Payable to Cash

Each report filed by a committee shall disclose the name and address of [illegible] whom it made an operating expenditure when the value or aggregate amount [illegible] exceeds $200 within the calendar year, as well as the date, amount, and purpose [illegible] expenditure. 2 U.S.C. § 434(b)(5)(A); 11 C.F.R. § 104.3(b)(4)(i).

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On its initial reports, the Committee failed to report or itemize $20,047 of disbursements which had been made by checks payable to "Cash."[10] The Committee amended its reports in an attempt to cure the omissions on August 4, 1992. However, $17,171 of the disbursements remained insufficiently reported because they were itemized under the name "Cash" and included no further information identifying the person to whom the disbursement was made.[11]

The Interim Audit Report recommended that the Committee file amended Schedules B for the cash disbursements which require itemization. In its response to the Interim Audit Report, the Committee stated it was not aware of the requirement to keep additional records for cash expenses. *See* Attachment 2 at 6. The Committee stressed its lack of familiarity with the petty cash rules under the FECA and the large number of daily cash expenditures involved in a volunteer campaign. The Committee did not, however, amend its reports as recommended. *Id.*

Therefore, the Office of General Counsel recommends that the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

E. FAILURE TO FILE 48-HOUR DISCLOSURE NOTICES

Committees of candidates for federal office are required to notify in writing either the Secretary of the Senate, the Clerk of the House of Representatives, or the Commission, and the

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[10] The audit referral cites the amount of $26,833 as the total of the Committee's checks made payable to cash. Attachment 1 at 18. However, some checks made payable to cash were sufficiently reported by the Committee in its amended reports using supplementary information. To the extent those cash disbursements apparently were not properly reported, they comprise the violation of 2 U.S.C. § 434(b)(5)(A) addressed in this section. Also, to the extent these disbursements lacked sufficient recordkeeping information, they are covered under section II.C. of this Report, concerning violation of 2 U.S.C. § 432(c)(5). *See supra* pp. 10-12.

[11] As noted in section II.C. of this Report, the Committee's records for disbursements were [illegible]. Because of the Committee's insufficient recordkeeping, it cannot be determined if some of the disbursements in question may not have required itemization under 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4). The amount noted is an adjusted number which excludes disbursements that cannot be established as exceeding the $200 aggregate reporting threshold and therefore requiring itemized reporting.

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Secretary of State, as appropriate, of each contribution totaling $1,000 or more, received by any authorized committee of the candidate after the twentieth day but more than forty-eight hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5(f). The FECA further requires notification to be made within forty-eight hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

Florida's primary election was on September 1, 1992; the run-off was October 1, 1992; and the general election was November 3, 1992. This required the Committee to file 48-hour notices of any contributions of $1,000 or more received from August 13, 1992 through August 29, 1992; from September 12, 1992 through September 28, 1992; and from October 15, 1992 through October 31, 1992. During those periods, the Committee received the following contributions of $1,000 or more for which 48-hour notices were not filed:

Election	Number of Contributions	Total Dollar Amount
Primary Election	8	$11,800
Run-Off Election	18	$35,570
General Election	19	$33,500

Based on the dates of these contributions, the Committee failed to file twenty 48-Hour Reports. The Committee did not contest these findings during the audit, but stated at the exit conference that Representative Brown was a first-time candidate and her staff was inexperienced with the federal campaign laws. Attachment 1 at 14. Also, the Committee noted that Representative Brown ran in three elections -- primary, run-off, and general -- in sixty-four days.

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Accordingly, the Office of General Counsel recommends the Commission find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

III.

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IV.

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V. PLAN FOR FURTHER INVESTIGATION

Provided that the Commission approves the reason to believe finding recommended in section II.B.1. of this Report (Loans from the Candidate), the Office of the General Counsel will need to obtain additional information regarding the loans from Corrine Brown to the Committee. Specifically, we will need to determine the source of the funds use to make those transactions. The Committee did not comply with the recommendations in the Interim Audit Report to provide documentation of the sources of the funds. As a consequence, this Office proposes to subpoena Barnett Bank of Jacksonville seeking the records of Corrine Brown's personal bank account and First Union Bank, Jacksonville, seeking records from the Committee's account concerning the candidate loans.[17] Due to the nature of the transactions (*e.g.*, use of cash, cashiers checks, and credit memos), the facts cannot be determined solely by reference to the documentary evidence. Accordingly, we propose to depose Corrine Brown. However, this Office does not intend to serve the deposition subpoena until we have reviewed the responses to the document subpoenas. This Office recommends that the Commission approve the attached subpoenas to Barnett Bank of Jacksonville and First Union Bank, Jacksonville. *See* Attachments 11 and 12. This Office also recommends the Commission approve the attached deposition subpoena to Corrine Brown. *See* Attachment 13.

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[17] This Office has determined that the information requested in the subpoena directed at Corrine Brown's personal bank account at Barnett Bank is protected by the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3401. Accordingly, if the Commission approves the subpoena of Barnett Bank, this Office will take steps to insure compliance with the requirements of the Right to Financial Privacy Act.

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Provided that the Commission approves the reason to believe finding recommended by section II.D.1. of this Report (Cash Disbursements in Excess of $100), the Office of the General Counsel will need to obtain additional information establishing the parties who endorsed the checks in question. This Office recommends that the Commission approve the attached subpoena to First Union Bank, Jacksonville, seeking the bank records of the Committee. *See* Attachment 12.

VI. RECOMMENDATIONS

MUR 4160

1. Find no reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441(e);

2. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a);

3. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e);

4. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a);

5. Find reason to believe that the candidate, Corrine Brown, violated 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.9(a);

6. Find reason to believe that the candidate, Corrine Brown, violated 2 U.S.C. § 441g;

7. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5);

8. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1);

9. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A);

10. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A);

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11. Approve the attached Subpoenas;

12. Approve the attached Factual and Legal Analyses; and

13. Approve the appropriate letters.

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Lawrence M. Noble
General Counsel

5/14/96
Date

BY: Kim Bright-Coleman
Kim Bright-Coleman
Associate General Counsel

Attachments:

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR
Friends of Corrine Brown and	)	4160
Gloria Simmons, as treasurer	)	

CORRECTED CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 6, 1996, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions with respect to MUR 4160:

MUR 4160

1. Find no reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441(e);

2. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a);

3. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e);

(continued)

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June 6, 1996

4. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a);

5. Find reason to believe that the candidate, Corrine Brown, violated 2 U.S.C. § 441a(f) and 11 C.F.R. 110.9(a);

6. Find reason to believe that the candidate, Corrine Brown, violated 2 U.S.C. § 441g;

7. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5);

8. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1);

9. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A);

10. Find reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A);

11. Find reason to believe that Florida Rock Industries, Inc., Aviation Department, violated 2 U.S.C. § 441b(a), but take no further action.

(continued)

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12. Approve the Subpoenas recommended in the General Counsel's report dated May 14, 1996;

13. Approve the Factual and Legal Analyses, as recommended in the General Counsel's report dated May 14, 1996, and direct that a Factual and Legal Analysis be written with respect to Florida Rock Industries, Inc., Aviation Department, and sent; and

14. Approve appropriate letters as recommended in the General Counsel's May 14, 1996 report.

(continued)

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Commissioners Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens was not present.

Attest:

6-13-96
Date

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John D. Baker, President
Florida Rock Industries, Inc.
Aviation Department
155 E. 21st Street
Jacksonville, Florida 32201

June 17, 1996

RE: MUR 4160

Dear Mr. Baker:

On June 6, 1996, the Federal Election Commission found reason to believe that Florida Rock Industries, Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. 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 Florida Rock Industries, Inc. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that use of a corporate aircraft without advance payment by a candidate for federal office is a violation of 2 U.S.C. § 441b(a). Florida Rock Industries, Inc. should take steps to ensure that this activity does not occur in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect with respect to all respondents still involved in this matter.

If you have any questions, please contact Matthew J. Tanielian, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary
YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 4160

RESPONDENT: Florida Rock Industries, Inc.

This matter was generated by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"). 2 U.S.C. § 437g(a)(2). Friends of Corrine Brown ("Committee") was the principal campaign committee for Corrine Brown's 1992 race for the House of Representatives, 3rd District for the State of Florida. Florida Rock Industries, Inc. is incorporated in the State of Florida and is in the business of producing construction materials.

It is unlawful for any corporation to make a contribution in connection with a federal election, or for any candidate or political committee to knowingly accept such a contribution. 2 U.S.C. § 441b(a). The Commission's regulations provide that a candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation that is not licensed to offer commercial services for travel in connection with a federal election must reimburse the corporation in advance. 11 C.F.R. § 114.9(e). The amount of the reimbursement shall be the first class airfare for travel to a city served by regularly scheduled commercial service or the usual charter rate for travel to a city not served by a regularly scheduled commercial service. *Id.*

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The Commission identified payments from the Committee to Florida Rock Industries, Inc., Aviation Department, totaling $4,111 for transportation services rendered to the Committee. Invoices related to the travel services are dated August 26, 1992, for $1,289 and October 13, 1992, for $2,823. The August 26th invoice does not indicate the date of transportation. The October 13th invoice indicates that transportation services were rendered on September 23, 1992. The Committee paid Florida Rock Industries, Inc. $1,300 on December 17, 1992; $2,500 on December 23, 1992; and $311 on February, 22, 1993. The Committee stated that at the time the aircraft was used, the campaign was not aware that advance payment was required and payments were made when the mistake was discovered.

Florida Rock Industries, Inc. is not in the business of providing commercial service for travel. Thus, the Committee must pay for the air travel in advance. 11 C.F.R. § 114.9(e). Because the Committee did not reimburse the corporation in advance for the air travel as required, Florida Rock Industries made a prohibited corporate contribution in violation of 2 U.S.C. § 441b(a). While the Committee made the necessary payments to Florida Rock Industries, Inc., the payments did not begin until December 17, 1992, four months after the first travel date occurred and the invoice was received. Complete payment was not made until February, 22, 1993, six months after the travel occurred.

Therefore, the Commission has found reason to believe that Florida Rock Industries, Inc., violated 2 U.S.C. § 441b(a). However, the Commission has also determined to take no further action with respect to the violation.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1996

Friends of Corrine Brown
Gloria Simmons, Treasurer
3109 River Bend Court, D-102
Laurel, Maryland 20724

RE: MUR 4160

Dear Ms. Simmons:

On June 6, 1996, the Federal Election Commission found that there is reason to believe Friends of Corrine Brown and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 433(h)(1), 434(b)(5)(A), and 434(a)(6)(A), 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.

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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

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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 437(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 Matthew J. Tanielian, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

cc: Corrine Brown

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MURs: 4160

RESPONDENT: Friends of Corrine Brown and Gloria Simmons, as treasurer

This matter was generated by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"). 2 U.S.C. § 437g(a)(2). Friends of Corrine Brown ("Committee") was the principal campaign committee for Corrine Brown's 1992 race for the House of Representatives, 3rd District for the State of Florida. MUR 4160 was generated by an audit undertaken in accordance with 2 U.S.C. § 438(b). The treasurer during the period of the audit was Dr. Kenneth W. Jones. The current treasurer is Ms. Gloria Simmons.

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I. MUR 4160

A. PROHIBITED CONTRIBUTIONS

1. Contributions from Corporations

FECA prohibits any corporation from making a contribution in connection with a federal election. 2 U.S.C. § 441b(a). A candidate or political committee may not knowingly accept such a contribution. *Id.*

The Audit Division's review of the Committee's contributor records identified sixteen contributions from corporations totaling $3,200 in amounts ranging from $100 to $500. Of the

total prohibited corporate contributions, three contributions totaling $1,250 had been untimely refunded at the time of the audit fieldwork. The remaining prohibited contributions totaling $1,950 were not refunded until over twenty-four months after the contributions were accepted by the Committee: three checks totaling $600 were refunded in August and September 1993, following the audit fieldwork; and nine checks totaling $1,350 were refunded in July 1994, following issuance of the Interim Audit Report.

Therefore, the Commission has found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a).

2. Use of Corporate Aircraft

It is unlawful for any corporation to make a contribution in connection with a federal election, or for any candidate or political committee to knowingly accept such a contribution. 2 U.S.C. § 441b(a). The Commission's regulations provide that a candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation that is not licensed to offer commercial services for travel in connection with a federal election must reimburse the corporation in advance. 11 C.F.R. § 114.9(e). The amount of the reimbursement shall be the first class airfare for travel to a city served by regularly scheduled commercial service or the usual charter rate for travel to a city not served by a regularly scheduled commercial service. *Id.*

During the review of the Committee's disbursements, the Audit staff identified payments to Florida Rock Industries, Inc., Aviation Department, totaling $4,111 for transportation services rendered to the Committee. Invoices related to the travel services are dated August 26, 1992, for $1,289 and October 13, 1992, for $2,823. The August 26th invoice does not indicate the date of

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transportation. The October 13th invoice indicates that transportation services were rendered on September 23, 1992. The Committee paid Florida Rock Industries, Inc. $1,300 on December 17, 1992; $2,500 on December 23, 1992; and $311 on February, 22, 1993. In response to the Interim Audit Report, the Committee stated that at the time the aircraft was used, the campaign was not aware that advance payment was required and payments were made when the mistake was discovered.

Because the Committee did not reimburse the corporation in advance for the air travel as required by 11 C.F.R. § 114.9(e), the Committee received a prohibited corporate contribution in violation of 2 U.S.C. § 441b(a). While the Committee made the necessary payments, the payments did not begin until December 17, 1992, four months after the first travel date occurred and the invoice was received. Complete payment was not made until February, 22, 1993, six months after the travel occurred.

Therefore, the Commission has found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e).

B. LOANS FROM THE CANDIDATE

Candidates and political committees may not knowingly accept any contributions or make any expenditures in violation of the limitations of the FECA. 2 U.S.C. § 441a(f); 11 C.F.R. § 110.9(a). The limitations on contributions and expenditures do not apply to the candidate's use of his or her personal funds. 11 C.F.R. § 110.10(a); *see Buckley v. Valeo*, 424 U.S. 1, 54 (1976). "Personal funds" include any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest.

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11 C.F.R. § 110.10(b). Contributions or expenditures that do not satisfy the [illegible] of "personal funds" are subject to the limitations of the FECA. *See* 2 U.S.C. §§ [illegible], and 441e. In addition, the FECA provides that no person may make contributions of money which, in the aggregate, exceed $100 for any election.

During the period from July 24, 1992 through August 31, 1992, the Committee reported the following five loans from the candidate to the Committee, totaling $14,500:

Date	Type of Transaction	Amount
July 24, 1992	cashier's check	$ 3,000
July 31, 1992	cashier's check	$ 3,000
August 28, 1992	personal check	$ 2,000
August 28, 1992	credit memo	$ 5,000
August 31, 1992	cash	$ 1,500
TOTAL:		$14,500

The only documentation provided by the Committee regarding these funds were copies of the cashier's checks, the candidate's personal check, and the deposit slip for the cash deposit. Notations on the cash deposit slip indicate that the deposit is a loan from the candidate. The only documentation for the $5,000 credit memo is a notation on the Committee's [illegible] indicate that it is a loan. No documentation was provided to demonstrate [illegible] originated from the candidate's personal funds.

The Interim Audit Report recommended the Committee provide [illegible] candidate's personal checking account from which the $2,000 loan was [illegible] [illegible] source of funds used to make the remaining $12,500 [illegible]

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did not provide the requested information. Instead, the Committee merely stated that the candidate possessed sufficient funds to make the series of loans.

There is insufficient evidence that the funds were the candidate's personal funds. The candidate's and the Committee's refusal to provide basic information, such as the candidate's bank statements or descriptions of the source of the funds from which the loans were made, creates the adverse inference that the loans were not made from the candidate's personal funds.[1] Consequently, the funds for the $14,500 in loans were subject to the limitations of FECA. It therefore appears that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting contributions in violation of the FECA.

Therefore, the Commission has found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a).

C. RECORDKEEPING FOR DISBURSEMENTS

The treasurer of a political committee shall keep an account of the name and address of every person to whom any disbursement is made, and the date, amount and purpose of the disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1)-(2). If the disbursement is in excess of $200, the record must include a receipt, invoice, or canceled check for [illegible] disbursement. *Id.* The Audit staff reviewed the Committee's disbursements [illegible]

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[1] The adverse inference rule provides "that where a party has relevant evidence within his control which he fails to produce, that failure gives rise to an inference that the evidence is unfavorable to him." [illegible] *United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) v. NLRB*, [illegible] (D.C. Cir. 1972). This rule applies even where there is no adequate compelling [illegible] party can be expected to introduce evidence within his or her control that would [illegible] Indeed, the adverse inference rule plays a vital role in protecting the integrity of [illegible] "raises the circumstantial inference that if the evidence would do [illegible] it would readily produce it." *Id.* at 1339. This inference is of particular value at the [illegible] of the Commission's enforcement process, where such a finding serves only to initiate an [illegible] the Commission will have the opportunity to discount the inference by producing [illegible] that were from the candidate's personal funds.

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117 disbursements totaling $46,962 for which there was inadequate documentation. The Committee's records of disbursements generally consisted of a canceled check with the purpose recorded on the memo line or the check stub or both. For the noted 117 disbursements, however, the checks gave no name or address, or gave no adequate indication of the purpose of the disbursements.

The Interim Audit Report recommended that the Committee provide sufficient documentation for the $46,962 in disbursements, including but not limited to, receipts, invoices, or canceled checks. The Committee provided evidence that seven disbursements totaling $6,250 for contributor refunds and candidate reimbursements were adequately documented, adjusting the total for inadequate records for disbursements to $40,712. Regarding the $40,712 remainder, the Committee stated that "many of the expenditures listed in the Interim Audit Report are less than $200 and, therefore, the Committee was not required to maintain such records."

The Committee's response to the Interim Audit Report reflects a misunderstanding of the requirements of 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b). While a receipt, invoice, or canceled check is required only for disbursements in excess of $200, *see* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b), the FECA and Commission regulations require that records be maintained of the name and address of every person to whom any disbursement is made, as well as the date, amount, and purpose of that disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. § 102.9(b)(1). Thus, the Committee was required to keep at least the name, address, amount, and purpose of the disbursement even when the amount was under $200. The Committee did not maintain sufficiently these records.

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Therefore, the Commission has found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.[illegible] failing to maintain adequate records for disbursements.

D. DISBURSEMENTS MADE PAYABLE TO CASH

1. Cash Disbursements in Excess of $100

Disbursements by a political committee must be made by check or similar draft drawn on an account established as a designated depository. 2 U.S.C. § 432(h)(1). The sole exception to this requirement is for disbursements of $100 or less made from a petty cash fund pursuant to 2 U.S.C. § 432(h)(2) and 11 C.F.R. § 102.11. Under this exception, a committee may maintain a petty cash fund for expenditures of $100 or less. 2 U.S.C. § 432(h)(2). If a petty cash fund is maintained, the treasurer must keep a written journal of all disbursements, including name and address of persons to whom the disbursements are made, as well as the date, amount and purpose of such disbursement. 11 C.F.R. § 102.11.

Between August 13, 1992 and December 18, 1992, the Committee wrote thirty-[illegible] made payable to "Cash" in amounts over $100. The checks to "Cash" totaled $26,1[illegible]

[illegible]

[illegible] the fact that many of the checks appear to have been [illegible]

[illegible]

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In its response to the Interim Audit Report, the Committee [illegible]

with the petty cash rules under [illegible]

expenditures involved in a volunteer campaign. However, only [illegible]

made payable to "Cash" were disbursements of $[illegible] or less, and thus [illegible]

permissible under the petty cash rules of 2 U.S.C. § [illegible]. Furthermore, [illegible]

offered no explanation why it would be necessary to write thirty-six checks in amounts [illegible]

than $100 payable to "Cash."

Therefore, the Commission has found reason to believe that [illegible]

and Gloria Simmons, as treasurer, violated 2 U.S.C. § [illegible]

2. Reporting of Disbursements Made Payable to Cash

Each report filed by a committee shall disclose the name and address of [illegible]

whom it made an operating expenditure when the value or aggregate amount [illegible]

exceeds $200 within the calendar year, as well as the date, amount, and [illegible]

expenditure. 2 U.S.C. § [illegible]; 11 C.F.R. § [illegible].

On its initial reports, the Committee failed to report [illegible]

which had been [illegible]

[illegible]

included on further [illegible]

The Interim Audit [illegible]

[illegible]

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cash expenses. The Committee stressed its lack of familiarity with the petty cash rules [illegible] FECA and the large number of daily cash expenditures involved in a volunteer [illegible] Committee did not, however, amend its reports as recommended.

Therefore, the Commission has found reason to believe that Friends of [illegible] and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A).

E. FAILURE TO FILE 48-HOUR DISCLOSURE NOTICES

Committees of candidates for federal office are required to notify in writing either the Secretary of the Senate, the Clerk of the House of Representatives, or the Commission, and the Secretary of State, as appropriate, of each contribution totaling $1,000 or more, received by any authorized committee of the candidate after the twentieth day but more than forty-eight hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5(f). The FECA further requires notification to be made within forty-eight hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these [illegible] shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

Florida's primary election was on September 1, 1992; the run-off [illegible] and the general election was November 3, 1992. This required the Committee [illegible] notices of any contributions of $1,000 or more received from August 13, [illegible] August 29, 1992; from September 12, 1992 through September 28, 1992; and [illegible] 1992 through October 31, 1992. During these periods, the Committee [illegible] contributions of $1,000 or more for which 48-hour notices were not filed.

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Election	Number of Contributions	Total Dollar Amount
Primary Election	8	$11,800
Run-Off Election	18	$35,570
General Election	19	$33,500

Based on the dates of these contributions, the Committee failed to file twenty 48-Hour Reports. The Committee did not contest these findings during the audit, but stated at the exit conference that Representative Brown was a first-time candidate and her staff was inexperienced with the federal campaign laws. Also, the Committee noted that Representative Brown ran in three elections -- primary, run-off, and general -- in sixty-four days.

Accordingly, the Commission has found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to file the required 48 hour notices.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

RE: Friends of Corrine Brown (MUR 4160)

Dear Ms. Baughmen:

Enclosed is a Subpoena to Produce Documents, directed at Barnett Bank of Jacksonville. The Right to Financial Privacy Act of 1978 permits the customer whose records are sought ten days from the date of receipt of the Subpoena to move to quash them. Upon the expiration of this period, the Commission will notify you that it has complied with the Right to Financial Privacy Act. In the absence of judicial intervention, it is then your obligation to comply with the terms of the Subpoena. *See* 12 U.S.C. §§ 3405 and 3411.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Law Clerk

Enclosure
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	MUR 4160
	)	
	)	
	)	

SUBPOENA TO PRODUCE DOCUMENTS

TO: Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 30 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 14th day of June, 1996.

For the Commission,

Lee Ann Elliott

Lee Ann Elliott
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request

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I. INSTRUCTIONS

In answering this request for production of documents, furnish all documents, that are in possession of, known by or otherwise available to you, including documents and information appearing in your records.

If you cannot provide the requested documentation in full after exercising due diligence to secure the information, 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 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 the date of the opening of the account to the present.

The following 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.

II. 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 individual in this action to whom these discovery requests are addressed, including all 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 trust documents, contracts/agreements, amendments, codicils, bank statements, canceled checks (or copies - front and back), notes, vouchers, accounting statements, ledgers, money orders or other commercial paper, computer print-outs, and all other writings and other data compilations from which information can be obtained.

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"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.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Within 30 days of service of this request, Barnett Bank of Jacksonville is required to produce all documents discussing, describing, memorializing, evidencing, or otherwise relating to account number in the name of Corrine Brown, for the period from June 1, 1992 through September 1, 1992, including but not limited to:

1. account statements (all pages) to include all inserts;

2. deposit tickets and items deposited;

3. withdrawal slips, and;

4. all documentation related to Barnett Bank Official Checks Nos. 01030393 and 01030334, including but not limited to documentation of the funds used to purchase the checks.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Judy Alexander
First Union Legal Division (FL 0585)
P.O. Box 2080
Jacksonville, Florida 32231-0010

RE: Friends of Corrine Brown (MUR 4160)

Dear Ms. Alexander:

The Federal Election Commission has issued the enclosed subpoena which requires you to provide certain information in connection with the Commission's investigation of the Friends of Corrine Brown Committee. The subpoena requires the production of records and documentation requested in the subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made. You are advised that no such consent has been given in this case.

You may consult an attorney and have an attorney assist you in the preparation of your response to this subpoena. However, you are required to submit the information under oath within 30 days of service of this subpoena. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Law Clerk

Enclosure
Subpoena

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	MUR 4160
	)	
	)	
	)	

SUBPOENA TO PRODUCE DOCUMENTS

TO: Ms. Judy Alexander
First Union Legal Division (FL 0585)
P.O. Box 2080
Jacksonville, Florida 32231-0010

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 30 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 14th day of June, 1996.

For the Commission,

Lee Ann Elliott

Lee Ann Elliott
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request

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I. INSTRUCTIONS

In answering this request for production of documents, furnish all documents, that are in possession of, known by or otherwise available to you, including documents and information appearing in your records.

If you cannot provide the requested documentation in full after exercising due diligence to secure the information, 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 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 the date of the opening of the account to the present.

The following 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.

II. 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 individual in this action to whom these discovery requests are addressed, including all 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 trust documents, contracts/agreements, amendments, codicils, bank statements, canceled checks (or copies - from and back), notes, vouchers, accounting statements, ledgers, money orders or other commercial paper, 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.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Within 30 days of service of this request, First Union Bank, Jacksonville, is required to produce the following documents relating to the account number in the name of Corrine Brown Campaign Fund for U.S. House of Rep.:

1. all documentation concerning an August 28, 1992 transaction described as a $5,000 "credit" by "deposit counter document," and;

2. copies of the front and back of the following check numbers:

124	339	463
147	356	465
164	357	479
195	361	483
236	365	500
237	369	502
242	384	511
285	385	533
289	408	544
294	411	551
296	424	556
318	443	559
324	450	569
332	453	572
333	455	585
		588

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1996

Honorable Corrine Brown
United States House of Representatives
1610 Longworth House Office Building
Washington, D.C. 20515-0903

RE: MUR 4160

Dear Congresswoman Brown:

On June 6, 1996, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. §§ 441a(f) and 441g, provisions of the Federal Election Campaign Act of 1971, as amended. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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

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

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437(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 Matthew J. Tanielian, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

9/0434345516

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 4160

RESPONDENT: Corrine Brown

This matter was generated by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act"). 2 U.S.C. § 437g(a)(2). Friends of Corrine Brown ("Committee") was the principal campaign committee for Corrine Brown's 1992 race for the House of Representatives, 3rd District for the State of Florida. MUR 4160 was generated by an audit undertaken in accordance with 2 U.S.C. § 438(b). The treasurer during the period of the audit was Dr. Kenneth W. Jones. The current treasurer is Ms. Gloria Simmons.

Candidates and political committees may not knowingly accept any contributions or make any expenditures in violation of the limitations of the FECA. 2 U.S.C. § 441a(f); 11 C.F.R. § 110.9(a). The limitations on contributions and expenditures do not apply to the candidate's use of his or her personal funds. 11 C.F.R. § 110.10(a); *see Buckley v. Valeo*, 424 U.S. 1, 54 (1976). "Personal funds" include any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest. 11 C.F.R. § 110.10(b). Contributions or expenditures that do not satisfy the definition of "personal funds" are subject to the limitations of the FECA. *See* 2 U.S.C. §§ 441a, 441b, 441c,

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and 441e. In addition, the FECA provides that no person may make contributions of currency which, in the aggregate, exceed $100 for any election. 2 U.S.C. § 441g.

During the period from July 24, 1992 through August 31, 1992, the Committee reported the following five loans from the candidate to the Committee, totaling $14,500:

Date	Type of Transaction	Amount
July 24, 1992	cashier's check	$ 3,000
July 31, 1992	cashier's check	$ 3,000
August 28, 1992	personal check	$ 2,000
August 28, 1992	credit memo	$ 5,000
August 31, 1992	cash	$ 1,500
TOTAL:		$14,500

The only documentation provided by the Committee regarding these funds were copies of the cashier's checks, the candidate's personal check, and the deposit slip for the cash deposit. Notations on the cash deposit slip indicate that the deposit is a loan from the candidate. The only documentation for the $5,000 credit memo is a notation on the Committee's bank records indicating that it is a loan. No documentation was provided to demonstrate that any of the loans originated from the candidate's personal funds.

The Interim Audit Report recommended the Committee provide bank statements from the candidate's personal checking account from which the $2,000 loan was made and provide a description of the source of funds used to make the remaining $12,500 in loans. The Committee did not provide the requested information. Instead, the Committee merely stated that the candidate possessed sufficient funds to make the series of loans.

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There is insufficient evidence that the funds were the candidate's personal funds. The candidate's and the Committee's refusal to provide basic information, such as the candidate's bank statements or descriptions of the source of the funds from which the loans were made, creates the adverse inference that the loans were not made from the candidate's personal funds.[1] Consequently, the funds for the $14,500 in loans were subject to the limitations of FECA. It therefore appears that the candidate violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting contributions in violation of the FECA.

Therefore, the Commission has found reason to believe that Corrine Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a).

As previously stated, the candidate's August 31, 1992 loan to the Committee was made in the form of cash. The documentation of this transaction provided by the Committee consisted solely of a bank slip for a $1,500 cash deposit. The bank slip had a notation indicating that the deposit was a loan from the candidate. The use of cash to make the loan makes verification of the actual source of the funds extremely difficult and provides inadequate information for proper disclosure of the contribution. The Act prohibits cash contributions in excess of $100. 2 U.S.C. § 441g. There is no exception in the Act or the Commission's regulations for contributions from candidates.

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[1] The adverse inference rule provides "that when a party has relevant evidence within its control which he fails to produce, that failure gives rise to an inference that the evidence is unfavorable to him." *International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) v. NLRB*, 459 F.2d 1329, 1336 (D.C. Cir. 1972). This rule applies even where there is no subpoena compelling production of the information since a party can be expected to introduce evidence within his or her control that would strengthen his case. *Id.* at 1338. Indeed, the adverse inference rule plays a vital role in protecting the integrity of the administrative process, by allowing an agency to "utilize the commonsense inference that if the evidence would do the suppressing party any good, he would readily produce it." *Id.* at 1339. This inference is of particular value at the "reason to believe" stage of the Commission's enforcement process, where such a finding serves only to initiate an investigation in which the Committee will have the opportunity to disprove the inference by providing evidence to support its claim that the loans were from the candidate's personal funds.

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Therefore, the Commission has found reason to believe that Corrine Brown violated 2 U.S.C. § 441g by making a cash contribution in excess of $100.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 17, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Corrine Brown
United States House of Representatives
1610 Longworth House Office Building
Washington, D.C. 20515-0903

RE: MUR 4160

Dear Congresswoman Brown:

Records or information concerning your transactions held by the financial institution named in the attached subpoena is being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose: to investigate possible violations of the Federal Election Campaign Act of 1971, as amended, by you and your committee in connection with MUR 4160.

If you desire that such records or information not be made available, you must:

1. Fill out the accompanying motion paper and sworn statement or write one of your own, stating that you are the customer whose records are being requested by the Commission and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States District Courts: United States District Court for the Middle District of Florida or the United States District Court for the District of Columbia.

3. Serve the Commission by mailing or delivering a copy of your motion and statement to: Federal Election Commission, Office of the General Counsel, 999 E Street, N.W., Washington, D.C. 20463.

4. Be prepared to come to court and present your position in further detail.

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5. You do not need a lawyer, although you may wish to employ one to represent and protect your rights.

If you do not follow the above procedures, upon the expiration of ten days from the date of service or 14 days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Law Clerk

Enclosures:
Subpoena to Barnett Bank of Jacksonville
Motion to Quash Subpoenas
Affidavit

9/0438405522

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 4160
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)
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SUBPOENA TO PRODUCE DOCUMENTS

TO: Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 30 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 6th day of June, 1996.

For the Commission,

Lee Ann Elliott
Lee Ann Elliott
Chairman

ATTEST:

for Delores Hardy
Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request

9704384052 3

I. INSTRUCTIONS

In answering this request for production of documents, furnish all documents, that are in possession of, known by or otherwise available to you, including documents and information appearing in your records.

If you cannot provide the requested documentation in full after exercising due diligence to secure the information, 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 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 the date of the opening of the account to the present.

The following 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.

II. 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 individual in this action to whom these discovery requests are addressed, including all employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any [illegible] 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 trust documents, contracts, [illegible] agreements, outlills, bank statements, canceled checks (or copies - front and back), [illegible] accounting statements, ledgers, money orders or other commercial paper, [illegible] print-outs, and all other writings and other data compilations from which information can be obtained.

8 7 0 4 3 8 4 0 5 2 4

"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.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Within 30 days of service of this request, Barnett Bank of Jacksonville is required to produce all documents discussing, describing, memorializing, evidencing, or otherwise relating to account number in the name of Corrine Brown, for the period from June 1, 1992 through September 1, 1992, including but not limited to:

1. account statements (all pages) to include all inserts;

2. deposit tickets and items deposited;

3. withdrawal slips, and;

4. all documentation related to Barnett Bank Official Checks Nos. 01030393 and 01030334, including but not limited to documentation of the funds used to purchase the checks.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 1, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

RE: Friends of Corrine Brown (MUR 4160)

Dear Ms. Baughmen:

Enclosed is a Certificate of Compliance with the Right to Financial Privacy Act of 1978, issued in connection with the Subpoena sent to your financial institution on June 17, 1996, seeking the financial records of Corrine Brown.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

Enclosure:
Certificate

9704334052 6

CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

TO: Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

FROM: Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4160

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the Subpoena to Produce Documents forwarded to you in the above-captioned matter, responses to which are being ordered pursuant to 12 U.S.C. §§ 3402 and 3405.

7/1/96
Date

Matthew J. Tanielian
Attorney

97043840527

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

July 2, 1996

Michael J. Tanielian, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JUL 2 4 07 PM '96

Re: MUR 4160

Dear Mr. Tanielian:

Enclosed please find the Statements of Designation of Counsel for Congresswoman Corrine Brown and Friends of Corrine Brown, Gloria Simmons, Treasurer, as you requested.

Sincerely,

B. Holly Schadler
Counsel to Respondents

Enclosures

9704340526

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4160

NAME OF COUNSEL: B. Holly Schadler

ADDRESS: Perkins Coie
607 14th Street, N.W., Suite 800
Washington, D.C. 20005-2011

TELEPHONE: (202) 434-1634

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 2 4 07 PM '96

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.

July 1, 1996
Date

Corrine Brown
Signature

RESPONDENT'S NAME: Corrine Brown

ADDRESS: 1515 Jefferson Davis Hwy.
Apt. 1601
Arlington, VA 22202

HOME PHONE:

BUSINESS PHONE: 202-225-0123

9704384052 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4160

NAME OF COUNSEL: B. Holly Schadler

ADDRESS: Perkins Coie
607 14th Street, N.W., Suite 800
Washington, D.C. 20005-2011

TELEPHONE: (202) 434-1634

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.

July 1, 1996
Date

Gloria Simmons
Signature

RESPONDENT'S NAME: Friends of Corrine Brown
Gloria Simmons, Treasurer

ADDRESS: 3109 River Bend Ct. D-102
Laurel, MD 20724

HOME PHONE:

BUSINESS PHONE:

9704304053C

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 8 2 36 PM '96

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 FACSIMILE: 202 434-1690

June 26, 1996

Lawrence M. Noble, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 4160

Dear Mr. Noble:

In response to the Commission's letter of June 17, 1996 to Friends of Corrine Brown, we request an extension of time to file our response in this case. An extension of time is necessary in order to review the record, have an adequate opportunity to discuss the issues with our client and prepare a comprehensive response. Therefore, we are requesting an extension of time until July 24, 1996.

Sincerely,

B. Holly Schadler
Counsel to Friends of Corrine Brown

[19411-0001/DA961780.031]

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 12 3 20 PM '96

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

July 1, 1996

Lawrence M. Noble, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 4160

Dear Mr. Noble:

In response to the Commission's letter of June 17, 1996 to Congresswoman Corrine Brown, we request an extension of time to file our response in this case. An extension of time is necessary in order to review the record, have an adequate opportunity to discuss the issues with our client and prepare a comprehensive response. Therefore, we are requesting an extension of time until July 24, 1996.

Sincerely,

B. Holly Schadler
Counsel to Congresswoman Corrine Brown

{19411-0001/DA961780.031}

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 2, 1996

B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

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Dear Ms. Schadler:

This is in response to your letters dated June 26, 1996 and July 1, 1996, requesting extensions of 20 days, until July 24, 1996, to respond to notifications that the Commission has found reason to believe that Corrine Brown and Friends of Corrine Brown and Gloria Simmons, as treasurer, violated the Federal Election Campaign Act of 1971, as amended. After considering the circumstances presented in your letters, the Office of the General Counsel has granted the requested extensions. Accordingly, the responses of Corrine Brown and Friends of Corrine Brown and Gloria Simmons, as treasurer, are due by the close of business on July 24, 1996.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

First Union Corporation
Legal Division

One First Union Center (0630)
Charlotte, North Carolina 28288
704 374-6611
FAX: 704 374-3105

Post Office Box 2080
Jacksonville, Florida 32231-0010
904 361-3785
FAX: 904 361-3144

Broad Street (PMB010)
Philadelphia, Pennsylvania 19109
215 985-7969
FAX: 215 985-8973

OGC

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUL 15 4 06 PM '96

Reply to: Jacksonville

Direct Dial: 904/361-3357

MUR 4160

July 11, 1996

Lee Ann Elliot
999 East Street, Northwest
Washington, D.C. 20463

RE: Friends of Corrine Brown

Dear Ms. Elliot:

Please accept this letter as notice that the Bank will require an extension to complete the above referenced. I am unable to provide you with an exact completion date due to the voluminous amount of subpoenas the bank is currently working on. However, obtaining these records should not take too long and I will forward the documents to you as soon as possible.

Should you have any questions, please feel free to call me at the above number.

Sincerely,

Judy Alexander

Judy Alexander
Regional Legal Administrator

JLA/hn

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The First Union Banks in Connecticut • Delaware • Florida • Georgia • Maryland • New Jersey • New York • North Carolina • Pennsylvania
South Carolina • Tennessee • Virginia • Washington, DC
First Union Mortgage Corporation • First Union Home Equity Bank, N.A.
First Union Brokerage Services, Inc. • General Financial Life Insurance, Co. • First Union Capital Markets Corp.

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 17, 1996

Ms. Judy Alexander
First Union Legal Division (FL 0585)
P.O. Box 2080
Jacksonville, Florida 32231-0010

RE: MUR 4160 (Friends of Corrine Brown)

Dear Ms. Alexander:

This is in response to your letter dated July 11, 1996, which we received on July 15, 1996, requesting an extension of time to respond to the subpoena of the account of Friends of Corrine Brown (account number The original subpoena response was due on July 23, 1996. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension for a period of up to 20 days. Accordingly, your response is due by the close of business on August 12, 1996. Should you obtain partial records prior to that date, please forward them immediately.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

9704353405

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1996

VIA FAX AND FIRST CLASS MAIL

B. Holly Schadler
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4150
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

This is to confirm our July 22, 1996 phone conversation in which you requested extensions of time to respond to notifications that the Commission has found reason to believe that Corrine Brown and Friends of Corrine Brown and Gloria Simmons, as treasurer, violated the Federal Election Campaign Act of 1971, as amended. After considering the circumstances presented, the Office of the General Counsel has granted the requested extensions. Accordingly, the responses of Corrine Brown and Friends of Corrine Brown and Gloria Simmons, as treasurer, are due by the close of business on Monday, July 29, 1996.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 24, 1996

BY HAND DELIVERY

B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160

Dear Ms. Schadler:

On June 17, 1996, in accordance with the Right to Financial Privacy Act of 1978, the Office of General Counsel mailed to Representative Corrine Brown notification of a subpoena of her personal bank records. The notice was sent by certified mail to Representative Brown's official address at the United States House of Representatives. Representative Brown maintains that her office never received the notification. An ongoing search by the Post Office has thus far been unable to establish that the certified letter was delivered, and as of this date, the Office of General Counsel has not received the return receipt. The Office of General Counsel is therefore reinitiating the notification process of the Right to Financial Privacy Act at this time.

Records or information concerning the transactions of your client, Corrine Brown, held by the financial institution named in the attached subpoena are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose: to investigate possible violations of the Federal Election Campaign Act of 1971, as amended, by Corrine Brown and Friends of Corrine Brown and Gloria Simmons, as treasurer, in connection with MUR 4160.

If your client desires that such records or information not be made available, you or she must:

1. Fill out the accompanying motion paper and sworn statement or write one of your own, stating that your client is the customer whose records are being requested by the Commission and either giving the reasons you or your client believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records.

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2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States District Courts: United States District Court for the Middle District of Florida or the United States District Court for the District of Columbia.

3. Serve the Commission by mailing or delivering a copy of your motion and statement to: Federal Election Commission, Office of the General Counsel, 999 E Street, N.W., Washington, D.C. 20463.

4. Be prepared to come to court and present your position in further detail. If you or your client do not follow the above procedures, upon the expiration of ten days from the date of service or 14 days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other client will be notified after the transfer.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

Enclosures
Subpoena to Barnett Bank of Jacksonville
Motion to Quash Subpoenas
Affidavit

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	MUR 4160
	)	
	)	
	)	

SUBPOENA TO PRODUCE DOCUMENTS

TO: Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 30 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 6th day of June, 1996.

For the Commission,

Lee Ann Elliott

Lee Ann Elliott
Chairman

ATTEST:

Delores Hardy
for Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request

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I. INSTRUCTIONS

In answering this request for production of documents, furnish all documents, that are in possession of, known by or otherwise available to you, including documents and information appearing in your records.

If you cannot provide the requested documentation in full after exercising due diligence to secure the information, 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 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 the date of the opening of the account to the present.

The following 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.

II. 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 individual in this action to whom these discovery requests are addressed, including all 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 trust documents, contracts/agreements, amendments, codicils, bank statements, canceled checks (or copies - front and back), notes, vouchers, accounting statements, ledgers, money orders or other commercial paper, computer print-outs, and all other writings and other data compilations from which information can be obtained.

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"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.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Within 30 days of service of this request, Barnett Bank of Jacksonville is required to produce all documents discussing, describing, memorializing, evidencing, or otherwise relating to account number in the name of Corrine Brown, for the period from June 1, 1992 through September 1, 1992, including but not limited to:

1. account statements (all pages) to include all inserts;

2. deposit tickets and items deposited;

3. withdrawal slips, and;

4. all documentation related to Barnett Bank Official Checks Nos. 01030393 and 01030334, including but not limited to documentation of the funds used to purchase the checks.

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
AUG 1 11 54 AM '96

July 29, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 1 3 07 PM '96

Matthew J. Tanielian, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: MUR 4160

Dear Mr. Tanielian:

This letter responds to the notification dated June 17, 1996, that the Commission found reason to believe that Congresswoman Corrine Brown; Friends of Corrine Brown; and Gloria Simmons, as Treasurer, ("Respondents") violated the FECA in MUR 4160.

In an effort to resolve this matter, Respondents would like to explore pre-probable cause conciliation at this time. We look forward to receiving a proposed conciliation agreement in this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

B. Holly Schadler
Counsel to Respondents

[19411-0001/DA962080.018]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1996

Via Facsimile and First Class Mail

Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

RE: Corrine Brown (MUR 4160)

Dear Ms. Baughmen:

This is to inform you that on July 24, 1996, the Commission reinitiated the Right to Financial Privacy Act notification process in this matter, serving notice and a copy of the Subpoena on counsel to Corrine Brown. Consequently, Barnett Bank should disregard the previous certificate of compliance of July 1, 1996. Until informed otherwise by this office, Barnett Bank should hold all documents relating to the June 17, 1996 Subpoena of the financial records of Corrine Brown.

The Right to Financial Privacy Act of 1978 permits the customer whose records are sought ten days from the date of receipt of the Subpoena to move to quash them. Upon the expiration of this period, the Commission will notify you that it has complied with the Right to Financial Privacy Act. In the absence of judicial intervention, it is then your obligation to comply with the terms of the original Subpoena. *See* 12 U.S.C. §§ 3405 and 3411.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 1, 1996

B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160

Dear Ms. Schadler:

Pursuant to our telephone conversation of July 30, 1996, I am providing you with a courtesy copy of the factual and legal analysis for respondent Corrine Brown. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

Enclosures
Letter to Honorable Corrine Brown, June 17, 1996
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

RE: Friends of Corrine Brown (MUR 4160)

Dear Ms. Baughmen:

Enclosed is a Certificate of Compliance with the Right to Financial Privacy Act of 1978, issued in connection with the Subpoena sent to your financial institution on June 17, 1996, seeking the financial records of Corrine Brown. The enclosed certificate of compliance serves as notice, pursuant to the Commission's July 30, 1996 letter to you, that Barnett Bank may now release the subpoenaed documents.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

Enclosure
Certificate

CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

TO: Ms. Cindy Baughmen
Barnett Bank of Jacksonville
100 N. Laura Street
Jacksonville, Florida 32202

FROM: Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4160

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the Subpoena to Produce Documents forwarded to you in the above-captioned matter, responses to which are being ordered pursuant to 12 U.S.C. §§ 3402 and 3405.

3/6/96
Date

Matthew J. Tanielian
Attorney

97044305546

Barnett Bank

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 29 10 26 AM '96

August 13, 1996

Federal Election Commission
Attn: Attorney Matthew J. Tanielian
999 E. Street, N.W.
Washinton, D.C. 20463

Re: Friends of Corrine Brown

MUR 4160

Dear Mr. Tanielian:

Please be advised that we will require approximately three more weeks to produce records for your subpoena. We apologize for this inconvenience. Please find enclosed the statements for account number from June 1, 1992 through September 1, 1992.

Thank you for your understanding and cooperation, if you have any questions or require additional information, please contact me at (904) 464-7988.

Sincerely,

Sarah Evans

Sarah Evans
Research Services

9704384054 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1996

VIA FACSIMILE AND FIRST CLASS MAIL

Ms. Sara Evans
Research Services
Barnett Bank of Jacksonville
9000 Southside Blvd. MC 576-615
Jacksonville, Florida 32256

RE: Friends of Corrine Brown (MUR 4160)

Dear Ms. Evans:

This is in response to your letter dated August 13, 1996, which we received on August 23, 1996, requesting an extension of time to respond to the subpoena of the account of Corrine Brown. The original subpoena response was due on August 13, 1996. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension for a period of 21 days. Accordingly, your response is due by the close of business on September 3, 1996.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

AUG 29 10 32 AM '96

Barnett Bank

Mail Code 576-615
9000 Southside Blvd.
Jacksonville, FL 32256
(904) 464-7988

August 28, 1996

Federal Election Commission
Attn: Attorney Matthew J. Tanielian
999 E Street, N.W.
Washington, D.C. 20463

MUR 4160

RE: Friends of Corrine Brown

Dear Mr. Tanielian:

In addition to my letter dated August 13, 1996 and our phone conversations, please find enclosed the cancelled checks, deposit tickets and offsets from June 1, 1992 through September 1, 1992. The items not included were not located. We will forward the documentation used to purchase the official checks as soon as possible.

These documents are certified to be from records maintained by Barnett Bank of Jacksonville during the regular course of business. In accordance with Florida Statute 92.153 reimbursement is due within 30 days in the amount itemized below:

Statement Copies:	7 copies	@ 0.15	per copy	= $	1.05
Other Copies:	374 copies	@ 0.15	per copy	= $	56.10
Research Time:	25 hours	@ 10.00	per hour	= $	250.00
Postage:				$	0.00
TOTAL:				$	307.15

Please make your payment to Barnett Bank of Jacksonville at the address listed above.

Sincerely,

Sarah Evans
Research Services

97043840549

Barnett Bank

Mail Code 576-615
9000 Southside Blvd.
Jacksonville, FL 32256
(904) 464-7988

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 6 10 13 AM '96

September 5, 1996

MUR 4160

Federal Election Commission
Attn: Attorney Matthew J. Tanielian MT
999 E Street, N.W.
Washington, D.C. 20463

RE: Friends of Corrine Brown

Dear Mr. Tanielian:

In addition to my letter dated August 28, 1996 and our phone conversations, please find enclosed the offsets to the official check numbers 01030393 and 01030334 that show how the official checks were purchased.

These documents are certified to be from records maintained by Barnett Bank of Jacksonville during the regular course of business. In accordance with Florida Statute 92.153 reimbursement is due within 30 days in the amount itemized below:

Statement Copies:	0 copies	@ 0.15 per copy	= $	0.00
Other Copies:	6 copies	@ 0.15 per copy	= $	.90
Research Time:	1 hour	@ 10.00 per hour	= $	10.00
Postage:			$	0.00
TOTAL:			$	10.90

Please make your payment to Barnett Bank of Jacksonville at the address listed above.

Sincerely,

Sarah Evans

Sarah Evans
Research Services

9704384055C

MUR4160 092

APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR CANDIDATES
(S. 106.021(1), Florida Statutes)

CHECK APPROPRIATE BOX
☐ ORIGINAL APPOINTMENT
☐ DEPUTY TREASURER
☐ REAPPOINTMENT OF TREASURER
☐ SECONDARY DEPOSITORY

Name of Candidate (Please Type)	Address	
Corrine Brown	274 Tallulah Avenue Jax 32208	
1. Date: June 13, 1991	2. Party: Democratic	3. Office (Add District, Circuit, or Group): State Senate Dist. #7

I have appointed the following person to act as my Campaign Treasurer ☒, Deputy Treasurer ☐.

4. Name: Samuel Bruce

5. Mailing Address (If Post Office Box or Drawer, add Street Address): 12389 Caron Drive

7. City	8. County	9. State	10. Zip Code
Jacksonville	Duval	Fl.	32258

I have designated the following named bank as my Primary Depository ☐, Secondary Depository ☐.

11. Bank Name	12. Street Address		
First Union	1601 Main Street		
13. City	14. County	15. State	16. Zip Code
Jacksonville	Duval	Fl.	32231-0010

I will notify you of any additions or changes to these appointments.

17. Signature of Candidate: Corrine Brown

RECEIVED
DEPARTMENT OF STATE
1991 JUN 19 AM 10
DIVISION OF ELECTIONS
TALLAHASSEE, FLORIDA

Sworn and Subscribed before me this 17th day of June 19 91 at Jacksonville, Duval County, Florida

My commission expires NOTARY PUBLIC STATE OF FLORIDA MY COMMISSION EXP. APR. 27, 1994

(seal)

Maria A. Bartman
Notary Public

Campaign Treasurer's Acceptance of Appointment

I, Samuel Bruce (Please Print or Type), do hereby accept the appointment as Campaign Treasurer ☒, Deputy Treasurer ☐ for the campaign of Corrine Brown, who is seeking the nomination or election as a democratic (Party) candidate to the office of Senate. As a duly registered voter in Duval County, Florida, I am qualified to accept this appointment.

6/17/91
Date

Samuel Bruce
Signature of Campaign Treasurer

DS-DE 9
(Rev. 12/90)

CAMPAIGN TREASURER'S REPORT Hand delivered

792

POSTMARK DATE	
OFFICE USE ONLY	
IDENTIFICATION NUMBER	

1. Corrine Brown
Full Name of Candidate ☐ Political Committee XX Committee of Continuous Existence ☐ Party Executive Committee ☐

District #17 House Jan 1
Office Sought (Include District, Circuit and Group Number)

33 S. Hogan Street Suite #250
Address (Number & Street)

Jacksonville, Fl 32202
City, State & Zip Code

☐ Check here if Address is Different than previously reported
☐ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports

ORIGINAL

2. Type of Report (Check Appropriate Box)

a. QUARTERLY REPORTS
☐ January 10 ☐ July 10
☐ April 10 ☒ October 10

REPORTS AFTER QUALIFYING PERIOD
☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Termination Report (90 Day Report for Candidates Only)
☐ Special Election

b. Is this report an amendment ☐ Yes ☐ No

SUMMARY

Covering Period of July 1, 1991 through September 30, 1991

Balance in Account at End of Year
$ 0000000000000
(For Political Committees and Committees of Continuous Existence Only)

CONTRIBUTIONS	Column A "Monetary"	Column B "Loans"	Column C "In-Kind"
a. Contribution Total Brought Forward From Previous Report, If Any	$ 4285.00	$ -0-	$ 00
b. Contributions This Report Monetary	$ 10,945.00		
c. Contributions This Report Loans		$ -0-	
d. Contributions This Report In-Kind			$ -0-
e. Total Contributions To Date	Add Lines a & b	Add Lines a & c	Add Lines a & d
Grand Total for Contributions (Monetary & Loans) Add Columns A & B (Line e) $ 15,230.00	15,230.00	-0-	-0-

Expenditures

a. Expenditure Total Brought Forward From Previous Report, If Any.	$ 789.50
b. Expenditures This Report	$ 659.21
c. Total Expenditures Add Lines a & b	$ 1,448.71

Money Currently in Interest Bearing Account or Certificate of Deposit $ -0-
Campaign Depository or Bank Account Number
Total amount of proceeds from each campaign fundraiser

CERTIFICATION (THIS PART MUST BE DULY EXECUTED BEFORE FILING WILL BE COMPLETE)

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Gloria Simmons, Deputy
TYPE OR PRINT NAME OF TREASURER
Gloria Simmons, Deputy
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 4th DAY OF October 1991
NOTARY
State of Florida
My commission expires
County of Duval
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Corrine Brown
TYPE OR PRINT NAME OF CANDIDATE OR CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY
Corrine Brown
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 10 DAY OF Oct 1991
NOTARY
Notary Public, State of Florida
My Commission Expires

9104050552

ITEMIZED CONTRIBUTIONS

Report Covering Period of July 1, 1991 through September 30,1991 Page 1 of 4 Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 7/3/91	Florida Pharmacy P.O BOx 1575 Tallahassee, Fl 32303	PAC	500.00		
2. 7/3/91	FLO-PAC-Optometry P.O. Box 5628 Jax. FL 32247	PAC	1,000.00		
3. 7/3/91	Floeida Rock Industries,Inc P.O Box 4667 Jax. Fl 32201	Industry	500.00		
4. 7/3/91	Ed Baker P.O. Box 4667 Jax. Fl 32201	Contrac-tor	500.00		
5. 7/3/91	Underhill Personnel 3305 Hendricks Ave. Jax. Fl 32207		50.00		
6. 7/9/91	CLU-PAC 2971 Waller St. Jax. Fl 32205	PAC	500.00		
7. 7/15/91	James Talley 320 W. Jefferson ST Tallahassee, FL 32301		50.00		
8. 7/15/91	Ken Van Assenderp P.O. Box 1833 Tallahassee, Fl 32303		100.00		
9. 7/15/91	Continental Cablevision P.O. Box 17613-F Jax. Fl 32245-7613		100.00		
10. 7/17/91	Steve St. Armond & Assoc 12113 Blackfoot Court Jax. Fl 32123	consultant	200.00		
11. 7/22/91	Tony Nelson P.O. Box 11272 Jax. Fla 32239		50.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E006010-89

ITEMIZED CONTRIBUTIONS

Report Covering Period of ~~July 1, 1991~~ through Sep. 30, 1991 Page 2 of 4 Pages

Rep. Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 7/22/91	Fla. Assoc..Services, Inc. 76 S Laura St Jax. Fla 32202	Insurance	500.00		
2. 7/25/91	Robert Mitchell 2323 Courtney Dr. Jax. Fla 32208		50.00		
3. 7/26/91	Mobile Home Communities, Inc. 116 Inverness Dr. Suite 203 Englewood, Colorado 80112	mobile homes	250.00		
4. 7/26/91	Lautrec,Ltd. P.O. Box 339687 Farmington,Hills, MI 48333	mobile homes	250.00		
5. 7/26/91	BFI Waste System 8607 Roberts Dr. Suite 100 Atlanta, Ga 30350		100.00		
6. 7/26/91	Ray Dist. of Jax, Inc P.O. Box 43250 Jax. Fl 32203	D/B/A Baron Oil	1000.00		
7. 7/29/91	William McGill P.O. Box 98 Midway, FL 32343		25.00		
8. 7/26/91	Dorothy Davis 12270 NW 1st Ave NOrthMiami, Fl 33168		25.00		
9. 7/26/91	Ella Gilmore 333 W. 14th Street Apoka, Fl 32703		25.00		
10. 8/1/91	Clyde Collins, Jr. 22 N. Market St. Jacksonville,Fl 32202	attorney	500.00		
11. 8/5/91	J.B. Coxwell Contracting,Inc 6741 Lloyd Road, West Jax. Fl 32205	Contractor	1,000.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E006010-89

9/0434054

ITEMIZED CONTRIBUTIONS

Report Covering Period of 7/1/91 through 9/30/91 Page 3 of 4 Pages

Rep. Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 8/12/91	Southern Bell Florida P.O. Box 020100 Miami, Fl 33102-0100	PAC	500.00		
2. 8/16/91	Michael Atter 333-1 E Monroe St. Jacksonville, Fl 32202		100.00		
3. 8/16/91	Dr. W.G Allen, Jr. 3739 Duval Drive Jacksonville,Beach, Fl 32250	doctor	250.00		
4. 8/20/01	Neal Tyler & Sons Inc. 216 Druid Jacksonville, Fl	brewery	500.00		
5. 8/20/91	Jacksonville Area Physicians P.O BOx 40023 Jacksonville, FL 32203	PAC	1000.00		
6. 9/9/91	Kenneth Chin-Omn 8986 Palos Verde Dr. 273-0742 Orlnao, Fl 32825		20.00		
7. 9/17/91	Barry Kutun 200 Biscayne Blvd, Ste. 2940 Miami, Fl 33131-2307		100.00		
8. 9/17/91	Lawrence Jaffee 4444 Old Salisbury Rd. Jacksonville, Fl 32216	pharmacist	200.00		
9. 9/24/91	CSX Transportation, Inc. 500 Water St. Jacksonville, Fl 32202	transpor-tation	500.00		
10. 9/24/91	Mark Hulsey 225 W. Water St. Jacksonville, Fl 32204	attorney	100.00		
11. 9/25/91	LH.S. Van MIEROP, MD University of Florida Gainesville, Fl 32610		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

08-06-13

9704384055

ITEMIZED CONTRIBUTIONS

Report Covering Period of 7/1/91 through 9/30/91 Page 4 of 4 Pages

Rep. Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 9/25/91	Charles Williams 2106 NW 4th Place Gainesville, Fl 32603	physician	300.00		
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11.					

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E008010-89

9704304056

ITEMIZED EXPENDITURES

Report Covering Period of July 1, 1991 through September 30,1991 Page 1 of 2 Pages

Rep. Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 20.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 7/8/91	petty cash		20.00
2. 7/9/91	Postmaster General General Mailing Center Jacksonville, Fl 32204	Postage	22.48
3. 7/18/91	Office Depot 9230 Arlington Expressway Jacksonville, FL 32211	typewriter ribbon	85.17
4. 7/22/91	Postmaster General General Mailing Center Jacksonvilee, Fl 32204	Postage	65.00
5. 7/24/91	AmeriPress 19 S. Hogan Street Jacksonville, Fl 32202	Printing	30.65
6. 8/2/91	1st Union Bank P.O. Box 2870 Jacksonville, Fl 32204	checkbook	77.91
7. 8/2/91	1st Union Bank P.O. Box 2870 Jacksonville, Fl 32204	service charge	11.46
8. 8/7/91	Buddy's Office Supply PO Box 3476 Jacksonville, Fl 32206	Office Supplies	42.64
9. 8/21/91	Gloria Simmons 3416 Nancy Street Jacksonville, Fl 32209	Bookkeeping	30.00
10. 8/26/91	Felicia Harris 33 S. Hogan Jacksonville, Fl 32204	transportation for errands	10.00
11. 8/28/91	AmeriPress 19 S Hogan Street Jacksonville, Fl 32202	printing	14.31
12. 9/3/91	St. Paul AME Church 2225 Myrtke Ave Jacksonville, FL 32209	Banquet	25.00

CS-DE-14
DE2E007010-89

9/0430557

ITEMIZED EXPENDITURES

*Report Covering Period of July 1, 1991 through Sept. 30,1991 Page 2 of 2 Pages

Rep. Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 20.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 9/3/91	Postmaster General General Mailing Center Jacksonville, Fl 32202	Postage	185.00
2. 9/23/91	Buddy's Office Supply 20 W. 8th Street Jacksonville, Fl 32206	office supply	39.59
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DS-DE-14
DE2E007010-89

792

CAMPAIGN TREASURER'S REPORT

POSTMARK DATE	
OFFICE USE ONLY	
IDENTIFICATION NUMBER	

1. Corrine Brown
Full Name of Candidate ☐ Political Committee ☒ Committee of Continuous Existence ☐ Party Executive Committee ☐

Fla. State Senate # 7
Office Sought (Include District, Circuit and Group Number)

33 S. Hogan Street Suite #250
Address (Number & Street)

Jacksonville, Fl 32202
City, State & Zip Code

☐ Check here if Address is Different than previously reported
☐ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports

2. Type of Report (Check Appropriate Box)
a. QUARTERLY REPORTS
☒ January 10 ☐ July 10
☐ April 10 ☐ October 10

REPORTS AFTER QUALIFYING PERIOD
☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Termination Report (60 Day Report for Candidates Only)
☐ Special Election
b. Is this report an amendment ☐ Yes ☐ No

SUMMARY

3. Covering Period of October 1, 1991 through December 31, 1991

4. Balance in Account at End of Year
$ _____
(For Political Committees and Committees of Continuous Existence Only)

ORIGINAL

	Column A "Monetary"	Column B "Loans"	Column C "In-Kind"
5. CONTRIBUTIONS			
a. Contribution Total Brought Forward From Previous Report, If Any	$ 15,230.00	$ -0-	$ -0-
b. Contributions This Report Monetary	$ 3,400.00		
c. Contributions This Report Loans		$ -0-	
d. Contributions This Report In-Kind			$ -0
e. Total Contributions To Date	Add Lines a & b	Add Lines a & c	Add Lines a & d
	18,630.00	-0-	-0-

Grand Total for Contributions (Monetary & Loans)
Add Columns A & B (Line e) $ 18,630.00

ORIGINAL

6. Expenditures

a. Expenditure Total Brought Forward From Previous Report, If Any.	$ 1,448.71
b. Expenditures This Report	$ 2,050.23
c. Total Expenditures Add Lines a & b	$ 3,498.94

RECEIVED
DEPARTMENT OF STATE
1992 JAN -9 PM 2:27
DIVISION OF ELECTIONS
TALLAHASSEE, FLORIDA

7. Money Currently in Interest Bearing Account or Certificate of Deposit $ _____
8. Campaign Depository or Bank Account Number _____
9. Total amount of proceeds from each campaign fundraiser -0-

VERIFICATION (THIS PART MUST BE DULY EXECUTED BEFORE FILING WILL BE COMPLETE)

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Gloria Simmons, Deputy
TYPE OR PRINT NAME OF TREASURER
Gloria Simmons
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 2nd DAY OF January 1992
Sandra K. Brunell
NOTARY
My commission expires
Notary Public, State of Florida

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Corrine Brown
TYPE OR PRINT NAME OF CANDIDATE OR CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY
Corrine Brown
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 23 DAY OF January 1992
Sandra K. Brunell
NOTARY
My commission expires
Notary Public, State of Florida

ITEMIZED CONTRIBUTIONS

Report Covering Period of October 1,1991 through December 31,1991 Page 1 of 2 Pages

Corrine Brown for State Senate
Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation if over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 10/1/91	Lil Champ Jiffy Stores,Inc. P.O Box 23180 Jacksonville, Fl 32241	convenience stores	200.00		
2. 10/4/91	Janes L. Talbert, M.D J.Hillis MillerMed.Center University of Fla. Gainesville, Fl	doctor	300.00		
3. 10/9/91	Arlan L. Rosenbloom University of Fla.-Pediatrics Gainesville, Fl. 32610	doctor	100.00		
4. 10/9/91	Janet H. Silverstein, M.D 1932 N.W 24th Street Gainesville, FL 32605		100.00		
5. 10/28/91	Anheuser-Busch 402 HIgh Point Dr. Cocoa, Fl 32926	brewery	500.00		
6. 12/13/91	American Federation of State county,etc. employees 1625 L Street, N.W. Washington, D.C 20036	AFL CIO	300.00		
7. 12/13/91	American Payphones 5121 Bowden Road, Suite 104 Jacksonville, Fl 32216-5947		100.00		
8. 12/13/91	Attwood of North America,Inc. 2601 S. Bayshore Dr. Penthouse Coconut Grove, Fl 33133		500.00		
9. 12/13/91	Household International 981 Guys Court Lilburn, Ga. 30247		100.00		
10. 12/13/91	Beneficial Management Corp. 300 Beneficial Center Peapack, New Jersey 07977		100.00		
11. 12/13/91	American General Finance Corp 601 NW Second Street Evansville, Indiana 47708		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E000010-89

9/0438405 6C

ITEMIZED CONTRIBUTIONS

Report Covering Period of October 1,1991 through December 31, 1991 Page 2 of 2 Pages

Corrine Brown,State Senate Dist. # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation if over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 12/13/91	Aristar 8001 Centerview Parkway Cordova, TN. 38018		100.00		
2. 12/13/91	Fleet Finance Pol. Action 30 Perimeter Park Suite 201 Atlanta, GA. 30341		100.00		
3. 12/20/91	Curtis Richardson 590 Pasco CT. Tallahassee, Fl 32310		50.00		
4. 12/30/91	Calder Race Course,Inc. P.O Box 1808 OPA-LOCKA, Fl. 33055-0808	Racing	250.00		
5. 12/31	Int"l Longshoremen"s Assoc. 2040 E. 21st Street Jacksonville, Fl. 32206	Indep. Local	500.00		
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NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

9704384005561

ITEMIZED EXPENDITURES

Report Covering Period of Oct. 1, 1991 through Dec. 31, 1991 Page 1 of 2 Pages

Corrine Brown Sanate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 25.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 10/1/91	Data Movers 435 Clark Rd. Jax. Fl 32218	Labels(Names)	1006.00
2. 10/6/91	Sams Wholesale, Inc. 5119 Normandy Blvd. Jax. Fl. 32210	typewriter	301.53
3. 10/21/91	Gloria Simmons 3416 Nancy Street Jacksonville, FL 32209	Bookkeeping	200.00
4. 11/21/91	Petty Cash		25.00
5. 12/6/91	Postmaster General Gen. Mailing Center-Kings Rd. Jax. Fla 32204	Postage	55.00
6. 12/10/91	Theron Carmichael 1431 W. 23rd St. Jax. Fl 32209	gas reimbursement campaign worker	27.00
7. 12/17/91	Gloria Simmons 3416 Nancy Street Jax. Fl 32209	Christmas cards and postage	65.00
8. 12/31/91	Sams Wholesale, Inc. 5119 Normandy Blvd. Jax. Fl 32210	calculator / adding machine	40.00
9. 12/23/91	Theron Carmichael 1431 W. 23rd St. Jax. Fl. 32209	campaign work	250.00
10. 9/11/91	First Union Bank P.O. Box 2870 Jacksonville, Fl 32204	service charge	35.93
11. 9/7/91	First Union Bank P.O. Box 2870 Jax. Fl 32204	service charge	11.96
12. 10/07/91	First Union Bank P.O. Box 2870 Jax. Fl 32204	service charge	12.48

9704384056 2

ITEMIZED EXPENDITURES

Report Covering Period of October 1, 1991 through December 31,1991 Page 2 of 2 Pages

Corrine Brown Senate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 25.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 11/7/91	First Union Bank P.O. Box 2870 Jax. Fl 32204	service charge	11.66
2. 12/13/91	First Union Bank P.O Box 2870 Jax. Fl 32204	service charge	8.67
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DS-DE-14

9/0430405 63

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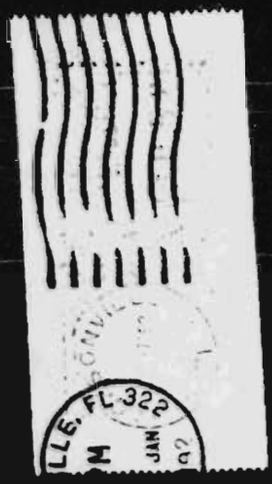

Campaign Treasurer's Report
(Please Type)

Identification Number: 792

792

RECEIVED
DEPARTMENT OF STATE
1992 APR -8 AM 9:57
TALLAHASSEE, FLORIDA

I. Brown Corrine
(Candidate's name by Last Name, First Name, Middle Initial or Name of Political Committee, Committee of Continuous Existence, or Party Name)

State Senate District # 7
Office Sought (Include District, Circuit And Group Number) (Candidates Only)

33 South Hogan St. Suite # 250
Address (Number And Street)

Jacksonville, Fl. 32202
City, State And Zip Code

☐ Candidate ☒ Committee of Continuous Existence
☐ Political Committee ☐ Party Executive Committee

☐ Check here if address is different than previously reported.
☐ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports.

Campaign depository or bank account number: First Union Bank

II. Type of Report (Check Appropriate Box)

☐ January 10 ☐ April 10 ☐ July 10 ☐ October 10
☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Special Election
☐ Termination Report (Candidates only)
☐ This Report is An Amendment.

III. Covering Period of January 1,1991 through March 31, 1992

IV. CONTRIBUTIONS	Column 1 Cash & Checks	Column 2 Loans	Column 3 Total Monetary (Columns 1 + 2)	Column 4 In-Kind
A. Contributions Brought Forward From Previous Report, If Any	18,630.00	-0-	18,630.00	-0-
B. Contributions This Report	3592.00	-0-	3,592.00	129.00
C. Total Contributions (Add Lines A & B)	22,222.00	-0-	22,222.00	129.00

V. EXPENDITURES

A. Expenditures Brought Forward From Previous Report, If Any	3,498.94	-0-
B. Expenditures This Report (Excluding Transfers to Office Account)	1993.18	-0-
C. Transfers to Office Account (Candidates Only)	-0-	-0-
D. Total Expenditures (Add Lines A, B & C)	5492.12	

ORIGINAL

VI. BALANCE

A. Balance in Account at End of Prior Year (For Political Committees, Committees of Continuous Existence and Party Executive Committees Only)	-0-
B. Total Monetary Contributions (from line C, Column 3 above)	22,222.00
C. Total Expenditures (from line D, Column 3 above)	5492.12
D. ACCOUNT BALANCE (Line A + Line B - Line C)	16,729.88

VII. Amount of 1.5 percent assessment remitted with this report (For Political Committees, Committees of Continuous Existence and Party Executive Committees Only) -0-

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Gloria Simmons
TYPE OR PRINT NAME OF TREASURER
Gloria Simmons
SIGNATURE

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Corrine Brown
TYPE OR PRINT NAME OF CANDIDATE OR COMMITTEE OR PARTY EXECUTIVE
Corrine Brown
SIGNATURE

FRANCES GLORIA GEOGHAGAN
MY COMMISSION # CC 188194
EXPIRES: MAY 12, 1996
BONDED THRU ANCHOR INSURANCE AGENCY

Frances Gloria Geoghagan

DE-12 (9/91)

ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 1 of 4 Pages

Corrine Brown for District #7 Senate

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation if over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 1/29/92	Meltonia May 4255 Camelia Cir. E Jax. Fl 32209		25.00		
2. 1/29/92	Physicians Protective 2121 Ponce de Leon Blvd #350 Coral Gables, Fl		500.00		
3. 1/04/92	Corrine Brown 33 South Hogan St. #250 Jax. Fl 32204	legislator		129.00	luncheon
4. 1/29/92	James Bailey 307 Pablo Rd. Ponte Vedra Beach 32082	✓	200.00		
5. 3/2/92	Bernard Gregory 8430 Sophist Cir. E Jax. Fl 32219		50.00		
6. 3/9/92	Rogers,Towers,Bailey,etc. P.A 1301 Gulf Life Dr. Suite 1500 Jax. Fl 32207	attorney	500.00		
7. 3/16/92	James A. Reiman, M.D 820 Prudential Dr. Ste.#606 Jax. Fl 32207		100.00		
8. 3/16	Peter Gloersen, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
9. 3/16	David Ogburn, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
10. 3/16	Anesthesiology PAC 6501 25th Way S.,Ste. #0 St. Petersburg, Fl 33712	PAC	250.00		
11. 3/16	William Boggs, Jr. M.D 2150 Riverside Ave. Jax. Fl 32204		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS [illegible] OF DUES BY A MEMBER IN A FORM [illegible] TO THE [illegible] NEED ONLY LIST THE AGGREGATE [illegible] MONTH [illegible] THE [illegible]

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ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 2 of 4 Pages

Corrine Brown for Senate District # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/16/92	Greg Bachman, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
2. 3/16/92	Stephen Tunstill 5212 Ortega Oaks Lane Jax. Fl 32210		100.00		
3. 3/16	William Barton, M.D 820 Prudential Sr. Jax. Fl 32207		100.00		
4. 3/16	Sharon Phillips, M.D 505 Lancaster Street Jax. Fl 32204		100.00		
5. 3/16	Jerry Dorsch, M.D 2517 Holly Point East Orange Park, Fl 32073		100.00		
6. 3/16	James Beeson, M.D 3250 Beach Blvd. Jax. Fl 32207		100.00		
7. 3/16	John C. Kruse, M.D 820 Prudential Sr. Ste.#606 Jax. Fl 32207		100.00		
8. 3/16	Mark Phillips, M.D 505 Lancaster Street Jax. Fl 32204		100.00		
9. 3/16	Mark Kramp, M.D 820 Prudential Dr. Ste.#606 Jax. Fl 32207		100.00		
10. 3/16	Catherine Atkinson 3075 Hendricks Ave. Jax. Fl 32207		10.00		
11. 3/16	Mary Crumley 1478 McConihe St. Jax. Fl 32209		1.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E000010-89

9/0435405567

ITEMIZED CONTRIBUTIONS

Report Covering Period of January 1, 1992 through March 31, 1992 Page 3 of 4 Pages

Corrine Brown for Senate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/16	Bernice Beamon P.O. Box 43624 Jax. Fl 32203-3624		5.00		
2. 3/16/92	Susye Pierce 2501 Doby Street Jax. Fl. 32209		5.00		
3. 3/16	Robert Keegan 8006 Catawba Dr. Jax. Fl 32217		10.00		
4. 3/16	Thomas Ian Robertson 1414 Felch Ave. Jax. Fl 32207		20.00		
5. 3/16	Dr. Harold Hinte.,Sr. 1070 Ellis Rd. S Jax. Fl 32205		26.00		
6. 3/24/92	Peter Caribaltes 1508 Glengarry Rd. Jax. Fl 32207		25.00		
7. 3/24	Martha Wells 6444 Aolandra Dr. S Jax. Fl 32210		5.00		
8. 3/24	Sandra Bond 8106 Summit Ridge Ln. Jax. Fl 32256-7149	✓	500.00		
9. 3/24	Geo S. Beckham 1485 Glendale Rd. Jax. Fl 32216		20.00		
10. 3/24	Virginia West 10413 Loyola Dr. Jax. Fl 32218		25.00		
11. 3/24	Mrs. G.B. Soloman 2013 Rowe Ave. Jax. Fl 32208		10.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
(DE2E006010-89)

ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 4 of 4 Pages

Corrine Brown for Senate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/24	Mrs. Marie McClaIN 5025 Lincoln Cir. N Jax. Fl 32209		5.00		
2. 3 3/26/92	James Chapman, M.D 2150 Riverside Ave. Jax. Fl 32204		100.00		
3.					
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DS-DE-13
DE2E000010-89

9/0450405569

ITEMIZED EXPENDITURES

Report Covering Period of: January 1,1992 through March 31, 1992 Page 1 of 2 Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. Jan.6,92	FCCJ foundation Downtown Campus Jax. Fl. 32204	Minority Schol. Banquet	$ 50.00
2. Jan.6	Shelanda Shaw 33 S. Hogan St. #250 Jax. Fl. 32204	Printing and Supplies	60.00
3. Jan.13	Chamber of Commerce 3 E. Independent Dr. Jax. Fl. 32202	M.L. King banquet	100.00
4. Jan. 13	Postmaster General General Mailing Center Jax.Fl 32209	Postage	40.00
5. Jan. 23	Mary SingletonMem.Found. 150 E. 1st Street Jax. Fl. 32206	Banquet	100.00
6. Jan. 23	Gloria Simmons 3416 Nancy St Jacksonville, Fl	Bookkeeping	80.00
7. Jan. 23	Elias Simmons Aubrey Lane Jacksonville, FL. 32209	postage/ mailing	29.00
8. Feb. 4	Mattie Simmons 6924 Rhode Island Dr. e Jax. Fl 32209	Catering reception	285.00
9. Feb.7	Pioneer Paper&Plastics 5201 Kings Rd. Jax. Fl 32236	PAPER GOODS for reception	100.00
10. Feb. 8	St. Paul AME Church 6910 New Kings Rd. Jax. Fl. 32208	rental of hall for reception	160.00
11. Feb. 8	Sean Washington 6910 Kings Rd. Jax. Fl 32208	hall clean-up reception	25.00
12. Feb. 8	Abraham Simmons 6924 Rhode Island Dr. E Jax. Fl 32209	reception hall eqip. set-up	40.00

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ITEMIZED EXPENDITURES

Report Covering Period of Jan.1,1992 through Mar. 31,1992 Page 2 of ____ Pages

Corrine Brown for Senate Dist. # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. Feb. 8	Eckerd Drugs Norwood Plaza Jax. FL 32206	film for reception	$ 25.00
2. Feb. 10	Johnny Robinson 2920 Van Cundy Rd. Jax. Fl 32208	reception equip. set-up	40.00
3. FFeb.27	Stephen Beasley 630 Brevard St. Tallahassee, Fl 32304	photographs	310.00
4. Mar. 2	Gloria Simmons 3416 Nancy St. Jax. Fl 32209	bookkeeping	80.00
5. Mar. 10	Dickinson & Broawer 215 Lake Ella Dr. Tallahassee, Fl 32303	photographs	270.18
6. Mar. 11	Petty Cash		30.00
7. Mar. 15	Ribault Sr. High 3701 Winton Dr. Jax. Fl 32208	banquet	15.00
8. Mar. 17	Homebound Advisory Council 150 E. First St. Jax. Fl 32206	banquet	15.00
9. Mar. 17	Special Events Advisory 828 W. 17th St. Jax. Fl 32209	banquet	10.00
10. Mar.18	Mt. Calvary Bapt. Church 301 Spruce St. Jax. Fl 32202	banquet	100.00
11. Mar. 24	Postmaster General General Mailing Ctr. Jax. Fl 32209	postage	29.00
12.			

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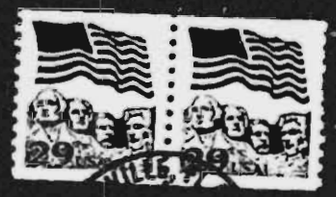

Campaign Treasurer's Report

(Please Type)

Registration Number: 792

792

RECEIVED
DEPARTMENT OF STATE
1992 APR -8 AM 9:57
DIVISION OF ELECTIONS
TALLAHASSEE, FLORIDA

I. Brown Corrine

Candidate's name by Last Name, First Name, Middle Initial or Political Committee, Committee of Continuous Existence, or Party Name)

State Senate District 7

Office Sought (Include District, Check And Space Number) (Candidates Only)

33 South Hogan St. Suite # 250

Address (Number And Street)

Jacksonville, Fl. 32202

City, State And Zip Code

☐ Candidate ☒ Committee of Continuous Existence
☐ Political Committee ☐ Party Executive Committee

☐ Check here if address is different than previously reported.
☐ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports.

Campaign depository or bank account number: First Union Bank

II. Type of Report (Check Appropriate Box)

☐ January 10 ☒ April 10 ☐ July 10 ☐ October 10

☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Special Election
☐ Termination Report (Candidates only)

☐ This Report is An Amendment.

III. Covering Period of January 1, 1992 through March 31, 1992

IV. CONTRIBUTIONS	Column 1 Cash & Checks	Column 2 Loans	Column 3 Total Monetary (Columns 1 + 2)	Column 4 In-Kind
A. Contributions Brought Forward From Previous Report, If Any	18,630.00	-0-	18,630.00	-0-
B. Contributions This Report	3592.00	-0-	3,592.00	129.00
C. Total Contributions (Add Lines A & B)	22,222.00	-0-	22,222.00	129.00

V. EXPENDITURES		
A. Expenditures Brought Forward From Previous Report, If Any	3,498.94	-0-
B. Expenditures This Report (Excluding Transfers to Office Account)	1993.18	-0-
C. Transfers to Office Account (Candidates Only)	-0-	-0-
D. Total Expenditures (Add Lines A, B & C)	5492.12	-0-

ORIGINAL

VI. BALANCE	
A. Balance Left at the End of Prior Year (For Political Committees, Committees of Continuous Existence and Party Executive Committees Only)	-0-
B. Total Contributions (From Line C, Column 3 above)	22,222.00
C. Total Expenditures (From Line D, Column 3 above)	5492.12
D. Balance (Line A + Line B - Line C)	16,729.88

VII. Amount of loan(s) guaranteed by candidate or family member (Political Committee, Committee of Continuous Existence and Party Executive Committee Only) -0-

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.

Corrine Brown

TYPE OR PRINT NAME OF CANDIDATE (CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY EXECUTIVE COMMITTEE)

Corrine Brown

ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 1 of 4 Pages

Corrine Brown lor District #7 Senate

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 1/29/92	Meltonia May 4255 Camelia Cir. E Jax. Fl 32209		25.00		
2. 1/29/92	Physicians Protective 2121 Ponce de Leon Blvd #350 Coral Gables, Fl		500.00		
3. 1/04/92	Corrine Brown 33 South Hogan St. #250 Jax. Fl 32204	legislator		129.00	luncheon
4. 1/29/92	James Bailey 307 Pablo Rd. 32082 Ponte Vedra Beach	✓	200.00		
5. 3/2/92	bernard Gregory 8430 Sophist Cir. E Jax. Fl 32219		50.00		
6. 3/9/92	Rogers,Towers,Bailey,etc. P.A 1301 Gulf Life Dr. Suite 1500 Jax. Fl 32207	attorney	500.00		
7. 3/16/92	James A. Reiman, M.D 820 Prudential Dr. Ste.#606 Jax. Fl 32207		100.00		
8. 3/16	Peter Gloersen, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
9. 3/16	David Ogburn, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
10. 3/16	Anesthesiology PAC 6501 25th Way S.,Ste. #D St. Petersburg, Fl 33712	PAC	250.00		
11. 3/16	William Boggs, Jr. M.D 2150 Riverside Ave. Jax. Fl 32204		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-19

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ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 2 of 4 Pages

Corrine Brown for Senate District # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/16/92	Greg Bachman, M.D 820 Prudential Dr. Ste. #606 Jax. Fl 32207		100.00		
2. 3/16/92	Stephen Tunstill 5212 Ortega Oaks Lane Jax. Fl 32210		100.00		
3. 3/16	William Barton, M.D 820 Prudential Sr. Jax. Fl 32207		100.00		
4. 3/16	Sharon Phillips, M.D 505 Lancaster Street Jax. Fl 32204		100.00		
5. 3/16	Jerry Dorsch, M.D 2517 Holly Point East Orange Park, Fl 32073		100.00		
6. 3/16	James Beeson, M.D 3250 Beach Blvd. Jax. Fl 32207		100.00		
7. 3/16	John C. Kruse, M.D 820 Prudential Sr. Ste.#606 Jax. Fl 32207		100.00		
8. 3/16	Mark Phillips, M.D 505 Lancaster Street Jax. Fl 32204		100.00		
9. 3/16	Mark Kramp, M.D 820 Prudential Dr. Ste.#606 Jax. Fl 32207		100.00		
10. 3/16	Catherine Atkinson 3075 Hendricks Ave. Jax. Fl. 32207		10.00		
11. 3/16	Mary Crumley 1478 McConihe St. Jax. Fl 32209		1.00		

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DS-DE-13
DE2E006010-89

ITEMIZED CONTRIBUTIONS

Report Covering Period of January 1, 1992 through March 31, 1992 Page 3 of 4 Pages

Corrine Brown for Senate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/16	Bernice Beamon P.O. Box 43624 Jax. Fl 32203-3624		5.00		
2. 3/16/92	Susye Pierce 2501 Doby Street Jax. Fl. 32209		5.00		
3. 3/16	Robert Keegan 8006 Catawba Dr. Jax. Fl 32217		10.00		
4. 3/16	Thomas Ian Robertson 1414 Felch Ave. Jax. Fl 32207		20.00		
5. 3/16	Dr. Harold Hinte.,Sr. 1070 Ellis Rd. S Jax. Fl 32205		26.00		
6. 3/24/92	Peter Caribaltes 1508 Glengarry Rd. Jax. Fl 32207		25.00		
7. 3/24	Martha Wells 6444 Aolandra Dr. S Jax. Fl 32210		5.00		
8. 3/24	Sandra Bond 8106 Summit Ridge Ln. Jax. Fl 32256-7149	✓	500.00		
9. 3/24	Geo S. Beckham 1485 Glendale Rd. Jax. Fl 32216		20.00		
10. 3/24	Virginia West 10413 Loyola Dr. Jax. Fl 32218		25.00		
11. 3/24	Mrs. G.B. Soloman 2013 Rowe Ave. Jax. Fl 32208		10.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
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ITEMIZED CONTRIBUTIONS

Report Covering Period of Jan. 1, 1992 through March 31, 1992 Page 4 of 4 Pages

Corrine Brown for Senate # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 3/24	Mrs. Marie McClaIN 5025 Lincoln Cir. N Jax. Fl 32209		5.00		
2. 3 3/26/92	James Chapman, M.D 2150 Riverside Ave. Jax. Fl 32204		100.00		
3.					
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DS-DE-13
DE2E005010-89

9/0435405577

ITEMIZED EXPENDITURES

Report Covering Period of January 1, 1992 through March 31, 1992 Page 1 of 2 Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. Jan.6,92	FCCJ foundation Downtown Campus Jax. Fl. 32204	Minority Schol. Banquet	$ 50.00
2. Jan.6	Shelanda Shaw 33 S. Hogan St. #250 Jax. Fl. 32204	Printing and Supplies	60.00
3. Jan.13	Chamber of Commerce 3 E. Independent Dr. Jax. Fl. 32202	M.L. King banquet	100.00
4. Jan. 13	Postmaster General General Mailing Center Jax.Fl 32209	Postage	40.00
5. Jan. 23	Mary SingletonMem.Found. 150 E. 1st Street Jax. Fl. 32206	Banquet	100.00
6. Jan. 23	Gloria Simmons 3416 Nancy St Jacksonville, Fl	Bookkeeping	80.00
7. Jan. 23	Elias Simmons Aubrey Lane Jacksonville, FL. 32209	postage/ mailing	29.00
8. Feb. 4	Mattie Simmons 6924 Rhode Island Dr. e Jax. Fl 32209	Catering reception	285.00
9. Feb.7	Pioneer Paper&Plastics 5201 Kings Rd. Jax. Fl 32236	PAPER GOODS for reception	100.00
10. Feb. 8	St. Paul AME Church 6910 New Kings Rd. Jax. Fl. 32208	rental of hall for reception	160.00
11. Feb. 8	Sean Washington 6910 Kings Rd. Jax. Fl 32208	hall clean-up reception	25.00
12. Feb. 8	Abraham Simmons 6924 Rhode Island Dr. E Jax. Fl 32209	reception hall eqip. set-up	40.00

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ITEMIZED EXPENDITURES

Report Covering Period of Jan.1,1992 through Mar. 31,1992 Page 2 of ____ Pages

Corrine Brown for Senate Dist. # 7

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. Feb. 8	Eckerd Drugs Norwood Plaza Jax. FL 32206	film for reception	$ 25.00
2. Feb. 10	Johnny Robinson 2920 Van Gundy Rd. Jax. Fl 32208	reception equip. set-up	40.00
3. FFeb.27	Stephen Beasley 630 Brevard St. Tallahassee, Fl 32304	photographs	310.00
4. Mar. 2	Gloria Simmons 3416 Nancy St. Jax. Fl 32209	bookkeeping	80.00
5. Mar. 10	Dickinson & Broawer 213 Lake Ella Dr. Tallahassee, Fl 32303	photographs	270.18
6. Mar. 11	Petty Cash		30.00
7. Mar. 15	Ribault Sr. High 3701 Winton Dr. Jax. Fl 32208	banquet	15.00
8. Mar. 17	Homebound Advisory Council 150 E. First St. Jax. Fl 32206	banquet	15.00
9. Mar. 17	Special Events Advisory 818 W. 17th St. Jax. Fl 32209	banquet	10.00
10. Mar.18	Mt. Calvary Bapt. Church 301 Spruce St. Jax. Fl 32202	banquet	100.00
11. Mar. 24	Postmaster General General Mailing Ctr. Jax. Fl 32209	postage	29.00
12.			

DS-DE-14
DE2L007010-89

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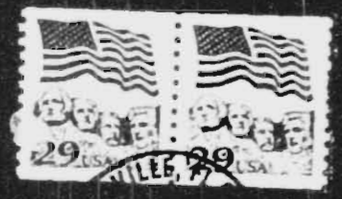
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CAMPAIGN TREASURER'S REPORT

POSTMARK DATE	
OFFICE USE ONLY	
IDENTIFICATION NUMBER	

1. Representative Corrine Brown

Full Name of Candidate ☐ Political Committee ☒ Committee of Continuous Existence ☐ Party Executive Committee ☐

~~District # 17 House~~ Senate 7

Office Sought (include District, Circuit and Group Number)

33 S. Hogan Street Suite 250

Address (Number & Street)

Jacksonville, FL 32202

City, State & Zip Code

☐ Check here if Address is Different than previously reported
☐ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports

2. Type of Report (Check Appropriate Box)

a. QUARTERLY REPORTS
☐ January 10 ☐ July 10
☐ April 10 ☐ October 10

REPORTS AFTER QUALIFYING PERIOD

☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Termination Report (90 Day Report for Candidates Only)
☐ Special Election

b. Is this report an amendment ☐ Yes ☐ No

SUMMARY

3. Covering Period of April 30, 1991 through June 30,1991

4. Balance in Account at End of Year
$ 0000
(For Political Committees and Committees of Continuous Existence Only)

5. CONTRIBUTIONS	Column A "Monetary"	Column B "Loans"	Column C "In-Kind"
a. Contribution Total Brought Forward From Previous Report, If Any	$ -0-	$ -0-	$ -0-
b. Contributions This Report Monetary	$4285.00		
c. Contributions This Report Loans		$ -0-	
d. Contributions This Report In-Kind			$-0-
e. Total Contributions To Date	Add Lines a & b	Add Lines a & c	Add Lines a & d
	4285.00	-0-	-0-

Grand Total for Contributions (Monetary & Loans) Add Columns A & B (Line e) $ 4285.00

6. Expenditures	
a. Expenditure Total Brought Forward From Previous Report, If Any.	$ -0-
b. Expenditures This Report	$ 789.50
c. Total Expenditures Add Lines a & b	$ 789.50

7. Money Currently in Interest Bearing Account or Certificate of Deposit $ -0-

8. Campaign Depository or Bank Account Number

9. Total amount of proceeds from each campaign fundraiser 4285.00

RECEIVED DEPARTMENT OF STATE 1991 JUL 10 AM 10:06 TALLAHASSEE, FLORIDA

VERIFICATION (THIS PART MUST BE DULY EXECUTED BEFORE FILING WILL BE COMPLETE)

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.

Gloria Simmons
TYPE OR PRINT NAME OF TREASURER

Gloria Simmons
SIGNATURE

SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 9th DAY OF July 1991

Sandra L. Brunell
NOTARY

My commission expires

Notary Public, State of Florida

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.

Corrine Brown
TYPE OR PRINT NAME OF CANDIDATE OR CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY

Corrine Brown
SIGNATURE

SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 9th DAY OF July 1991

Sandra L. Brunell
NOTARY

My commission expires

Notary Public, State of Florida

DSDE-12

792 ~~8374~~

CAMPAIGN TREASURER'S REPORT

POSTMARK DATE	
OFFICE USE ONLY	
IDENTIFICATION NUMBER	

1. Representative Corrine Brown
Full Name of Candidate ☐ Political Committee ☒ Committee of Continuous Existence ☐ Party Executive Committee ☐

~~District # 17 House~~ Senate 7
Office Sought (Include District, Circuit and Group Number)

33 S. Hogan Street Suite 250
Address (Number & Street)

Jacksonville, FL 32202
City, State & Zip Code

☐Check here if Address is Different than previously reported
☐Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports

2. Type of Report (Check Appropriate Box)
a. QUARTERLY REPORTS
☐January 10 ☐July 10
☐April 10 ☐October 10

REPORTS AFTER QUALIFYING PERIOD

☐32nd day preceding First Primary
☐18th day preceding First Primary
☐ 4th day preceding First Primary
☐18th day preceding Second Primary
☐4th day preceding Second Primary
☐18th day preceding General Election
☐ 4th day preceding General Election
☐Termination Report (60 Day Report for Candidates Only)
☐Special Election
b. Is this report an amendment ☐Yes ☐No

SUMMARY

3. Covering Period of April 30, 1991 through June 30,1991

4. Balance in Account at End of Year
$ 0000
(For Political Committee and Committee of Continuous Existence Only)

5. CONTRIBUTIONS	Column A "Monetary"	Column B "Loans"	Column C "In-Kind"
a. Contribution Total Brought Forward From Previous Report, If Any	$ -0-	$ -0-	$ -0-
b. Contributions This Report Monetary	$4285.00		
c. Contributions This Report Loans		$ -0-	
d. Contributions This Report In-Kind			$-0-
e. Total Contributions To Date	Add Lines a & b	Add Lines a & c	Add Lines a & d
	4285.00	-0-	-0-

Grand Total for Contributions (Monetary & Loans) Add Columns A & B (Line e) $ 4285.00

6. Expenditures	
a. Expenditure Total Brought Forward From Previous Report, If Any.	$ -0-
b. Expenditures This Report	$ 789.50
c. Total Expenditures Add Lines a & b	$ 789.50

7. Money Currently in Interest Bearing Account or Certificate of Deposit $ -0-
8. Campaign Depository or Bank Account Number
9. Total amount of proceeds from each campaign fundraiser 4285.00

RECEIVED DEPARTMENT OF STATE 1991 JUL 10 AM 10:06 TALLAHASSEE, FLORIDA

VERIFICATION (THIS PART MUST BE DULY EXECUTED BEFORE FILING WILL BE COMPLETE)

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Gloria Simmons
TYPE OR PRINT NAME OF TREASURER
Gloria Simmons
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 9th DAY OF July 1991
Sandra L. Brunell
NOTARY
My commission expires
Notary Public, State of Florida

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.
Corrine Brown
TYPE OR PRINT NAME OF CANDIDATE OR CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY
Corrine Brown
SIGNATURE
SUBSCRIBED AND SWORN TO (AFFIRMED) BEFORE ME THIS 9th DAY OF July 1991
Sandra L. Brunell
NOTARY
My commission expires
Notary Public, State of Florida

DS-DE-12
DE2E000010-00

ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30 through June 30, 1991 Page 1 of _____ Pages

State Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 6/18/91	Mrs. Frank Airth 2036 Retaw St. Jax. Fl 32210		15.00		
2. 6/19/91	Mr . B.J Walker 3930 Alhambra Dr. W Jax. Fl 32207	BANKER	150.00		
3. 6/19/91	1st Union Corp. of Florida 200 W. Forsyth St. Jax., Fl 32202	Employees Of Comm. of Cont. Exist.	300.00		
4. 6/20/91	William Falck 653 W. 8th Bldg. 1 Suite 4060 Jax, FL 32209	attorney	500.00		
5. 6/20/91	~~AVHF Service Corp., Inc.~~ suite 808, Barnett Bank Tallahassee, Fl 32301	Corp.	500.00		
6. 6/20/91	Gerold L. Schiebler, M.D 2115 NW 15th Ave. Jax, Fl 32605	doctor	150.00		
7. 6/20/91	~~Duval Teachers Tiger Cope Fund~~ 1035 La Salle St. Jax, Fl 32207		25.00		
8. 6/20/91	~~W.A McGriff III~~ P.O. Box 56350 Jax, Fl. 32241-6350		100.00		
9. 6/20/91	Azzie L. Childs 8040 Concord Boulevard, W Jax, Fl 32208		100.00		
10. 6/20/91	Lloriel Bryam 2330 Park St. Jax, Fl 32204		100.00		
11. 6/20/91	Dr. Thomas Klechak 7249 Trails End Jax, Fl 32211		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E000010-89

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ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30, 1991 through June 30, 1991 Page 2 of _____ Pages

State Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 6/20/91	Dr. Paul Wharton 2356 Jose Circle, North Jax. Fl 32217		100.00		
2. 6/20/91	Stephen A. Zaricki 8118 Baymeadows Cir. E Jax. Fl 32256		25.00		
3. 6/20/91	Alice M. Lake 6026 Bagley Rd. Jax, Fl 32209		25.00		
4. 6/20/91	Francis Millett, Jr. 1104 Ivanhoe Tallahassee, Fl 32312		100.00		
5. 6/20/91	Dr. Harold Hinte, SR. 1070 Ellis Rd. S Jax, Fl 32205		50.00		
6. 6/20/91	Edythe A. Taylor 1060 W. Durkee DR. Jax, Fl 32209-5621		25.00		
7. 6/20/91	Robert Alexander 4471 Harbour N. Ct. Jax. Fl 32225		25.00		
8. 6/20/91	Leonette Bostick 5339 Morgan Horse Dr. Jax, Fl 31157		30.00		
9. 6/20/91	Camilla Thompson 1443 W. 21, Street Jax. Fl 32209		25.00		
10. 6/20/91	E.A Welch P.O. Box 11066 Jax, Fl 32239		25.00		
11. 6/20/91	Lisa Wiley RT. 1 Box 145A Raiford, Fl 32083		50.00		

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DS-DE-13
DE2E008010-92

9 7 0 4 3 8 4 0 5 8 4

ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30, 1991 through June 30, 1991 Page 3 of 3 Pages

Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 6/20/91	Dr Herschel Douglas 505 Lancaster St. Jax, Fl 32204		50.00		
2. 6/20/91	Hattie Simmons 6924 Rhode Island DR. E Jax, Fl 32209		15.00		
3. 6/20/91	Charlotte Stewart 1369 W. 11th St Jax, Fl 32209		25.00		
4. 6/20/91	H. Martin Northup 414 N. Oceanwalk Dr. Atlantic Beach, Fl 32233		100.00		
5. 6/20/91	John F. Gregg 6335 Christopher Creek Rd. E Jacksonville, Fl 32217	Hospital Administrator	500.00		
6. 6/20/91	Alma Epps 8551 Andaloma Street Jax, Fl 32211		25.00		
7. 6/20/91	Clovia Russell 3329 Peeler Rd. Jax. Fl 32211		50.00		
8. 6/25/91	Prof. Fire Fighters of Fla. 345 W. Madison St. Tallahassee, Fl 32301	fire fighters	500.00		
9. 6/17/91	William Bond 4500 Baymeadows Jax, Fl 32256	Banker	500.00		
10.					
11.					

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

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ITEMIZED EXPENDITURES

Report Covering Period of April 1, 1991 through June 30, 1991 Page 1 of 1 Pages

Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 6/14/91	Postmaster General General Mailing Center Jacksonville, Fl 32204	Postage	203.00
2. 6/14/91	AmeriPress 19 S. Hogan Jax. Fl 32202	printing	50.00
3. 6/20/91	T-Birds Jax. Landing Jax. Fl 32202	Reception Fund Raiser	339.50
4. 6/14/91	Supervisor of Elections 105 E. Monroe St Jax. Fl. 32202	Labels	162.00
5. 6/26/91	Gloria Simmons 3416 Nancy St. Jax. Fl. 32209	Thank-you notes	35.00
6.			
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9704384005506

DS-DE-14

RECIPIENT 9 7 0 4 3

The sender has requested notification upon delivery. Immediately upon receipt, please telephone:

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Tel. No.: ( ) _____

EXPRESS MAIL

UNITED STATES POSTAL SERVICE

POST OFFICE TO ADDRESSEE

EXPRESS MAIL NEXT DAY SERVICE

FD455156944US

For Postal Use

ORIGIN	Date M D Y	Postage $
Post Office ZIP Code	Time In A.M. P.M.	Return Receipt $
Initials of Receiving Clerk	Weight lbs. oz.	C.O.D. $
ACCEPTANCE	International Delivery Code	
☐ Next Day Delivery or ☐ Second Day Delivery		Total Postage & Fees $
☐ By 12 Noon or ☑ By 3:00 P.M.		
☐ Military Next Day or ☐ Military Next Day		
Express Mail Corporate Account No.	Federal Agency Account No.	

For Postal Use

DESTINATION	Date of Delivery M D Y	Time of Delivery A.M. P.M.
X Signature of Addressee or Agent		
DELIVERY WAS ATTEMPTED	Date M D Y	Time A.M. P.M.
Signature of Delivery Employee 1.	2.	
Waiver of Signature and Indemnity (Domestic Only)	I wish delivery to be made without obtaining the signature of the addressee or the addressee's agent (if in the judgment of the delivery employee the article can be left in a secure location) and I authorize the delivery employee to sign that the shipment was delivered and understand that the signature of the delivery employee and receipt date shall be proof of delivery. SIGNATURE	

ADDRESSEE'S COPY

For Customer Use

FROM:

TO: Telephone Number: _____

FOR AVAILABILITY AND COST OF DELIVERY RETURN RECEIPT SERVICE CAN BE PURCHASED AT YOUR EXPRESS MAIL OFFICE

EP 13A SEPTEMBER 1990

ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30 through June 30, 1991 Page 1 of _____ Pages

State Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 6/18/91	Mrs. Frank Airth 2036 Retaw St. Jax. Fl 32210		15.00		
2. 6/19/91	Mr . B.J Walker 3930 Alhambra Dr. W Jax. Fl 32207	BANKER	150.00		
3. 6/19/91	Ist Union Corp. of Florida 200 W. Forsyth St. Jax., Fl 32202	Employees Of Comm. of Cont. Exist.	300.00		
4. 6/20/91	William Falck 653 W. 8th Bldg. 1 Suite 4060 Jax, FL 32209	attorney	500.00		
5. 6/20/91	AVHF Service Corp., Inc. suite 808, Barnett Bank Tallahassee, Fl 32301	Corp.	500.00		
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7. 6/20/91	Duval Teachers Tiger Cope Fund 1035 La Salle St. Jax, Fl 32207		25.00		
8. 6/20/91	W.A McGriff III P.O. Box 56350 Jax, Fl. 32241-6350		100.00		
9. 6/20/91	Azzie L. Childs 8040 Concord Boulevard, W Jax, Fl 32208		100.00		
10. 6/20/91	Lionel Bryan 2330 Park St. Jax, Fl 32204		100.00		
11. 6/20/91	Dr. Thomas Klechak 7249 Trails End Jax, Fl 32211		100.00		

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E006010-89

9/0434 5 8 8

ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30, 1991 through June 30, 1991 Page 2 of _____ Pages

State Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

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5. 6/20/91	Dr. Harold Hinte, SR. 1070 Ellis Rd. S Jax, Fl 32205		50.00		
6. 6/20/91	Edythe A. Taylor 1060 W. Durkee DR. Jax, Fl 32209-5621		25.00		
7. 6/20/91	Robert Alexander 4471 Harbour N. Ct. Jax. Fl 32225		25.00		
8. 6/20/91	Cedonette Bostick 5339 Morgan Horse Br. Jax, Fl 31157		30.00		
9. 6/20/91	Camilla Thompson 1443 W. 21, Street Jax. Fl 32209		25.00		
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11. 6/20/91	Lisa Wiley RT. 1 Box 145A Raiford, Fl 32083		50.00		

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DS-DE-13
DE2E006010-89

9/0404 0587

ITEMIZED CONTRIBUTIONS

Report Covering Period of April 30, 1991 through June 30, 1991 Page 3 of 3 Pages

Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation if over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
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4. 6/20/91	H. Martin Northup 414 N. Oceanwalk Dr. Atlantic Beach, Fl 32233		100.00		
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6. 6/20/91	Alma Epps 8551 Andaloma Street Jax, Fl 32211		25.00		
7. 6/20/91	Clovia Russell 3329 Peeler Rd. Jax. Fl 32211		50.00		
8. 6/25/91	Prof. Fire Fighters of Fla. 345 W. Madison St. Tallahassee, Fl 32301	fire fighters	500.00		
9. 6/17/91	William Bond 4500 Baymeadows Jax, Fl 32256	Banker	500.00		
10.					
11.					

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
LE-2E.006010-Rv

ITEMIZED EXPENDITURES

Report Covering Period of April 1, 1991 through June 30, 1991 Page 1 of 1 Pages

Representative Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account

Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 6/14/91	Postmaster General General Mailing Center Jacksonville, Fl 32204	Postage	203.00
2. 6/14/91	AmeriPress 19 S. Hogan Jax. Fl 32202	printing	50.00
3. 6/20/91	T-Birds Jax. Landing Jax. Fl 32202	Reception Fund Raiser	339.50
4. 6/14/91	Supervisor of Elections 105 E. Monroe St Jax. Fl. 32202	Labels	162.00
5. 6/26/91	Gloria Simmons 3416 Nancy St. Jax. Fl. 32209	Thank-you notes	35.00
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DS-DE-14
DE/E007010-C9

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RECIPIENT 9 7 0 4 3

The sender has requested notification upon delivery. Immediately upon receipt, please telephone:

Name: _____

Tel. No.: ( ) _____

EXPRESS MAIL

UNITED STATES POSTAL SERVICE

POST OFFICE TO ADDRESSEE

EXPRESS MAIL NEXT DAY SERVICE

FB455136744US

For Postal Use

ORIGIN		
Post Office ZIP Code	Date In: M D Y	Postage $
Initials of Receiving Clerk	Time In: A.M. P.M.	Return Receipt $
	Weight: lbs. oz.	C.O.D. $
ACCEPTANCE	International Country Code	
☒ Next Day Delivery or ☐ Second Day Delivery		
☐ By 12 Noon or ☒ By 3:00 P.M.		Total Postage & Fees $
☐ Military 2nd Day or ☐ Military 3rd Day		

Express Mail Corporate Account No.:

Federal Agency Account No.:

For Customer Use

FROM:

DESTINATION	Date of Delivery: M D Y	Time of Delivery: A.M. P.M.
X Signature of Addressee or Agent		
DELIVERY WAS ATTEMPTED	Date M D Y	Time A.M. P.M.
Signature of Delivery Employee 1.	2.	
Waiver of Signature and Indemnity (Domestic Only)	I wish delivery to be made without obtaining the signature of the addressee or the addressee's agent if, in the judgment of the delivery employee, this action will be in my interest and I authorize the delivery employee to sign that my shipment was delivered and acknowledge full liability for the delivery employee's signature. Initials	

ADDRESSEE'S COPY

TO:

Telephone Number: _____

SERVICE CAN BE PURCHASED AT YOUR EXPRESS MAIL OFFICE

Campaign Treasurer's Report

(Please Type)

Identification Number: 792

792

rown, Corrine

(Candidate's name by Last Name, First Name, Middle Initial or Name of Political Committee, Committee of Continuous Existence, or Party Name)

Senate, District # 7

Office Sought (Include District, Circuit And Group Number) (Candidates Only)

33 South Hogan Street Suite # 250

Address (Number And Street)

Jacksonville, Fl 32202

City, State And Zip Code

☒ Candidate ☐ Committee of Continuous Existence

☐ Political Committee ☐ Party Executive Committee

☐ Check here if address is different than previously reported.

☒ Check here if the Political Committee or Committee of Continuous Existence has disbanded as of this report and will no longer file reports.

Campaign depository or bank account number:

II. Type of Report (Check Appropriate Box)

☐ January 10 ☐ April 10 ☒ July 10 ☐ October 10

☐ 32nd day preceding First Primary
☐ 18th day preceding First Primary
☐ 4th day preceding First Primary
☐ 18th day preceding Second Primary
☐ 4th day preceding Second Primary
☐ 18th day preceding General Election
☐ 4th day preceding General Election
☐ Special Election
☒ Termination Report (Candidates only)
☐ This Report Is An Amendment.

II. Covering Period of April 1, 1992 through June 30, 1992

IV. CONTRIBUTIONS	Column 1 Cash & Checks	Column 2 Loans	Column 3 Total Monetary (Columns 1 + 2)	Column 4 In-Kind
A. Contributions Brought Forward From Previous Report, If Any	22,222.00	-0-	22,222.00	129.00
B. Contributions This Report	1,100.00	0	1,100.00	-0-
C. Total Contributions (Add Lines A & B)	23,322.00	0	23,322.00	129.00

V. EXPENDITURES

A. Expenditures Brought Forward From Previous Report, If Any	5492.12	-0-
B. Expenditures This Report (Excluding Transfers to Office Account)	17,829.88	-0-
C. Transfers to Office Account (Candidates Only)	-0-	-0-
D. Total Expenditures (Add Lines A, B & C)	23,322.00	-0-

ORIGINAL

VI. BALANCE

A. Balance In Account at End of Prior Year (For Political Committees, Committees of Continuous Existence and Party Executive Committees Only)	
B. Total Monetary Contributions (from line C, Column 3 above)	23,322.00
C. Total Expenditures (from line D, Column 3 above)	23,322.00
D. ACCOUNT BALANCE (Line A + Line B - Line C)	-0-

VII. Amount of 1.5 percent assessment remitted with this report: (For Political Committees, Committees of Continuous Existence and Party Executive Committees Only)

CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.

Gloria Simmons

TYPE OR PRINT NAME OF TREASURER

Gloria Simmons

SIGNATURE

I CERTIFY THAT I HAVE EXAMINED THIS REPORT AND IT IS TRUE, CORRECT AND COMPLETE.

Corrine Brown

TYPE OR PRINT NAME OF CANDIDATE (CHAIRMAN FOR POLITICAL COMMITTEE OR PARTY EXECUTIVE COMMITTEE)

Corrine Brown

SIGNATURE

DE-12 (9/91)

CONTRIBUTIONS

Report Covering Period of April 1, [redacted]2 through June 30, 1992 P[redacted] 1 of _____ Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Transfer of Funds from Interest Bearing Account or Certificate of Deposit to Campaign Account (Interest Not Included)			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Occupation If over $100	Monetary — Including Interest Earned	In-Kind	Description Of In-Kind
1. 4/28/92	Health Care Leadership PAC 215 S. Monroe St. Ste. 305 ~~Tallahassee, Fl~~ 32301	PAC	500.00		
2. 4/28/92	Fla. Hospital League 1st Fla. Bank Bldg. Ste. #305 Tallahassee, Fl 32301	PAC	500.00		
3. 4/24/92	Emma Morgan 2014 Durkee Dr. Jax. Fl 32209		100.00		
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					

9704530405594

NOTE: COMMITTEES OF CONTINUOUS EXISTENCE ONLY — ANY CONTRIBUTIONS WHICH REPRESENT THE PAYMENT OF DUES BY A MEMBER IN A FIXED AMOUNT PURSUANT TO THE SCHEDULE ON FILE WITH THE DIVISION OF ELECTIONS NEED ONLY LIST THE AGGREGATE AMOUNT OF SUCH CONTRIBUTIONS, TOGETHER WITH THE NUMBER OF MEMBERS PAYING SUCH DUES AND THE AMOUNT OF MEMBERSHIP DUES.

DS-DE-13
DE2E008010-80

ITEMIZED EXPENDITURES

Report Covering Period of April 1, 1992 through June 30, 1992 Page 1 of 3 Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $_____

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 4/1/92	Vision Printing 8919 Lem Turner Jacksonville, Fl 32208	Printing	441.98
2. 4/1/92	Mary Adams 438 Ravine Street Jax. Fl 32206	campaign worker	330.00
3. 4/1/92	Gloria Simmons 3416 Nancy Street jax. Fl. 32209	bookeeping & campaign work	400.00
4. 4/13/92	AmeriPress 19 South Hogan St. Jax. Fl 32202	Printing	10.31
5. 4/13/92	First Union Bank Sprungfield Branch Jax. Fl 32231	service charge	12.58
6. 4/14/92	EAR ENTERPRISES, INC. 2000 JABCO COURT BLDG. C LITHONIA, GEORGIA 30058	campaign paraphanalia(fans, hats& shirts)	2617.00
7. 5/6/92	Shriners Circus 3800 S. St. Johns Bluff Jax. Fl 32216	tickets	24.00
8. 5/6/92	Vision Printing 8919 Lem Turner Rd. Jax. Fl 32208	Printing	228.98
9. 5/12/92	Farah's of Downtown 33 South Hogan Street Jax. Fl 32202	breakfast reception	266.25
10. 5/12/92	First Union Bank Springfield Branch Jax. Fl 32231	service charge	6.54
11. 5/12/92	Shelanda Shaw 33 S. Hogan St. #250 Jax. Fl. 32202	reimbursement business luncheon	25.00
12. 5/12/92	Vision Printing 8919 Lem Turner Jax. Fl 32208	printing	376.53

DS-DE-14
DE2E007010-89

ITEMIZED EXPENDITURES

Report Covering Period of April 1, 1992 through June 30, 1992 Page 2 of 3 Pages

Corrine Brown
Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 5/12/92	Ramada Inn Lakeland 3260 U.S North 98 Lakeland, Fl 33809	hotel accomodations	99.00
2. 5/13/92	Elias Simmons 2741Aubrey Lane Jax. Fl 32209	workshop traveling expenses reimbursements	175.00
3. 5/16/92	Farah's of Downtown 33 S. Hogan Street Jax. Fl 32202	reception	301.38
4. 5/13/92	EAR ENTERPRISES, INC. 2000 JABCO COURT BLDG. C LITHONIA, GEORGIA 30058	campaign para-phanelia balance	1300.00
5. 5/19/92	Gloria Simmons 3416 Nancy Street Jax. Fl 32209	bookkeeping / campaign workers	400.00
6. 5/19/92	Carter G. Woodson Comm, INc 4415 Moncrief Rd. Jax. Fl. 32209	advertising	50.00
7. 5/19/92	WJBT/WZAZ Radio Stations PO Box 5635 Jax. Fl 32207	advertising	100.00
8. 5/19/92	Central Metropolitan CME Church 4611 Pearl Street Jax. Fl 32206	banquet	50.00
9. 6/1/92	L.E.Hadden,INC. 8606 Burkhall St. Jax. Fl 32211	typewriter ribbon	19.17
10. 6/9/92	The Market Place, Inc. 6839 Ramona Blvd. Jax. Fl 32205	advertising	66.00
11. 4/30/92	First Union Bank Springfield Branch Jax. Fl 32231	service charge	12.58
12. 6/15/92	Postmaster General General Mailing Center Jax. Fl. 32202	postage	145.00

DS-DE-14

ITEMIZED EXPENDITURES

Report Covering Period of April 1, 1992 through June 30, 1992 Page 3 of 3 Pages

Corrine Brown

Name of Candidate, Political Committee or Committee of Continuous Existence

Total amount spent for Petty Cash purposes during the Reporting Period $ 30.00

Transfer of Funds to Interest Bearing Account or Certificate of Deposit from Campaign Account			
Name of Financial Institution	Nature of Account	Date of Transfer	Amount

Date	Full Name, Mailing Address and Zip Code	Purpose of Expenditure	Amount
1. 6/15/92	petty cash		30.00
2. 6/15/92	Data Movers 435 Clark Road Jax. Fl 32218	labels	2000.00
3. 6/15/92	Summit Paper & Supplies 3455 26th Ave South St. Petersburg, FL 33711	computer	5000.00
4. 6/16/92	Vision Printing 8919 Lem Turner Jax. Fl 32208	printing	645.00
5. 6/22/92	Office Depot 9355 Atlantic Blvd. Jacksonville, Fl 32211	office supplies	53.09
6. 6/30/92	First Union Bank Springfield Branch-Main Street Jacksonville, Fl 32231	service charge	8.67
7. 6/30/92	Transferred balance to U.S Congressional Account	new account	2626.00
8.			
9.			
10.			
11.			
12.			

DS-DE-14
DE2E007010-89

9/0408409591

RECIPIENT
The sender has requested notification upon delivery
Immediately upon receipt, please telephone:

Name: _____

Tel. No.: ( ) _____

EXPRESS MAIL

UNITED STATES POSTAL SERVICE

POST OFFICE TO ADDRESSEE

EXPRESS MAIL
NEXT DAY SERVICE

HB880993277 L

For Postal Use

ORIGIN		
Post Office ZIP Code	Date In 7/10/92	Postage
Initials of Receiving Clerk	Time AM PM	Return Receipt $
	Weight lbs. oz.	C.O.D. $
ACCEPTANCE	Hemisphere Country Code	
Next Day Delivery or	Second Day Delivery	
By 12 Noon or	By 3:00 PM	Total Postage & Fees $ 9.95
Military 2nd Day or	Military 3rd Day	

Express Mail Corporate Account No.

Federal Agency Account No.

For Customer Use

FROM:

For Postal Use

DESTINATION	Date of Delivery 7/10/92	Time of Delivery 7:05 AM PM
X Signature of Addressee or Agent		
DELIVERY WAS ATTEMPTED	Date 07/10/92	Time 0205 AM PM
Signature of Delivery Employee 1.	2.	

Waiver of Signature and Indemnity (Domestic Only)

I wish delivery to be made without obtaining the signature of the addressee or the addressee's agent if, in the judgment of the delivery employee, the article can be left in a secure location; and I authorize the delivery employee to sign that the shipment was delivered and understand that the signature of the delivery employee will constitute valid proof of delivery.

SIGNED: _____

ADDRESSEE'S COPY

For Customer Use

TO:

Telephone Number: _____

23

FOR A WRITTEN RECORD OF DELIVERY, RETURN RECEIPT

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

SEP 6 3 48 PM '96

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)		
	)		
Friends of Corrine Brown	)	MUR 4160	**SENSITIVE**
and Gloria Simmons, as treasurer	)		
Corrine Brown	)		

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 6, 1996, the Commission found reason to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer ("Committee"), violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 433(h)(1), 434(b)(5)(A), and 434(a)(6)(A). The Commission also found reason to believe that Corrine Brown violated 2 U.S.C. §§ 441a(f) and 441g. The 2 U.S.C. § 441a(f) findings against both the Committee and Corrine Brown were related to a series of candidate loans which appeared to be made from money other that the candidate's personal funds. The Commission issued two subpoenas for bank documents related to the candidate loans and authorized this Office to depose Corrine Brown, if necessary, after a review of the documents. On July 29, 1996, counsel for the respondents responded to the reason to believe findings. Attachment 1. The response consisted merely of a request for pre-probable cause conciliation; there was no substantive response to the Commission's reason to believe findings.[1]

II. ANALYSIS

The Office of General Counsel recommends the Commission decline, at this time, to enter into conciliation prior to a finding of probable cause to believe. This Office is currently

[1] Respondents had been granted a 20-day extension of time to submit a response to the reason to believe findings.

9 7 0 4 3 0 4 0 5 9 9

conducting an investigation to determine the facts in this matter. At this time, we are analyzing the subpoenaed bank documents and are awaiting supplemental responses. A preliminary assessment of the subpoena responses indicates that the bank documents will not fully establish the nature of the funds used by Corrine Brown to make the loans to the Committee. Moreover, respondents have not offered any response to the findings that would clarify the facts in this matter. Therefore, entering into pre-probable cause conciliation at this time would be premature. After the investigation is completed, the Office of General Counsel will report to the Commission with appropriate recommendations.

III. RECOMMENDATIONS

1. Decline, at this time, to enter into conciliation with Friends of Corrine Brown and Gloria Simmons, as treasurer, and Corrine Brown prior to a finding of probable cause to believe.

2. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

9/6/96
Date

BY: Kim Bright-Coleman
Kim Bright-Coleman
Associate General Counsel

Attachments
1. Letter from B. Holly Schadler, dated July 29, 1996

Staff Assigned: Matthew I. Tanielian

9/0430160

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Corrine Brown	)	MUR 4160
and Gloria Simmons, as treasurer;	)	
Corrine Brown.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 12, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 4160:

1. Decline, at this time, to enter into conciliation with Friends of Corrine Brown and Gloria Simmons, as treasurer, and Corrine Brown prior to a finding of probable cause to believe.

2. Approve the appropriate letters, as recommended in the General Counsel's Report dated September 6, 1996.

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

Attest:

9-13-96
Date

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

Received in the Secretariat: Fri., Sept. 06, 1996 3:48 p.m.
Circulated to the Commission: Mon., Sept. 09, 1996 11:00 a.m.
Deadline for vote: Thurs., Sept. 12, 1996 4:00 p.m.

lrd

97043840601

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

B. Holly Schadler, Esquire
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

On June 6, 1996, the Federal Election Commission found reason to believe that Corrine Brown violated 2 U.S.C. §§ 441a(f) and 441g, and Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 433(h)(1), 434(b)(5)(A), and 434(a)(6)(A). On July 29, 1996, you submitted a request on behalf of both respondents to enter into conciliation negotiations prior to findings of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

9704384060 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 22, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Honorable Corrine Brown
United States House of Representatives
c/o B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Congresswoman Brown:

By letter dated June 17, 1996, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. §§ 441a(f) and 441g, provisions of the Federal Election Campaign Act of 1971, as amended.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena requiring you to appear and give sworn testimony on November 13, 1996. You may consult with an attorney and have an attorney present with you at the deposition.

Within two days of your receipt of this notification, please confirm the scheduled appearance with me at (202) 219-3690. Please contact me if you have any questions regarding this matter.

Sincerely,

Matthew J. Tanielian
Attorney

Enclosure
Subpoena

9704384060 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 4160
)
)

SUBPOENA

TO: Honorable Corrine Brown
United States House of Representatives
1610 Longworth House Office Building
Washington, D.C. 20515-0903

Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to appear for deposition with regard to MUR 4160. Notice is hereby given that the deposition is to be taken on November 13, 1996 in Room 651 at the Federal Election Commission, 999 E Street N.W. Washington, D.C. 20463, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand in Washington, D.C., on this 22nd day of October, 1996.

For the Commission,

Lee Ann Elliott

Lee Ann Elliott
Chairman

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

9704384060 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FAXED 11/1/96

November 1, 1996

VIA FACSIMILE
AND FIRST CLASS MAIL

B. Holly Schadler, Esquire
Perkins Coie
607 14th Street, N.W.
Washington, D.C 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

This letter is to confirm that the deposition of your client, Corrine Brown, will be taken on November 25, 1996 in Room 651 at the Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Taniclian
Attorney

9704384060 5

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 19 9 47 AM '96

Barnett Bank

Mail Code 576-615
9000 Southside Blvd.
Jacksonville, FL 32256
(904) 464-7988

November 18, 1996

Federal Election Commission
Attn: Matthew J. Tanielian
999 E Street, N.W.
Washington, D.C. 20463

MUR 4160

RE: Friends of Corrine Brown

Dear Mr. Tanielian:

In addition to my letter dated August 28, 1996 and our phone conversation, please find enclosed copies of official check numbers 01030393 and 01030334.

These documents are certified to be from records maintained by Barnett Bank during the regular course of business. Reimbursement is due within 30 days in the amount itemized below:

Statement Copies:	0 copies	@ 0.15	per copy	= $	0.00
Other Copies:	2 copies	@ 0.15	per copy	= $	0.30
Research Time:	1/2 hours	@ 10.00	per hour	= $	5.00
Postage:				$	0.00
TOTAL:				$	5.30

Please make your payment to Barnett Bank at the address listed above.

Sincerely,

Sarah Evans

Sarah Evans
Research Services

Barnett Bank

Official Check

CREDIT COPY

01030334

Date JULY 24, 1992

Affiliate Name BARNETT BANK OF JACKSONVILLE, N.A. 0A**

Office Name BARNETT CENTER**** By CORRINE BROWN***

Pay Exactly BARNETT BANK 3.0 00 CTS $ ****3,000.00*****

To The Order Of ****CORRINE BROWN FOR CONGRESS****

LOAN TO CAMPAIGN**

JC 217 CREDIT

9/0430460/

Barnett Bank

Official Check

CREDIT COPY

No. 01030393

Date JULY 31, 1992

Affiliate Name BARNETT BANK OF JACKSONVILLE, N.A.

Office Name BARNETT CENTER TELLER DEPT. Re (LOAN TO CAMPAIGN) CORRINE BROWN

NOTICE TO CUSTOMER

Pay Exactly BARNETT BANK $ 3,000.00***

T/C 217 CREDIT

To The Order Of CORRINE BROWN FOR CONGRESS***

Barnett Bank Services, Inc. Member of Barnett Banks of Florida, Inc.

Tran 00026 07-31-92 11143
Br. 001 Br. 001 Tlr. 036
Account 1030393
C.C $3000.00

9/0436460

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 27, 1996

VIA FACSIMILE
AND FIRST CLASS MAIL

B. Holly Schadler, Esquire
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

Pursuant to requests for documents agreed to during the course of the November 25, 1996 deposition of Corrine Brown, please submit the following by December 16, 1996:

1. Documentation of all loans Corrine Brown made to Springfield Travel Agency, Inc.;

2. Documentation of the sale of Springfield Travel Agency, Inc., including but not limited to documents which verify the date and amount of each deposit and/or payment, the total purchase price, the date of the sales agreement, the date of the transfer of the business operations, and the parties to the transaction.

If, in reviewing the deposition transcript, we identify additional documents which were requested during the course of the deposition, we will send you another letter regarding those documents. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

December 11, 1996

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
DEC 11 11 41 AM '96

By Facsimile

Matthew J. Tanielian, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

Re: MUR 4160

Dear Mr. Tanielian:

Pursuant to our telephone conversation, we are requesting an extension of time to produce the documents that you have requested in your letter dated November 27, 1996. In response to the request, we have begun retrieving these documents. Respondents have, however, found it necessary to contact third parties to get any documents that might be responsive. Therefore, the process is taking some time. Moreover, holiday schedules and Representative Brown's travel schedule will make it impossible to meet the December 16 deadline. Therefore, we are requesting an extension of time until Monday, January 6.

Sincerely,

B. Holly Schadler
Counsel to Respondents

97044384061C

[19411-0001/DA961040.043]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 13, 1996

VIA FACSIMILE
AND FIRST CLASS MAIL

B. Holly Schadler, Esquire
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

This is in response to your letter dated December 11, 1996, requesting an extension until January 6, 1997, to respond to this Office's request for documents relating to the November 25, 1996 deposition of Corrine Brown. 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 January 6, 1997.

If you have any questions, please contact me at (202) 219-3690.

Matthew J. Trudeau
Attorney

9704384061 1

PERKINS COIE
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

January 6, 1997

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JAN 6 5 28 PM '97

Hand Delivered

Matthew J. Tanielian, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

Re: MUR 4160

Dear Mr. Tanielian:

Enclosed you will find documents received by this firm from Congresswoman Brown and forwarded to you in response to your request dated November 27, 1996. If you have any questons, please do not hesitate to call me.

Sincerely,

B. Holly Schadler
Counsel to Respondents

97004360612

[15411-0001/DA961840.043]

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JAN 6 5 30 PM '97

BILL OF SALE OF BUSINESS

1. Springfield Travel Agency, Inc., is a full service travel agency, which provides travel related services, including travel information, planning, and assistance. All majority shares of stock are owned by Corrine Brown.

2. **Description of Property Sold.** KNOW ALL MEN BY THESE PRESENTS, that Springfield Travel Agency, Inc., doing business under the tradename of Springfield Travel, and located at 1671-B North Monroe Street, Tallahassee, Florida 32303, Corrine Brown (Seller) in consideration of $40,000.00 paid to me by Edward R. Scott, II, DMD and Melvin T. Stith, PhD, of 1100 East Tennessee Street, Suite 2A, Tallahassee, Florida 32308, (Buyer), receipt of which is acknowledged, have bargained and sold and by these presents sell and convey to Buyer all of the assets of the business conducted by me under the above trade name, which assets are more fully described in Schedule A attached to this instrument and made a part of it.

TO HAVE AND HOLD UNTO THE BUYER, his heirs, executors, administrators, and assigns forever.

3. **Covenant of Title and Covenant to Defend Title.** Seller covenants with Buyer that Seller is that lawful owner of the business and assets conveyed by this instrument, free from any encumbrance. Seller further covenants that she will warrant and defend the title to the business and assets against all adverse claims made by any person, firm, corporation, or association.

Further, Seller covenants to satisfy and to hold Buyers harmless for outstanding indebtedness or liabilities of the Springfield Travel Agency existing prior to the closing date of this agreement. Satisfaction for such indebtedness or liability shall be made within thirty (30) calendar days of closing of this agreement. Liabilities of the Agency shall include but shall not be limited to those items fully described in schedule B attached to this instrument and by reference made a part of it and any other obligations known or should be known to the Seller but not disclosed in writing to the Buyer.

4. **Date.** **IN WITNESS WHEREOF**, Seller has signed this and sealed this Agreement on this 20th day of October, 1992.

Signed, Sealed, and Delivered in the Presence of: Michael R. Moore, Notary

CORRINE BROWN, PRESIDENT
Springfield Travel Agency, Inc.
Seller

State of Florida
County of Leon

The foregoing instrument was acknowledged under oath before me this 20th day of October, 1992, by CORRINE BROWN, President, Springfield Travel Agency, Inc., a Florida Corporation, on behalf of the corporation. She is personally known to me or has produced as identification.

NOTARY PUBLIC, STATE OF FLORIDA
Notary Public, State of Florida
My Commission Expires Aug. 22, 1993
Bonded Thru Gen. Ins. Underwriters, Inc.

My Commission Expires:

EDWARD R. SCOTT II, DMD
PRESIDENT, Springfield Travel & Tours, Inc.

MELVIN T. STITH, PhD
SECRETARY/TREASURER,
Springfield Travel & Tours, Inc.
Buyer

State of Florida
County of Leon

The foregoing instrument was acknowledged under oath before me this 20th day of October, 1992, by EDWARD R. SCOTT, II, DMD, President and MELVIN T. STITH, PHD, Secretary/Treasurer, of Springfield Travel & Tours, Inc., a Florida Corporation, on behalf of the corporation. They are personally known to me or has produced _____ and _____ respectively, as identification.

NOTARY PUBLIC, STATE OF FLORIDA
Notary Public, State of Florida
My Commission Expires Aug. 22, 1993

My Commission Expires:

9704384006 15

SCHEDULE A

ASSETS OF THE TRAVEL AGENCY INCLUDE THE FOLLOWING:

Current client list and related information. All furniture and other furnishings at the Tallahassee Office, including the telephone system and equipment, the photocopier, books travel guides, travel magazines and related documents, office stationery, pens, and all related office support materials.

SCHEDULE B

LIABILITIES OF THE AGENCY INCLUDE THE FOLLOWING:

Bills for outstanding tickets, rental payments, as required by the current lease agreement, bills for telephone services and the World Span Computer used for the travel agency, outstanding salaries of employees, payroll taxes or assessments, outstanding utility bills, any and all service contracts.

Seller agrees to assume full responsibility for each of the above liabilities and hold Buyer entirely harmless. In consideration of this covenant to hold harmless, Buyer agrees to forego and waive any entitlement to any and all accounts receivables that are due and outstanding to the Seller prior to the date of closing of this agreement.

escoagr2.doc

9704384061 6

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
JAN 7 2 59 PM '97

January 7, 1997

Hand Delivered

Matthew J. Tanielian, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

Re: MUR 4160

Dear Mr. Tanielian:

Enclosed you will find additional documents that were provided by Congresswoman Corrine Brown in response to your letter dated November 27, 1996.

Due to scheduling difficulty these did not get included in our package sent over to you last night. These documents are provided in response to Item 1 of your letter. If you have any questions, please feel free to contact me.

Sincerely,

B. Holly Schadler
Counsel to Respondents

Enclosures

[19411-0001/DA970070.025]

97004306017

9 7 0 4 3 8 4 0 6 1 8

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

T-92

235

63 2/630
Branch 150

Oct. 23 19 92

PAY TO THE ORDER OF J. WAYNE REITZ $ 8479.63

eight - thousand - four Seventy nine 63/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR

Corrine Brown

CORRINE BROWN P b T1298 34229043

Number 0405

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Aug. 5 19 86 63-4/630

PAY TO THE ORDER OF Triad Associates $ 343.00

Three-hundred fourty-three and 00/100 DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Monthly Rent

Corrine Brown

CORRINE BROWN P b T1420 38488756

Number 0570

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 17 1986 63-4/630

PAY TO THE ORDER OF Triad Associates $342.00

Three-hundred forty two DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Rent

Corrine Brown

CORRINE BROWN 11-85
SPRINGFIELD TRAVEL P b T0410 47157133

Number 356

1707 NORTH MAIN ST
JACKSONVILLE, FL 32206

Dec 8 1986 63-4/630

PAY TO THE ORDER OF Triad Associates $ 363.00

Three hundred sixty three 00/100 DOLLARS

Barnett Bank
100 Laura Street
Jacksonville, Florida 32231

FOR Rent

Corrine Brown

9/04304061 9

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

P b T1230 45714415

Number 219

March 2 1986 63-4/630

PAY TO THE ORDER OF Triad Ass $ 341.00

Three - hundred & forty one DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN P b T1398 33167121

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 155

March 31 1986 63-4/630

PAY TO THE ORDER OF TRIAD Associates $ 341 00

Three hundred and fourty-one and 00/100 DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR RENT

Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 0467

Sept 2 1986 63-4/630

PAY TO THE ORDER OF Triad Associate $ 343

Three hundred & forty three DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

Corrine

9/0430640620

CORRINE BROWN 0351

2716 WEST 45TH STREET P 6 T0699 47618092
JACKSONVILLE, FL 32209

19 63-4/630 12

PAY TO THE ORDER OF Andy Grange $ [illegible]

[illegible] hundred [illegible] DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0830000H 11-13-85 607

FOR [illegible]

CORRINE BROWN 0390

2716 WEST 45TH STREET P 6 T1944 42607511
JACKSONVILLE, FL 32209

Dec 7 1985 63-4/630 12

PAY TO THE ORDER OF Grangey $341.50

Three hundred + forty one ~~dollars~~ 50

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0830000H 12-11-85 607

FOR Rent Corrine Brown

CORRINE BROWN 0352

2716 WEST 45TH STREET P 6 T0699 47618091
JACKSONVILLE, FL 32209

Nov 4 19[illegible] 63-4/630 12

PAY TO THE ORDER OF Andy Grangey $15.02

Eighteen — dollars DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0830000H 11-13-85 607

FOR [illegible]

9/0450621

Cashier's Check

11812730

Issued by LEHeadley BR# 3686
Corrine Brown Loan Proceeds
Purchaser

NOTICE TO CUSTOMER
THE PURCHASE OF AN INDEMNITY BOND WILL BE REQUIRED BEFORE THIS CHECK WILL BE REPLACED OR REFUNDED IN THE EVENT IT IS LOST, MISPLACED, OR STOLEN. THIS COPY MUST BE RETAINED IN ORDER TO OBTAIN ANY INFORMATION REGARDING THIS CHECK. SEE ADDITIONAL NOTICE ON BACK

63-2/530

Pay to
the order of University of Florida

Date 1/6/92

4,000.00

FIRST UNION NATIONAL BANK OF FLORIDA 4,000 dollars 00 cents

Customer Copy

First Union National Bank
of Florida
Jacksonville, Florida 32202

Retain this copy - Serial No. is Required
for any further inquiry.

COPY - NOT NEGOTIABLE

9/0438406 22

CORRINE BROWN P 6 T1608 34784457 0285

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 8 1985 63-4/630 12

PAY TO THE ORDER OF Hands Grocery $ 54.00

Three hundred + forty DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0830004 10-10-85

FOR Corrine Brown

CORRINE BROWN 0391

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

P 6 T1944 42607510

Dec 9 1985 63-4/630 12

PAY TO THE ORDER OF A.N.D. OF FLA. SPRINGFIELD $15.00

Fifteen dollars DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0830004 12-11-85 597

FOR Corrine Brown

9/0430406623

CORRINE BROWN 344

136 PHELPS STREET
JACKSONVILLE, FL 32206

June 5 19 84 63-4/630

PAY TO THE ORDER OF W. D. Sweat $200

Two hundred DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

PAID 06-06-84

FOR Corrine Brown

CORRINE BROWN 535

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

PAID AUG 1 1982 63-4/630 12

PAY TO THE ORDER OF Dorsey W. Sweat $133.00

One hundred Thirty Three DOLLARS

AUG 18 BARNETT BANK OF JACKSONVILLE, N.A. JACKSONVILLE, FLORIDA

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 322

FOR Corrine Brown

CORRINE BROWN 479

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

July 10 1982 63-4/630 12

PAID

PAY TO THE ORDER OF D. W. Sweat $200.

Two hundred DOLLARS

BARNETT BANK OF JACKSONVILLE N.A. JACKSONVILLE, FLORIDA

125472305

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32204

FOR Corrine Brown

9704384062 4

CORRINE BROWN 1-92 X 02 BULK 185
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630 Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $504.30

FIVE HUNDRED FOUR DOLLARS & 30/100---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9012

CORRINE BROWN 1-92 X 02 BULK 184
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630 Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $522.44

FIVE HUNDRED TWENTY TWO DOLLARS & 44/100 DOLLARS

FIRST UNION First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9009 Corrine Brown

CORRINE BROWN 1-92 X 02 BULK 186
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 754.11

SEVEN HUNDRED FIFTY FOUR & 11/100---------- DOLLARS

FIRST UNION First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9103 Corrine Brown

9704384062 5

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

182

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 479.32

FOUR HUNDRED SEVENTY NINE & 32/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9003

Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

180

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1235.23

ONE THOUSAND TWO HUNDRED THIRTY FIVE & 23/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-8909

Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

181

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1622.61

ONE THOUSAND SIX HUNDRED TWENTY TWO & 61/100 DOLLARS

FIRST

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-8912

Corrine Brown

9704384 0626

9704384006 27

CORRINE BROWN 1-92 X 02 BULK 189
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630 Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1156.19

ONE THOUSAND ONE HUNDRED FIFTY SIX & 19/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9112 Corrine Brown

CORRINE BROWN 1-92 X 02 BULK 178
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630 Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1984.45

ONE THOUSAND NINE HUNDRED EIGHTY FOUR & 45/100 DOLLARS

FIRST UNION First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9203 Corrine Brown

CORRINE BROWN 1-92 X 02 BULK 183
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630 Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 405.41

FOUR HUNDRED FIVE DOLLARS & 41/100---------- DOLLARS

FIRST UNION First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9006 Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

188

63-2 630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $715.74

SEVEN HUNDRED FIFTEEN DOLLARS & 74/100---------- DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9109

Corrine Brown

X 02 BULK

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

191

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 65.01

SIXTY FIVE DOLLARS & 01/100---------- DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 940-1990

Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02-BULK 1175187

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 840.81

EIGHT HUNDRED FORTY DOLLARS & 81/100---------- DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9106

Corrine Brown

9704384062 3

9 7 0 4 3 8 4 0 6 2 9

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92 X 02 BULK 192

(10-2/630)
Branch 150

OCT 26 19

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 124.44

One Hundred Twenty-Four & 44/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR Form 941-9206 Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92 X 02 BULK 179

(10-2/630)
Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 2,244.87

TWO THOUSAND TWO HUNDRED FORTY FOUR & 87/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9206 Corrine Brown

9 7 0 4 3 8 4 0 6 3 C

CORRINE BROWN 1-92
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

X 02 BULK

195
63-2/630
Branch 150

October 30 .92

PAY TO THE ORDER OF Florida Unemployment Comp Fund $445.84
Four Hundred Forty-Five & 84/cents DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

QE 9/30/92

FOR A/C 1210136

X 02 BULK

CORRINE BROWN 1-92
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

237
63-2/630
Branch 150

Oct. 19, 92

PAY TO THE ORDER OF Florida Unemployment Compensation Fd 853.29
Eight Hundred Fifty-Three and 29/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR

9/U4 3 8 4 0 6 3 1

Number

NAME _____

ACCT. NO. _____

19__

63-4/630

PAY TO THE ORDER OF [illegible] $ 54,02

[illegible] DOLLARS

Barnett Bank

50 WEST STATE STREET
JACKSONVILLE, FLORIDA 32202

FOR _____

NAME Corrine Brown

ACCT. No.

63-4 / 630 12

Aug 15 1984

PAY TO THE ORDER OF Barnett Bank $549.02

five hundred + forty nine 02 DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR Corrine Brown

CORRINE BROWN 219

136 PHELPS STREET
JACKSONVILLE, FL 32206

63-4 / 630

Aug 12 1983

PAY TO THE ORDER OF Barnett Bank for $50.00

fifty — dollars DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR Corrine Brown

CORRINE BROWN 226

136 PHELPS STREET
JACKSONVILLE, FL 32206

63-4 / 630

Sept 1 1983

PAY TO THE ORDER OF Barnett Bank $50.00

fifty — dollars DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR Corrine Brown

9/0438400632

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 0519

63-4
630

PAY TO THE ORDER OF $

DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

CORRINE BROWN 0278

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 1 85 63-4/630 12

PAY TO THE ORDER OF Barnett Bank $550.00

Five hundred + fifty DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN 171

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

July 13 85 63-4/630 12

PAY TO THE ORDER OF Barnett Bank $274.50

Two hundred + seventy four + 50/100 DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

_____ 19___ 1085

Pay to the order of _____ $ _____

_____ Dollars

Barnett Bank 1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

Memo _____

CORRINE BROWN

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

324

Sept 14 1984

63-4 / 630 12

PAY TO THE ORDER OF Barnett Bank $549.02

five hundred + forty nine 02

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

0530004 09-14-84 LOY

FOR _____

Corrine Brown

CORRINE BROWN

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

Aug 1 1989 1030

Pay to the order of Barnett Bank $549.02

five hundred + forty nine 02 Dollars

Barnett Bank 1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

Memo _____

Corrine Brown

9/0430406634

B

CORRINE BROWN

Number 137

2710 WEST 45TH STREET
JACKSONVILLE, FL 32209

Feb 10 1986 — 634/630

PAY TO THE ORDER OF Cash $400.00

four — hundred — DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR AKC Trip Corrine Brown

97043840635

Corrine Brown T1/10-91082-6 3728

274 Tallulah Ave.
Jacksonville, FL 32208

19 634/630

Pay to the order of [illegible] $ [illegible]

[illegible] Dollars

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

⑆137580599⑆ 2140⑈2411⑈02 020-23-93

For [illegible]

63-4/630

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER

No. 1104641

RE CORRINE BROWN

Date: 12/26/91

PAY TO THE ORDER OF ARC*********

$ 1,730.00*******

⑆063000173⑆ 2008

CASHIER'S CHECK

NOTICE TO CUSTOMER
The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen

COPY-NON-NEGOTIABLE

Authorized Signature

CUSTOMER COPY

63-4/630

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER

No. 1104691

RE SPRINGFIELD TRAVEL AGENCY

Date: 1/2/92

4,789.89

PAY TO THE ORDER OF ARC*******

$ 4,789.89*******

⑆063000474⑆ 9893⑈

CASHIER'S CHECK

NOTICE TO CUSTOMER
The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen

COPY-NON-NEGOTIABLE

Authorized Signature

CUSTOMER COPY

9/0430406 36

63-4/630

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER TELLER DEPARTMENT

No. 1103064

RE **SPRINGFIELD TRAVEL**

Date: DECEMBER 18, 1991

PAY TO THE ORDER OF **A. R. C.**

$ **1,645.00**

BANK ID 1645229

CASHIER'S CHECK

NOTICE TO CUSTOMER

The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen

Authorized Signature

CUSTOMER COPY

9/0436406 37

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFIC

02-14-86

AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

DEBIT

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

By C

---

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 11-17-

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Detail Above

BROWN, CORRINE
2715 W 45TH STREET
JAX FL 32209
PAID 06300004 11-18-86 C07 X01

By C

---

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 10-17-86

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Detail Above

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

By C

9704364063 8

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 12-17-85

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Details Above

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

PAID 0830000H 12-18-85 007

By C

9704384040639

9704384064 0

001 BARNETT BANK OF JACKSONVILLE N.A.
004 NORTH JACKSONVILLE OFFICE 06-01-84

AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	1[illegible].43

DEBIT

BROWN, CORRINE
2716 JOSEPH STREET
JAX FL 32209

C 000

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE DATE 06-01-84

PARTICULARS	AMOUNT
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	155.23

WE DEBIT YOUR ACCOUNT AS PER DETAIL ABOVE

BROWN CORRINE
136 PHELPS ST
SUITE 1
JAX FL 32206

PAID 0250000 06-04-84 C13
BY C

9 / 0 4 3 0 4 0 6 4 1

CORRINE BROWN

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

272 88365 1172 148 035 1230101663 21 5

12/27 19 88 411

PAY TO THE ORDER OF American Express $ 763.87

seven - hundred & sixty three 87/100 DOLLARS

Barnett Bank
1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

2534515750 5227 6813 04 01-03-89

MEMO

Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 149

March 3, 86 63-1/630

PAY TO THE ORDER OF Cash $200.

Two-hundred DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Trip to Tallahassee Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

0275

Sept 28, 85 63-1/630 12

PAY TO THE ORDER OF C.L.I.A. $12.00

Twelve dollars DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Cruise Tickets Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 119

86 63-1/630

PAY TO THE ORDER OF CASH $200.00

Two-hundred Dollars DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Trio-D Corrine Brown

9/0450640642

CORRINE BROWN

0271

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

19 63-4/630 12

PAY TO THE ORDER OF

$

DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

CORRINE BROWN

Number 0521

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Nov 7 86 19 63-4/630

PAY TO THE ORDER OF CASH $1,300

One thousand + Three hundred DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

FOR England

CORRINE BROWN

227

136 PHELPS STREET
JACKSONVILLE, FL 32206

PA Sept 1 19 83

PAY TO THE ORDER OF Jacksonville Specialty

$100

One hundred DOLLARS

Barnett Bank 100 Laura Street
Jacksonville, Florida

BARNETT BANK OF JACKSONVILLE, N.A. JACKSONVILLE, FLORIDA

FOR 10007

Corrine Brown

CORRINE BROWN

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

325

SEP 10 RECD

I. L. D.
SEP 10 1984
N. P.

September 7, 84 63-4/630 12

PAY TO THE ORDER OF Florida National Bank $377.80

Three Hundred Seventy-Seven 80/100 DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN

136 PHELPS STREET
JACKSONVILLE, FL 32206

214

August 12, 1983 63-4/630

PAY TO THE ORDER OF Jacksonville Specialty Advertising Inc $100.00

One hundred and 00/100 DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR # 10007

BARNETT BANK OF JACKSONVILLE, N.A. JACKSONVILLE, FLORIDA

CORRINE BROWN 11-11-46

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

420

Sept 17 1984 63-4/630 12

PAY TO THE ORDER OF Pass Port Office $42.00

8002 8041 02 10-01-84 323593252

Forty-two DOLLARS

8002 2033 22 09-21-84 132268580

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

Corrine Brown

9704504644

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 24, 1997

B. Holly Schadler, Esquire
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

I am writing to advise you that I will be leaving the Commission on January 24, 1997. Henceforth, Andre Pineda will be representing the Commission in the above-referenced matter. He may be reached at (202) 219-3690.

Sincerely,

Matthew J. Tanielian
Attorney

9704304645

BEFORE THE FEDERAL ELECTION COMMISSION

MAR 24 2 31 PM '97

In the Matter of

Friends of Corrine Brown and Gloria Simmons, as treasurer	)	
	)	MUR 4160
Congresswoman Brown	)	
	)	

AFFIDAVIT

I, Dr. Melvin T. Stith, being first duly sworn, depose say as follows:

1. I currently reside at 2588 Noble Drive, Tallahassee, Florida 32312-3487.

2. I am employed by Florida State University.

3. I am business partners with Dr. Edward R. Scott, II.

4. On or about October 20, 1992, Dr. Scott and I purchased Springfield Travel Agency, Inc. ("Springfield") from Corrine Brown. To the best of my recollection, Dr. Scott and I paid between $30,000 to $35,000 for Springfield. To the best of my knowledge, Springfield was on the market for about $40,000.

5. To the best of my recollection, Dr. Scott and I negotiated with Corrine Brown no more than 60 days for Springfield's purchase.

6. On or about August 28, 1992, Dr. Scott and I gave Corrine Brown earnest monies towards Springfield's purchase. Although I do not remember the exact amount given to Ms. Brown, Dr. Scott and I gave equal amounts to her.

7. I do not recall whether such earnest monies were drawn by personal check or cashier's check. However, such monies would have been drawn from my account at

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The Tallahassee State Bank ("Tallahassee Bank") in Tallahassee, Florida. I currently serve on the Board of Directors for the Tallahassee Bank.

8. I am not friends with Congresswoman Brown nor do I have a personal relationship with her. Other than the Springfield purchase negotiations, I only recall speaking with Congresswoman Brown at one or two receptions where social pleasantries were exchanged.

9. I did not make any contributions to Congresswoman Brown's 1992 campaign for the Third District, House of Representatives, from the State of Florida nor have I made any subsequent contributions to her Congressional campaigns.

10. To the best of my knowledge, Springfield has not made a profit during the period that Dr. Scott and I have owned it. However, it has generated sufficient monies to pay all debts.

11. Springfield is a small travel agency with two travel agents. To the best of my knowledge, many small travel agencies do not generate a profit and many have gone out of business.

Date: March 18, 1995
State of Florida

Melvin T Stith
Dr. Melvin T. Stith

Sworn to before me this 18th day
of March, 1997

Betty T. Smith
Notary Public

BETTY T. SMITH
MY COMMISSION # CC409150 EXPIRES
September 22, 1998
BONDED THRU TROY FAIN INSURANCE, INC.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAR 24 2 31 PM '97

CONFIDENTIALITY ADVISEMENT

Since this information is being sought as part of an investigation being conducted by the Federal Election Commission, the confidentiality provisions of 2 U.S.C., Section 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation. You are advised that no such consent has been given in this case.

Melvin T. Smith
Name

March 18, 1997
Date

Melvin T. Smith
Signature

8/11/46
Date of Birth

170 36 5886
Social Security Number

904 385 4701
Telephone Number

2588 Nable Dr, Tall FL 32312
Address (including Street, City, State, and Zip Code)

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

Re: MUR 4160
Friends of Corrine Brown,
and Gloria Simmons, as Treasurer
Congresswoman Brown

Dear Ms. Schadler:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 6, 1996, the Federal Election Commission found reason to believe that Friends of Corrine Brown ("the Committee"), and Gloria Simmons, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 432(h)(1), 434(b)(5)(A), 434(a)(6)(A) and 11 C.F.R. §§ 110.9(a) and 114.9(e). On the same date, the Federal Election Commission found reason to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a). As a result of these findings, the Federal Election Commission instituted an investigation in these matters.

After considering all of the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that the above-stated violations have occurred.

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

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considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

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

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

Should you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Corrine Brown and Gloria Simmons, as treasurer	)	MUR 4160
	)	
Congresswoman Corrine Brown	)	

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On June 6, 1996, the Commission found reason to believe that Friends of Corrine Brown ("Committee"), and Gloria Simmons, as treasurer[1], violated 2 U.S.C. § 441b(a) by accepting corporate contributions. On the same date, the Commission also found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e) by failing to make advance payments for use of a corporate aircraft. The Commission further found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting loans totaling $9,500 from Congresswoman Brown that were not made from her personal funds. Additionally, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 432(c)(5) by failing to maintain disbursement records for 117 disbursements totaling $46,962. The Commission also found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 432(h)(1) by writing 36 checks made payable to "cash" totaling $26,180, despite a requirement that disbursements over $100 must be made by check. Moreover, the Commission found reason to believe that the Committee and its treasurer

[1] Dr. Kenneth W. Jones was the Committee's treasurer and Gloria Simmons was the Committee's assistant treasurer at the time these apparent violations occurred. On February 23, 1993, Gloria Simmons replaced Dr. Jones as treasurer for the Committee. Ms. Simmons remains treasurer of the Committee.

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violated 2 U.S.C. § 434(b)(5)(A) by failing to report or itemize disbursements totaling $20,047. Further, the Commission found reason to believe that the Committee and its treasurer violated 2 U.S.C. § 434(a)(6)(A) by failing to file 48-hour notices for 45 contributions of $1,000 or more, totaling $80,870. Finally, the Commission found reason to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a) by making loans to her Committee totaling $9,500 from monies that were not her personal funds.[2]

Based on a review of the information obtained by the Commission, there is probable cause to believe that the Committee violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 432(h)(1), 434(b)(5)(A), 434(a)(6)(A) and 11 C.F.R. §§ 110.9(a) and 114.9(e). There is also probable cause to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a).

II. ANALYSIS

A. Prohibited Corporate Contributions

The Federal Election Campaign Act of 1971, 2 U.S.C. §§ 431-442, as amended, ("Act" or "FECA") prohibits any corporation from making a contribution in connection with a federal election. 2 U.S.C. § 441b(a). A candidate or political committee may not knowingly accept such a contribution. *Id.* If a contribution presents genuine questions as to whether it was made by a corporation, it may be deposited into a campaign depository pursuant to 11 C.F.R. § 103.3(a) or returned to the contributor. 11 C.F.R. § 103.3(b)(1). If such a contribution is deposited, the treasurer shall make his or her best efforts to determine the legality of the contribution. *Id.* The treasurer shall make at least one written or oral request for evidence of the legality of the

[2] The Committee has not submitted a substantive response to the reason to believe findings.

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contribution. *Id.* If the contribution cannot be determined to be legal, the treasurer shall, within 30 days of the treasurer's receipt of the contribution, refund the contribution to the contributor. *Id.*

The Committee received 16 contributions from corporations totaling $3,200, in amounts ranging from $100 to $500. Because the Committee did not resolve the prohibited contributions in accordance with 11 C.F.R. § 103.3, the Commission recommended in the Interim Audit Report that the Committee demonstrate that the contributions are not prohibited or that it refund the contributions to the contributors. *See* 2 U.S.C. § 441b(a). In response to this recommendation, the Committee refunded three contributions totaling $1,250 in August and September 1993; it refunded the remaining 13 contributions totaling $1,950 in July 1994. These contributions were refunded many months after they were received. In the meantime, the Committee had use of those corporate funds.

Because the Committee did not refund these contributions in a timely manner, there is probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C.

§ 441b(a) by accepting $3,200 in prohibited contributions.

B. Use of Corporate Aircraft

The Commission's regulations provide that a candidate, candidate's agent, or person traveling on behalf of a candidate who uses an airplane which is owned or leased by a corporation that is not licensed to offer commercial services must reimburse the corporation in advance of such travel. 11 C.F.R. § 114.9(e). The amount of the reimbursement shall be the first

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class airfare for travel to a city served by regularly scheduled commercial service or the usual charter rate for travel to a city not served by a regularly scheduled commercial service. *Id.* Failure to make advance reimbursement results in a prohibited corporate contribution. 2 U.S.C. § 441b(a). A candidate or political committee may not knowingly accept such a contribution. *Id*

The Committee disbursed a total of $4,111 to Florida Rock Industries, Inc., Aviation Department ("Florida Rock"), for transportation services rendered to the Committee. However, these disbursements were not made in advance of the travel. *See* 11 C.F.R. § 114.9(e). Invoices related to the travel services are dated August 26, 1992 and October 13, 1992 for $1,289 and $2,823, respectively. The October 13th invoice indicates that the transportation services were rendered on September 23, 1992.[3] On December 17 and 23, 1992, and February 22, 1993, the Committee paid Florida Rock $1,300, $2,500, and $311, respectively.

The Committee has not provided flight itineraries and passenger listings, or even an explanation of how the cost of each flight was determined, as requested in the Interim Audit Report. *See* 11 C.F.R. § 114.9(e). Instead, the Committee has merely stated that at the time the aircraft was used, the campaign was not aware that advance payment was required and payments were made when the mistake was discovered.

The Committee's explanation does not excuse it from complying with regulations that clearly state advance payment, in the amount of a first class airfare, is required. 11 C.F.R. § 114.9(e). Such advance payment is required because the corporation is not in the regular business of offering commercial transportation for credit. *Explanation and Justification for*

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[3] The August 26, 1992 invoice does not indicate when the travel occurred. The Commission has assumed the travel occurred prior to the invoice date. The Committee has not disputed this assumption.

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11 C.F.R. § 114.9(e), H.R. Doc. No. 44, 95th Cong., 1st Sess. at 16 (1977). Thus, failure to make advance payment results in a prohibited corporate contribution. 2 U.S.C. § 441b(a). Therefore, because the Committee did not reimburse Florida Rock in advance for the air travel as required by 11 C.F.R. § 114.9(e), the Committee received a prohibited corporate contribution from Florida Rock in violation of 2 U.S.C. § 441b(a). Although the Committee eventually paid Florida Rock the invoiced amounts, such payments occurred months after the first travel date took place, and complete payments were not made until February 22, 1993.

Therefore, there is probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e).

C. <u>Loans from the Candidate</u>

The Act states that candidates and political committees may not knowingly accept any contributions or make any expenditures in violation of the limitations of the FECA. 2 U.S.C. § 441a(f); 11 C.F.R. § 110.9(a). However, the limitations on contributions and expenditures do not apply to the candidate's use of his or her personal funds. 11 C.F.R. § 110.10(a); *see Buckley v. Valeo*, 421 U.S. 1, 54 (1976). Commission regulations define "personal funds" to include any assets which, under applicable state law, at the time he or she became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had either legal and rightful title or an equitable interest. 11 C.F.R. § 110.10(b). Contributions or expenditures that do not satisfy the definition of "personal funds" are subject to the limitations of the Act. *See* 2 U.S.C. §§ 441a, 441b, 441c, and 441e.

The Act further provides that no person may make contributions of currency which, in the aggregate, exceed $100 for any election. 2 U.S.C. § 441g.

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The Committee reported five loans from Congresswoman Brown totaling $14,500 between July 28 and August 31, 1992. The Committee provided the following documentation: two $3,000 cashier's checks from Congresswoman Brown, a bank statement denoting an unidentified $5,000 deposit to the Committee's account, a $2,000 personal check from Congresswoman Brown, and a $1,500 cash deposit slip. This documentation, however, was insufficient to establish that Congresswoman Brown made loans to the Committee from her personal funds. For example, this documentation failed to disclose the source of funds Congresswoman Brown used to purchase the two $3,000 cashier's checks, and it did not identity the source of the $5,000 deposited into the Committee's account. Additionally, this documentation did not disclose the balance of Congresswoman Brown's bank account at the time a $2,000 personal check was deposited into the Committee's account, nor did it disclose the source of $1,500 cash deposit.

1. Loans #1 and #2

One of the two $3,000 cashier's checks was purchased with a $3,000 check drawn on the account of Springfield Travel Agency ("Springfield"). The other cashier's check was purchased with a $1,160 check drawn on the Springfield account and a $1,840 check drawn from Congresswoman Brown's personal bank account. Both Springfield checks were made payable to "cash" and were signed by Corrine Brown. Springfield was incorporated at the time these transactions occurred. Congresswoman Brown was the sole owner and president of Springfield.

Congresswoman Brown stated that the checks she received from Springfield were to repay her for "[the] money that I put in Springfield Travel Agency." She characterized the money that she put into Springfield as an "ongoing loan" so that Springfield "[could] make its

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bills or pay its debts." She could not, however, identify any particular loans (e.g., amounts, dates, purposes) that she made to Springfield which corresponded to the checks. Moreover, she did not know the total amount she purportedly loaned to Springfield in this manner during her ownership of Springfield, nor did she have any documentation for such loans. Furthermore, she stated that prior to the two $3,000 cashier's checks, she was never previously repaid for monies that she put into Springfield.

During the course of the investigation, this Office requested that Congresswoman Brown produce documents to show that she, in fact, made loans to Springfield which would correspond to the $3,000 and $1,160 repayments from Springfield. In response, Congresswoman Brown produced copies of 63 checks drawn on her personal bank accounts. Eighteen of the checks are dated two months after Congresswoman Brown received the $3,000 and $1,160 payments from Springfield and some checks date as far back as 1982. None of the checks show a direct transfer of funds from Congresswoman Brown to Springfield. Rather, the checks are written to various third parties and they do not include any indication that they were written to cover Springfield's expenses. For example, the memo line entries do not indicate an expense related to Springfield.

Therefore, there is probable cause to believe that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making two $3,000 loans to the Committee from monies that were not her personal funds. There is also probable cause to believe that the Committee and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting two loans totaling $3,000 from Congresswoman Brown that consisted of monies that were not her personal funds.

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2. Loan #3

The $5,000 deposit made to the Committee's account on August 28, 1992 consisted of a $2,500 cashier's check from Dr. Edward Scott II and a $2,500 cashier's check from Dr. Melvin Stith. The checks were made payable to Corrine Brown. The Committee's disclosure reports do not list any contributions from these individuals.

Congresswoman Brown testified that she could not recall the purpose of these checks from Drs. Scott and Stith. Although she stated that she sold Springfield to Drs. Scott and Stith in 1992, she could not recall whether the checks were related to the sale of Springfield. Although she also claimed that there was no reason Drs. Scott and Stith would have given her checks for $2,500 but for the sale of Springfield, she nevertheless declined to state under oath that the $5,000 received were in fact connected to the purchase of Springfield.

Consequently, this Office requested that Congresswoman Brown produce documentation to demonstrate that the $2,500 checks from Drs. Scott and Stith were connected to the purchase of Springfield. In response, Congresswoman Brown produced the sales contract for Springfield, which identified Drs. Scott and Stith as purchasers of the business for $40,000. The contract was dated October 20, 1992, approximately three months after these cashier's checks were deposited into the Committee's account, and the contract did not reference a $5,000 deposit or down payment. This sales contract alone does not provide sufficient evidence to demonstrate that the checks from Drs. Stith and Scott represent a deposit or down payment for Springfield.

Information obtained from Drs. Stith and Scott, however, indicates that the $2,500 checks were, in fact, connected with the sale of Springfield. Although Dr. Stith could not recall the exact date that Dr. Scott and he purchased Springfield, he recalls purchasing Springfield in the

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autumn of 1992.[4] Dr. Stith further recalls that Dr. Scott and he gave earnest monies to Congresswoman Brown in equal amounts for Springfield's purchase prior to signing a purchase agreement for Springfield. Dr. Stith also recalls that such monies would have been drawn from his account at The Tallahassee State Bank.[5] Moreover, Dr. Stith remembers purchasing Springfield for approximately $30,000 to $35,000.[6] Finally, Dr. Stith indicated that to the best of his memory, Springfield, during his ownership, has not been profitable.[7]

Dr. Scott also recalls purchasing Springfield from Congresswoman Brown for approximately $30,000. Although he does not remember the specific date that he spoke with Congresswoman Brown, he recalls finding out that Springfield was for sale through her. He further recalls that contract negotiations between Congresswoman Brown, Dr. Stith, and himself lasted between one and two months, and that Congresswoman Brown was seeking more money for Springfield than Dr. Stith and he were willing to pay. Although Dr. Scott does not specifically recall giving deposit or earnest monies for Springfield's purchase to Congresswoman Brown, he stated that such monies may have been paid. Dr. Scott also states that even though he is friends with Congresswoman Brown, he does not recall giving any contributions to her 1992

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[4] Drs. Stith and Scott are business partners. Dr. Stith wanted to purchase Springfield for long term business interests. Upon purchasing Springfield, Drs. Stith and Scott renamed Springfield to Springfield Travel and Tours, Inc., and filed new incorporation papers with the State of Florida.

[5] Dr. Stith could not recall whether his portion of the earnest monies were drawn from a personal check or cashier's check. However, he specifically stated that such monies would have been drawn from his account at The Tallahassee State Bank because he is a member of its Board of Directors.

[6] Dr. Stith does not remember the exact purchase price of Springfield but does recall Congresswoman Brown listing the agency at $40,000. Dr. Stith also recalls contract negotiations with Congresswoman Brown lasting no more than 60 days. According to Dr. Stith, Springfield's value was primarily derived from ticket sale commissions.

[7] Dr. Stith indicated that Springfield is a small agency with only two agents. Dr. Stith stated that many small travel agencies do not make a profit and many such agencies have gone out of business. According to Dr. Stith, any monies that Springfield generates result from ticket sale commissions.

campaign, and if he did so, he would not have given more than $100. Finally, he states that Springfield is not profitable.

The information obtained from Drs. Stith and Scott corroborates Congresswoman Brown's assertion that Drs. Stith and Scott's checks may have been for the purchase of Springfield. Although the sales contract for Springfield does not reference a $5,000 deposit or down payment, Dr. Stith recalls paying earnest monies and Dr. Scott indicates that he may have paid such monies. Additionally, Drs. Stith's and Scott's statements that Springfield has not been profitable buttress similar claims by Congresswoman Brown. Moreover, Dr. Stith's assertions that negotiations lasted no more than 60 days, as well as Dr. Scott's recollection that they purchased Springfield within one or two months after he spoke with Ms. Brown about Springfield, correspond with the date of Drs. Stith and Scott's cashier's checks and the Springfield's purchase contract date (i.e., 53 days (August 28, 1992 through October 20, 1992)).

Although the evidence suggests that Congresswoman Brown loaned $5,000 to her Committee from her personal funds, she has not answered all questions concerning this loan. However, based on the information obtained from Drs. Stith and Scott, this Office believes that no further action is warranted with respect to this loan.

3. Loan #4

On the same day Congresswoman Brown deposited a $2,000 personal check into the Committee's account, August 28, 1992, a $2,000 check from Elias Simmons was deposited into her account. The memo line of Mr. Simmons' check stated "Loan." On August 27, 1992, prior to the deposit of Mr. Simmons' check, Congresswoman Brown's personal account had a balance

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of $1,049. On August 28, 1992, a $514.84 check cleared the account, leaving a bank balance of $534 at the end of the day, excluding the deposit of Mr. Simmons' check.[8]

It is clear that Congresswoman Brown did not have sufficient personal funds to loan $2,000 to her Committee when she wrote the August 28, 1992 check. 11 C.F.R. § 110.10(b). Congresswoman Brown testified that Mr. Simmons loaned her the $2,000. She also admitted that the purpose of the loan was to benefit her 1992 campaign. She further stated that Mr. Simmons had never loaned her money in the past and that, other than the check, no documentation of the loan exists. Finally, she testified that she could not recall repaying Mr. Simmons once the Committee repaid her for the loan.

Therefore, there is probable cause to believe that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making a $2,000 loan to the Committee from monies that were not her personal funds. There is also probable cause to believe that the Committee and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting a $2,000 loan from Congresswoman Brown that consisted of monies that were not her personal funds.

4. Loan #5

On August 31, 1992, Congresswoman Brown made a $1,500 loan to her Committee. The Committee provided the Commission with a copy of a $1,500 cash deposit slip to document this loan.

Congresswoman Brown testified that she could not remember the source of the $1,500 cash transaction. No withdrawals from her personal account correspond to the August 31, 1992

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[8] The Committee's disclosure reports did not disclose any contributions from Elias Simmons.

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cash deposit. When asked if the cash came from any other bank account, Congresswoman Brown merely stated

> I mean, we're speculating. I don't know. It says $1,500. I'm not sure what this is, and I said that before. Just like I told you, I don't remember any of the specific amounts.

Thus, Congresswoman Brown has provided no information or documentation to demonstrate the $1,500 cash deposit was made with her personal funds. *See* 11 C.F.R. § 110.10(b).

Therefore, based on the available evidence, there is probable cause to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a) by making a $1,500 cash loan to the Committee from monies that were not her personal funds. There is also probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting a $1,500 loan from Congresswoman Brown that consisted of monies that were not her personal funds.

D. <u>Recordkeeping for Disbursements</u>

The treasurer of a political committee shall keep an account of the name and address of every person to whom any disbursement is made, and the date, amount and purpose of the disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1)-(2). If the disbursement is in excess of $200, the record must include a receipt, invoice, or canceled check for each disbursement. *Id.*

The Commission identified 117 disbursements totaling $46,962 for which inadequate documentation existed. The Committee's disbursement records generally consisted of a canceled check with the purpose recorded on the memo line of the check, the check stub or both. These

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disbursements lacked name, address or other sufficient information to indicate the purpose of the disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1)-(2).

The Committee subsequently provided documentation for seven disbursements totaling $6,250. With respect to the remaining 111 disbursements totaling $40,712, the Committee stated that "many of the expenditures . . . are less than $200 and, therefore, the Committee was not required to maintain such records."[9]

The Committee's response reflects a complete misunderstanding of the requirements provided at 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b). Although a receipt, invoice, or canceled check is required for disbursements in excess of $200, the Act and Commission regulations require committees to maintain records stating the name, address, date, amount, and purpose of *any* disbursement. *Compare* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b)(1) *with* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b)(2). The Committee, however, failed to maintain records which identified the name, address, amount and purpose for 111 disbursements under $200 totaling $40,712. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1).

Therefore, there is probable cause to believe the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5).

E. **Disbursements Made Payable to Cash**

Disbursements by a political committee must be made by check or similar draft drawn on an account established as a designated depository. 2 U.S.C. § 432(h)(1). The sole exception to this requirement is for disbursements of $100 or less made from a petty cash fund pursuant to

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[9] The Committee noted that no further documentation existed, other than canceled checks, for $13,089 of the $40,712 in disbursements in question.

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2 U.S.C. § 432(h)(2) and 11 C.F.R. § 102.11. If a petty cash fund is maintained, the treasurer must keep a written journal of all disbursements, including the name and address of persons to whom the disbursements are made, as well as the date, amount and purpose of such disbursement. 11 C.F.R. § 102.11.

Each report filed by a committee shall disclose the name and address of each person to whom it made an operating expenditure when the value or aggregate amount of that expenditure exceeds $200 within the calendar year, as well as the date, amount, and purpose for such expenditure. 2 U.S.C. § 434(b)(5)(A); 11 C.F.R. § 104.3(b)(4)(i).

1. Cash Disbursements in Excess of $100

Between August 13, 1992 and December 18, 1992, the Committee wrote 36 checks made payable to "cash" in amounts over $100; 12 of the checks were $1,000 or more. The checks to "cash" totaled $26,180. The check stubs noted the funds were for such purposes as "fieldworkers," "Senior GOTV," and particular campaign workers. Furthermore, many of the checks at issue appear to have been endorsed by the Committee.

Although the "cash disbursements [may] reflect the large number of expenditures that a volunteer campaign must make day-to-day," as the Committee argued, there are no exceptions to the requirements that disbursements greater than $100 must be made by check. 2 U.S.C. §§ 432(h)(1) and (2); 11 C.F.R. § 102.11. Again, the Act and regulations clearly state the requirements pertaining to committee disbursements, and the Committee's claimed lack of familiarity with the Act does not absolve it from complying with the requirements.

The Committee further noted that it was not familiar with the petty cash rules of the Act. However, none of the 36 checks made payable to "cash" were for disbursements of $100 or less;

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thus, none were permissible under the petty cash rules. 2 U.S.C. § 432(h)(2). The Committee has not explained, let alone refuted the finding related to its 36 checks made payable to "cash" in amounts greater than $100. The Committee's practice regarding these disbursements undermined the reporting and disclosure purposes of the Act and violated the check disbursements requirement of 2 U.S.C. § 432(h)(1).

Therefore, based on the available evidence, there is probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1).

2. Reporting of Disbursements Made Payable to Cash

The Committee failed to report or itemize disbursements totaling $20,047. *See* 2 U.S.C. § 434(b)(5)(A). These disbursements were in the form of Committee checks made payable to "cash." The Committee's attempt to cure these reporting errors by filing amendments on August 4, 1992 failed. Of the disbursements in question, $17,171 still were not reported correctly because they were itemized under the name of "cash" and included no further information identifying the person to whom the disbursement was made. 2 U.S.C. § 434(b)(5)(A).

Rather than filing amended reports for the cash disbursements requiring itemization, the Committee stated that it was not aware of the requirement to keep additional records for cash expenses. The Committee stressed its lack of familiarity with the petty cash rules under the FECA and the large number of daily cash expenditures involved in a volunteer campaign.

The Committee's lack of familiarity with the Act's petty cash rules and its claimed large number of daily cash expenditures involved in a volunteer campaign does rectify or justify the reporting errors.

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Therefore, because the Committee failed to report or itemize disbursements by check totaling $17,171 made payable to "cash," there is probable cause to believe that the Committee, and its treasurer, Gloria Simmons, violated 2 U.S.C. § 434(b)(5)(A).

F. **Failure to File 48-Hour Disclosure Notices**

Committees are required to notify in writing either the Secretary of the Senate, Clerk of the House of Representatives, or the Commission, and the Secretary of State, as appropriate, of each contribution totaling $1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5(f). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).The Committee did not file 48-hour notices for 45 contributions of $1,000 or more totaling $80,870. 2 U.S.C. § 434(a)(6)(A) and 11 C.F.R. § 104.5(f). The Committee was required to file 48-hour notices for 8 contributions totaling $11,800 received between August 13, 1992 and August 29, 1992; 18 contributions totaling $35,570 received between September 12, 1992 and September 28, 1992; and 19 contributions totaling $33,500 received between October 15, 1992 and October 31, 1992.

The Committee's claims that Congresswoman Brown was a first-time candidate, that her staff was inexperienced with federal campaign laws, and that she was a candidate in three consecutive elections held within 64 days of each other do not absolve the Committee from complying with the Act's reporting requirements.

Because the Committee failed to file the required 48-hour notices, there is probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Friends of Corrine Brown Committee and Gloria Simmons, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 432(h)(1), 434(b)(5)(A), 434(a)(6)(A) and 11 C.F.R. §§ 110.9(a) and 114.9(e); and

2. Find probable cause to believe that Congresswoman Corrine Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a).

4/9/97
Date

Lawrence M. Noble
General Counsel

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: 202 628-6600 · FACSIMILE: 202 434-1690

April 25, 1997

Via Facsimile

Andre G. Pineda, Esq.
Federal Election Commission
Office of the General Counsel
999 E Street, N.W. - 6th Floor
Washington, D.C. 20463

APR 28 10 27 AM '97
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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Re: MUR 4160

Dear Mr. Pineda:

This letter responds to Mr. Noble's letter dated April 10, 1997, accompanying the General Counsel's Brief in this matter. On behalf of Friends of Corrine Brown and Gloria Simmons, as treasurer, and Congresswoman Corrine Brown, I am requesting an extension of time to file Respondent's brief. Additional time will be necessary to review the extensive records in this matter and consult with my client about the response. Due to travel and other scheduling conflicts, the 15 days provided in the letter is not adequate to prepare the response.

Therefore, I am requesting an extension of time until May 22. If you have questions or would like to discuss this request, please call me at 202-434-1634.

Sincerely,

B. Holly Schadler
Counsel to Respondents

BHS:bhs

[09901-0001/DA971150.035]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 29, 1997

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Kim Bright-Coleman
Associate General Counsel

SUBJECT: Request for Extension of Time in MUR 4160

I. BACKGROUND

On April 10, 1997, the Office of General Counsel sent Friends of Corrine Brown, its Treasurer, Gloria Simmons, and Congresswoman Brown ("the respondents") a General Counsel's Brief in MUR 4160, which the respondents received on April 17, 1997. Accordingly, a response was due on May 2, 1997, 15 days after receipt. On April 25, 1997, the respondents requested a 20-day extension of time to respond to the General Counsel's Brief. Attachment 1. The respondents' request stated that an extension of time "will be necessary to review the extensive records in this matter and consult with my client about the response." *Id.* The respondents' request further stated that "due to travel and other scheduling conflicts, the 15 days provided in the letter is not adequate to prepare the response." *Id.*

The activities involved in this matter occurred between May 21, 1992 and August 13, 1992. As a result, the five-year statute of limitations is approaching. Therefore, in light of the limited time left before these activities may be barred by the statute of limitation at 28 U.S.C. § 2462, this Office recommends that the Commission approve the respondents' request contingent upon them agreeing to waive for the period of their requested extension any defense based on 28 U.S.C. § 2462. The waiver is set forth as an attachment to the proposed letter. Attachment 2. While the reasons set forth in the respondents' request may present an adequate basis to grant an extension, the timing issues involved in this matter are considerable and require a waiver. *See* General Counsel's Report in MUR 3974 (Rangel for Congress Committee) dated March 21, 1997, and Memorandum to the Commission concerning MUR 4173 (Clinton/Gore '92 Committee) dated April 9, 1997.

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II. RECOMMENDATIONS

1. Grant the request of Friends of Corrine Brown, Gloria Simmons, as Treasurer, and Congresswoman Brown, for 20 additional days or until May 22, 1997, to submit a response to the General Counsel's Brief contingent upon them agreeing to waive for such period any defense based on 28 U.S.C. § 2462 or any other statute of limitation or repose; and

2. Approve the attached letter.

Attach 00ments

1. Extension Request
2. Letter with Waiver Attachment

Staff assigned: Andre G. Pineda

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Corrine Brown and	)	MUR 4160
Gloria Simmons, as Treasurer;	)	
Congresswoman Brown.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 1, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4160:

1. Grant the request of Friends of Corrine Brown, Gloria Simmons, as Treasurer, and Congresswoman Brown, for 20 additional days or until May 22, 1997, to submit a response to the General Counsel's Brief contingent upon them agreeing to waive for such period any defense based on 28 U.S.C. § 2462 or any other statute of limitation or repose, as recommended in the General Counsel's Memorandum dated April 29, 1997.

2. Approve the letter, as recommended in the General Counsel's Memorandum dated April 29, 1997.

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

Attest:

5/2/97
Date

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

Received in the Secretariat: Tues., April 29, 1997 4:27 p.m.
Circulated to the Commission: Wed., April 30, 1997 11:00 a.m.
Deadline for vote: Thurs., May 01, 1997 4:00 p.m.

bjr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 1, 1997

VIA FACSIMILE

Ms. B. Holly Schadler, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Friends of Corrine Brown,
and Gloria Simmons, as Treasurer

Congresswoman Brown

Dear Ms. Schadler:

This is in response to your letter dated April 25, 1997 requesting an extension of time until May 22, 1997 to respond to the General Counsel's Brief concerning Friends of Corrine Brown ("Committee"), and Gloria Simmons, as Treasurer, and Congresswoman Brown. In light of the potential application of the five-year statute of limitations at 28 U.S.C. § 2462, the Commission granted this request on May 1, 1997 contingent upon the agreement of the Committee, Ms. Simmons, and Congresswoman Brown to waive for the extended period any defense based on 28 U.S.C. § 2462, or any other statute of limitations or repose.

If the Committee, Ms. Simmons, and Congresswoman Brown agree to this condition, please sign the attached waiver, and return it within three days or by May 2, 1997, whichever is sooner. If the waiver is not received by the close of business on May 2, 1997, the Commission will have denied your extension request.

If you have any questions, please call me at (202) 219-3690.

Sincerely,

Andre G. Pineda
Attorney

Attachment
Waiver

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 7 3 44 PM '97

In the Matter of

Friends of Corrine Brown	)	
and Gloria Simmons, as treasurer	)	
	)	MUR 4160
Congresswoman Brown	)	
	)	

AFFIDAVIT

I, Dr. Edward R. Scott, II, DDS, being first duly sworn, depose say as follows:

1. I am a dentist in Tallahassee, Florida.

2. My dental practice is located at 1100 East Tennessee Street, #B, Tallahassee, Florida 32308. My business number is (904) 561-6115.

4. I am business partners with Dr. Melvin T. Stith.

5. To the best of my recollection, I became aware that Springfield Travel Agency, Inc. ("Springfield") was for sale through a telephone conversation with Corrine Brown. I do not recall the specific date that this telephone conversation occurred, but I recall that Ms. Brown initiated the telephone call. I further recall that the initial purpose of Ms. Brown's telephone call was to ask me for a contribution to her 1992 campaign for the House of Representatives, Third District for the State of Florida. However, I also recall that as our conversation evolved, Ms. Brown told me that Springfield was for sale. I further recall telling Ms. Brown that I was interested in purchasing Springfield with my business partner, Dr. Stith.

6. To the best of my recollection, Dr. Stith and I negotiated with Corrine Brown with respect to Springfield's purchase. To the best of my recollection, Dr. Stith

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and I purchased Springfield within one or two months after my telephone conversation with Ms. Brown, as described in ¶5. I recall financing Springfield's purchase through The Tallahassee State Bank in Tallahassee, Florida. Dr. Stith and I purchased Springfield's Tallahassee location only.

7. To the best of my recollection, I do not remember paying earnest monies or deposit monies to Corrine Brown prior to signing Springfield's purchase agreement. However, I may have paid such monies to Ms. Brown.

8. I do not recall the asking price that Corrine Brown was seeking for Springfield. However, to the best of my recollection, I recall that Dr. Stith and I purchased Springfield for approximately $30,000. I further recall that Ms. Brown was seeking more money for Springfield than what Dr. Scott and I were prepared to pay.

9. To the best of my recollection, I did not contribute $2,500 to Ms. Brown's 1992 Congressional campaign. However, if I did make any contribution, it would not have been more than $100, the usual amount that I give to political campaigns. To the best of my recollection, I have not made other contributions to her Congressional campaigns.

10. To the best of my knowledge, Dr. Stith and I changed the name of Springfield upon its purchase to Springfield Travel and Tours, Inc. ("Springfield Tours"). Dr. Stith and I made this name change due to collection problems and bad debts that Springfield had incurred during its operation. Dr. Stith and I filed corporation papers for Springfield Tours with the State of Florida on or about October 20, 1992.

11. To the best of my knowledge, Springfield Tours has not made a profit since Dr. Stith and I purchased the agency.

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12. I consider Corrine Brown to be my friend. At one time, Ms. Brown was an emergency dental patient of mine. I continue to be friendly with her.

13. Other than the Springfield transaction, I have not had any other business dealings with Ms. Brown.

Date: March 31, 1997
State of Florida

Dr. Edward R. Scott, II, ~~DDS~~ D.M.D.

Sworn to before me this 31st day
of March, 1997

Notary Public

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CONFIDENTIALITY ADVISEMENT

Since this information is being sought as part of an investigation being conducted by the Federal Election Commission, the confidentiality provisions of 2 U.S.C., Section 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation. You are advised that no such consent has been given in this case.

Edward R. Scott, II
Name

March 31, 1997
Date

Signature

9/26/54
Date of Birth

266-11-9472
Social Security Number

904-561-6115
Telephone Number

1100 East Tennessee St. Tallahassee, Fl. 32308
Address (including Street, City, State, and Zip Code)

9704384006676

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

MAY 7 5 19 PM '97

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter Of	)	
	)	
Friends of Corrine Brown and Gloria Simmons	)	MUR 4160
as Treasurer, and Congresswoman Corrine Brown	)	

RESPONDENT'S BRIEF

The General Counsel's brief fails to take into account evidence that bears directly on several of the alleged violations and to recognize the challenge to a first time campaign relying entirely on volunteer assistance of complying with the reporting and recordkeeping requirements.

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COMMISSION
OFFICE OF GENERAL
COUNSEL

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Introduction

In 1992, Congresswoman Brown was a first-time federal candidate; she and her volunteer campaign workers had no experience with the federal election campaign laws. With few resources to hire staff, she relied almost entirely on volunteer assistance, including volunteers to maintain the records and comply with the reporting obligations required under federal law.

In addition to her limited financial resources, she faced three elections in 64 days -- the primary, runoff and general. Because of redistricting and protracted litigation related to the configuration of the Florida district, Ms. Brown had little time to put her campaign in place. Inexperience with federal law and the demanding schedule placed considerable pressure on the administration of the campaign and dramatically increased the likelihood of error. Whatever shortcomings Friends of Corrine Brown ("the Committee") experienced in complying with the myriad of recordkeeping and reporting rules reflect the difficulties of a fledgling campaign that lacked resources and experience.

This matter arose out of a Commission audit. The Committee made substantial progress in correcting any errors and obtaining additional information prior to the audit staff initiating its review. All of the Committee's records were retrieved and organized by time period. The reports for the entire 1992 campaign were amended to

reflect additional information about contributors, provide support for disbursements, and correct mathematical errors.

Since the 1992 campaign, the Committee has taken steps to address a broad range of compliance and reporting issues. The Committee retained an accountant to conduct a review of the Committee's 1992 FEC reports and, where necessary, prepare amendments, assist in organizing the recordkeeping systems, and produce all future FEC reports. The General Counsel does not recognize any of these efforts, and in some cases does not acknowledge the Committee's substantial work in providing documentation in response to the audit.

Corporate Contributions

The first alleged violations arise from the receipt of corporate funds. The initial acceptance of the contributions was due to a lack of familiarity with the rules regarding corporate contributions and, in many cases, a lack of familiarity with the specific contributor. The Committee had difficulty determining whether some of these contributions were from corporations. Moreover, because under Florida law a candidate is permitted to accept contributions from corporations, the change in rules was a source of obvious confusion for a first-time federal candidate.

The Committee attempted to respond within a reasonable time frame in resolving issues related to possible corporate contributions. The total amount of money is quite nominal and the Committee refunded all of the contributions in question in July before the 1994 primary and general election. While the General Counsel states that the Committee "had use of the corporate funds," (General Counsel's Brief at 3) the Committee did not benefit from these funds in the final months of the 1994 election. Because Florida has a late September primary, the final months of the campaign are significant ones for campaign spending.

Use of Corporate Aircraft

The General Counsel recommends finding probable cause with regard to the Committee's failure to advance funds for use of corporate aircraft. The Commission's regulations specifically provide that a candidate may use corporate aircraft to travel on behalf of the campaign. As the Committee has stated in previous responses, at the time the aircraft was used, the campaign was not aware that advance payment was required. The campaign was still in the exploratory phase. The trips were made under the pressure of the campaign and the staff was unfamiliar with payment

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requirements. The Committee, nevertheless, made the necessary payments upon receipt of the relevant invoices.

Loans from the Candidate

Loans #1 and #2: Loans 1 and 2 involve two $3,000 cashiers checks purchased in part with funds from the Springfield Travel Agency. The General Counsel has chosen to ignore evidence that Congresswoman Brown presented regarding her personal loans to Springfield Travel Agency. Congresswoman Brown made statements in her deposition and later provided documents regarding checks she wrote on behalf of Springfield Travel Agency: "Anytime Springfield Travel Agency needed money, I would loan Springfield Travel Agency money to make its bills or pay its debts." Deposition Transcript at 39. She provided checks demonstrating that she has made personal expenditures on behalf of the travel agency during the years it did business. While some of these checks post-date her receipt of funds from the travel agency in 1992 (and show this pattern continued even after her candidacy and the repayments in question), many do not.

Every argument the General Counsel cites to discount the evidence of Ms. Brown's loans to the travel agency is inapposite. First, the General Counsel states that "none of the checks show a direct transfer of funds from Congresswoman Brown to Springfield." General Counsel's Brief at 7. That is true, but has absolutely no bearing on the question of whether she loaned funds to the agency by making payments on the agency's behalf. Loans do not have to be direct transfers to be considered loans. Payments to vendors and others on behalf of the travel agency clearly constitute "in-kind" loans.

Second, the General Counsel states that the "checks written to third parties do not include any indication that they were written to cover Springfield's expenses. For example, the memo line entries do not indicate an expense related to Springfield." Id. This too is irrelevant. There is no requirement that Ms. Brown indicate that a check is written on behalf of the agency for it to constitute a loan. Indeed, a simple review of the payee should provide more than sufficient evidence. For example, a series of checks were written to Triad Associates, for rent. Other checks were written to the ARC (the Airlines Reporting Corporation) to pay for airline tickets. There is no other possible reason why Ms. Brown would be writing checks to the ARC, unless it was to pay a debt of a travel agency. Other checks were written to Barnett Bank to repay loans. The total of these payments exceeds the amount Ms. Brown took out of the travel agency as personal funds to support her campaign. See Exhibit A. Moreover, Ms. Brown secured additional funds through a line of credit from Barnett Bank, as

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evidenced by the attached Affidavit (Exhibit B), which she claims were used in part for the agency.

Third, the General Counsel states that "some of the payments on behalf of Springfield went as far back as 1982." Id. That is correct and the length of time the loan was outstanding to Ms. Brown does not change its character or make it any less of a loan.

Finally, the General Counsel states that "[Ms. Brown] did not know the total amount she purportedly loaned to Springfield." Id. This too has no bearing on whether Ms. Brown had made sufficient loans to the agency to justify taking agency funds as a repayment of personal funds. The only question is whether Ms. Brown loaned enough funds to the agency during the period from its inception to 1992 to account for the amount she took out in personal funds to loan to her campaign. The evidence shows that she did.

The General Counsel's brief also raises an issue about a check dated July 31 for $1,840 drawn on her personal bank account and used to purchase an official bank check for $3,000. This check is dated the same day as two checks written to Ms. Brown from the State of Florida. One check is for $1,476.58 and the other check is for $422.80. The two checks and a deposit slip are attached as Exhibit C. These checks support the conclusion that Ms. Brown had sufficient personal funds to make this loan to her campaign.

Loan #4: Upon additional review, it appears that the loan of $2,000 which was originally reported as a loan from the candidate should have been reported as a loan (and later when forgiven as a contribution) from Mr. Ronnie Simmons. The Committee is in the process of amending its reports to reflect that Mr. Simmons loaned the funds to the Congresswoman. Mr. Simmons was permitted to lend the campaign funds up to the legal limit. Ms. Brown had not only a primary, but also a runoff and general election. Therefore, this loan to the candidate, for the purpose of supporting her campaign, was permissible and was merely misreported.

Loan #5: While no documentation was available to document that the $1,500 loan was her personal funds, there is also no evidence that she did not have the funds to make this nominal contribution to her campaign. The campaign occurred almost five years ago and the evidence appears unavailable.

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Itemization and Recordkeeping for Disbursements

As the Audit Report states, the Committee, prior to the initiation of the audit, materially corrected its reports and provided additional information on receipts and disbursements. The Committee maintained records of disbursements which generally included canceled checks with a memo line recording the purpose of the disbursement. Therefore, the General Counsel's assertion that the Committee did not maintain records that provided basic information is inaccurate. The Committee's records may not have included all of the information required by the audit staff, but did substantially comply.

It is unclear from the General Counsel's Brief whether the amount cited for inadequate documentation is $46,962 or $40,712. If it is the former, as stated on page 1 of the Brief, this figure is incorrect. As the final Audit Report states, and the General Counsel notes, the Committee provided additional documentation on seven disbursements totaling $6,250. Therefore, any suggestion that the actual figure is $46,962 is incorrect.

Many of the expenditures were for campaign workers and get-out-the-vote efforts for which there is no documentation available other than canceled checks. Others were contributions to community organizations. No invoice or receipt would have been available for these disbursements. They went to pay individuals working on the campaign both part-time and on an occasional basis right around an election day. There are also disbursements for campaign workers expenses. Campaign workers will frequently have nominal expenses for local travel, food and other purchases that are not the sort for which a receipt would be available. These workers often played a brief, but central, role in the campaign and were sporadic at best in their attention to recordkeeping requirements.

Disbursements to Cash

The Committee's cash disbursements are also reflective of the requirements of a large volunteer campaign. The expenditures paid for by cash were by and large for get-out-the-vote and volunteer campaign activities. The Committee was not aware of any requirement to maintain records for these expenses. Moreover, paying these expenses by check would have been extremely difficult given the nominal size of the expenditure and the fact that the volunteers needed to have money, not checks, to pay their immediate expenses.

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Failure to File 48-Hour Disclosure Notices

The Committee was not aware of the 48-hour reporting requirement, nor did it have the systems in place to comply. The Committee volunteers had no experience with federal law and the pressure of the election cycles resulted in inadvertent errors. Moreover, the Committee disclosed the contributions in its numerous pre- and post-election reports.

Conclusion

While the Committee is aware that certain errors were made in the 1992 campaign, the General Counsel fails to take into account specific evidence provided by Respondent that demonstrates certain alleged violations did not occur. Moreover, the Brief fails to recognize the unique circumstances presented by the concentrated election schedule in 1992, the inexperience of the campaign staff at the time, and the substantial efforts of the Committee to correct past errors and avoid similar errors in the future.

All of these factors call for a reasonable and measured response from the Commission to resolve this matter fairly.

Respectfully Submitted,

B. Holly Schadler
Counsel to Respondent

BHS:ksn

Attachments

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EXHIBIT A

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CORRINE BROWN P 6 T1298 342290 43 Number 0405

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Aug. 5 19 86 63-4/630

PAY TO THE ORDER OF Triad Associates $ 343.00

Three-hundred fourty-three and 00/100 DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 05300204 05-10-86 007

FOR Monthly Rent Corrine Brown

CORRINE BROWN P 6 T1420 38488756 Number 0570

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 17 19 86 63-4/630

PAY TO THE ORDER OF Triad Associates $342.00

Three-hundred forty two DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 05300204 11-07-86 007

FOR Rent Corrine Brown

CORRINE BROWN 11-85 Number 356
SPRINGFIELD TRAVEL P 6 T0410 47157133
1707 NORTH MAIN ST.
JACKSONVILLE, FL 32206

Dec 1 19 86 63-4/630

PAY TO THE ORDER OF Triad Associates $ 343.00

Three hundred forty three 00/100 DOLLARS

Barnett Bank
100 Laura Street
Jacksonville, Florida 32231

FOR Rent Corrine Brown

9704358406884

CORRINE BROWN Number 219

P 6 T1230 45714415

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

March 2 1986 63-4/630

PAY TO THE ORDER OF Triad Ass $ 341.00

Three hundred forty one DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 0530004 03-13-86 C07

FOR Corrine Brown

CORRINE BROWN P 6 T1398 33167727 Number 155

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

March 31 1986 63-4/630

PAY TO THE ORDER OF Triad Associates $ 341.00

Three hundred and fourty-one and 00/100 DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 0530004 04-04-86 C07

FOR RENT Corrine Brown

CORRINE BROWN Number 0467

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Sept 2 1986 63-4/630

PAY TO THE ORDER OF Triad Associate $ 343

Three hundred forty three DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Corrine

PAID 0531005 09-08-86 C07

9704384006 85

CORRINE BROWN 0351

2716 WEST 45TH STREET P 6 T0699 47618092
JACKSONVILLE, FL 32209

Nov 1 19 85 63-4/630 12

PAY TO THE ORDER OF Cindy Grange $ 5.41

five & 41/100 hundred DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 05300004 11-13-85 007

FOR

CORRINE BROWN 0390

P 6 T1944 42607511
2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Dec 7 1985 63-4/630 12

PAY TO THE ORDER OF Grangey $341.50

Three hundred + forty one dollars 50/100

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 05300004 12-11-85 007

FOR Rent Corrine Brown

CORRINE BROWN 0352

2716 WEST 45TH STREET P 6 T0699 47618091
JACKSONVILLE, FL 32209

Nov 4 1985 63-4/630 12

PAY TO THE ORDER OF Cindy Grangier $15.02

fifteen + 02/100 dollars DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 05300004 11-13-85 007

FOR

CORRINE BROWN

0285

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 8 1985 63-4/630 12

PAY TO THE ORDER OF Grainger $ 341.55

three hundred forty one DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

CORRINE BROWN

0391

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Dec 7 1985 63-4/630 12

PAY TO THE ORDER OF A.N.B. OF FLA. SPRINGFIELD $ 15.00

fifteen dollars DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

CORRINE BROWN 344

136 PHELPS STREET
JACKSONVILLE, FL 32206

June 5 19 84 63-4/630

PAY TO THE ORDER OF W. D. Sweat $200

Two hundred DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR Corrine Brown

CORRINE BROWN 534 535

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

PAID Aug 1 1982 63-4/630 12

PAY TO THE ORDER OF Dorsey W. Sweat $133.00

One hundred thirty three DOLLARS

AUG 18 1982 BARNETT BANK OF JACKSONVILLE, N.A. JACKSONVILLE, FLORIDA

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR Corrine Brown

CORRINE BROWN 479

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

July 10 1982 63-4/630 12

PAID

PAY TO THE ORDER OF D. W. Sweat $200

Two hundred DOLLARS

BARNETT BANK OF JACKSONVILLE N.A. JACKSONVILLE, FLORIDA

125472305

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR Corrine Brown

CORRINE BROWN
274 TALLULAH AVE
JACKSONVILLE, FL 32209

1-92

X 02 BULK

185

63-2/630
Branch 150

OCTOBER 26 92

INTERNAL REVENUE SERVICE 504.30

FIVE HUNDRED FOUR DOLLARS & 30/100----------

First Union National Bank
of Florida
Jacksonville, Florida 32202

FORM 941-9012

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

184

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $522.44

FIVE HUNDRED TWENTY TWO DOLLARS & 44/100 DOLLARS

FIRST UNION

First Union National Bank
of Florida
Jacksonville, Florida 32202

FOR FORM 941-9009

Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

186

63-2/630
Branch/150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 754.11

SEVEN HUNDRED FIFTY FOUR & 11/100---------- DOLLARS

FIRST UNION

First Union National Bank
of Florida
Jacksonville, Florida 32202

FOR FORM 941-9103

Corrine Brown

9/0430406 89

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

182

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 479.32

FOUR HUNDRED SEVENTY NINE & 32/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9003

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

180

63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1235.23

ONE THOUSAND TWO HUNDRED THIRTY FIVE & 23/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR ~~FORM 941-8909~~

Corrine Brown

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

X 02 BULK

181

63-2/630
Branch 150

OCTOBER 26 1992

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1622.61

ONE THOUSAND SIX HUNDRED TWENTY TWO & 61/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-8912

Corrine Brown

9704384069C

CORRINE BROWN
274 TALLULAH AVE
JACKSONVILLE, FL 32209

1-92 X 02 BULK 189
63-2/630
Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1156.19

ONE THOUSAND ONE HUNDRED FIFTY SIX & 19/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9112

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92 X 02 BULK 178
63-2/630
Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 1984.45

ONE THOUSAND NINE HUNDRED EIGHTY FOUR & 45/100 DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9203

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92 X 02 BULK 183
63-2/630
Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 405.41

FOUR HUNDRED FIVE DOLLARS & 41/100---------- DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9006

9/0438406 91

CORRINE BROWN 1-92 X 02 BULK 188
274 TALLULAH AVE 63-2/630
JACKSONVILLE, FL 32209 Branch 150

OCTOBER 26 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $715.74

SEVEN HUNDRED FIFTEEN DOLLARS & 74/100----------

First Union National Bank of Florida Jacksonville, Florida 32202

FOR FORM 941-9109

9704384006692

X 02 BULK

CORRINE BROWN 1-92 191
274 TALLULAH AVE. 63-2/630
JACKSONVILLE, FL 32209 Branch 150

OCTOBER 26 1992

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 65.01

SIXTY FIVE DOLLARS & 01/100---------- DOLLARS

FIRST UNION First Union National Bank of Florida Jacksonville, Florida 32202

FOR FORM 940-1990

CORRINE BROWN 1-92 X 02 BULK 175187
274 TALLULAH AVE. 63-2/630
JACKSONVILLE, FL 32209 Branch 150

OCTOBER 26, 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $ 840.81

EIGHT HUNDRED FORTY DOLLARS & 81/100---------- DOLLARS

FIRST UNION First Union National Bank of Florida Jacksonville, Florida 32202

FOR FORM 941-9106

CORRINE BROWN 1-92 X 02 BULK 192
274 TALLULAH AVE
JACKSONVILLE, FL 32209
63-2/630
Branch 150

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $124.44

ONE HUNDRED TWENTY-FOUR & 44/CENTS DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941 9206 Corrine Brown

CORRINE BROWN T92 5075 X 02 BULK 179
274 TALLULAH AVE.
JACKSONVILLE, FL 32209
63-2/630
Branch 150

OCTOBER 26 19 92

PAY TO THE ORDER OF INTERNAL REVENUE SERVICE $2244.87

TWO THOUSAND TWO HUNDRED FORTY FOUR & 87/100 DOLLARS

FIRST UNION
First Union National Bank of Florida
Jacksonville, Florida 32202

FOR FORM 941-9206 Corrine Brown

9/0450693

CORRINE BROWN
274 TALLULAH AVE
JACKSONVILLE, FL 32209

1-92

X 02 BULK

195

PAY TO THE ORDER OF Florida Unemployment Comp Fund $ 445.84
Four Hundred Forty-Five & 84/100 DOLLARS

First Union National Bank of Florida
Jacksonville, Florida 32202

CE 9/30/92

FOR Pl# 1210136

Corrine Brown

X 02 BULK

CORRINE BROWN
274 TALLULAH AVE.
JACKSONVILLE, FL 32209

1-92

237

63-2/630
Branch 150

Oct. 19, 1992

PAY TO THE ORDER OF Florida Unemployment Compensation Fund $ 853.29
Eight Hundred Fifty-Three and 29/100 DOLLARS

FIRST UNION

First Union National Bank of Florida
Jacksonville, Florida 32202

10-25 00110410

FOR

Corrine Brown

9/104300694

NAME _____

ACCT. NO. _____

Number

March 13 19 84

63-4/630

PAY TO THE ORDER OF Barnett Bank $ 549.02

Five hundred forty nine and 02/100 DOLLARS

Barnett Bank

50 WEST STATE STREET
JACKSONVILLE, FLORIDA 32202

PAID 05300004 03-13-84

FOR _____

Carmen Rios

9/0438469 9

NAME [illegible]

ACCT. NO.

Aug 15, 84

63-4 / 630 12

PAY TO THE ORDER OF Barnett Bank $549.00

five hundred + forty three 00 DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN 219

136 PHELPS STREET
JACKSONVILLE, FL 32206

Aug 12 19 83 63-4 / 630

PAY TO THE ORDER OF Barnett Bank of Jax $50.00

fifty — dollars DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR

Corrine Bro

CORRINE BROWN 226

136 PHELPS STREET
JACKSONVILLE, FL 32206

Sept 1 19 83 63-4 / 630

PAY TO THE ORDER OF Barnett Bank $50.00

fifty — dollars DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR

Corrine Bro

9/0436406 96

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 0519

63-4
630

PAY TO THE ORDER OF $

DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR

CORRINE BROWN 0278

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Oct 1 1985 63-4/630 12

PAY TO THE ORDER OF Barnett Bank $550.00

five hundred & fifty DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 05300004 10-01-85 007

FOR

Corrine Brown

CORRINE BROWN 171

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

July 13 1985 63-4/630 12

PAY TO THE ORDER OF Barnett Bank $274.50

Two hundred & seventy four & 50/100 DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218

PAID 05300004 07-13-85 007

FOR

Corrine Brown

9704304697

CORRINE BROWN

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

_____ 19___ 1085

Pay to the order of _____ $

_____ Dollars

Barnett Bank 1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

Memo _____

CORRINE BROWN

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

324

Sept 14 1984 63-4/630 12

PAY TO THE ORDER OF Barnett Bank $549.02

five hundred & forty nine 02/100 DOLLARS

Barnett Bank 1055 Dunn Avenue
Jacksonville, Florida 32218 ⑆530000⑆ 09-14-84 LOY

FOR _____ Corrine Brown

CORRINE BROWN

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

Aug 1 1989 1030

Pay to the order of Barnett Bank $549.02

five hundred & forty nine 02/100 Dollars

Barnett Bank 1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

Memo _____ Corrine Brown

9704304698

CORRINE BROWN

Number 137

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Feb 10 1986 634/630

PAY TO THE ORDER OF Cash $400.00

four hundred DOLLARS

1055 Dunn Avenue
Jacksonville, Florida 32218

FOR AKC Trip Corrine Brown

Corrine Brown 1/10-91082-6 3728

274 Tallulah Ave.
Jacksonville, FL 32208

Feb 19 93 63-4/630

Pay to the order of [illegible] Corp $ [illegible]

Fifty [illegible] Dollars

001-005
1055 Dunn Avenue
Jacksonville, Florida 32218

⑆37580592 ⑈ 3728⑈ ⑆1⑈02⑆20-23-93

FOR

9704384069 9

63-4/630

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER

No. 1104641

RE CORRINE BROWN

Date: 12/26/91

PAY TO THE ORDER OF ARC*********

$ 1,730.00*******

⑈001730⑈

CASHIER'S CHECK

NOTICE TO CUSTOMER

The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen.

COPY-NON-NEGOTIABLE

Authorized Signature

CUSTOMER COPY

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER

No. 1104691

RE SPRINGFIELD TRAVEL AGENCY

Date: 1/2/92

4,749.89

PAY TO THE ORDER OF ARC*******

$ 4,789.89*******

⑈004749⑈

CASHIER'S CHECK

NOTICE TO CUSTOMER

The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen.

COPY-NON-NEGOTIABLE

Authorized Signature

CUSTOMER COPY

9704384070C

63-4/630

Barnett Bank

Barnett Bank of Jacksonville, N.A.

Office BARNETT CENTER TELLER DEPARTMENT

No. 1103064

RE **SPRINGFIELD TRAVEL**

Date: DECEMBER 18, 1991

PAY TO THE ORDER OF **A. R. C.**

$ **1,645.00**

⑈001103064⑈ ⑆063100463⑆ 9704384070 1⑈

CASHIER'S CHECK

NOTICE TO CUSTOMER

The purchase of an indemnity bond will be required before any official check on this bank will be replaced or refunded, in the event it is lost, misplaced or stolen.

Authorized Signature

CUSTOMER COPY

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

02-14-86

AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

DEBIT

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

DATE PROCESSED 02-18-86 DEP
By C

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 11-17-86

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Detail Above

BROWN, CORRINE
2715 W 45TH STREET
JAX FL 32209

PAID 06300004 11-18-86 C07 X01
By C

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 10-17-86

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Detail Above

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

DATE PROCESSED

9704384070 2

9704384070 3

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

Date 12-17-95

Particulars	Amount
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	249.05

We DEBIT Your Account As Per Dated Ac.

BROWN, CORRINE
2716 W 45TH STREET
JAX FL 32209

PAID 06300004 12-18-95 C07

001 BARNETT BANK OF JACKSONVILLE N.A.
[illegible] DOWNTOWN JACKSONVILLE OFFICE

[illegible]-21-[illegible]

AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	125.43

DEBIT

BROWN, CORRINE
2716 N ASH STREET
JAX FL 32209

By C 007

97043840704

001 BARNETT BANK OF JACKSONVILLE N.A.
001 DOWNTOWN OFFICE

DATE 06-01-84

PARTICULARS	AMOUNT
AS PER YOUR REQUEST YOUR CHECKING ACCT HAS BEEN DEBITED FOR PAYMENT ON LOAN	155.23

WE DEBIT YOUR ACCOUNT AS PER DETAIL ABOVE

BROWN CORRINE
136 PHELPS ST
SUITE 1
JAX FL 32206

PAID 05500004 06-04-84

By C 013

9 7 0 4 3 8 4 0 7 0 5

CORRINE BROWN 50272 88365 1172 148 035 1226101663 21 5

2/27 19 88 411

274 TALLULAH AVENUE
JACKSONVILLE, FL 32208

PAY TO THE ORDER OF American Express $ 763.87

seven hundred sixty three 87/100 DOLLARS

Barnett Bank
1055 DUNN AVENUE
JACKSONVILLE, FLORIDA 32218

2584B1570 6229 6813 04 01-03-99

MEMO

Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 149

March 3 '86 63-4/630

PAY TO THE ORDER OF Cash $200.

Two hundred DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Trip to Tallahassee Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

0275

Sept 28 1985 63-4/630 12

PAY TO THE ORDER OF C.L.I.A. $12.00

Twelve & dollars DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Crime Watch Corrine Brown

CORRINE BROWN

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Number 119

8085 8009 02 01-28-85 1986 63-4/630

PAY TO THE ORDER OF CASH $200.00

Two hundred Dollars DOLLARS

Barnett Bank
1055 Dunn Avenue
Jacksonville, Florida 32218

FOR Trip-D Corrine Brown

9704384070 6

CORRINE BROWN 0271

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

63-4 / 630 12

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0530000 09-30-85 507

FOR _____ _____

CORRINE BROWN Number 0521

2716 WEST 45TH STREET
JACKSONVILLE, FL 32209

Nov 7 86 19 63-4 / 630

PAY TO THE ORDER OF Cash $1,300

One thousand + Three hundred DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

PAID 0530000 11-07-85 507

FOR England Corrine Brown

CORRINE BROWN 227

136 PHELPS STREET
JACKSONVILLE, FL 32206

PA Sept 1 19 83

PAY TO THE ORDER OF Jacksonville Specialty $100

One hundred DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32202

FOR 11007 Corrine Brown

9704384070 7

CORRINE BROWN

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

325

SEP 10 RECD

I. L. D.
SEP 10 1984
N. D.

September 7, 84 63-4/630 12

PAY TO THE ORDER OF Florida National Bank $377.00

Three-Hundred Seventy-Seven 84/100 DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

Corrine Brown

CORRINE BROWN

136 PHELPS STREET
JACKSONVILLE, FL. 32206

63-4 214

August 12, 1983 63-4/630

PAY TO THE ORDER OF Jacksonville Specialty Advertising Inc $700.00

One hundred and 00/100 DOLLARS

Barnett Bank 100 Laura Street Jacksonville, Florida 32231

FOR # 10007

BARNETT BANK OF JACKSONVILLE, N.A. JACKSONVILLE, FLORIDA

CORRINE BROWN

2716 W. 45TH STREET
JACKSONVILLE, FL 32209

420

Sept 17, 1984 63-4/630 12

PAY TO THE ORDER OF Pass Port Office $42.00

Forty-two DOLLARS

Barnett Bank 1055 Dunn Avenue Jacksonville, Florida 32218

FOR

Corrine Brown

9704384070 8

EXHIBIT B

BEFORE THE FEDERAL ELECTION COMMISSION

MUR 4160

AFFIDAVIT OF SHEILA E. CRIBB

I, Sheila E. Cribb, as Special Assets Officer of Barnett Banks, Inc., hereby state as follows:

1. I have personal knowledge of the facts set forth herein and if called to testify in this matter, I would testify as set forth herein.

2. Barnett Bank records reflect that Congresswoman Corrine Brown has had a personal account with Barnett Bank since 1976.

3. Barnett Bank records reflect that in 1985, Barnett Bank issued a Letter of Credit on behalf of Springfield Travel Agency in the amount of $14,900.00.

4. Barnett Bank records reflect that in 1986, Barnett Bank issued a Credit Line to Corrine Brown with a credit limit of $10,000.00.

5. Barnett Bank records reflect that in 1987, the Credit Line limit was increased to $20,000.00.

6. Barnett Bank records reflect that in 1991, Barnett Bank consolidated Barnett Bank debt, including the Credit Line, in the amount of $93,070.30 in the name of Corrine Brown.

7. Barnett Bank records reflect that as of May 7, 1997, the outstanding balance is $62,246.67.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this __ day of May, 1997.

Sheila E Cribb

EXHIBIT C

DEPOSIT TICKET

274 Talleh Ave.
Jacksonville, FL 32202

July 31 92

CHECKS OR TOTAL FROM OTHER SIDE

SUB TOTAL

LESS CASH

NET DEPOSIT $ 1899.38

476.18
422.20

Trn 0302 07-31-92 11:33
Br 001 Op 001 Tlr 036
Account
Deposit $1899.38

SAMAS ORG CODE 11212160000 SAMAS ACCOUNT CODE 11101000000 DATE 07/31/92

STATE OF FLORIDA
OFFICE OF COMPTROLLER - TALLAHASSEE

3-21 192 979

AMOUNT

PAY
ONE THOUSAND FOUR HUNDRED SEVENTY SIX & 58/100 DOLLARS

SALARY WARRANT

267-76-4025

CORRINE BROWN
274 TALLAHUHEAVE
JACKSONVILLE, FL 32206

COMPTROLLER OF FLORIDA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Friends of Corrine Brown and Gloria Simmons, as treasurer	)	MUR 4160
Congresswoman Corrine Brown	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 6, 1996, the Commission found reason to believe that Friends of Corrine Brown ("Committee"), and Gloria Simmons, as treasurer,[1] violated 2 U.S.C. §§ 432(c)(5), 432(h)(1), 434(a)(6)(A), 434(b)(5)(A), 441a(f), and 441b(a) and 11 C.F.R. §§ 110.9(a) and 114.9(e). The Commission also found reason to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a).

At the same time the Commission made these reason to believe findings, it also approved the issuance of two subpoenas for bank documents related to candidate loans from Congresswoman Brown.[2] The Commission also authorized the Office of General Counsel to depose Congresswoman Brown, if necessary, after a review of the subpoenaed documents.

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[1] Dr. Kenneth W. Jones was the Committee's treasurer and Gloria Simmons was the Committee's assistant treasurer at the time these apparent violations occurred. On February 23, 1993, Gloria Simmons replaced Dr. Jones as treasurer for the Committee. Ms. Simmons remains treasurer of the Committee.

[2] On June 17, 1996, the Commission sent a document subpoena to First Union Bank ("First Union"). A response to the subpoena was due on July 23, 1996. On July 11, 1996, First Union requested an extension of time to respond, which the Office of General Counsel granted; accordingly, a response was due on August 12, 1996. On July 26, 1996, the Office of General Counsel received documentation from First Union pursuant to the subpoena.

On June 17, 1996, the Commission also sent a document subpoena to Barnett Bank of Jacksonville ("Barnett Bank"), and notified Congresswoman Brown, pursuant to the Right to Financial Privacy Act of 1978, of a subpoena to Barnett Bank requesting her personal bank records. On July 1, 1996, the Office of General Counsel notified Barnett Bank that the Commission complied with the Right to Financial Privacy Act of 1978, and that it was obligated to comply with the subpoena. Although this Office sent this notification to her via certified mail,

9704384071 3

On July 29, 1996, the Committee and Congresswoman Brown responded to the reason to the believe findings.[3] Attachment 4 at 5. The response was not substantive and merely consisted of a request for pre-probable cause conciliation. *Id.* On September 6, 1996, the Office of General Counsel notified the respondents that the Commission denied their request.

After reviewing the subpoenaed information, this Office deposed Congresswoman Brown on November 25, 1996. On November 27, 1996, the Office of General Counsel, pursuant to a request made at her deposition, sought documentation from Congresswoman Brown concerning loans that she made to Springfield Travel Agency, Inc. ("Springfield"), as well as documentation concerning the sale of Springfield.[4] On January 6 and 7, 1997, the respondents provided the requested documentation. Attachments 1 and 2.

On April 10, 1997, this Office mailed the respondents a letter and General Counsel's Brief notifying them that the Office of General Counsel was prepared to recommend that the

9 7 0 4 3 8 4 0 7 1 4

Congresswoman Brown maintained that she did not receive it. As a result, this Office reinitiated the Right to Financial Privacy Act notification process and, so notified Barnett Bank on July 30, 1996. On August 6, 1996, this Office notified Barnett Bank that the Commission complied with the reinitiated Right to Financial Privacy Act notification process, and that it was permitted to release the subpoenaed documents. On August 13, 1996, Barnett Bank produced some bank statements pursuant to the subpoena, but requested a three-week extension of time to produce additional documentation, which this Office granted; accordingly, a response was due on September 3, 1996. On August 28, 1996, Barnett Bank produced additional information, such as canceled checks, deposit tickets, and offsets. Additional documents were produced on September 5, 1996, November 18, 1996, and December 12, 1996.

[3] On June 26, 1996, the Committee requested an extension of time to respond to the reason to believe findings. On July 1, 1996, Congresswoman Brown requested an extension of time to respond to the reason to believe findings. On July 2, 1996, the Office of General Counsel granted the respondents' request; accordingly, a response was due from both the Committee and Congresswoman Brown on July 24, 1996. On July 22, 1996, the respondents' requested additional time to respond to the reason to believe findings, which this Office granted; accordingly, a response was due on July 29, 1996.

[4] On December 11, 1996, the respondents requested a 25-day extension of time to respond to the documentation request. On December 13, 1996, this Office granted this request; accordingly, a response was due on January 6, 1997.

Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, as well as Congresswoman Brown, violated various Federal campaign laws.[5] On May 7, 1997, the respondents submitted their response to the Office of General Counsel.[6] Attachment 3.

After reviewing the respondents' response, this Office recommends that the Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. §§ 432(c)(5), 432(h)(1), 434(a)(6)(A), 434(b)(5)(A), 441a(f), 441b(a), and 11 C.F.R. §§ 110.9(a) and 114.9(e), as well as probable cause to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a). However, this Office further recommends that the Commission take no further action and close the file.

II. SUMMARY OF COMMITTEE RESPONSE

At the outset, the respondents contend that the General Counsel's Brief "fails to take into account evidence that bears directly on several of the alleged violations. Attachment 3 at 1. They note that as a first-time federal candidate, Congresswoman Brown was inexperienced with federal election campaign laws, and she relied on volunteers to conduct Committee business. *Id.* They also contend that Congresswoman Brown had little time to "put her campaign into place" due to recent redistricting and "protracted litigation related to the configuration" of the district.

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[5] The General Counsel's Brief dated April 10, 1997 is incorporated herein by reference.

[6] On April 17, 1997, the respondents received the letter and General Counsel's Brief; accordingly, a response was due on May 2, 1997. On April 25, 1997, the respondents requested an extension of time to respond to the General Counsel's Brief until May 22, 1997. On May 1, 1997, the Office of General Counsel notified the respondents that the Commission approved this request contingent upon the agreement of the respondents to sign an agreement to waive for the extended period any defense based on 28 U.S.C. § 2462, or any other statute of limitations or repose. Subsequently, on May 2, 1997, the respondents notified this Office that only a five-day extension of time was necessary, and Counsel for respondents signed a written agreement to waive for a period of five days any defense based 28 U.S.C. § 2462, or any other statute of limitations or repose; accordingly, their response was due on May 7, 1997.

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Id. They further note that Congresswoman Brown faced three elections -- the primary, runoff, and general -- in 64 days, which when viewed with her inexperience and the complexity of federal election law, "placed considerable pressure on the administration of the campaign and dramatically increased the likelihood of error." *Id.* Finally, the respondents claim that the Committee made "substantial progress" in correcting errors, obtaining additional information, and taking corrective action, such as the hiring of an accountant and the filing of reporting amendments, both before and after the completion of the audit. *Id.* at 2.

With respect to the corporate contribution, the respondents argue that the Committee's acceptance of prohibited corporate contributions was "due to a lack of familiarity with the rules regarding corporate contributions and, in many cases, a lack of familiarity with the specific contributor." *Id.* They claim that the Committee had difficulty determining whether some of the contributions were from corporate entities, and the acceptance of corporate contributions was "a source of obvious confusion" for a first-time federal candidate since Florida law permits candidates to accept corporate contributions. *Id.* The respondents also argue that the Committee responded "within a reasonable time frame" to resolve these corporate contributions because it refunded all of them in July 1994. *Id.* Furthermore, the respondents contend that the amount of the contributions was "quite nominal," and the Committee did not benefit from these funds in the 1994 election. *Id.*

The respondents assert that they did not know that advance payment was required for the use of corporate aircraft by a candidate, but argue that use of such an aircraft by a candidate on behalf of the campaign is permitted under the Commission's regulations. *Id.* They assert that the campaign was in the exploratory phase, the trips were "made under the pressure of the

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campaign," and the Committee made the necessary payments upon its receipt of the "relevant invoices." *Id.* at 2-3.

With respect to two of the loans from Congresswoman Brown to the Committee (each for $3,000 ("loans #1 and 2")), the respondents argue that the General Counsel "has chosen to ignore" Congresswoman Brown's deposition testimony and subsequent documentation provided by her concerning personal loans that she made to Springfield. *Id.* at 3. The respondents contend that Congresswoman Brown stated at her deposition that she loaned money to Springfield any time it was needed to pay bills or debts, and that the subsequent documentation she produced demonstrated that she had made such loans in the past. *Id.* The respondents also argue that although "none of the checks show a direct transfer of funds from Congresswoman Brown to Springfield," a direct transfer has "absolutely no bearing on the question of whether she loaned funds to the agency by making payments on the agency's behalf." *Id.* The respondents argue that loans do not have to be direct transfers, but that payments to vendors and others by Congresswoman Brown on behalf of Springfield "clearly constitute 'in-kind' loans." *Id.*

The respondents further argue that the lack of identifying information concerning third party checks written by Congresswoman Brown for Springfield-related expenses is irrelevant because she is not required to indicate that a check is written on behalf of Springfield for it to constitute a loan. *Id.* The respondents assert that a review of the check payee should provide "more than sufficient evidence" to determine whether the payment was related to Springfield. *Id.* In support of this assertion, the respondents note that checks written to "ARC (the Airlines Reporting Corporation)" by Congresswoman Brown could not have been for any other purpose but to pay for Springfield related expenses. *Id.* The respondents also claim that checks written

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to Barnett Bank by Congresswoman Brown were to repay loans. *Id.* Thus, the respondents argue that the total of these payments "exceeds the amount Ms. Brown took out of the travel agency as personal funds to support her campaign." *Id.*

Moreover, the respondents argue that Congresswoman Brown secured additional funds through a line of credit from Barnett Bank which was used for Springfield. *Id.* at 3-4. Additionally, they note that the length of time a loan was outstanding to Congresswoman Brown does not change the character of the loan because it remains a loan. *Id.* at 4. Moreover, the respondents argue that it is irrelevant whether Congresswoman Brown knew the total amount she loaned to Springfield because it has no bearing on whether she made sufficient loans to Springfield to justify taking Springfield monies as a repayment of personal funds. *Id.* The respondents assert that the evidence demonstrates that she loaned enough monies to Springfield from its inception to 1992 to account for the monies that she withdrew as personal funds to loan to her campaign. *Id.* Finally, the respondents assert that Congresswoman Brown had sufficient monies in her personal bank account on July 31, 1992 to loan her campaign $1,840, which was used to purchase, in part, one of the two cashier's checks in question.[7] *Id.*

With respect to the loan for $2,000 ("loan #4"), the respondents admit that upon further review, the Committee should have reported this transaction as a loan from Ronnie Simmons, rather than as a loan from Congresswoman Brown. *Id.* They assert that Mr. Simmons later forgave this loan as a contribution, that such a contribution was legal due to the occurrence of the

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[7] In support of this assertion, the respondents provided copies of two checks from the State of Florida, $1,476.58 and $422.80, respectively, that were deposited into her account on July 31, 1992. Attachment 3 at 36-37.

three elections, and that the Committee was in the process of amending its reports to reflect a loan from Mr. Simmons.

With respect to final loan of $1,500 in cash ("loan #5"), the respondents admit that no documentation is available to demonstrate that the $1,500 loan was from Congresswoman Brown's personal funds. *Id.* However, they contend that there is "also no evidence that she did not have the funds to make this nominal contribution to her campaign." *Id.*

With respect to the itemization and recordkeeping issues, the Committee claims that it materially corrected its reports and provided additional information. *Id.* The respondents argue that the Committee maintained records which provided basic information because it maintained general disbursement records, such as canceled checks, with purposes noted as memo entries. *Id.* at 5. The respondents further note that the amount cited for inadequate documentation is not clear; it should be $40,712, not $46,962, based on additional documentation provided by the Committee concerning seven disbursements totaling $6,250. *Id.* They also admit that no documentation, except for canceled checks, exists for many of the expenditures related to campaign workers and get-out-the-vote efforts, and that documentation is not available for Committee disbursements to community organizations which provided individuals to work on campaign activities. *Id.* Finally, the respondents claim that documentation for campaign worker expenses, such as food, travel, and other purchases, "are not the sort for which a receipt would be available." *Id.* Because campaign workers played brief, but central roles in the campaign, the respondents admit that they were "sporadic at best in their attention to recordkeeping requirements." *Id.*

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With respect to the cash disbursement transactions, the respondents argue that such disbursements are reflective of "a large volunteer campaign," and that such cash disbursements were "by and large" for get-out-the-vote and volunteer campaign activities. *Id.* The Committee claims that it was not aware of any requirement to maintain records for these expenses, that payment by check for these expenses would have been "extremely difficult" given the nominal size of the expenditures, and that volunteers needed cash to pay for their expenses. *Id.*

Finally, with respect to the failure to file 48-hour disclosure notices, the Committee asserts that it was neither aware of this reporting requirement nor did it have the systems to comply with such a requirement. *Id.* at 6. The Committee argues that its volunteers had no experience with federal law, and election pressures resulted in "inadvertent errors." *Id.* The Committee further claims that it disclosed the contributions in later reports. *Id.*

III. ANALYSIS

A. Loans from the Candidate

The Committee reported five loans from Congresswoman Brown totaling $14,500 between July 28 and August 31, 1992, but provided insufficient documentation to establish that Congresswoman Brown made loans to the Committee from her personal funds. Instead, the Committee merely made conclusory assertions during the audit that Congresswoman Brown had sufficient personal funds to make the loans. Thus, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) and that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a).

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1. **Loans #1 and #2**

One of the two $3,000 cashier's checks was purchased with a $3,000 check drawn on the account of Springfield. The other cashier's check was purchased with a $1,160 check drawn on the Springfield account and a $1,840 check drawn from Congresswoman Brown's personal bank account. Both Springfield checks were made payable to "cash" and were signed by Corrine Brown. Springfield was incorporated at the time these transactions occurred. Congresswoman Brown was the sole owner and president of Springfield.

Although the respondents claim that Congresswoman Brown explained at her deposition that she loaned money to Springfield so that it could pay its bills or debts, they neglect to mention that she also testified that she could not identify any particular loans that she made which correspond to the cashier checks.[8] *Compare* Deposition Transcript ("Tr.") at 38-39 *with* Tr. at 40 ("Do you have any documentation of [the $3,000 loan] at all, meaning the checks you gave to Springfield Travel Agency in order to make the loans?" "No")[9] Moreover, she did not know the total amount that she loaned to Springfield in this manner and had no documentation for any loans to Springfield. Tr. at 39, 41-42, 98-99. The respondents also ignore Congresswoman Brown's testimony that prior to the two $3,000 checks, she was never previously repaid for monies that she put into Springfield. Tr. at 99-100 ("Congresswoman Brown, when Springfield Travel Agency made a repayments of loans to you, how often was

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[8] Contrary to the respondents' arguments, this Office has not ignored Congresswoman Brown's deposition testimony or the subsequent documentation that she provided concerning the personal loans to Springfield. As noted in the General Counsel's Brief, Congresswoman Brown "could not, however, identify any particular loans (e.g., amounts, dates, purposes) that she made to Springfield which corresponded to the checks. Moreover, she did not know the total amount she purportedly loaned to Springfield in this manner during her ownership of Springfield, nor did she have any documentation for such loans." General Counsel's Brief at 7.

[9] A copy of Congresswoman Brown's deposition transcript is available for review in the General Counsel's Office.

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that?" "A I don't have a time . . ." "Q In 1992 when you repaid yourself for loans to Springfield Travel Agency, this was the first time you had repaid yourself for something?" "Right, but I did not take a salary. I worked in the agency.").

The respondents further admit that none of the documentation submitted by Congresswoman Brown shows a direct transfer of funds from her to Springfield. Although Congresswoman Brown may not have been prohibited from writing checks directly to vendors on Springfield's behalf, a check payee name, by itself, is not sufficient evidence to demonstrate the purpose of the expenditure. For example, the respondents refer to checks written by Congresswoman Brown to the Airlines Reporting Corporation ("ARC"), and state that these checks were written for no other purpose than to pay Springfield-related expenses. This assertion may be accurate. The check payee names are *some* indication that the checks could have been written to pay an expense on behalf of Springfield. However, it could also indicate that Congresswoman Brown wrote checks to ARC for personal travel-related expenses unrelated to Springfield. Similar arguments can be made for checks written to Barnett Bank as well as checks written to various other persons and entities. For example, most of the checks written to Barnett Bank by Congresswoman Brown lack *any* information that would evidence they were written for Springfield-related expenses. Moreover, the respondents admit that the line of credit from Barnett Bank was used only "in part" for Springfield. Attachment 3 at 4. Therefore, contrary to the respondents' arguments, additional information, such as memo entries, is relevant to determine whether Congresswoman Brown made loans to Springfield.

Moreover, in addition to the lack of documentation concerning the loans that she made to Springfield, Congresswoman Brown admits she does not know the total amount of money that

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she loaned to it. Tr. at 38-41. Therefore, it is not possible to determine whether the $4,160 ($3,000 + $1,160) in Springfield monies that Congresswoman Brown used to purchase the cashier's checks was less than the amount of personal funds she claims to have expended on Springfield's behalf. Thus, contrary to the respondents' arguments, this information directly bears upon the amount of money Congresswoman Brown purports to have loaned to Springfield.

Finally, the respondents assert that on July 31, 1992, Congresswoman Brown had sufficient monies in her personal bank account to loan her campaign $1,840. Only in response to the General Counsel's Brief recommending probable cause to believe that a violation occurred did the respondents provide a deposit slip and copies of the accompanying check to support this claim. A review of the documentation and Congresswoman Brown's checking account statement from Barnett Bank for the relevant period confirms this assertion. Attachment 3 at 36-37. On July 30, 1992, Congresswoman Brown's bank balance was $540.67. On July 31, 1992, she made a deposit of $1,899.38. *Id.* The deposit consisted of two checks totaling $1,899.38 ($1,476.58 + $422.80) from the State of Florida issued to her as an individual; thus, the funds appear to be her personal funds. On the same day, Ms. Brown wrote a check made payable to "cash" for $1,840 and it was deducted from her account. Although not entirely clear, the cash was apparently used to purchase, in conjunction with Springfield monies totaling $1,160, a $3,000 cashier's check dated July 31, 1992 made payable to Corrine Brown for Congress. Two other checks were deducted from her account on the same day; her ending balance for July 31, 1992 was $502.07. Hence, Congresswoman Brown had a sufficient balance in her bank account on July 31, 1992 to make a $1,840 loan to her campaign.

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The respondents have failed to provide specific documentation regarding the alleged loans from Congresswoman Brown to the Committee. Further, Congresswoman Brown's testimony regarding the loans is too vague to support a conclusion that the loans were made with her personal funds. Thus, despite numerous opportunities to do so, the respondents have failed to demonstrate that Congresswoman Brown loaned Springfield $4,160 ($3,000 + $1,160) from her personal funds. The respondents have also failed to demonstrate that Springfield was actually repaying Congresswoman Brown $4,160 for loans that she purportedly made to it. Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making one $3,000 loan and another $1,160 ($3,000 - $1,840) loan to the Committee from monies that were not her personal funds. This Office also recommends that the Commission find probable cause to believe that the Committee and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting loans totaling $4,160 ($3,000 + $1,160) from Congresswoman Brown that consisted of monies that were not her personal funds.

2. Loan #3

The $5,000 deposit made to the Committee's account on August 28, 1992 consisted of a $2,500 cashier's check from Dr. Edward Scott II and a $2,500 cashier's check from Dr. Melvin Stith.[10] The checks were made payable to Corrine Brown.

The information obtained from Drs. Stith and Scott in the investigation of this matter corroborates Congresswoman Brown's testimony that their checks may have been for the purchase of Springfield. Tr. at 72; Attachments 4 and 5. Although the sales contract for

[10] The Committee's disclosure reports do not list any contributions from these individuals.

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Springfield does not reference a $5,000 deposit or down payment, Dr. Stith recalls paying earnest monies and Dr. Scott indicates that he may have paid such monies. Attachments 4 and 5. Additionally, Drs. Stith's and Scott's statements that Springfield has not been profitable buttress similar claims by Congresswoman Brown. Tr. at 100. Moreover, Dr. Stith's assertions that negotiations lasted no more than 60 days, as well as Dr. Scott's recollection that they purchased Springfield within one or two months after he spoke with Ms. Brown about Springfield, correspond with the date of Drs. Stith and Scott's cashier's checks and the Springfield's purchase contract date (i.e., 53 days (August 28, 1992 through October 20, 1992)). *Id.*

Although the evidence suggests that Congresswoman Brown loaned $5,000 to her Committee from her personal funds, she has not answered all questions concerning this loan despite opportunities to do so during the audit, in response to the Factual and Legal Analysis, her deposition, and finally, in response to the General Counsel's Brief. However, based on the information obtained from Drs. Stith and Scott, this Office recommends that the Commission take no further action with respect to this loan.[11]

3. Loan #4

On the same day Congresswoman Brown deposited a $2,000 personal check into the Committee's account, August 28, 1992, a $2,000 check from Elias Simmons was deposited into her account. The memo line of Mr. Simmons' check stated "Loan." On August 27, 1992, prior to the deposit of Mr. Simmons' check, Congresswoman Brown's personal account had a balance

[11] The respondents did not submit a response to the General Counsel's Brief concerning the $5,000 loan (loan #3). *See* Attachment 3 at 4.

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of $1,049.27. On August 28, 1992, a $514.84 check cleared the account, leaving a bank balance of $534.43 at the end of the day, excluding the deposit of Mr. Simmons' check.[12]

It is clear that Congresswoman Brown did not have sufficient personal funds to loan $2,000 to her Committee when she wrote the August 28, 1992 check. *See* 11 C.F.R. § 110.10(b). Furthermore, the respondents now admit that Mr. Simmons' check should have been reported by the Committee as loan from him, rather than her. They further state that the Committee is in the process of amending its reports accordingly.[13]

For more than four and one-half years, the public record has indicated that Congresswoman Brown made a $2,000 loan to her campaign, despite evidence to the contrary. It is only now, many years after the initial reporting, and approximately two and one-half years after the Commission approved the Final Audit Report, that the respondents suggest that this transaction was misreported. The evidence clearly indicates that Congresswoman Brown did not have sufficient monies in her bank account on August 28, 1992 to make a $2,000 loan to her campaign. Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making a $2,000 loan to the Committee from monies that were not her personal funds. This Office also recommends that the Commission find probable cause to believe that the Committee and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and

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[12] The Committee's disclosure reports did not disclose any contributions from Ellen Simmons.

[13] As of July 16, 1997, the Committee has not filed any corrective amendments with the Commission concerning this loan.

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11 C.F.R. § 110.9(a) by accepting a $2,000 loan from Congresswoman Brown that consisted of monies that were not her personal funds.[14]

4. Loan #5

On August 31, 1992, Congresswoman Brown made a $1,500 loan to her Committee. The Committee provided the Commission with a copy of a $1,500 cash deposit slip to document this loan.

Congresswoman Brown testified that she could not remember the source of the $1,500 cash transaction. Tr. at 96. No withdrawals from her personal account correspond to the August 31, 1992 cash deposit. When asked if the cash came from any other bank account, Congresswoman Brown merely stated

> I mean, we're speculating. I don't know. It says $1,500. I'm not sure what this is, and I said that before. Just like I told you, I don't remember any of the specific amounts.

Id.

The respondents candidly admit that no documentation exists to prove that this loan consisted of the Congresswoman's personal funds. Additionally, no bank withdrawals correspond to this deposit. Finally, Congresswoman Brown apparently could not remember the details of this transaction, including where the money came from. Neither the Committee nor Congresswoman Brown have demonstrated that she made the $1,500 cash deposit with her personal funds. 11 C.F.R. § 110.10(b). Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that Congresswoman Brown violated

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[14] This Office notes that Mr. Simmons' loan to Congresswoman Brown may have constituted a "contribution in the name of another person." *See* 2 U.S.C. § 441f. This Office makes no recommendation with respect to Mr. Simmons in keeping with the recommendations at the end of this Report to take no further action with respect to the loans from the candidate.

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2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a) by making a $1,500 cash loan to the Committee from monies that were not her personal funds. This Office also recommends that the Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by accepting a $1,500 cash loan from Congresswoman Brown that consisted of monies that were not her personal funds.

B. Prohibited Corporate Contribution

The Committee received 16 contributions from corporations totaling $3,200, which it did not resolve in accordance with 11 C.F.R. § 103.3. *See* 2 U.S.C. § 441b(a). The Committee did not refund these contributions until many months after they were received.[15]

The Committee admits that it accepted 16 corporate contributions totaling $3,200 and that it continued to possess most of these funds until July 1994. Attachment 3 at 2; 11 C.F.R. § 103.3(b). The respondents' arguments, such as the lack of familiarity with federal rules and specific contributors, the difficulty in ascertaining whether an entity was a corporation, and lack of familiarity with federal law due to Florida law, go to mitigation, not negation, of the violation. Moreover, the Committee did not refund all corporate contributions until July 1994, approximately 19 months after the general election. Contrary to the respondents' arguments, the Committee had use of corporate funds during this 19-month period, as well as use of [illegible] for several months prior to the general election. The regulations provide clear guidelines for processing such contributions in a timely manner. *See* 11 C.F.R. § 103.3(b). Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that

[15] In response to a recommendation in the Interim Audit Report that the Committee determine [illegible] contributions are not prohibited or that it refund the contributions to the contributors, the Committee refunded [illegible] contributions totaling $1,250 in August and September 1993; it refunded the remaining 13 contributions totaling $1,950 in July 1994.

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the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) by accepting $3,200 in prohibited contributions.

C. Use of Corporate Aircraft

The Committee disbursed a total of $4,111 to Florida Rock Industries, Inc., Aviation Department ("Florida Rock"), for transportation services rendered to the Committee. However, these disbursements were not made in advance of the travel. *See* 11 C.F.R. § 114.9(e).

Despite several opportunities to do so, the Committee has never provided flight itineraries and passenger listings, or even an explanation of how the cost of each flight was determined, as was originally requested in the Interim Audit Report. *See* 11 C.F.R. § 114.9(e). Instead, the respondents state in response to the General Counsel's Brief that at the time the aircraft was used, the Committee did not know that advance payment was required, and they provide other explanations for the failure to make payment in advance of the travel.

However, it is irrelevant that the corporate aircraft was used at the exploratory phase of the campaign as the respondents contend. *See* 11 C.F.R. § 100.7(b)(1)(i) (funds received by an individual during exploratory phase become contributions to the individual if he or she subsequently becomes a candidate). The Commission's regulations are clear: any use of corporate aircraft by candidates or their campaigns must include advance payment for the amount of a first class airline, in the corporation. 11 C.F.R. § 114.9(e). Such advance payment was required because the corporation is not in the regular business of offering commercial transportation for credit. *Explanation and Justification for 11 C.F.R. § 114.9(e)*, H.R. Doc. No. 44, 95th Cong., 1st Sess. at 16 (1977). Thus, failure to make advance payment results in a prohibited corporate contribution. 2 U.S.C. § 441b(a). Because the Committee did not reimburse Florida Rock in

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advance for the air travel as required by 11 C.F.R. § 114.9(e), the Committee received a prohibited corporate contribution from Florida Rock totaling $4,111 in violation of 2 U.S.C. § 441b(a). Although the Committee eventually paid Florida Rock the invoiced amounts, such payments occurred after the general election, months after the date of the first travel date, and complete payments were not made until February 22, 1993.

Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e).

D. Recordkeeping for Disbursements

The Commission identified during the audit 117 disbursements totaling $46,962 for which inadequate documentation existed. The Committee's disbursement records generally consisted of a canceled check with the purpose recorded on the memo line of the check, the check stub or both. These disbursements lacked name, address or other sufficient information to indicate the purpose of the disbursement. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1)-(2). The Committee subsequently provided documentation for seven disbursements totaling $6,250. With respect to the remaining 111 disbursements totaling $40,712, the Committee contends that "many of the expenditures . . . are less than $200 and, therefore, the Committee was not required to maintain such records."[16]

The Committee's response reflects a complete misunderstanding of the requirements provided at 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b). Although a receipt, invoice, or canceled check is required for disbursements in excess of $200, the Federal Election Campaign

[16] The Committee notes that no further documentation exists, other than canceled checks, for $13,089 of the $40,712 in disbursements in question.

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Act of 1971, as amended, ("the Act"), and Commission regulations require committees to maintain records stating the name, address, date, amount, and purpose of *any* disbursement. *Compare* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b)(1) *with* 2 U.S.C. § 432(c)(5) and 11 C.F.R. § 102.9(b)(2). Contrary to the respondents' arguments, canceled checks with memo line entries, by themselves, are not records which indicate the name, address, date, amount and purpose of a disbursement. *Id.* Moreover, the recordkeeping requirements of the statute and regulations do not exempt certain types of expenditures. Thus, it is irrelevant whether an expenditure was incurred for campaign workers and get-out-the-vote efforts, or whether an expenditure was for the payment of part-time work, local travel, food, and other related expenses: a committee is required to keep certain information for *all* disbursements. 2 U.S.C. § 432(c)(5); 11 C.F.R. § 102.9(b)(1). The Committee failed to maintain records which identified the name, address, amount and purpose for 111 disbursements under $200 totaling $40,712. 2 U.S.C. § 432(c)(5); 11 C.F.R. §§ 102.9(b)(1).

Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5).

E. **Disbursements Made Payable to Cash**

1. **Cash Disbursements in Excess of $100**

Between August 13, 1992 and December 18, 1992, the Committee wrote 36 checks made payable to "cash" in amounts over $100; 12 of the checks were $1,000 or more. The checks to "cash" totaled $26,180. The check stubs noted the funds were for such purposes as "fieldworkers," "Senior GOTV," and particular campaign workers. Furthermore, many of the checks at issue appear to have been endorsed by the Committee.

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Although the "cash disbursements [may] reflect the large number of expenditures that a volunteer campaign must make day-to-day," as the Committee argued, there are no exceptions to the requirement that disbursements greater than $100 must be made by check. 2 U.S.C. §§ 432(h)(1) and (2); 11 C.F.R. § 102.11. Similarly, no exceptions to the requirement exists for get-out-the-vote activities. Further, any Committee difficulties that are associated with check disbursements to volunteers are irrelevant; the statute and regulations require disbursements greater than $100 to be by check. *Id.* Finally, the Committee's claimed lack of familiarity with the Act does not absolve it from complying with the requirements.[17]

Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1).

2. Reporting of Disbursements Made Payable to Cash

The Committee has failed to report or itemize disbursements totaling $20,047. *See* 2 U.S.C. § 434(b)(5)(A). These disbursements were in the form of Committee checks made payable to "cash." The Committee's attempt to cure these reporting errors by filing amendments on August 4, 1992 failed. Of the disbursements in question, $17,171 still were not reported correctly because they were itemized under the name of "cash" and included no further information identifying the person to whom the disbursement was made. 2 U.S.C. § 434(b)(5)(A).

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[17] The Committee previously noted that it was not familiar with the petty cash rules of the Act. However, none of the 36 checks made payable to "cash" were for disbursements less than $100; thus, none were permissible under the petty cash rules. 2 U.S.C. § 432(h)(2). The Committee has not explained, let alone refuted, the finding related to its 36 checks made payable to "cash" in amounts greater than $100. The Committee's practice regarding these disbursements undermined the reporting and disclosure purposes of the Act and violated the check disbursements requirement of 2 U.S.C. § 432(h)(1).

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Rather than filing amended reports for the cash disbursements requiring itemization, the Committee merely insists that it was not aware of the requirement to keep additional records for cash expenses.[18] The Committee stressed its lack of familiarity with the Act's petty cash rules and the large number of daily cash expenditures involved in a volunteer campaign. Lack of familiarity with the Act's petty cash rules, and the Committee's claimed large number of daily cash expenditures involving a volunteer campaign, does not rectify or justify the reporting errors. Moreover, even if the Committee was unfamiliar with the Act's reporting requirements during the campaign, once it was made aware of them in the audit report, the Committee still failed to amend its reports.[19] Therefore, the Office of General Counsel recommends that the Commission find probable cause to believe that the Committee, and its treasurer, Gloria Simmons, violated 2 U.S.C. § 434(b)(5)(A) by failing to report or itemize disbursements by check totaling $17,171 made payable to "cash."

F. **Failure to File 48-Hour Disclosure Notices**

The Committee did not file 48-hour notices for 45 contributions of $1,000 or more totaling $80,870. 2 U.S.C. § 434(a)(6)(A); 11 C.F.R. § 104.5(f).

The Committee's arguments that Congresswoman Brown was a first-time candidate, that her staff was inexperienced with federal campaign laws, and that she was a candidate in three consecutive elections held within 64 days of each other do not absolve the Committee of violating the law. Neither do Committee claims that it was not aware of the 48-hour reporting

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[18] The Committee's response to the General Counsel's Brief focused on recordkeeping obligations, not reporting obligations. Attachment 3 at 5.

[19] The Commission sent the Committee many notices seeking additional information once the reports were initially filed.

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requirement and that the pressure of the election cycles resulted in inadvertent errors. Likewise, disclosing the contributions in later reports does not comply with the disclosure requirements. Thus, the Committee's arguments go to mitigation, not negation, of the violation.

Because the Committee failed to file the required 48-hour notices, the Office of General Counsel recommends that the Commission find probable cause to believe that the Committee, and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A).

G. Conclusion

The respondents have had numerous opportunities to provide information pertaining to the activity at issue in this matter. Instead, they have failed to provide documentation or failed to correct the public record by filing amended reports as first requested during the audit. Moreover, respondents did not submit a substantive response to the Commission's findings of reason to believe. During the investigation of this matter, respondents continued to provide information which could have absolved them of at least some violations. Even in response to the General Counsel's Brief recommending probable cause to believe, respondents relied frequently on their status as a first-time federal candidate and their ignorance of the law. Respondents have been unpersuasive in arguing they did not violate federal election laws.

This Office notes that the loan transactions involving Congresswoman Brown are problematic. Her deposition testimony and the subsequent documentation provided by her contain insufficient information about the loan transactions, and many questions remain unanswered. Particularly noteworthy is Congresswoman Brown's lack of knowledge concerning loans she purportedly made to Springfield over a ten-year period. *See, e.g.*, Tr. at 98. Although she claims to have loaned money to Springfield over many years, she could not recall the number

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of times that she did. Tr. at 39-41. Moreover, she did not keep records or other documentation of the money that she purportedly loaned Springfield over this ten-year period. *Id.* Congresswoman Brown's lack of recall and her lack of documentation concerning her dealings with Springfield is troubling. However, the total dollar amount that Congresswoman Brown loaned to the Committee from monies that were not her personal funds is relatively small ($7,660). Nonetheless, the Office of General Counsel recommends that the Commission exercise its prosecutorial discretion based on the circumstances of this case and, consistent with the proper ordering of the Commission's resources and priorities, take no further action against Congresswoman Brown, and close the file. *See Heckler v. Chaney*, 470 U.S. 821 (1985).

This Office also recommends that the Commission take no further action against the Committee, and its treasurer, Gloria Simmons and close the file.[20] Due to the continuing nature of the reporting violations, as well as Congresswoman Brown's ongoing involvement in the electoral process, this Office would normally focus conciliation efforts on getting the Committee to amend its reports to properly disclose its activity. *See supra* pp. 20-21. However, the Committee has stated that it does not have records of the disbursements at issue. Therefore, conciliation efforts would most likely fail to correct the public record. Accordingly, the Office of General Counsel recommends that the Commission exercise its prosecutorial discretion based on the circumstances of this case and, consistent with the proper ordering of the Commission's

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[20] The activity involved in this matter occurred almost five years ago (prohibited corporate contributions: May 21, 1992 - November 30, 1992; use of corporate airplanes: August 26, 1992 - September 23, 1992; acceptance of monies from Congresswoman Brown: July 24, 1992 - August 31, 1992; failure to keep adequate records for disbursements: June 10, 1992 - December 31, 1992; cash disbursements in excess of $100: August 13, 1992 - December 18, 1992; failure to properly report cash disbursements: September 1992 - January 19993; failure to file 48-hour notices: August 13, 1992 - October 31, 1992). Thus, litigation to recover a civil penalty with respect to some of these violations may be time barred. 28 U.S.C. § 2462; *FEC v. Williams*, 104 F.3d 237 (9th Cir. 1996); *FEC v. National Republican Senatorial Committee*, 877 F. Supp. 15 (D.D.C. 1995). However, some of the violations, such as the recordkeeping and reporting violations, are continuing in nature.

resources and priorities, take no further action against the Committee and its treasurer, Gloria Simmons. *See Heckler*, 470 U.S. 821.

Upon approval of these recommendations, this Office will send the appropriate admonishment letters.

IV. RECOMMENDATIONS

1. Find probable cause to believe that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making three loans totaling $6,160 to Friends of Corrine Brown from monies that were not her personal funds, but take no further action;

2. Find probable cause to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a) by making a $1,500 cash loan to Friends of Corrine Brown from monies that were not her personal funds, but take no further action;

3. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. 110.9(a) by accepting four loans totaling $7,660 from Congresswoman Brown that consisted of monies that were not her personal funds, but take no further action;

4. Take no further action with respect to one loan for $5,000 that Congresswoman Brown made to Friends of Corrine Brown on August 28, 1992;

5. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) by accepting $3,200 in prohibited corporate contributions, but take no further action;

6. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e) by failing to make advance payment totaling $4,111 for travel, but take no further action;

7. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5) by failing to maintain records which identified the name, address, amount and purpose for 111 disbursements under $200 totaling $40,712, but take no further action;

8. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1) by making 36 check disbursements payable to "cash" for amounts over $100 totaling $26,180, but take no further action;

9. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A) by failing to report or itemize check disbursements totaling $17,171 made payable to "cash," but take no further action;

10. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to file 48-hour notices for 45 contributions totaling $80,870, but take no further action;

11. Send the appropriate admonishment letters; and

12. Close the file.

8/18/97
Date

Lawrence M. Noble
General Counsel

Attachments

1. Letter and documentation from Congresswoman Brown dated January 6, 1997
2. Letter and documentation from Congresswoman Brown dated January 7, 1997
3. Respondents' response to the General Counsel's Brief dated May 7, 1997
4. Affidavit from Dr. Edward R. Scott, II, DDS
5. Affidavit from Dr. Melvin T. Stith

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Corrine Brown and Gloria Simmons, as treasurer; Congresswoman Corrine Brown.	)	MUR 4160

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 22, 1997, the Commission decided by a vote of 5-0 to take the following actions in MUR 4160:

1. Find probable cause to believe that Congresswoman Brown violated 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a) by making three loans totaling $6,160 to Friends of Corrine Brown from monies that were not her personal funds, but take no further action.

2. Find probable cause to believe that Congresswoman Brown violated 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a) by making a $1,500 cash loan to Friends of Corrine Brown from monies that were not her personal funds, but take no further action.

3. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441a(f) and 11 C.F.R. 110.9(a) by accepting four loans totaling $7,660 from Congresswoman Brown that consisted of monies that were not her personal funds, but take no further action.

4. Take no further action with respect to one loan for $5,000 that Congresswoman Brown made to Friends of Corrine Brown on August 28, 1992.

(continued)

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5. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) by accepting $3,200 in prohibited corporate contributions, but take no further action.

6. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e) by failing to make advance payment totaling $4,111 for travel, but take no further action.

7. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(c)(5) by failing to maintain records which identified the name, address, amount, and purpose for 111 disbursements under $200 totaling $40,712, but take no further action.

8. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 432(h)(1) by making 36 check disbursements payable to "cash" for amounts over $100 totaling $26,180, but take no further action.

9. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(b)(5)(A) by failing to report or itemize check disbursements totaling $17,171 made payable to "cash," but take no further action.

(continued)

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10. Find probable cause to believe that Friends of Corrine Brown and Gloria Simmons, as treasurer, violated 2 U.S.C. § 434(a)(6)(A) by failing to file 48-hour notices for 45 contributions totaling $80,870, but take no further action.

11. Send the appropriate admonishment letters, as recommended in the General Counsel's Report dated August 18, 1997.

12. Close the file.

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

Attest:

8-25-97
Date

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

Received in the Secretariat: Tues., Aug. 19, 1997 9:52 a.m.
Circulated to the Commission: Tues., Aug. 19, 1997 4:00 p.m.
Deadline for vote: Fri., Aug. 22, 1997 4:00 p.m.

lrd

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1997

Dr. Edward R. Scott, II
1100 East Tennessee Street
Suite #B
Tallahassee, FL 32308

RE: MUR 4160

Dear Mr. Scott:

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. 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 receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Andrie G. Pineda
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1997

Dr. Melvin T. Stith
2588 Noble Drive
Tallahassee, FL 32312

RE: MUR 4160

Dear Mr. Stith:

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. 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 receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Andre G. Pineda
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1997

John D. Baker, President
Florida Rock Industries, Inc.
Aviation Department
155 E. 21st Street
Jacksonville, FL 32201

RE: MUR 4160

Dear Mr. Baker:

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. 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 receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Andre G. Pineda
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1997

B. Holly Schadler, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Corrine Brown

Dear Ms. Schadler:

This is to advise you that on August 25, 1997, the Federal Election Commission found probable cause to believe that Congresswoman Corrine Brown violated 2 U.S.C. §§ 441a(f) and 441g, provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.9(a). After considering the circumstances of this matter, the Commission also determined to take no further action against Congresswoman Brown, and closed its file in this matter.

The Commission reminds Congresswoman Brown that the making of three loans totaling $6,160 to Friends of Corrine Brown from monies that were not her personal funds is a violation of 2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a). The Commission also reminds Congresswoman Brown that the making of a $1,500 cash loan to Friends of Corrine Brown from monies that were not her personal funds is a violation of 2 U.S.C. §§ 441a(f) and 441g and 11 C.F.R. § 110.9(a). Congresswoman Brown should take steps to ensure that these violations do no occur in the future.

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 receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

cc: The Honorable Corrine Brown

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1997

B. Holly Schadler, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 4160
Friends of Corrine Brown and
Gloria Simmons, as treasurer

Dear Ms. Schadler:

This is to advise you that on August 25, 1997, the Federal Election Commission found probable cause to believe that Friends of Corrine Brown ("Committee") and Gloria Simmons, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 432(c)(5), 432(h)(1), 434(b)(5)(A), and 434(a)(6)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. §§ 110.9(a) and 114.9(e). After considering the circumstances of this matter, the Commission also determined to take no further action against the Committee and Ms. Simmons, as treasurer, and closed its file in this matter.

The Commission reminds the Committee and its treasurer, Ms. Simmons, that the following constitute violations of the Act: the acceptance of four loans totaling $7,660 from Congresswoman Brown that were made from Moines that were not her personal funds (2 U.S.C. § 441a(f) and 11 C.F.R. § 110.9(a)); the acceptance of $3,200 in prohibited corporate contributions (2 U.S.C. § 441b(a)); the failure to make advance payments totaling $4,111 for corporate travel (2 U.S.C. § 441b(a) and 11 C.F.R. § 114.9(e)); the failure to maintain records which identified the name, address, amount and purpose for 111 disbursements under $200 totaling $40,712 (2 U.S.C. § 432(c)(5)); the making of 24 check disbursements payable to "cash" for amounts over $100 totaling $26,180 (2 U.S.C. § 432(h)(1)); the failure to report or itemize check disbursements totaling $17,171 made payable to "cash" (2 U.S.C. § 434(b)(5)(A)); and the failure to file 48-hour notices for 45 contributions totaling $80,870 (2 U.S.C. § 434(a)(6)(A)). The Committee and its treasurer, Ms. Simmons, should take steps to ensure that these violations do not occur in the future.

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

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as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

cc: The Honorable Corrine Brown

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TRANSCRIPT OF PROCEEDINGS

THE FEDERAL ELECTION COMMISSION

In the Matter of:)
) No.: MUR-4160
MUR 4160)

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Dec 10 10 54 AM '96

DEPOSITION OF: CORRINE BROWN

Pages: 1 through 106

Place: Washington, D.C.

Date: November 25, 1996

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HERITAGE REPORTING CORPORATION
Official Reporters
1220 L Street, NW, Suite 600
Washington, D.C.
(202) 628-4888

THE FEDERAL ELECTION COMMISSION

In the Matter of:)
) File No.: MUR-4160
MUR 4160)

Monday,
November 25, 1996

Room No. 657
Federal Elections Commission
999 E Street, N.W.
Washington, D.C.

The above-entitled matter came on for hearing, pursuant to notice, at 10:01 a.m.

APPEARANCES:

On behalf of the Federal Election Commission:

MATTHEW J. TANIELIAN, ESQ.
RHONDA V. VOSDINGH, ESQ.
Federal Election Commission
Office of General Counsel
999 E Street, N.W.
Washington, D.C. 20463
(202) 219-3690

On behalf of the Witness:

B. HOLLY SCHADLER, ESQ.
MARTIN P. WILLARD, ESQ.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011
(202) 434-1634/434-1636

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INDEX

WITNESS:	EXAMINATION:
Corrine Brown	4

EXHIBITS:	PAGE	DESCRIPTION
Commission's		
1	26	Excerpt from Friends of Corrine Brown Committee Report of Receipts and Disbursements to the Federal Election Commission
2	27	Barnett Bank cashier's check dated 7-24-92 to Corrine Brown for Congress, $3,000
3	30	Check from Springfield Travel Agency used to purchase Exhibit 2 cashier's check
4	44	Barnett Bank cashier's check dated 7-31-92 to Corrine Brown for Congress, $3,000
5	47	Check from Brown [illegible] 7-31-92 for ca[illegible] used to purchase [illegible] cashier's che[illegible]
6	49	Check from Sp[illegible] Travel Agency [illegible] 7-31-92, $1,160, [illegible] purchase Exhibit [illegible] cashier's check
7	54	Springfield Tra[illegible] check dated 6-17[illegible] cash, $1,000; [illegible] slip, $1,000

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EXHIBITS:	PAGE	DESCRIPTION
Deposition's		
8	60	Springfield Travel Agency check dated 7-20-92, $250; Brown deposit slip dated 7-20-92, $250
9	64	First Union Bank statement for Corrine Brown, Funds for U.S. House of Representatives, account
10	66	Brown deposit slip, $5,000
11	67	Check from Stith dated 8-27-92 to Brown, $2,500
12	69	Check from Scott dated 8-27-92 to Brown, $2,500
13	81	United States House of Representatives Financial Disclosure Statement for Calendar Year 1992
14	85	Check from Brown dated 8-28-92 to campaign fund, $2,000
15	85	Bank statement for Brown account for period 8-11-92 to 9-10-92
	86	Brown deposit slip; Check from Eliza [illegible] dated 8-24-92 to [illegible]
	88	Brown deposit slip dated 8-31-92, $1,500

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1 P R O C E E D I N G S

2 Whereupon,

3 CORRINE BROWN

4 having been first duly sworn, was called as a

5 witness herein and was examined and testified as follows:

6 THE REPORTER: Would you please state your name

7 for the record?

8 THE WITNESS: Corrine Brown.

9 THE REPORTER: Thank you.

10 EXAMINATION

11 BY MR. TANIELIAN:

12 Q Congresswoman Brown, could you also please state

13 your address and social security number for the record?

14 A What address do you want?

15 Q Your local address.

16 A 1515 Jefferson Davis Highway. My social security

17 number is

18 Q My name is Matt Tanielian. I am an attorney with

19 the Federal Election Commission. This is Rhonda Vosdingh.

20 She is also an attorney with the Commission. I will be

21 taking your deposition today.

22 This deposition is being taken in connection with

23 an investigation authorized under Section 437(g) of Title II

24 of the U.S. Code. The statute provides that the

25 confidentiality of this matter must be maintained until the

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1 Commission has closed its file on this matter.

2 This investigation is designated Matter Under

3 Review or MUR 4160.

4 Congresswoman Brown, are you represented by

5 counsel today?

6 A Yes, I am.

7 MR. TANIELIAN: Counsel, could you identify

8 yourselves?

9 MR. WILLARD: Martin Willard from Perkins Coie.

10 MS. SCHADLER: Holly Schadler, Perkins Coie.

11 BY MR. TANIELIAN:

12 Q Congresswoman Brown, have you ever been deposed

13 before?

14 A Once.

15 Q And under what circumstances was that? Was it a

16 civil trial?

17 MR. WILLARD: What was the case about? Do you

18 recall?

19 THE WITNESS: A property dispute.

20 BY MR. TANIELIAN:

21 Q Since you have been deposed before, I am just

22 going to briefly explain what is going to go on here today.

23 As you know, I am going to be asking you a series

24 of questions. The court reporter is going to be recording

25 everything we say, and your answers are going to be under

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1 oath.

2 If you do not understand a question just say so,

3 and I will try and clarify it for you the best I can. Also,

4 please answer verbally. The court reporter will not be

5 recording gestures or nods.

6 If at any time you need a break, please tell me.

7 Just so you understand, we are on the record, and we will be

8 on the record until I instruct the court reporter to go off

9 the record.

10 Before we get started with the questions, is there

11 any reason why you cannot be deposed today?

12 A No.

13 Q What did you do to prepare for today's deposition?

14 A Would you explain prepare?

15 Q Did you review any documents?

16 A Yes.

17 Q And what were those documents?

18 A Reports. My reports.

19 Q Your committee disclosure reports --

20 A That's correct.

21 Q -- for the period in 1992, the year 1992 campaign?

22 A Yes.

23 Q Did you discuss this deposition with your campaign

24 treasurer, Gloria Simmons?

25 A No.

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1 Q Did you discuss this deposition with Elias
2 Simmons?
3 A Yes.
4 Q And what did you discuss with Mr. Simmons?
5 A That this deposition was taking place.
6 Q Okay. Did you discuss anything about what had
7 happened in 1992 during your campaign or go over any
8 background information with Mr. Simmons?
9 A I'm not quite sure what you mean.
10 Q When you told Mr. Simmons that you were going to
11 be deposed by the Federal Election Commission, did you have
12 a discussion with him about the deposition?
13 A Yes.
14 Q Did you discuss the loans you made to your
15 campaign in 1992?
16 A Not exactly.
17 Q Other than counsel and Mr. Simmons, did you
18 discuss this deposition with anyone else?
19 A No.
20 Q For the record, could you please state your
21 current occupation?
22 A I'm a member of the United States Congress.
23 Q And what year were you elected in?
24 A 1992.
25 Q Prior to your 1992 election, what was your

9704384075 5

1 occupation?

2 A I was a member of the Florida House of

3 Representatives for ten years. I was a professor at Florida

4 Community College.

5 Q During those ten years at the Florida House of

6 Representatives, how many times did you run for re-election?

7 A Four.

8 Q Could you tell me what was your salary as a

9 Florida state representative in 1992?

10 A I can't remember.

11 Q Can you give me an approximate amount?

12 A I really don't know exactly. At one point it was

13 $12,000 for many years, and then we got a raise. I can't

14 tell you the exact amount. I'm not sure.

15 Q As a professor at Florida Community College, can

16 you tell me what was your salary there?

17 A I don't remember exactly.

18 Q Can you give me an approximation, please?

19 A It was prorated depending on the number of days

20 that I worked, so they vary it.

21 Q Okay. Did you have any other sources of income in

22 1992?

23 A No, no other sources of income.

24 Q Did you own any businesses in 1992?

25 A Yes, I did.

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1 Q And what were those businesses?
2 A The Springfield Travel Agency.
3 Q Any other businesses?
4 A Not to my knowledge.
5 Q Were you a member of any partnerships?
6 A I'm not sure what you mean.
7 Q Congresswoman Brown, could you tell me what was
8 Springfield Travel Agency?
9 A Springfield Travel Agency was a travel agency.
10 Q And where was the business located?
11 A In what year?
12 Q In 1992?
13 A Tallahassee, Florida, I think.
14 Q Did it have any other locations prior to its move
15 to Tallahassee?
16 A What years?
17 Q Going back to 1991?
18 A Tallahassee, I think. I'm not real sure.
19 Q Prior to its move to Tallahassee, where was it
20 located?
21 A In Jacksonville.
22 Q When did it cease operation in Jacksonville?
23 A I cannot be exact on the dates.
24 Q Okay. I understand. Could you give me a year?
25 A I cannot. I don't remember.

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1 Q But at some point it ceased operation in
2 Jacksonville and moved to Tallahassee, and in 1992 it
3 operated in Tallahassee?
4 A I'm not sure about 1992.
5 Q In 1992 it was operating in Tallahassee?
6 A I think so, but I'm not sure about the dates. I
7 want to be clear about that. I'm not sure about the dates.
8 Q I am interested in knowing when Springfield Travel
9 Agency ceased operations. I would ask if you could find out
10 that information for me and submit it to the Commission.
11 A Yes, sir.
12 MR. TANIELIAN: That would be very helpful.
13 MR. WILLARD: I am sorry. When the agency moved
14 from one place to another or when it ceased entirely?
15 MR. TANIELIAN: Actually, we would like to know
16 both when it moved from Jacksonville to Tallahassee, and
17 then it appears Congresswoman Brown is saying that at some
18 point it ceased operations in Tallahassee also. We would
19 like to know that date.
20 THE WITNESS: Ceased my ownership because I think
21 it's still operating.
22 MR. TANIELIAN: Okay. Then it would be
23 Congresswoman Brown's date of ownership that would be the
24 important date.
25 //

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BY MR. TANIELIAN:

Q Was Springfield Travel Agency incorporated?

A I think so.

Q Do you know approximately what date it was incorporated?

A No.

Q And you had stated that you were an owner of Springfield Travel Agency?

A Yes.

Q Could you identify the other owners of Springfield Travel Agency?

A I was the owner.

Q You were the single owner?

A Yes, to my recollection.

Q And this is in 1992?

A You're saying 1992, and I'm saying I can't remember the exact date. I want to be clear about that because I don't remember.

Q During the period that you owned Springfield Travel Agency, at any time that you owned Springfield Travel Agency were there other owners with you, or were you always the sole owner?

A Sole owner.

Q You were the sole owner?

A Sole owner.

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1 Q Okay.

2 A To my knowledge.

3 Q Could you tell me what is Gator Travel Agency?

4 A It is a travel agency.

5 Q Could you identify the owners?

6 A I don't know who the owners are.

7 Q Could you identify the owners in 1992?

8 A At some point I was the owner. I'm not sure about

9 the dates.

10 Q Were you a corporate officer or director of

11 Springfield Travel Agency?

12 A I was the owner. Corporate officer? I'm not sure

13 what you mean.

14 Q Did you have a title? Were you the president?

15 A Yes.

16 Q During your ownership of Gator Travel, were you

17 also an officer in Gator Travel?

18 A I don't remember exactly how that was

19 incorporated.

20 Q Can you tell me what the location of Gator Travel

21 was?

22 A It was in Gainesville, Florida.

23 Q Gainesville?

24 A Uh-huh.

25 Q And what about the approximate dates of operation?

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1 A I can't help you with that. I don't remember.
2 Q Were Gator Travel Agency and Springfield Travel
3 Agency affiliated in any way?
4 A At one time they all had the same owner.
5 Q Did one ever do business as the other? Did Gator
6 Travel ever do business as Springfield Travel Agency?
7 A I'm not sure what you mean by that.
8 Q Did they ever share office space?
9 A No.
10 Q In 1992, did you receive a salary from Springfield
11 Travel Agency?
12 A Never received a salary.
13 Q And also in 1992, did you receive a salary from
14 Gator Travel?
15 A Never received a salary.
16 Q Did you receive a distribution of profits from
17 Springfield Travel Agency?
18 A Never had any profit to distribute.
19 Q And did you receive a distribution of profits from
20 Gator Travel in 1992?
21 A Never had any profit.
22 Q I believe you have already stated this, but you
23 are no longer affiliated or you are no longer an owner of
24 either Gator Travel or Springfield Travel?
25 A That's correct.

1 Q I would just like to jump back to a couple
2 background questions real quickly. Congresswoman Brown, are
3 you married?
4 A No, I'm not.
5 Q Have you been married previously?
6 A No.
7 Q Do you have any children?
8 A Yes. I have a daughter.
9 Q And her name?
10 A Shantrel Brown.
11 Q What college did you attend?
12 A Florida A&M University and the University of
13 Florida.
14 Q Did you receive a post graduate degree?
15 A From which school?
16 Q From either.
17 A From Florida A&M University I received a
18 Bachelor's and a Master's, and from the University of
19 Florida I received an Education Specialist's.
20 Q I would like to talk about your 1992 congressional
21 campaign for the United States House of Representatives.
22 When did you make the decision to run for the U.S. Congress?
23 A I'm not sure about the date.
24 Q And what date did you announce your candidacy?
25 A I don't remember.

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1 Q Can you give me an approximate date, a month, in
2 1992?
3 A It would be speculating. I just don't remember.
4 It was sometime during the petition drive because I
5 petitioned.
6 Q Correct. Okay. At that same time that you
7 announced for the United States Congress, were you also
8 filed as a candidate for the Florida State Senate?
9 A That's correct.
10 Q And did you subsequently withdraw that candidacy,
11 or was that not necessary?
12 A It was not necessary, to my knowledge.
13 Q Okay.
14 A I didn't file for it.
15 Q Okay. Did Gloria Simmons work on your 1992 U.S.
16 House campaign?
17 A That's correct.
18 Q And what was her position?
19 A Treasurer.
20 Q How long have you known Gloria Simmons?
21 A All of my life.
22 Q And did you have any other financial dealings with
23 Gloria Simmons?
24 MR. WILLARD: What do you mean, any other
25 financial dealings?

1 BY MR. TANIELIAN:

2 Q Were you in any business ventures together?

3 A Gloria Simmons' relationship with my business

4 ventures was all volunteer. She has never been paid for any

5 services.

6 Q Was Gloria Simmons affiliated with Springfield

7 Travel Agency?

8 A I think as an officer, but I don't remember

9 exactly. It was a non-paid position.

10 Q Are Gloria Simmons and Elias Simmons related in

11 any way?

12 A Not in any way.

13 Q To your knowledge, was Gloria Simmons employed in

14 any other position or job when she was working on your 1992

15 campaign?

16 A Gloria Simmons worked for the Duval County public

17 school system. Her affiliation with the campaign is --

18 was -- strictly volunteer.

19 Q Okay. Did Elias Simmons work on your 1992 House

20 campaign?

21 A Yes, he did.

22 Q Does Mr. Simmons go by another name, specifically

23 Ronnie Simmons?

24 A That's correct. His given name -- well, I would

25 be speculating, but I think his given name is Elias, but

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1 everybody calls him Ronnie.

2 Q Okay. What position did Elias Simmons hold on

3 your 1992 campaign?

4 A Volunteer.

5 Q Did he have any specific duties?

6 A He worked in the campaign.

7 Q Was he involved with fundraising?

8 MR. WILLARD: What do you mean, involved in

9 fundraising?

10 I think she just said he had a position as a

11 volunteer on the campaign. Can you be a little more

12 specific?

13 BY MR. TANIELIAN:

14 Q Did Elias Simmons raise any money for your

15 campaign?

16 A No.

17 Q Did he ever speak to contributors about --

18 A Well, I can't really speak to that. Not to my

19 knowledge.

20 Q Congresswoman Brown, who was your 1992 campaign

21 manager?

22 A Congresswoman Corrine Brown.

23 Q And what position did Joyce Rogers hold in your

24 campaign?

25 A She came in towards the end and worked in the

9 7 0 4 3 3 4 0 7 6 5

1 campaign as manager.

2 Q Was she paid, or was she a volunteer?

3 A I'm not quite sure. Maybe a little of both.

4 Q What position did Dr. Kenneth Jones hold in your

5 1992 campaign?

6 A Campaign treasurer, I think. You see, you have

7 treasurer and co-treasurer. I'm not sure.

8 Q You stated previously that Gloria Simmons was the

9 treasurer. Did they operate in that capacity as

10 co-treasurers?

11 A Perhaps one was treasurer and one was assistant

12 treasurer. I'm not quite sure.

13 Q But both Dr. Jones and Gloria Simmons were

14 involved with the campaign finance materials submitted to

15 the Commission, for example, and the duties of being a

16 treasurer, correct?

17 A Yes.

18 Q Did you have any paid fundraisers or consultants

19 on your 1992 campaign?

20 A I can't remember, but I don't think so.

21 Q Did you have anybody on the campaign who you would

22 consider your chief fundraiser?

23 A No.

24 Q To the best of your recollection, how much did

25 your 1992 committee spend on your campaign for the U.S.

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1 House of Representatives?

2 A Can you be more exact?

3 Q What were the total expenditures of your 1992

4 committee?

5 A I'm confused about the question.

6 Q Let me just go on then. Did you consider prior to

7 mounting your 1992 campaign how expensive it would be to run

8 for the United States House of Representatives?

9 A No, sir.

10 Q Did you give any thought to how much it would

11 cost?

12 A No, sir.

13 Q Prior to the campaign, did you ever consider

14 whether it would be necessary at some point in the campaign

15 to contribute your own funds?

16 A Yes. I was prepared to do it.

17 Q During the 1992 campaign, you continued in your

18 position as a member of the Florida State House of

19 Representatives?

20 A Yes.

21 Q Through the end of your term?

22 A Yes, through the end of my term.

23 Q Did you also continue your position at Florida

24 State Community College?

25 A Florida Community College --

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1 Q Florida Community College.

2 A -- in Jacksonville. Keeping in mind, I only

3 worked certain days.

4 Q Right. Could you just briefly describe this

5 system of prorating your salary?

6 A Based on the number of days that I worked.

7 Q And was that impacted significantly by the change

8 in semesters and the summer?

9 A No. I had legislative duties, times I could not

10 be at the college.

11 Q Right.

12 A My total contract was 170 days or whatever days

13 that we worked out. It was negotiated days.

14 Q During your 1992 campaign, did you have any other

15 sources of income such as dividend disbursements from

16 stocks?

17 A No, sir.

18 Q Did you have any rental properties that you

19 received income from?

20 A Rental properties? Possibility. However, they

21 paid the rental property. There was no profit involved.

22 Q When you say that, do you mean they paid the

23 amount of the mortgage payment?

24 A The mortgage payment, yes.

25 Q And they made that payment to you?

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1 A And I made it to the rental company.

2 Q Okay. Were these incomes sufficient to cover your

3 personal expenses during the campaign?

4 MR. WILLARD: Excuse me. Which incomes are you

5 referring to?

6 MR. TANIELIAN: The incomes from the Florida state

7 legislature, Florida Community College and the rental

8 property, to the extent you needed to use it.

9 THE WITNESS: Yes.

10 BY MR. TANIELIAN:

11 Q Did you borrow any money during your 1992

12 campaign?

13 A I don't remember exactly.

14 Q When you say you do not remember exactly, do you

15 mean you do not remember exactly from whom you borrowed the

16 money or if you borrowed the money?

17 A From whom.

18 Q Did you borrow money from banks?

19 A No.

20 Q Did you borrow money from friends or relatives?

21 A Yes.

22 Q Could you tell me what were the names of the

23 people you borrowed money from?

24 A Elias Simmons is the only one I remember.

25 Q Did you borrow money from any business

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1 acquaintances?

2 A No.

3 Q When you borrowed money from Elias Simmons, what

4 was the amount of that loan?

5 A I don't remember exactly.

6 Q Was there any documentation of that loan?

7 A No.

8 Q Was there any signed agreement?

9 A No.

10 Q Was there interest on that loan?

11 A No.

12 Q Were there any terms of repayment schedule?

13 A No.

14 Q And what were the loan proceeds from the loan from

15 Elias Simmons used for?

16 A The campaign.

17 Q Had you ever taken a loan from Elias Simmons

18 before?

19 A No.

20 Q Congresswoman Brown, your committee has reported

21 that you made $14,500 in loans to your campaign in 1992.

22 Did making these loans put a strain on your personal

23 finances?

24 MR. WILLARD: I am sorry. What do you mean by

25 putting a strain on her personal finances? It is vague.

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1 BY MR. TANIELIAN:

2 Q When you made those loans to your campaign, they
3 came at the end of July and at the end of August, 1992, in
4 two distinct groups.

5 At the end of July when you made two loans to your
6 campaign, were you able to continue your personal
7 obligations that you had without any problems?

8 A I really don't understand that question.

9 Q Concerning the money you gave to your campaign,
10 those contributions were made in the form of loans.

11 A Yes.

12 Q Can you tell me why you decided to make these
13 loans and not direct contributions to your campaign?

14 A My understanding is that's the proper way to make
15 a contribution to your campaign.

16 Q It can be done either way. You can make it in the
17 form of a loan or in the form of a contribution. At the
18 time, did you consider doing that?

19 A No.

20 Q Your committee reported that on July 28, 1992, you
21 made a $3,000 loan to your campaign. Do you remember making
22 this loan?

23 A I don't remember the exact amounts. I remember
24 over the period of the campaign I made a total contribution
25 of $14,000 and something, which is what you said, but I do

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1 not remember the exact amounts.

2 Q Do you remember anything about this loan in

3 particular, the first loan you made to your campaign?

4 A No.

5 Q In general, why did you decide to loan money to

6 your committee?

7 A It needed it.

8 Q And how did you know this?

9 A There are things that you have to do in a

10 campaign.

11 Q Did someone on your campaign inform you that the

12 committee needed money at a certain point in time?

13 A I was the campaign. I was very involved with the

14 campaign. I knew exactly what the campaign needed.

15 Q Did you ever discuss making these loans with

16 anybody on your campaign prior to making them, Gloria

17 Simmons or Elias Simmons?

18 A (Non-verbal response.)

19 MR. WILLARD: Can we take a break to get some more

20 water?

21 MR. TANIELIAN: Let's take a break and go off the

22 record.

23 (Whereupon, a short recess was taken.)

24 MR. TANIELIAN: We will go on the record.

25 //

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1 BY MR. TANIELIAN:

2 Q Congresswoman Brown, in your capacity directing

3 your 1992 campaign, were you compensated in any way, or were

4 you a volunteer on your campaign?

5 A I was a volunteer. I ran the campaign, meaning

6 the literature, the radio, whatever the drops, whatever the

7 information getting out into the community. That's what I

8 mean by I ran the campaign.

9 Q Besides Elias Simmons, was there anyone else who

10 loaned you money during your 1992 campaign?

11 A Not to my knowledge. Not that I can remember.

12 Q And your rental property that you had during the

13 campaign, who was the person renting the property?

14 A Oh, I don't remember. That changes.

15 Q Do you still own that property?

16 A Yes.

17 Q And do you still rent that property?

18 A That's correct.

19 Q Is it no longer the same person?

20 A Oh, no. I mean, it changes. I mean, with rental

21 property it changes.

22 Q You said that you do not remember the particular

23 loan you made to your campaign on July 28?

24 A No.

25 MR. TANIELIAN: If you could mark this FEC Exhibit

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1 1, please?

2 This is a four page document which is an excerpt

3 of Friends of Corrine Brown Committee Report of Receipts and

4 Disbursements to the Federal Election Commission.

5 (The document referred to was

6 marked for identification as

7 FEC Exhibit No. 1.)

8 MR. TANIELIAN: Congresswoman Brown, if I could

9 have you take a look at that?

10 MR. WILLARD: You do not have an extra copy of

11 this, do you?

12 MR. TANIELIAN: Sure.

13 MS. SCHADLER: Thank you.

14 THE WITNESS: Is this the original, or is this the

15 corrected one?

16 MR. TANIELIAN: This is the final amended --

17 THE WITNESS: The amended one.

18 MR. TANIELIAN: -- report that you filed.

19 BY MR. TANIELIAN:

20 Q Have you had a chance to look at this?

21 A Yes.

22 Q Congresswoman Brown, could I have you refer to

23 Page 4 of the document, the last page of the document?

24 A Yes.

25 Q This is Schedule C, Loans.

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1 A Uh-huh.

2 Q On the second entry, could you please read for me

3 the name of the loan source?

4 A This one? My name?

5 Q Right. Yes.

6 A Corrine Brown, personal funds, Jacksonville,

7 Florida 32208, $3,000.

8 Q Does this refresh your recollection of that loan

9 in your mind?

10 A No, it does not. I know that it's on the form,

11 but I don't remember the amounts, the exact amounts.

12 MR. TANIELIAN: If the court reporter would please

13 mark this FEC Exhibit 2?

14 (The document referred to was

15 marked for identification as

16 FEC Exhibit No. 2.)

17 MS. SCHADLER: If you have extra copies of these,

18 if you could pass them to me?

19 MR. TANIELIAN: Sure.

20 MS. VOSDINGH: We need them back.

21 MS. SCHADLER: That is fine.

22 MS. VOSDINGH: Okay.

23 MS. SCHADLER: Sure.

24 BY MR. TANIELIAN:

25 Q Congressman Brown, could you

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1 document marked FEC Exhibit 1?

2 A Uh-huh.

3 Q This is a Barnett Bank official check which was

4 provided by your committee as the source of the July 28

5 loan.

6 Could you please tell me what is the name of the

7 person to whom the check is written to?

8 A Corrine Brown for Congress.

9 Q And what does it say directly under that?

10 A Loan to campaign.

11 Q And what kind of check is this?

12 A Cashier's. Official cashier's check.

13 Q Are official checks the same as cashier's checks

14 basically?

15 A Yes.

16 Q And the date on this check?

17 A July 24.

18 Q Could you also read for me the serial number in

19 the upper right-hand corner?

20 A 01030334.

21 Q Have you ever seen this document before?

22 A I don't recall.

23 Q Does it refresh your recollection at all to know

24 that your committee provided this as the source of the

25 July 24th $3,000 loan you made to your committee?

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1 A As I said before, I knew over the course of the
2 period that I contributed $14,000 to the campaign. I don't
3 remember the exact figures. This is one of the checks that
4 you have indicated was a part of that.
5 Q Do you remember purchasing this check?
6 A I don't recall. I don't remember.
7 Q Is it possible that you had somebody else purchase
8 this check for you? Would you have done that?
9 A You cannot do that. If my name -- when you go to
10 the bank and you make the cashier's check, then it has
11 Corrine Brown. I'm certain that I was the person that
12 purchased the check, but I do not remember.
13 Q Do you mean where it says Corrine Brown following
14 the Re: in the center of the check? Is that where you are
15 referring to?
16 A It says Paid By: Corrine Brown. It says Paid By
17 right here.
18 MR. WILLARD: I think it is just Re: Corrine
19 Brown.
20 THE WITNESS: All right.
21 BY MR. TANIELIAN:
22 Q That is what you were referring to?
23 A Yes.
24 Q All right. Thank you. Is there any reason why
25 you would have used an official bank check rather than a

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1 personal check to make a transfer of funds to your campaign?

2 A It was official, and I felt this is the way I do

3 business.

4 MR. TANIELIAN: If I could have the court reporter

5 please mark that FEC Exhibit 3?

6 (The document referred to was

7 marked for identification as

8 FEC Exhibit No. 3.)

9 BY MR. TANIELIAN:

10 Q Congresswoman Brown, if I could please have you

11 take a look at that check?

12 A Uh-huh.

13 Q It appears to be a check from Springfield Travel

14 Agency.

15 A Uh-huh.

16 Q This check was supplied by Barnett Bank as the

17 item used to purchase Official Check 01030334.

18 A Uh-huh.

19 Q Have you ever seen this document before?

20 A Have I ever seen this? Yes, I've seen it.

21 Q Could you describe the document to me? What is

22 the name at the top of the check?

23 A Springfield Travel Agency.

24 Q And who is the check made out to?

25 A Cash.

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1 Q And the signature on the check? Is that your
2 signature?
3 A Yes.
4 Q Could you tell me what the date on this check is?
5 A It looks like August 25.
6 Q And the year?
7 A There's no year there. I don't see a year.
8 Q Congresswoman Brown, did you write this check?
9 A I don't recall.
10 Q You say you have seen this check before, though?
11 A Yes. I have a copy of this.
12 Q When was the last time you looked at the copy of
13 this check?
14 A I don't remember, but I've seen this.
15 Q Was it any time in the last year?
16 A Yes.
17 Q And why did you have occasion to look at this
18 check in the past year?
19 A I looked through all of them. I went through the
20 checks and reports.
21 Q When you say all of the checks, do you mean all of
22 the --
23 A I went through all of the checks.
24 Q All of what checks?
25 A The checks that we're talking about.

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1 Q In 1992, were you the sole owner of Springfield
2 Travel Agency?
3 A I don't recall.
4 Q Were you the sole owner of Springfield Travel
5 Agency in July, 1992?
6 A I'm going to repeat that I don't remember the
7 exact dates.
8 Q Could you tell me were you an owner of Springfield
9 Travel Agency at any time during 1992?
10 A Yes, I think so. I mean, 1991-1992. I'm not sure
11 about the dates. I want to emphasize that. I am not sure
12 about the dates. You're asking me to speculate.
13 Q How did you end your affiliation with Springfield
14 Travel Agency?
15 A I sold it.
16 Q Who did you sell it to?
17 A Dr. -- I can't think of his name -- Stith or
18 something like that. Melvin Stith. Who was the other
19 person? Two people from Tallahassee.
20 Q Do you remember their names?
21 A Not exactly. I know Melvin Stith, and the other
22 one is a dentist. I can't think of it right this moment.
23 MR. WILLARD: Can we take a two minute break?
24 MR. TANIELIAN: Sure.
25 (Discussion held off the record.)

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1 THE WITNESS: Before we go on, I want to go back
2 to the cashier's check. You asked me the same question over
3 and over again, and I want to be clear.
4 I do not remember writing this check. I do not
5 remember, like I said, the total amount. I remember it was
6 $14,000 something because I reviewed the documents. I don't
7 remember this specific check. I mean, I have seen it in
8 preparation for this, but I cannot recall three years ago or
9 four years ago going to the bank and purchasing this.
10 I just want to be clear about that because you
11 have asked me about this several times, and I want to be
12 clear that I do not remember the actual purchasing of this
13 check, but I do know that I purchased a total amount of
14 $14,000. I want to be clear on that.
15 MR. TANIELIAN: Okay.
16 MR. WILLARD: And on the purchasers of Springfield
17 Travel Agency, did you want to clarify that? Do you
18 remember?
19 THE WITNESS: Oh, the names. I'm not sure about
20 Melvin. Both of them are doctors, but Melvin Stith, I
21 think. I'm not sure about his last name. The other one is
22 Dr. Scott. I can't remember his first name.
23 BY MR. TANIELIAN:
24 Q Edward Scott?
25 A Edward Scott, yes. You know the name. Edward

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1 Scott.

2 Q Why did you decide to sell Springfield Travel

3 Agency?

4 A That's a long story.

5 Q If you could tell me briefly?

6 A It's just a very long story. First of all, I was

7 not going to be in Tallahassee any longer, and it's very

8 hard to run a business long distance. Two, I was not going

9 to be there, so I wanted to get out of the business in

10 Tallahassee.

11 Q When you sold the business, how much did you sell

12 it for?

13 A I don't remember exactly.

14 Q Could you give me an approximate amount?

15 A Between $40,000 and $50,000, but I had to pay the

16 outstanding tickets and the expenses of the business.

17 Q To go back to when you sold Springfield Travel

18 Agency, do you remember if it was before you began your

19 campaign?

20 A I don't remember. I just don't remember. I don't

21 think before I started because the petition drive started

22 early. I would say that my campaign started officially when

23 the petition drive started.

24 Q Do you know the date the petition drive began?

25 A I do not. That is information that I could get

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1 for you, but it started during the petition drive because
2 you're officially saying that you're running for office if
3 you petition. I petitioned and filled out the necessary
4 petitions, which saved the campaign $10,000.
5 Q Do you remember if you sold Springfield Travel
6 Agency before this check was written or after?
7 A I do not remember specific dates.
8 Q Would it be reasonable for us to say that you
9 would not have written a check on Springfield Travel Agency
10 after the date that you had sold the business?
11 MR. WILLARD: Do you understand what he is asking?
12 THE WITNESS: After I sold it I would not, right.
13 Absolutely, but I still can't tell you the date.
14 BY MR. TANIELIAN:
15 Q Just to give you one more date to try and relate
16 this to, did you sell Springfield Travel Agency before the
17 1992 election?
18 A I do not recall, and you do need to clarify what
19 election. I have asked you that before.
20 Q The 1992 for the United States House of
21 Representatives.
22 A The election date?
23 Q The general election.
24 A Well, that's November.
25 Q Right.

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1 A Keep in mind, I had three elections during that
2 period. When you say elections, I'm not sure what election
3 you're talking about. I had a primary, a run-off and a
4 general, so I had a total of three elections. I think that
5 is very important for the record that I had three elections.
6 You keep saying election as if it is one. I had a
7 primary, I had a run-off, and I had a general. I had them
8 within a 90 day period, probably more than anyone else in
9 this entire country. Three elections -- full elections --
10 in 90 days.
11 Q Do you remember then, to be more specific, if you
12 sold Springfield Travel Agency before the primary election?
13 A I don't remember. I do not recall.
14 Q Do you remember what this $3,000 check from
15 Springfield Travel Agency was used for?
16 A I don't recall.
17 Q Did you cash this check?
18 A It says cashed.
19 Q Do you remember cashing this check?
20 A I do not remember cashing this check.
21 Q Could you read for me the endorsement on the back
22 of the check?
23 A It says Exchange For, and then you have some
24 numbers. I don't know what that means.
25 Q Could you read those numbers for me?

1 A 0C1030334.

2 Q I would have you refer back to Exhibit 2. Does

3 that number match the number that appears at the top of the

4 Barnett Bank official check?

5 A This says 0C.

6 Q I believe that is OC.

7 A I don't see a C on here.

8 MR. WILLARD: The number is 1030334.

9 THE WITNESS: Yes, but it doesn't exactly match.

10 I can't say it exactly matches. It doesn't. What are these

11 two numbers?

12 BY MR. TANIELIAN:

13 Q When you say it does not exactly match, could you

14 be more specific?

15 A Well, there are some numbers on the back of this

16 check that are not on the check you asked me to read from.

17 Q Do the final seven digits of the serial number on

18 the Barnett Bank official check match the three numbers that

19 appears on the endorsement?

20 A Yes.

21 Q Okay.

22 A But not the first two.

23 Q Does this at all refresh your recollection --

24 A No, sir.

25 Q -- about what these checks were used for?

1 A No, sir, it doesn't. I mean, it says for the
2 campaign. It says that.
3 Q Referring to FEC Exhibit 3, the Springfield Travel
4 Agency check --
5 A Uh-huh.
6 Q -- could you tell me why did you receive $3,000
7 from Springfield Travel Agency?
8 MR. WILLARD: I am sorry. What do you mean, why
9 did she receive?
10 THE REPORTER: Could you speak up please, Mr.
11 Willard. I can barely hear you.
12 MR. WILLARD: I just do not understand what you
13 mean by that question. She already said that she cashed the
14 check.
15 BY MR. TANIELIAN:
16 Q And what was the purpose of Springfield Travel
17 Agency conveying $3,000 to you?
18 A Repayment. My money that I put in Springfield
19 Travel Agency.
20 Q Was it the repayment of a loan to Springfield?
21 A An ongoing loan.
22 Q So you had an ongoing loan with Springfield Travel
23 Agency as the owner?
24 A Yes, that's correct.
25 Q Could you describe for me this ongoing loan?

9 7 0 4 0 3 4 0 7 8 6

1 A Yes. Any time Springfield Travel Agency needed
2 money, I would loan Springfield Travel Agency money to make
3 its bills or pay its debts.
4 Q Were there any terms to this loan?
5 A Hopefully one day I would get paid back.
6 Q Was there any interest?
7 A There was no interest. I mean, you know, I just
8 paid the bills.
9 Q Was there any documentation of this loan? Was
10 there any agreement that you memorialized this loan with?
11 A No. This was over a period of years that I made
12 contributions. Not contributions, but carried the bills
13 hoping that it would jump start.
14 Q How many times approximately did you --
15 A I can't recall, --
16 Q -- put money in to Springfield Travel Agency?
17 A -- but over a long period of time.
18 MR. WILLARD: Try to let him finish asking the
19 question.
20 THE WITNESS: Okay.
21 BY MR. TANIELIAN:
22 Q Was it more than ten?
23 A Yes.
24 Q Was it more than 100?
25 A I can't say the exact.

9/0/0/4/0/0/4/0/7/8/7

1 Q Okay.

2 A A lot more than ten.

3 Q Do you have any documentation of this loan at all,

4 meaning the checks you gave to Springfield Travel Agency in

5 order to make the loans?

6 A No.

7 Q Was the $3,000 check that is Exhibit 3 repayment

8 of a $3,000 loan, a specific $3,000 loan you made to

9 Springfield Travel Agency, or was it a general repayment?

10 MR. WILLARD: Do you understand?

11 THE WITNESS: No. I don't understand the

12 question.

13 BY MR. TANIELIAN:

14 Q Did you make a specific $3,000 loan to Springfield

15 Travel Agency?

16 A I don't recall a specific $3,000 loan, but I

17 recall lots more than $3,000 over a period of time.

18 Q So the repayment of these loans would not match

19 specific loans --

20 A No.

21 Q -- that you had made?

22 A No.

23 Q And this repayment in particular could have

24 covered more than one loan you made to Springfield Travel

25 Agency?

1 A It could, yes, but we're speculating.

2 Q Was anybody else aware of the loan you made to

3 Springfield Travel Agency?

4 A No.

5 Q Did you have an accountant who did the books for

6 Springfield Travel Agency?

7 A Yes. Over a period of time, yes. Not one exact

8 person.

9 Q This person, would they have kept records of

10 something like this?

11 A Not to my knowledge. I don't remember.

12 Q Is it possible that you can contact this

13 accountant and --

14 A I would like to clear this up. Over a period of

15 time, I made numerous loans to Springfield Travel Agency.

16 Not one specific amount. I mean, over the course of the

17 time that the travel agency was there, I made loans to the

18 travel agency. My money. This was a repayment of my money.

19 Q This went on the entire amount of time that you

20 owned Springfield Travel Agency?

21 A Oh, absolutely.

22 Q Is it --

23 A It never -- excuse me. You can ask the question.

24 Q Is it possible that you could provide us with

25 documentation that you were putting money in to Springfield

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1 Travel Agency in that manner?

2 A Yes, it's possible.

3 MR. TANIELIAN: I would ask that that information

4 be produced so that we can determine the original source of

5 this loan with some accuracy.

6 MR. WILLARD: Can we go off the record for a

7 second?

8 MR. TANIELIAN: Sure.

9 (Discussion held off the record.)

10 BY MR. TANIELIAN:

11 Q Is there any other reason that you would have

12 received a check from Springfield Travel Agency besides the

13 repayment of the loan you made?

14 A No.

15 Q Okay. Congresswoman Brown, when you wrote this

16 check as the repayment of a loan you made to Springfield

17 Travel Agency, you wrote it payable to the order of cash.

18 Why did you not write it payable to Corrine Brown?

19 A I don't recall. That's just the way I write

20 checks.

21 Q Do you have or can you tell me during 1992 what

22 the total amount of the loans you made to Springfield Travel

23 Agency was?

24 A I cannot tell you that. I don't recall that. I

25 do not remember that.

1 Q Was it more than $10,000?

2 A I would think so, but I just can't recall.

3 MS. SCHADLER: This is another thing for the

4 documents.

5 MR. WILLARD: Let me clarify that. I think she

6 might have been answering a different question.

7 He was asking about 1992 only. I am not sure

8 whether you were referring to 1992 only.

9 THE WITNESS: No, I'm not. It was over a period

10 of time.

11 BY MR. TANIELIAN:

12 Q And what was that period of time, your entire

13 ownership of Springfield Travel Agency?

14 A That's correct. That's correct.

15 Q And you have no idea in 1992 what your total

16 amount of loans was?

17 A No, I do not.

18 Q Could this repayment have been for monies you

19 loaned to Springfield Travel Agency in 1991 or earlier?

20 A I don't remember the exact times.

21 Q Congresswoman Brown, your committee reported that

22 on July 31, 1992, you made a $3,000 loan. Do you remember

23 making this loan?

24 A No. I do not remember any specific amount for a

25 loan.

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1 Are you talking about this loan?

2 Q No. This is another one.

3 A Okay. Are you finished with this?

4 Q Yes, we are finished with that.

5 MR. TANIELIAN: I would ask the court reporter to

6 mark this as FEC Exhibit 4.

7 (The document referred to was

8 marked for identification as

9 FEC Exhibit No. 4.)

10 BY MR. TANIELIAN:

11 Q Congresswoman Brown, this is another Barnett Bank

12 official Check that was supplied to us by your committee as

13 a source of a $3,000 loan you made on July 31, 1992.

14 A Uh-huh.

15 Q Do you recognize this check?

16 A Do I recognize this check?

17 Q Have you seen this check before?

18 A Yes.

19 Q And you saw this check in preparation for this

20 deposition?

21 A That's correct.

22 Q Do you remember seeing this check in 1992?

23 A I do not remember.

24 Q Could you read for me the person to whom this

25 check is made payable?

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A Corrine Brown for Congress.

Q And the amount?

A $3,000.

Q And the date, please?

A July 31.

Q And the Re: line?

A Loan to campaign, Corrine Brown.

Q Did you personally purchase this check?

A I don't recall. I don't recall.

Q Did you use this $3,000 check to make a loan to your committee?

A That's what it says. It says loan to campaign, Corrine Brown.

Q Do you have any recollection of the circumstances under which you gave both Exhibit 2 and Exhibit 4, the two official bank checks, to your committee?

MR. WILLARD: He is asking you about Exhibit 2 here and Exhibit 4.

I am sorry. Can you restate that?

MR. TANIELIAN: Sure.

BY MR. TANIELIAN:

Q Do you remember giving these two checks to anyone on your committee?

A Giving it to someone? I don't understand what you're asking. This says that this was made to the

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1 campaign.

2 Q Right. Let me restate the question. When you

3 purchased these checks, what did you do with them?

4 A I'm confused about the question. Were these not

5 deposited to the campaign? I mean, I don't understand the

6 question.

7 Q Did you give these checks to your treasurer?

8 A I don't recall. I probably deposited them into

9 the campaign.

10 Q Did you personally deposit them into the campaign?

11 A I'm not certain, but I would think so.

12 Q In the case of a loan like this to your campaign

13 in general, would you have taken the money yourself and

14 deposited it in the campaign committee's account?

15 A That's correct.

16 Q If you had not done it yourself, who would you

17 have given it to in order to make the deposit?

18 A I don't recall, but during the end of the --

19 you're talking about the end of August just before the first

20 primary.

21 Q If I could correct that, it is the end of July for

22 these two items.

23 A July? Obviously there was some kind of a -- there

24 was no money in the campaign. I was trying to get money in

25 the campaign as quickly as possible. You know, I'm

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1 speculating.

2 MR. TANIELIAN: Would the court reporter please

3 mark this FEC Exhibit 5?

4 (The document referred to was

5 marked for identification as

6 FEC Exhibit No. 5.)

7 BY MR. TANIELIAN:

8 Q Congresswoman Brown, I would ask you to take a

9 look at that document. Have you ever seen this document

10 before?

11 A Yes.

12 Q And when did you see this document before?

13 A In preparation for this meeting.

14 Q Do you remember seeing this document in July,

15 1992?

16 A No, I don't recall that.

17 Q Could you describe this document? Tell me the

18 name of the account holder.

19 A Corrine Brown.

20 Q And this is your personal account?

21 A Yes.

22 Q Did you have any other bank accounts in 1992?

23 A I don't recall.

24 Q Do you currently have any other bank accounts?

25 A Do I currently have any other bank accounts?

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1 Q Yes.

2 A I don't understand that question.

3 Q Do you still hold this account at Barnett Bank?

4 A Yes. Yes, I do.

5 Q In addition to this account, do you have any other

6 personal accounts, bank accounts?

7 A No. I mean, I -- what do you mean, personal bank

8 accounts?

9 Q Do you have any other bank accounts in general?

10 A (Non-verbal response.)

11 MR. WILLARD: I am sorry. Can we take a break?

12 MS. VOSDINGH: Sure.

13 (Discussion held off the record.)

14 MR. TANIELIAN: Back on the record.

15 BY MR. TANIELIAN:

16 Q Congresswoman Brown, did you have any other bank

17 accounts in 1992 besides the one marked by FEC Exhibit 5?

18 A To my knowledge, no. I mean, this was my personal

19 bank account.

20 Q Is there anyone else who would know that you had a

21 bank account, a personal accountant?

22 A Who else would know whether I had a personal bank

23 account besides me?

24 MR. TANIELIAN: If the court reporter could mark

25 this FEC Exhibit 6, please?

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1 (The document referred to was
2 marked for identification as
3 FEC Exhibit No. 6.)
4 MR. WILLARD: Do you want us to hold on to Exhibit
5 5?
6 MR. TANIELIAN: You can keep Exhibit 5 for the
7 time being.
8 BY MR. TANIELIAN:
9 Q Congresswoman Brown, if I could have you take a
10 look at FEC Exhibit 6?
11 This is a check which was supplied by Barnett Bank
12 as one of the items used to purchase the $3,000 official
13 check marked FEC Exhibit 4. Have you ever seen this check
14 before?
15 A Yes, I've seen the check before.
16 Q Could you read for me the account number on the
17 top of this check?
18 A
19 Q What was that account number?
20 A I don't remember what was this account number.
21 Q I would have you refer back to FEC Exhibit 3, the
22 Springfield Travel Agency check. It would be the center
23 number at the bottom of the check.
24 A Okay.
25 Q The center number at the bottom of the check on

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1 FEC Exhibit 3, does that match the number on FEC Exhibit 6?

2 A Yes, it does.

3 Q The account number?

4 A Uh-huh.

5 Q Did you write this check?

6 MR. WILLARD: Now you are referring to Exhibit 6?

7 MR. TANIELIAN: I am sorry. Exhibit 6.

8 THE WITNESS: This is my writing.

9 BY MR. TANIELIAN:

10 Q Is that your signature?

11 A That's my signature.

12 Q And the date of this check is?

13 A July 31.

14 Q The year?

15 A 1992.

16 Q Could you read for me what it says on the memo

17 line?

18 A For repayment of loan?

19 Q Yes.

20 A Okay. For repayment of loan.

21 Q By those words, repayment of loan, are you

22 referring to what we have previously discussed [illegible]

23 of loans --

24 A Yes.

25 Q -- that you made to Spectrum.

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1 A Yes.

2 Q [illegible]

3 repayment of a [illegible]

4 Agency?

5 A I don't recall. I recall it is [illegible]

6 as our earlier discussion.

7 Q The check that is FBI Exhibit 5 was [illegible] -- let

8 me restate the question.

9 Do you [illegible] 5?

10 A No, I do [illegible]

11 Q Could you tell me what type of check is this? It

12 is not a pre-printed check?

13 A It's like a counter check.

14 Q So you would have gone into Barnes [illegible] and

15 gotten this check from them and filled it [illegible]

16 counter?

17 A That's correct. It's a counter [illegible]

18 Q [illegible]

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1 Q FEC Exhibit 6. When you went to the bank and got
2 this counter document, do you remember what you did with it?
3 A I don't recall what I did with it. I don't recall
4 doing it.
5 Q If I point you back to FEC Exhibit 5, this is a
6 check from your personal account for $1,840, which together
7 with the check marked FEC Exhibit 6 for $1,160 equals
8 $3,000, which you can see quite clearly printed on the
9 bottom of the back of the check by the bank, $3,000.
10 A Uh-huh.
11 Q They were used together, and they were provided by
12 the bank, to purchase FEC Exhibit 4, the Barnett Bank
13 official check.
14 Do you remember using these funds to purchase this
15 check?
16 MR. WILLARD: Wait a minute. Can we see Exhibit
17 4?
18 THE WITNESS: Right.
19 MR. WILLARD: I guess the question is do you
20 remember using Exhibits 5 and 6 to purchase Exhibit 4?
21 THE WITNESS: I don't remember.
22 BY MR. TANIELIAN:
23 Q Congresswoman Brown, in 1992, were you aware that
24 contributions from corporations were prohibited?
25 A No, I was not aware of that.

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1 Q Are you aware today that contributions from
2 corporations --
3 A Yes, I am.
4 Q -- are prohibited?
5 A Yes.
6 Q Were you aware in July, 1992, that the definition
7 of a contribution under the Federal Election Campaign Act
8 includes loans?
9 MR. WILLARD: I am sorry. Could you ask that
10 again?
11 BY MR. TANIELIAN:
12 Q Are you aware now that a loan is considered a
13 contribution under the Federal Election Campaign Act?
14 A I am aware now, yes.
15 Q Were you aware in 1992 of that fact?
16 A No. No.
17 MR. TANIELIAN: We are all done with those.
18 MR. WILLARD: Just to clarify that last set of
[illegible] loans from the [illegible]
[illegible] I am not sure it makes a difference to you, but it
might make a difference to Congresswoman Brown's answer.
[illegible] MR. TANIELIAN: Both.
[illegible]
[illegible] Corporation
[illegible]

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1 used the word loan generally, and I am not sure that is the
2 question she heard.
3 MR. TANIELIAN: Okay.
4 BY MR. TANIELIAN:
5 Q Under the Federal Election Campaign Act, the term
6 contribution --
7 A What year are you talking about?
8 Q Today.
9 A Today?
10 Q Yes, currently. Your knowledge today. That is
11 what the question is about.
12 Under the Federal Election Campaign Act, and the
13 law was the same in 1992 as it is now, one of the things a
14 contribution is defined as is a loan. My question is were
15 you aware of that fact? Are you aware of that fact now?
16 A That a contribution and a loan is the same thing?
17 Q Right.
18 A I am aware of that fact today.
19 Q Were you aware of that fact in 1992?
20 A No, I was not.
21 MR. TANIELIAN: If I could have the court reporter
22 mark this FEC Exhibit 7?
23 (The document referred to was
24 marked for identification as
25 FEC Exhibit No. 7.)

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1 THE WITNESS: May I have a moment with my
2 attorney?
3 MR. TANIELIAN: Sure. Off the record.
4 (Discussion held off the record.)
5 MR. TANIELIAN: We are back on the record.
6 BY MR. TANIELIAN:
7 Q Congresswoman Brown, I would ask you to take a
8 look at FEC Exhibit 7. It is a two page document.
9 A Uh-huh.
10 Q Could you describe this document for me?
11 A It looks like it's a counter check again.
12 MR. WILLARD: Just to clarify, Exhibit 7 looks
13 like it is two different documents.
14 THE WITNESS: Yes, it is.
15 MR. TANIELIAN: Exhibit 7 is a check for $1,000 on
16 the first page, and on the second page a deposit slip for
17 $1,000. They are connected.
18 BY MR. TANIELIAN:
19 Q What is the name on the top of the check?
20 A Springfield Travel Agency.
21 Q And the date of the check?
22 A I'm not sure about that. It looks like June 19,
23 but I'm not sure.
24 Q And the year?
25 A 1992.

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1 Q And the amount of the check?

2 A $1,000.

3 Q And who is it made payable to?

4 A ARC.

5 Q I am sorry. The check is made payable to?

6 A To cash. I'm sorry.

7 Q You mentioned ARC.

8 A Uh-huh. Do you see the ARC?

9 Q Yes. That appears on the memo line?

10 A Uh-huh.

11 Q Could you tell me what ARC stands for?

12 A It's the -- I'm not sure, but it deals with the

13 travel agency. The Airline Reporting Corporation, ARC.

14 Q And why would that be written on the bottom of

15 this check?

16 A Because that would indicate to me that I was

17 paying the travel agency bill to ARC.

18 Q I am sorry. You just said that it indicates that

19 you were paying a bill?

20 A Uh-huh.

21 Q This is a check written to cash. Am I correct?

22 A Cash. That's correct.

23 Q And this check is endorsed by?

24 A Corrine Brown.

25 MR. WILLARD: Why do you not just explain to him

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1 what ARC's --

2 THE WITNESS: Okay.

3 MR. WILLARD: -- feeling on personal checks was?

4 THE WITNESS: ARC is everywhere you have to pay

5 for the tickets, and you have to pay for it by cashier's

6 check, or you have to wire transfer the money. You have to

7 pay for whatever outstanding tickets is due. That's what

8 this is.

9 BY MR. TANIELIAN:

10 Q You are saying then that you wrote this check to

11 pay for a debt of the travel agency?

12 A That's correct.

13 Q I would ask you to refer back to the pre-printed

14 Springfield check, which is FEC Exhibit 3.

15 Does the account number, which is the center set

16 of numbers on the bottom of the check, match the account

17 number on this check, FEC Exhibit 7?

18 A Yes.

19 Q So this is a check from Springfield Travel Agency?

20 Am I correct?

21 A Yes.

22 Q If I could have you turn to Page 2, which is the

23 corresponding deposit slip for this document? Could you

24 read for me the name on the top of the deposit ticket?

25 A Corrine Brown.

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1 Q These two items were provided together. Based on
2 that, does it appear that the check on Page 1 of FEC Exhibit
3 7 for $1,000 was deposited into your personal account?
4 A Yes, but this says ARC here.
5 Q Congresswoman Brown, was this check, FEC Exhibit
6 7, a repayment to you of a loan you made to Springfield
7 Travel Agency for the purpose of ARC?
8 A Repeat the question.
9 Q It appears this check, FEC Exhibit 7, was
10 deposited into your personal account.
11 A Uh-huh.
12 Q You have explained to me what ARC means. Was this
13 repayment made to you from Springfield Travel Agency a
14 repayment specifically for ARC paid by Springfield Travel
15 Agency?
16 A I am going to repeat that I don't recall, but it
17 seems to me that seeing the ARC on this indicates that it
18 was a bill pertaining to the travel agency that I was
19 paying.
20 Q Did you pay the ARC account from your personal
21 account?
22 A Yes, I would pay it from my personal account at
23 times. I would wire transfer because they didn't take
24 travel agency checks.
25 Q So you made a payment at some point before this to

1 ARC, either by wire transfer or some other form?

2 A Yes. I mean, I don't remember, but seeing the ARC

3 on the check, if you go back and look at the others it

4 indicates I would assume what the check was for.

5 MR. WILLARD: I do not think she said one way or

6 the other whether the payment to ARC would have been before

7 or after.

8 THE WITNESS: They were due every Wednesday.

9 BY MR. TANIELIAN:

10 Q And this check that is FEC Exhibit 7 --

11 A Which one is that?

12 Q I just want to clarify this. This is a check

13 written from Springfield Travel Agency to you personally --

14 A Uh-huh.

15 Q -- which is a repayment of one of those checks you

16 wrote?

17 A I did not say repayment. See, I don't recall.

18 I'm just trying to go along with this here. I'm looking at

19 the check, and I see ARC. That would tell me that it was

20 payment for the travel agency.

21 Q Okay.

22 A That's what it would tell me.

23 MR. TANIELIAN: If I could have the court reporter

24 mark this FEC Exhibit 8?

25 //

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1 (The document referred to was
2 marked for identification as
3 FEC Exhibit No. 8.)
4 BY MR. TANIELIAN:
5 Q Congresswoman Brown, if I could have you refer to
6 this document, FEC Exhibit 8? This is a check from
7 Springfield Travel Agency. Have you seen this document
8 before?
9 A No, I have not seen this before.
10 Q Is that your signature on the signature line on
11 Page 1?
12 A Yes.
13 Q This is a three page document. There is a
14 corresponding deposit slip and then also a single item for
15 $10, which is found on that deposit slip.
16 A Uh-huh. What is this?
17 MR. WILLARD: Can we take two minutes to look at
18 this?
19 MR. TANIELIAN: We can go off the record.
20 (Discussion held off the record.)
21 MR. TANIELIAN: We are on the record.
22 BY MR. TANIELIAN:
23 Q Congresswoman Brown, is this a Springfield Travel
24 Agency pre-printed check, FEC Exhibit 8?
25 A Yes.

1 Q And what is the amount of this check ?
2 A $250.
3 Q I do not recall. You stated that that is your
4 signature?
5 A Yes.
6 Q Could you tell me what the purpose of this check
7 was?
8 A I don't know the purpose.
9 Q Referring to Page 2 of the document, this check
10 was deposited into your personal account on July 20.
11 A Uh-huh.
12 Q Was this check a repayment of a loan you made to
13 Springfield Travel Agency?
14 A Oh, I don't know what this was. It could have
15 been some bill that I was paying. I mean, I just don't
16 recall.
17 Q Why else would you have received money from
18 Springfield Travel Agency?
19 A I paid the bills.
20 Q When you say you paid the bills, you paid
21 Springfield Travel Agency's bills?
22 A That's correct. I was responsible for all of
23 them.
24 Q When you paid Springfield Travel Agency's bills,
25 you have said that you considered those loans to Springfield

1 Travel Agency. Am I correct?

2 A That's correct.

3 MR. WILLARD: I am sorry. Can you state that

4 again?

5 BY MR. TANIELIAN:

6 Q When you paid bills of Springfield Travel Agency,

7 the money you used to pay those bills you considered loans

8 to Springfield Travel Agency, correct?

9 A Yes.

10 Q And so when you received checks from Springfield

11 Travel Agency, those checks would then be repayments of

12 those loans?

13 A In this case, I don't remember what that was

14 because this could be to pay a bill. I mean, I just

15 couldn't tell you what this was.

16 Q Is there any other reason Springfield Travel

17 Agency would have written you a check for $250?

18 A To pay the Springfield Travel Agency bills.

19 Q You seem to be making a distinction between when

20 you would loan money to Springfield Travel Agency and when

21 you would pay the bills of Springfield Travel Agency. Is

22 there any difference?

23 A I don't understand the question.

24 MR. WILLARD: Can we go off the record a second?

25 MR. TANIELIAN: Sure.

1 (Discussion held off the record.)

2 BY MR. TANIELIAN:

3 Q Congresswoman Brown, your committee reported on

4 August 28, 1992, that you made a $5,000 loan to your

5 committee. Do you remember making this loan?

6 A I don't remember.

7 Q At this point on August 28, 1992, this was

8 approximately three days before your primary date of

9 September 1, 1992.

10 Do you remember having any discussions with your

11 campaign staff or reviewing any documents that would make

12 you think --

13 A No.

14 Q -- your committee needed additional funds?

15 A Not discussions, no. I don't recall having that,

16 but common knowledge about campaigns, you would know that

17 you would want to do whatever you needed to do to get your

18 message out just before the election.

19 Q Were you aware that your committee was short on

20 funds at that point?

21 A I was aware that my committee ran short on funds

22 during the entire 90 day period.

23 Q Did you discuss making this $5,000 loan with

24 anyone?

25 A I don't remember discussing it.

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1 Q Do you remember this $5,000 loan?

2 A I do not remember the $5,000 loan.

3 MR. TANIELIAN: Can we have that marked FEC

4 Exhibit 9, please?

5 (The document referred to was

6 marked for identification as

7 FEC Exhibit No. 9.)

8 BY MR. TANIELIAN:

9 Q Congresswoman Brown, if I could have you look at

10 FEC Exhibit 9? This is your committee's bank account

11 statement --

12 A Uh-huh.

13 Q -- for August, 1992.

14 A Uh-huh.

15 Q Have you ever seen this document before?

16 A No, I have never seen this document before.

17 Q Could you read for me the name on the account that

18 appears at the top of the document?

19 A Corrine Brown, Funds for U.S. House of

20 Representatives.

21 Q And the account number that appears on the

22 right-hand side below the date?

23 A 115? Is that what you want?

24 Q Yes.

25 A

1 Q This is a four page document. If I could please
2 have you turn to the fourth page of the document?
3 A Could I have a minute to look at this?
4 Q Sure.
5 MR. WILLARD: By the way, were these four pages
6 together, or are they an excerpt from a bigger document?
7 MR. TANIELIAN: These four pages were together.
8 This is a four page bank statement.
9 MR. WILLARD: Okay.
10 MR. TANIELIAN: We can go off the record.
11 (Discussion held off the record.)
12 MR. TANIELIAN: We can go back on the record.
13 BY MR. TANIELIAN:
14 Q Congresswoman Brown, when you would write checks
15 to Springfield Travel Agency or pay Springfield Travel
16 Agency bills, would you write those checks from your
17 personal account?
18 A There were times that I would, yes.
19 Q Was there any other source where you would write
20 those checks from?
21 A I don't recall any other source.
22 Q And when you would write checks to Springfield
23 Travel Agency from your personal account, would you write
24 them to Springfield Travel Agency, or would you simply write
25 them to the vendor or whoever?

1 A I don't remember. I don't remember. I can't
2 recall, and I can't speculate. I mean, I just don't
3 remember. It was a mom and pop operation.
4 Q I would have you refer to FEC Exhibit 9, which is
5 a committee bank statement.
6 A Uh-huh.
7 Q On Page 4 of that document on the top line next to
8 the arrow on the side of the page under the date 8-28, there
9 is an item, a $5,000 credit by deposit counter document.
10 A Uh-huh.
11 Q Do you recognize this deposit?
12 A No, I do not.
13 MR. TANIELIAN: I am going to have the court
14 reporter mark this FEC Exhibit 10.
15 (The document referred to was
16 marked for identification as
17 FEC Exhibit No. 10.)
18 BY MR. TANIELIAN:
19 Q Congresswoman Brown, if I could have you look at
20 that document?
21 A Uh-huh.
22 Q Could you describe this document for me?
23 A No, I can't. I don't know what it is.
24 Q Does it appear to be a deposit slip?
25 A It appears to be that, yes.

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1 Q Could you tell me the name written on the top?
2 A Corrine Brown.
3 Q And the amount of the two checks?
4 A $2,500 each it looks like.
5 Q And the total deposit?
6 A $5,000 it looks like.
7 Q And if you could read for me the account number
8 that appears at the bottom of this deposit slip? It is the
9 center number on the document.
10 A 1150023 -- is that 6 or G -- 923. I'm not sure
11 what that is.
12 Q And does that number correspond with the number on
13 the committee bank statement, FEC Exhibit 9?
14 A Yes.
15 Q Have you ever seen this document before, FEC
16 Exhibit 10?
17 A No, I don't recall I've ever seen this before.
18 MR. TANIELIAN: Please mark that FEC Exhibit 11.
19 (The document referred to was
20 marked for identification as
21 FEC Exhibit No. 11.)
22 BY MR. TANIELIAN:
23 Q Congresswoman Brown, I am handing you a cashier's
24 check from Dr. Melvin Stith --
25 A Uh-huh.

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1 Q -- which was provided to the Commission as the
2 item that was deposited along with the deposit slip marked
3 FEC Exhibit 10. Have you ever seen this document before?
4 A No, I don't recall seeing this document before.
5 Q Could you describe the document for me? Who is
6 the check made payable to?
7 A Corrine Brown.
8 Q And the amount?
9 A $2,500 it looks like.
10 Q What is the date on this check?
11 A August 27.
12 Q And the year?
13 A 1992.
14 Q You previously stated that Dr. Melvin Stith
15 purchased Springfield Travel Agency from you. Is that
16 correct?
17 A That's correct.
18 Q Is this check marked FEC Exhibit 11 related to
19 that purchase?
20 A I don't recall exactly, but I do know that he
21 purchased it.
22 Q Is there any other reason Dr. Stith would have
23 given you a check for $2,500 other than the purchase of
24 Springfield Travel Agency?
25 A No.

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1 Q Do you remember depositing this document in your
2 committee's bank account?
3 A I don't remember.
4 Q Could you tell me if you did deposit this item in
5 your committee bank account based on the deposit document
6 marked FEC Exhibit 10?
7 A I'm confused. There are two checks.
8 MR. WILLARD: Are you asking whether Exhibit 10 is
9 her handwriting?
10 BY MR. TANIELIAN:
11 Q Is Exhibit 10 your handwriting?
12 A I mean, it's a print. I can't tell from the
13 signature. I'm not saying it's not. I'm just saying I
14 can't really tell whether it's my handwriting.
15 This has $2,500 and $2,500 deposited, and this is
16 $2,500.
17 MR. WILLARD: I assume he probably has another
18 exhibit.
19 MR. TANIELIAN: If I could have this marked FEC
20 Exhibit 12?
21 (The document referred to was
22 marked for identification as
23 FEC Exhibit No. 12.)
24 MR. WILLARD: I figured there was another exhibit
25 coming.

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1 BY MR. TANIELIAN:

2 Q Congresswoman Brown, if I could have you look at

3 FEC Exhibit 12, which is a check from Dr. Edward Scott which

4 was provided to the Commission as one of the two items

5 deposited with the deposit slip, FEC Exhibit 10, into your

6 committee's bank account?

7 A Uh-huh.

8 Q Have you ever seen this check before, FEC Exhibit

9 12?

10 A I don't remember seeing it, no. I don't recall

11 seeing it.

12 Q Could you describe this document for me? What is

13 the name of the remitter that appears on the top of the

14 document?

15 A Edward Scott.

16 Q And the amount?

17 A $2,500.

18 Q And the check is made payable to who?

19 A Corrine Brown.

20 Q And the date, please?

21 A August 27.

22 Q Is there any other reason other than the purchase

23 of Springfield Travel Agency that Dr. Edward Scott would

24 have given you a check for $2,500?

25 A Not to my knowledge.

1 Q These checks, FEC Exhibits 11 and 12, are dated
2 the same day, August 27, 1992. On that day, did you have a
3 transaction with Drs. Stith and Scott?
4 A What do you mean by a transaction?
5 Q Let me rephrase that. Looking at FEC Exhibit 11
6 first, do you remember Dr. Stith giving you this check?
7 A I told you before I don't remember.
8 Q When Drs. Stith and Scott purchased Springfield
9 Travel Agency, how did they purchase it? Did they provide a
10 down payment first?
11 A I don't recall, but I think so. I don't recall.
12 I mean, I just can't really remember.
13 Q Did they take a mortgage out and provide you with
14 a --
15 A A mortgage?
16 Q Or a loan out.
17 A I don't know what they did.
18 Q Did you receive a single payout for the purchase
19 of Springfield Travel Agency?
20 A A one time payment?
21 Q Right.
22 A No. No, I did not.
23 Q So you received a series of payments?
24 A I wouldn't say a series. I don't remember
25 exactly, but I think, and I'm speculating, that I received a

1 deposit.

2 Q By deposit, what do you mean?

3 A I don't remember the amount, but maybe it was

4 $5,000.

5 Q Then could this have been the deposit on their

6 purchase of Springfield Travel Agency from Drs. Stith and

7 Scott?

8 A It could have been.

9 Q Do you have any documentation of that purchase

10 that you can provide to the Commission?

11 A I don't have the final agreement. I don't have

12 it. I've been trying to get a copy of it, but I don't have

13 it.

14 Q Who have you been trying to get this from?

15 A The people I sold it to.

16 Q From Drs. Stith and Scott?

17 A Uh-huh.

18 THE REPORTER: Is that a yes?

19 THE WITNESS: Yes.

20 BY MR. TANIELIAN:

21 Q So you have been attempting to get a copy of what

22 document in particular from them?

23 A The final agreement.

24 Q Are there any other documents concerning the

25 purchase of the property or the business --

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1 A Oh, I don't know.

2 Q -- that you possess?

3 A That I possess? I don't even possess these

4 checks. I don't know where the final documents -- excuse

5 me. I want to clear something up.

6 I don't think I have the final document. I found

7 something or I have something, and I gave it to my attorney.

8 It's my signature, but it's not their signature. I don't

9 think it's the final document, but I just don't remember, so

10 whatever I have --

11 Q Does this document memorialize the terms of the

12 agreement?

13 A Yes, but I still don't know whether it's the final

14 one --

15 Q Okay.

16 A -- because it only has my signature. It does not

17 have their signature, so I don't know.

18 Q Concerning these two checks from Drs. Stith and

19 Scott marked FEC Exhibits 11 and 12 dated August 27, 1992,

20 does this refresh your recollection at all concerning the

21 date of your sale of Springfield Travel Agency?

22 A No, because I don't think this -- I mean, I don't

23 know when the sale took place.

24 Q You said that there was not one single payout.

25 Were there other payments in addition to this $5,000 one?

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1 A Yes. This was the deposit I think, but I can't be
2 sure. I think this was the deposit.
3 Q Did they make subsequent payments to you?
4 A Yes.
5 Q And what were the amounts of those payments?
6 A I don't remember the amounts.
7 Q Was there a single payment, or was there --
8 A There was more than one payment.
9 Q -- more than one?
10 A Uh-huh.
11 Q When were they done making these payments?
12 A I don't remember. That's what I'm saying. I
13 don't remember.
14 Q Do you remember approximately? Was it within the
15 year that they completed paying for the travel agency?
16 A I guess when we transferred all of the
17 information, but I don't remember. I do recall during the
18 campaign I was busy, so it had to be after that, sometime
19 after that first 30 days. I know that.
20 Q The first 30 days?
21 A The first primary.
22 Q Okay.
23 A It was sometime during that period, but I can't be
24 exact.
25 Q So there was an eventual transfer? You

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1 transferred all the information, documents or whatever of
2 Springfield Travel Agency over to the doctors --
3 A That's correct.
4 Q -- at a certain point?
5 A Uh-huh.
6 Q Do you remember the date of that transfer?
7 A I don't remember any dates. I don't remember
8 dates too well.
9 Q Do you remember if that happened after the general
10 election?
11 A I don't remember.
12 MR. WILLARD: I am sorry. When you say that
13 happened, you are referring to what, the final --
14 MR. TANIELIAN: The final transfer.
15 MR. WILLARD: -- closing of the deal or something
16 like that?
17 MR. TANIELIAN: Correct.
18 THE WITNESS: I don't remember.
19 BY MR. TANIELIAN:
20 Q Congresswoman Brown, what is your relationship to
21 Dr. Melvin Stith?
22 A I don't have any relationship with him. I don't
23 understand that question. He's a college professor.
24 Q How do you know Dr. Stith?
25 A He's a college professor at FSU. I don't have a

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1 personal relationship with him.

2 Q What is your business relationship with him?

3 A I don't have a business relationship with him. I

4 don't have a relationship with him. I sold my travel agency

5 to him. I knew Dr. Scott better.

6 Q Okay. How did you know Dr. Scott?

7 A He was my dentist.

8 Q How did it arise that Dr. Scott decided to

9 purchase your travel agency?

10 A I don't recall any of that. That was four years

11 ago.

12 Q Did you put your travel agency on the market to be

13 sold?

14 A No. I just let it be known that I was interested

15 in selling it.

16 Q And Dr. Scott came to you and said I would like

17 to --

18 A I don't remember how it transpired.

19 Q Did Dr. Scott tell you that he had a business

20 partner in Dr. Stith, who was also interested?

21 A I don't remember.

22 Q When did you first meet Dr. Stith?

23 A During that time period. I didn't know him

24 before.

25 Q During the time period of the purchase?

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1 A Yes.

2 Q Has Dr. Scott ever had any other financial

3 dealings with you? Did he ever purchase anything else from

4 you?

5 A No, not to my knowledge.

6 Q Has he ever given or loaned you money?

7 A No.

8 Q Would you consider Dr. Scott to be a personal

9 friend?

10 A We're Rattlers. We both went to Florida A&M

11 University.

12 Q Did you deposit these two checks, FEC Exhibits 11

13 and 12, into your committee bank account?

14 A Yes, I guess.

15 Q Are you aware that --

16 A I'm not sure of it. I'm just looking at the

17 documents you gave me.

18 MR. WILLARD: On Exhibit 10, there is an account

19 number that was handwritten in. I really cannot make it out

20 on this copy. Do you have a copy where --

21 MR. TANIELIAN: The copy in this case is not that

22 clear.

23 MR. WILLARD: Do you have a feeling about that?

24 That one you think corresponds to --

25 THE WITNESS: This one here.

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1 MR. TANIELIAN: As best we can tell, the number
2 that is printed in matches the number that is pre-printed on
3 the bottom of the deposit slip.
4 MR. WILLARD: I see.
5 THE WITNESS: Where is the pre-printed number?
6 MS. SCHADLER: Right here in the middle.
7 MR. TANIELIAN: Now, I do not know if that is
8 pre-printed or if that was printed by the bank at the time
9 the deposit slip went through their system, but it was
10 provided by the bank as a deposit that matched the deposit
11 found on FEC Exhibit 9, which is the campaign account
12 statement.
13 MR. WILLARD: What number?
14 MR. TANIELIAN: The $5,000 credit --
15 MR. WILLARD: Right.
16 MR. TANIELIAN: -- on August 28, and then these
17 two checks from Drs. Stith and Scott, FEC Exhibits 11 and
18 12, were provided as the two items that correspond to this
19 deposit slip.
20 MR. WILLARD: Can you make out a date on Exhibit
21 10 anywhere?
22 MR. TANIELIAN: If you look on the bank printout
23 on the back of the check on the top line, I believe it says
24 8-28-92.
25 MR. WILLARD: Okay. That is fine. I was just

1 wondering. I wanted to make sure I understood what these
2 said.
3 THE WITNESS: I think it's important to iterate
4 that this goes back to what I initially said. The
5 contributions that I personally made to my campaign, loans
6 that I made, was loans that I made to my campaign account
7 and if I had any resources that I was trying to help to run
8 my campaign. The campaign was in need of money.
9 BY MR. TANIELIAN:
10 Q When you were dealing with Drs. Stith and Scott
11 concerning the purchase of Springfield Travel Agency, were
12 they aware that you were running for the United States
13 Congress?
14 A I would think they was aware of it. Everybody was
15 aware of it.
16 Q Did you ever tell them?
17 A I mean, I don't remember conversations with them,
18 but it was common knowledge. It was in the papers.
19 Q Are Drs. Stith and Scott in your district?
20 A No, they're not.
21 Q Were they both located in Tallahassee?
22 A That's correct.
23 Q Are you aware that the individual contribution
24 limit is $1,000?
25 A Do you mean someone to my campaign?

1 Q Yes.

2 A I'm aware of it now, but --

3 Q Were you aware of that in August, 1992?

4 A I wasn't aware of it, but we -- you need to

5 clarify. Are you trying to say that these people

6 contributed to my campaign this amount of money? I don't

7 know what you're saying.

8 Q I am not asking --

9 A Is there any limit to individuals contributing to

10 the campaign?

11 Q Yes. Not candidates.

12 A I mean individuals like the candidate. Is there

13 any limits that an individual can make to their campaign?

14 Q That was not the question.

15 A That is my question.

16 Q No, there is not.

17 A Okay. Is it per cycle? You just made a point

18 that there is limits to what an individual can make to a

19 candidate.

20 Now, my understanding, and I don't know the law.

21 I mean, I have lawyers, but my understanding is per

22 election. For example, it's $1,000 for the primary, $1,000

23 for the run-off and $1,000 for the general. Is that the

24 law?

25 Q That is correct.

1 A Okay.

2 MR. TANIELIAN: If I could have the court reporter

3 please mark this FEC Exhibit 12?

4 THE WITNESS: Are we through with this?

5 MR. TANIELIAN: Yes, we are.

6 THE REPORTER: We are on Exhibit 13.

7 MR. TANIELIAN: We are on Exhibit 13? Okay. If I

8 could have the court reporter mark this FEC Exhibit 13?

9 (The document referred to was

10 marked for identification as

11 FEC Exhibit No. 13.)

12 BY MR. TANIELIAN:

13 Q Congresswoman Brown, if I could have you take a

14 look at that document, please?

15 A What is this, the financial disclosure?

16 (Pause.)

17 Q Have you had a chance to look at the document?

18 A Yes.

19 Q Could you tell me what is this document?

20 A It says Financial Disclosure Statement for

21 Calendar Year 1992.

22 Q And this is from the United States House of

23 Representatives? Am I correct?

24 A That's correct.

25 Q Is that your signature at the bottom of the

1 document?

2 A That's correct.

3 Q If I could please have you turn to Page 2 of this

4 five page document? I am sorry. If I could please have you

5 turn to Page 3 under Schedule 3, Assets and Unearned Income?

6 A Uh-huh.

7 Q Did you list on this financial disclosure report

8 your ownership of Springfield Travel Agency in 1992?

9 A I did not.

10 Q If I could have you turn to Page 5 under Schedule

11 8, Positions? Did you list your position with Springfield

12 Travel Agency during 1992?

13 A I did not. Maybe I should try to clarify. To my

14 knowledge, it's probably an oversight in not listing

15 Springfield Travel Agency, but in the House, which is

16 probably the source of my confusion, the laws are different.

17 You don't list it if it's an indebtedness, if it's a debt as

18 opposed to just listing it.

19 Of course, I've had an accountant go back and

20 review my records. I found out recently that that was

21 probably an oversight. It wasn't intentional. It should

22 have been included.

23 Q An accountant has told you that there was an

24 oversight on this?

25 A No, no accountant. I'm just saying in reviewing

1 the documents as we prepared, that probably is an oversight
2 that needs to be amended. It wasn't intentional.
3 Like I said, there are many laws that the states
4 have and that the federal elections have that are confusing
5 to an accountant.
6 Q So you are going to go back then --
7 A Yes.
8 Q -- and amend these reports?
9 A Yes, that's correct.
10 Q When you amend these reports, these reports will
11 reflect that you were the owner of Springfield Travel Agency
12 at some point in 1992?
13 A Yes. See, I'm still not sure about the dates
14 because I did sell it, so that should be reflected also.
15 I'm not sure whether it was 1991 or 1992. I am not certain
16 about the dates. I have to stress that, but I am going to
17 amend it to reflect what actually happened.
18 Q In order to make the amendments, are you going to
19 need to determine what those dates were?
20 A Yes.
21 Q Could you provide that information when you make
22 that determine to us, to the Commission?
23 A Yes. Yes. I also want it clear that I would not
24 intentionally violate any election laws. The election laws
25 are very complicated, and it's very difficult for a

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1 candidate that's running for office to abide by the laws and
2 not have a professional CPA or attorney.
3 Running a campaign like I did with volunteers is
4 just something that you cannot do. In any campaign reform,
5 that is something that has to be considered because you need
6 professional people. An amateur cannot dig out all of the
7 rules and regulations.
8 I think it's important to have that on the record
9 to acknowledge that a person had three campaigns in 90 days,
10 complete elections, without professional CPAs and
11 accountants and lawyers. You just cannot do it. Mistakes
12 was made, but none intentional.
13 MR. WILLARD: Can we take not a lunch break, but
14 maybe a ten minute break?
15 MR. TANIELIAN: Sure.
16 MS. VOSDINGH: Off the record.
17 (Whereupon, a short recess was taken.)
18 BY MR. TANIELIAN:
19 Q Congresswoman Brown, your committee reported that
20 on August 28, 1992, you made a $2,000 loan to your
21 committee. Do you remember making this loan?
22 A I don't remember any exact amounts. I remember
23 $14,000 over the period of the campaign, you know, the
24 period that we're talking about.
25 MR. TANIELIAN: If I could have the court reporter

1 mark this FEC Exhibit 14?

2 (The document referred to was

3 marked for identification as

4 FEC Exhibit No. 14.)

5 BY MR. TANIELIAN:

6 Q Congresswoman Brown, if I could have you look at

7 that check, please? Your committee provided this check as

8 the source of the $2,000 loan you made to your committee on

9 August 28. Have you ever seen this check before?

10 A Yes, I've seen it in preparation.

11 Q Who is this check made payable to?

12 A The campaign fund. Corrine Brown's campaign fund.

13 Q Is this your personal check?

14 A Yes.

15 Q And is that your signature?

16 A It looks like it, yes.

17 Q And the memo line? What does it read there?

18 A Loan.

19 MR. TANIELIAN: I would ask the court reporter to

20 mark this as FEC Exhibit 15.

21 (The document referred to was

22 marked for identification as

23 FEC Exhibit No. 15.)

24 BY MR. TANIELIAN:

25 Q Congresswoman Brown, if I could have you take a

look at that? Have you ever seen this document before?

A Yes.

Q Can you tell me what it is?

A It's my personal bank statement for the period 8-11-92 to 9-10-92.

Q On Page 1 of this two page document at August 28, does your bank statement reflect the $2,000 check that is marked FEC Exhibit 14? That would be the third item dated 8-28.

A Yes.

Q And that is check 441?

A Check 441? Where do you see that?

MR. WILLARD: Do you mean 3441?

THE WITNESS: Check 3441.

MR. TANIELIAN: Yes. I am sorry. Check 3441.

THE WITNESS: Yes.

BY MR. TANIELIAN:

Q And does your bank statement also reflect a $2,000 deposit on 8-28?

A Yes.

MR. TANIELIAN: I would have the court reporter mark this FEC Exhibit 16.

(The document referred to was marked for identification as FEC Exhibit No. 16.)

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1 BY MR. TANIELIAN:

2 Q Congresswoman Brown, if I could have you take a

3 look at this two page document? The first page is a deposit

4 ticket.

5 A Uh-huh.

6 Q Is that deposit ticket to your personal bank

7 account?

8 A Yes.

9 Q On the second page of the document there appears a

10 check. Have you ever seen this document before?

11 A Yes.

12 Q And when did you see this document?

13 A In preparation for this meeting.

14 Q Do you remember seeing this document in 1992?

15 A No, I do not remember.

16 Q Could you describe this document? Who is the

17 account holder on the check?

18 A Elias Simmons.

19 Q And this check is made payable to?

20 A Corrine Brown.

21 Q And the amount?

22 A $2,000.

23 Q And the date, please?

24 A August it looks like 28, 1992.

25 Q What is the notation that appears on the memo

1 line?

2 A Loan.

3 Q Did Elias Simmons give you this $2,000 check

4 marked FEC Exhibit 16?

5 A I don't remember, but it says loan.

6 Q Earlier in the deposition you said that Elias

7 Simmons had loaned you money during your campaign in 1992.

8 Does this document that I am showing you reflect this loan?

9 A Yes.

10 Q Did Elias Simmons provide you with any other loans

11 besides this one during your 1992 campaign?

12 A Not to my knowledge.

13 Q Do you remember if you personally deposited this

14 $2,000 check?

15 A I don't remember that.

16 Q Did anyone else besides Elias Simmons loan you

17 money during your campaign?

18 A Not to my knowledge, no.

19 Q Based on the handwriting that appears on the

20 deposit ticket, is it possible that Elias Simmons deposited

21 this check to your account using that deposit ticket?

22 MR. WILLARD: Is it possible?

23 THE WITNESS: Is it possible?

24 MR. TANIELIAN: Yes.

25 THE WITNESS: I could say possible, but I couldn't

1 be certain.

2 BY MR. TANIELIAN:

3 Q Is there anyone else besides Mr. Simmons and

4 yourself who would have deposited this?

5 A See, you're asking me to speculate. I don't know.

6 Are you asking for my knowledge, or are you asking me to

7 speculate?

8 Q I am asking you for your knowledge.

9 A Okay. My knowledge is that I don't know.

10 Q How would you characterize the purpose of this

11 $2,000 check?

12 A It says on there loan.

13 Q Is it a personal loan?

14 A Yes.

15 Q Did you discuss this loan with Mr. Simmons before

16 he gave you the check for $2,000?

17 A Can you be clearer?

18 Q Did you have a conversation with Mr. Simmons

19 preceding him giving you this $2,000 check?

20 A In what year?

21 Q In 1992.

22 A I don't recall. I really don't.

23 Q When Mr. Simmons gave you this check, what was the

24 purpose of it?

25 A It was a personal loan to me.

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1 Q What was the purpose of the funds? Were they for
2 the campaign or for your personal expenses?
3 A I'm sure it was for the campaign. You know, that
4 would have been the purpose.
5 Q Did Elias Simmons believe that this was a
6 contribution to your campaign?
7 A No. A loan. It says it on the check.
8 Q Did Mr. Simmons ever loan you any money besides
9 this?
10 A No, not to my knowledge.
11 Q When your committee repaid you for this loan, did
12 you subsequently repay Mr. Simmons?
13 A I don't recall. I don't even recall when I got
14 the payments back.
15 Q According to your committee's disclosure reports,
16 you received repayment of this loan on January 13, 1993.
17 Does that refresh your recollection?
18 A No, because I don't remember dates.
19 Q Do you remember if you ever repaid Mr. Simmons for
20 this loan?
21 A I don't remember.
22 Q Is it possible that you never repaid Mr. Simmons
23 for this loan?
24 A Are you asking me to speculate?
25 Q I am asking you if you never paid Elias Simmons

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1 for this loan?

2 A And I don't remember paying him. I'll be

3 truthful. I don't remember receiving it.

4 Q You say you do not remember receiving this loan.

5 Do you remember any conversation with Mr. Simmons concerning

6 the loan?

7 A Not about the loan. About the needs, you know, of

8 the campaign. He was working very closely with the

9 campaign.

10 Q So you spoke to him about --

11 A Oh, yes.

12 Q -- the finances of the campaign, and he was aware

13 of the financial status of the campaign, --

14 A Yes.

15 Q -- for instance, at this point on August 28?

16 A Yes.

17 Q So he would have been aware that the campaign

18 could have used $2,000 at that point?

19 A Yes.

20 Q Was there any documentation of this, any written

21 agreement, a letter of any sort, that would memorialize this

22 loan?

23 MR. WILLARD: Do you mean other than the check?

24 MR. TANIELIAN: Other than the check.

25 THE WITNESS: No, not to my knowledge.

1 BY MR. TANIELIAN:

2 Q I will ask you one more time. Do you have any

3 memory of any repayment to Elias Simmons for the proceeds of

4 this loan?

5 A And I will answer it one more time. I don't

6 remember the circumstances of this loan, and I don't

7 remember any payment of this loan to Elias Simmons.

8 MR. TANIELIAN: It would be important that the

9 Commission have documentation that this loan was repaid or

10 that there was an intent that it be repaid, so I would ask

11 that you provide any documentation that would substantiate

12 the repayment of this loan.

13 THE WITNESS: Excuse me. Can I speak to my

14 counsel for a minute?

15 (Discussion held off the record.)

16 MR. TANIELIAN: We can go back on the record.

17 BY MR. TANIELIAN:

18 Q Congresswoman Brown, one more question concerning

19 this $2,000 loan. When you received the loan from Elias

20 Simmons, did you intend to repay the loan?

21 A Yes.

22 Q The final loan your committee reported that you

23 made --

24 A Can I turn this back in now?

25 Q Yes.

1 The final loan your committee reported made by you
2 to the committee was on August 31, 1992, in the amount of
3 $1,500. Do you remember making this loan?
4 A I don't remember any amounts. What date did you
5 say? August what?
6 Q August 31. This would be I believe the day of the
7 primary.
8 A No. The primary is --
9 Q September 1?
10 A No. Labor Day. The Tuesday after Labor Day in
11 Florida.
12 MR. TANIELIAN: I would ask the court reporter to
13 please mark that FEC Exhibit 17.
14 (The document referred to was
15 marked for identification as
16 FEC Exhibit No. 17.)
17 BY MR. TANIELIAN:
18 Q Congresswoman Brown, if I could have you take a
19 look at this document? This document is a deposit slip
20 provided by your committee as the source of the $1,500 loan
21 you made to your campaign on August 31, 1992.
22 A Uh-huh.
23 Q Do you recognize this document?
24 A No. I mean, have I seen it before? Yes, I think
25 so.

1 Q When you say you have seen it --
2 A In preparation for this.
3 Q In preparation?
4 A Uh-huh.
5 Q Do you remember this document from 1992?
6 A No.
7 Q Could you read for me the name on the top of the
8 deposit slip?
9 A Corrine Brown.
10 Q And the account number which is printed below
11 that?
12 A
13 Q And this is your committee's account?
14 A I think so.
15 Q Could you read for me on the document above the
16 deposit slip what it says in the top left-hand corner?
17 A What do you mean, cash debit?
18 Q Yes.
19 A Okay.
20 Q Based on this document, does it appear that you
21 made a cash deposit into your campaign account in the form
22 of a loan?
23 A Oh, I don't know. I mean, this is a -- I mean, it
24 could be. I don't know. I don't know what this is.
25 Q Does it appear to you that this document

1 represents a cash deposit slip?

2 A It says cash debit. Now, what does that mean? I

3 don't know.

4 Q I realize that it is not quite legible on this

5 copy.

6 A This says cash debit. That's the only

7 explanation.

8 Q On the deposit slip, what is the amount that

9 appears there?

10 A You know, I'm going to say it's $1,500, but I

11 don't see that because the top part looks like it's $150,

12 and then the bottom part looks like it could be $1,500.

13 Q Are there any other items on there that would have

14 added up to that total on the bottom?

15 A There's no other items.

16 Q And that $1,500 appears on the first line of the

17 deposit slip?

18 A Yes. It's right there. I'm sure it must be

19 $1,500.

20 Q Is it possible that somebody else made this

21 deposit for you?

22 A No. Not to my knowledge, no. Who would?

23 Q Could you tell me why did you choose to make a

24 loan to your campaign using cash instead of purchasing an

25 official check or some other check as you had in the past?

1 A No particular reason.

2 Q Congresswoman Brown, could you tell me what the

3 source of the $1,500 you had in cash on August 30 was?

4 A I cannot. I don't remember.

5 Q Is there anybody else who would have information

6 concerning what the source of those funds were?

7 A No.

8 Q Did this money come from your personal bank

9 account?

10 A I'm sure it was personal, or it could have been

11 one of my checks from my job. I mean, I don't know what it

12 is. We're speculating. It could very well be one of my

13 checks.

14 Q Could it have been a withdrawal from any other

15 bank account?

16 A I mean, we're speculating. I don't know. It says

17 $1,500. I'm not sure what this is, and I said that before.

18 Just like I told you, I don't remember any of the specific

19 amounts.

20 Q You had said that this could have been funds from

21 a paycheck you received?

22 A Uh-huh. It could have been.

23 Q Did you receive paychecks in the amount of $1,500?

24 A My paychecks ranged in that amount, and I could

25 have deposited part in my account and part in here.

9/0430844

1 Q Would you have cashed that check and then --

2 A Yes.

3 Q -- made a cash deposit to your committee account?

4 A Uh-huh. They would have just listed it that way.

5 I could have checked my personal check and put $1,500 in my

6 campaign account, yes.

7 Q Were you aware or are you aware that

8 contributions, and that includes loans, are not permitted to

9 be made in cash in amounts over $100?

10 A Of your personal funds?

11 Q Yes.

12 A I'm not aware.

13 MR. TANIELIAN: I would like to take a short

14 break.

15 (Whereupon, a short recess was taken.)

16 MR. TANIELIAN: On the record.

17 BY MR. TANIELIAN:

18 Q I just have a few more questions for you. Could

19 you tell me, how long have you known Gloria Simmons? You

20 said all of your life?

21 A That's correct.

22 Q How did you know her?

23 A She's a relative.

24 Q She is a relative?

25 A Yes. She's a cousin.

9704384084 5

1 Q A cousin?

2 A Uh-huh.

3 Q Concerning the loans that we have spoken about

4 that you made to Springfield Travel Agency, could you tell

5 me whether you made those loans for the entire period that

6 you owned Springfield Travel Agency?

7 A Yes. Yes.

8 Q And how long did you own Springfield Travel Agency

9 approximately?

10 A I don't know exactly, but I can get you that

11 information. I don't know. Under ten years, but I just

12 don't remember.

13 Q Under ten years, and it ended in 1992?

14 A That's what you're saying. I'm saying I need to

15 get the documents that show exactly.

16 I'm not sure whether it was 1991 or 1992. I'm

17 just not sure about the dates, so I'm going to have to get

18 back to you with that information.

19 Q When you would make these loans to Springfield

20 Travel Agency, would you keep any sort of log of how much

21 money you were personally putting in to the travel agency?

22 A No, but I'm sure I can provide you with some

23 documentation.

24 Q And based on that documentation, that is how you

25 would know how much you needed to be paid back?

7704384084 6

1 A No, no. Over a period of time -- I mean, it was
2 just an investment as far as I'm concerned. It was just a
3 mom and pop operation. It was a small business, and I just
4 invested in it.
5 Q We talked about your sale of Springfield Travel
6 Agency, but you also referred to a company called Gator
7 Travel Agency.
8 A Uh-huh.
9 Q Did you sell Gator Travel Agency also?
10 A That's correct.
11 Q And could you tell me when you sold --
12 A I don't know the exact date.
13 Q Do you have the year?
14 A I don't know the exact year or date. I think
15 that's on my financial disclosure form, though.
16 Q And who did you sell --
17 A I don't know the name of the people.
18 Q -- Gator Travel Agency to?
19 A It should be on that. I can't remember the name.
20 Q Are you any unsure as to the year you sold Gator
21 Travel Agency?
22 A I'm unsure of the year, yes.
23 Q Congressman Brown, when Springfield Travel
24 Agency made repayments of loans to you, how often was that?
25 A [illegible]

9704384084 7

1 Q Was there any set schedule?

2 A There was never a set schedule. I only repaid

3 myself during the campaign period. I mean, other than that

4 it was a one way relationship.

5 Q So most of the loans --

6 A I would pay the bills --

7 Q Right.

8 A -- of the travel agency. The travel agency did

9 not generate enough money to pay the bills.

10 Q In 1992 when you repaid yourself for loans to

11 Springfield Travel Agency, this was the first time you had

12 repaid yourself for something?

13 A Right, but I did not take a salary. I worked in

14 the agency.

15 Q I understand.

16 Considering the documents that we have gone over

17 this afternoon related to the source of the loans you made

18 to your committee, can you tell me why some of this

19 information was not provided to the audit division during

20 the audit process?

21 A No, I cannot tell you that. I hired a bookkeeper,

22 and we worked on the campaign and tried to provide as much

23 documentation and information as we possibly could.

24 I found a couple things that I need to go back and

25 adjust, and I will do that.

9704584084 8

1 MR. TANIELIAN: Is there anything else that you
2 would like to add to your answers you have given today?
3 MR. WILLARD: Can we take two minutes to talk
4 about that?
5 MR. TANIELIAN: Sure.
6 (Whereupon, a short recess was taken.)
7 MR. TANIELIAN: On the record.
8 BY MR. TANIELIAN:
9 Q If I could just have one more question, please?
10 At the very beginning of this deposition you mentioned that
11 you had been deposed in relation to a property dispute. Did
12 that property dispute have anything to do with Drs. Stith
13 and Scott?
14 A No.
15 MR. TANIELIAN: You can go ahead.
16 MR. WILLARD: I think I just have one or two
17 questions.
18 MR. TANIELIAN: I would interrupt, counsel. It is
19 Commission policy that we do not allow for cross-examination
20 of the witness.
21 MR. WILLARD: I am just trying to clarify
22 something that was said earlier. I am not trying to add
23 anything. I just want to clarify something.
24 MR. TANIELIAN: Okay. A couple clarifying
25 questions then.

9704384049

1 MR. WILLARD: Early on in the deposition, I think
2 there was a question about discussions with Mr. Simmons
3 relating to these matters, and I just wanted Congresswoman
4 Brown to clarify that a little bit if she would.
5 THE WITNESS: Yes. You asked a question -- I
6 think maybe we clarified it; I just want to make sure --
7 whether or not I remember asking him for any money or a loan
8 or anything pertaining to the campaign. Clearly, I don't
9 remember that at all.
10 Then you asked a question about was there any
11 discussion with him about the checks, you know, I guess the
12 list of checks you have shown me. I don't remember any
13 discussion with him, I mean, even while we were preparing;
14 only discussions with my attorney.
15 Now, the specific check that I saw that he gave
16 me, I don't remember asking him for it or any of that. I
17 just want to be clear on that.
18 MR. TANIELIAN: Okay.
19 THE WITNESS: It was discussed, but there is just
20 no memory of it.
21 MR. WILLARD: Just to clarify, you did have a
22 discussion with Mr. Simmons about that particular check?
23 THE WITNESS: Yes, but not a lengthy discussion at
24 all.
25 MR. WILLARD: And again, we are talking about in

1 preparation for --

2 THE WITNESS: For this, right. Right. Not in

3 1991. Not in 1991.

4 MR. TANIELIAN: Is there any other statement you

5 would like to add?

6 THE WITNESS: They warned me not to talk about the

7 90 days again, three campaigns in 90 days, so I won't

8 mention that again.

9 MR. TANIELIAN: That is all I have for today,

10 Congresswoman Brown. Thank you for coming.

11 THE WITNESS: And I will get back with you on

12 those questions that you asked.

13 MR. WILLARD: Can you send us a letter? I mean,

14 sort of throughout there were documents --

15 MR. TANIELIAN: Yes. We have been keeping track.

16 MR. WILLARD: -- that you --

17 MR. TANIELIAN: We will send you a letter.

18 MR. WILLARD: I tried to keep track, but if you

19 can send me a letter or send Holly a letter saying what

20 exactly it is we owe you?

21 MR. TANIELIAN: Okay.

22 MS. SCHADLER: And what we will do is respond in

23 turn and let you know when we can do that, by what date.

24 MS. VOSDINGH: Okay.

25 MS. SCHADLER: It may take awhile to get

1 documents.

2 MR. TANIELIAN: I would just remind you that we

3 are continuing the deposition rather than adjourning it,

4 which as a formal matter means the subpoena remains in

5 effect, and we may choose to speak with you at a later date.

6 We do not plan on it, but that is Commission policy.

7 MR. WILLARD: Okay. I assume that that would not

8 arise unless there was some new information.

9 MR. TANIELIAN: Absolutely.

10 We are off the record.

11 (Whereupon, at 1:25 p.m. the hearing was

12 adjourned, to reconvene sine die.)

13 I have read the foregoing pages 1 through 104, and

14 they are a true and accurate record of my

15 testimony therein recorded, and any changes and/or

16 corrections appear on the attached errata sheet

17 signed by me.

18 _____

19 Corrine Brown

20

21 Subscribed and sworn to before me

22 this _____ day of _____, 199_

23 _____

24 Notary Public

25 My Commission expires: _____

1 REPORTER'S CERTIFICATE

2

3 DOCKET NO.: N/A

4 CASE TITLE: MUR-4160 / Corrine Brown

5 HEARING DATE: November 25, 1996

6 LOCATION: Washington, D. C.

7

8 I hereby certify that the proceedings and evidence are
9 contained fully and accurately on the tapes and notes
10 reported by me at the hearing in the above case before the
11 Federal Election Commission.

12

13 Date: November 25, 1996

14

15

16

17 Official Reporter

18 Heritage Reporting Corporation

19 Suite 600

20 1220 L Street, N. W.

21 Washington, D. C. 20005

22

23

24

25

JURISDICTION: FEDERAL ELECTION COMMISSION

Before me, the undersigned authority, personally appeared Corrine Brown who, after being duly sworn states that she has read the foregoing deposition transcript, and states that she wishes to make the following changes or corrections to this transcript for the following reasons:

PAGE	LINE	CHANGE	REASON FOR CHANGE

The witness states that the deposition transcript, pages ____ through _____, is otherwise true and accurate.

_____

SWORN AND SUBSCRIBED before me on the _____ day of _____, A.D. 19__.

_____
Notary Public

My Commission Expires: _____

9/0450854

EXHIBIT 1

9704500408550

HAND DELIVERED

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

(Summary Page)

Received
OFFICE OF RECORDS & PROCEDURES
1993 AUG -3 PM 2:08
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

USE FEC PARSING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full): Friends of Corrine Brown

ADDRESS (Number and street): P.O. Box 1066 — ☐ Check if different than previously reported

CITY, STATE and ZIP CODE: Jacksonville, FL 32201 — STATE/DISTRICT: FL/3rd

2. FEC IDENTIFICATION NUMBER: C00272733 (152380)

3. IS THIS REPORT AN AMENDMENT? ☒ YES ☐ NO

4. TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☒ Twelfth day report preceding Primary (Type of Election) election on 9/1/92 in the State of Florida
- ☐ Twelfth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

This report contains a July 1st ☐ Primary totals ☐ General totals ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period: January 1, 1992 through 06/30/92	COLUMN A This Period	COLUMN B Calendar Year to Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a))	60,363.26	70,363.26
(b) Total Contribution Refunds (from Line 20(a))		
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	60,363.26	60,363.26
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	31,835.26	31,835.26
(b) Total Offsets to Operating Expenditures (from Line 14)		
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	31,835.26	31,835.26
8. Cash on Hand at Close of Reporting Period (from Line 27)	16,883.83	
9. Debts and Obligations Owed TO the Committee (Number all on Schedule C or D/E; Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Number all on Schedule C and/or Schedule D)	5,000.00	

For further information contact: Federal Election Commission, 999 E Street, NW, Washington, DC 20463, Toll Free 800-424-9530, Local 202-376-3120

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

Type or Print Name of Treasurer: Gloria Simmons

Signature of Treasurer: Gloria Simmons

Date: August 2, 1992

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

FEC FORM 3

FEC Exh. #1
DEPOSITION EXHIBIT
11-25-96

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

Name of Committee (in full): Friends of Corrine Brown

Report Covering the Period: From Inception to 08/12/97

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year To Date	
11. CONTRIBUTIONS (other than loans) PROM:			
(a) Individuals/Persons Other Than Political Committees			
i. Itemized (see Schedule A)	13,953.00		11(a)i
ii. Unitemized	18,990.00		11(a)ii
iii. Total of contributions from individuals	32,943.00	32,943.00	11(a)iii
(b) Political Party Committees	450.00	450.00	11(b)
(c) Other Political Committees (such as PACs)	7,969.24	7,969.24	11(c)
(d) The Candidate			11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	40,362.24	40,362.24	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	2,326.00	2,326.00	12
13. LOANS			
(a) Made or Guaranteed by the Candidate	6,000.00	6,000.00	13(a)
(b) All Other Loans			13(b)
(c) TOTAL LOANS (add 13(a) and (b))	6,000.00	6,000.00	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	48,688.32	48,688.32	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	31,035.30	31,035.30	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS			
(a) Of Loans Made or Guaranteed by the Candidate			19(a)
(b) Of All Other Loans			19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))			19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20(a)
(b) Political Party Committees			20(b)
(c) Other Political Committees (such as PACs)			20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))			20(d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	31,035.30	31,035.30	22

III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ -0-	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	$ 48,688.32	24
25. SUBTOTAL (add Line 23 and Line 24)	$ 48,688.32	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	$ 31,035.30	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	$ 16,653.02	27

SCHEDULE A **ITEMIZED RECEIPTS**

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

PAGE 1 OF 1

FOR LINE NUMBER: 13a

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

NAME OF COMMITTEE (In Full): Friends of Corrine Brown

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Corrine Brown 2/4 Talluleh Avenue Jacksonville, FL Receipt For: Primary / General / Other (specify)	Candidate Loan Aggregate Year-to-Date $ 6,000.00	7/28/92 7/31/92	3,000.00 3,000.00
B.			
C.			
D.			
E.			
F.			
G.			

SUBTOTAL of Receipts This Page (optional): 6,000.00

TOTAL This Period (last page this line number only): 6,000.00

SCHEDULE C
(Revised 3/89)

LOANS

Page 1 of 1 for LINE NUMBER 10
(Use separate schedule for each contributing line)

Name of Committee (In Full)
Friends of Corrine Brown

A. Full Name, Mailing Address and ZIP Code of Lender Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding as Close of This Period
Corrine Brown (Personal Funds) 274 Tallulah Avenue Jacksonville, FL 32208 (Lender) ☒ Primary ☐ Guarantor ☐ Other (specify)	3,000.00	-0-	3,000.00
Terms: Date Incurred 7/31/92 Date Due Upon Demand Interest Rate NA % (Mark) ☐ Secured			

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

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

B. Full Name, Mailing Address and ZIP Code of Lender Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding as Close of This Period
Corrine Brown (Personal Funds) 274 Tallulah Avenue Jacksonville, FL 32208 (Lender) ☒ Primary ☐ Guarantor ☐ Other (specify)	3,000.00	-0-	3,000.00
Terms: Date Incurred 7/28/92 Date Due Upon Demand Interest Rate NA % (Mark) ☐ Secured			

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

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

SUBTOTALS This Period This Page (optional)	6,000.00
TOTALS This Period (last page in this line only)	6,000.00

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

EXHIBIT 2

9/043840860

CREDIT COPY

Barnett Bank

Official Check

Date JULY 24,1997

No. 01030334

Affiliate Name BARNETT BANK OF JACKSONVILLE, N.A. 0A**

Office Name BARNETT CENTER**** Pk CORRINE BROWN***

Pay Exactly BARNETT BANK 3,0 00 CTS

$ ****3,000.00*****

To The Order Of ****CORRINE BROWN FOR CONGRESS****

LOAN TO CAMPAIGN**

JC 717 CREDIT

DEPOSITION EXHIBIT 11-25-96

9

9704584086 1

EXHIBIT 3

9 7 0 4 3 8 4 0 8 6 2

SPRINGFIELD TRAVEL AGENCY
33 SOUTH HOGAN ST. SUITE 250
JACKSONVILLE, FL 32202

2128

Aug 25

PAY TO THE ORDER OF Cash $3000.00

Three thousand DOLLARS

FOR Corrine Brown

Exh #3
DEPOSITION
EXHIBIT
11-25-96

EXHIBIT 4

9/04/08 64

Barnett Bank

Official Check

CREDIT COPY

No. 01030393

Date JULY 31, 1992

Affiliate Name BARNETT BANK OF JACKSONVILLE, N.A.

Office Name BARNETT CENTER TELLER DEPT. (LOAN TO CAMPAIGN) By CORRINE BROWN

Pay Exactly BARNETT BANK $**3,000.00***

To The Order Of CORRINE BROWN FOR CONGRESS***

T/C 217 CREDIT

Tran 00026 07-31-92 11:43
Br 001 Dr 001 Tlr. 036
Account 1030393
C.C $3000.00

EXH #4
DEPOSITION EXHIBIT
11-25-96

EXHIBIT 5

Corrine Brown

[illegible] Gallinda Ave.
Jacksonville, FL 32208

3462

July 21 1992

Pay to the order of Cash $ 1,840.00

One thousand eight hundred forty

For Campaign

Corrine Brown

Date 07-31-92 [illegible]

[illegible] $3000.00

FOR EXH #5
DEPOSITION
EXHIBIT
11-25-96

EXHIBIT 6

9704384086 8

Name Corine Brown

Account No

July 11 - 22

PAY TO THE ORDER OF Cash $1,160

one - thousand one + sixty.....

[redacted]

Re Payment Law Corine Brown

Pl Exh #6

DEPOSITION EXHIBIT

11-25-96

EXHIBIT 7

9704384087C

Name Springfield Travel Agency

Account No. _____ June 12, 92

PAY TO THE ORDER OF Cash $1,000.00

One thousand DOLLARS

MR. ARC

Carrie Brown

Carrie Brown

FOR DEPOSIT ONLY

FOR DEPOSITION EXHIBIT

DEPOSIT TICKET

Corrine Brown

274 Eubank Ave.
Jacksonville, FL 32208

June 12, 92

CASH $ 3000.00

CHECKS

CHECKS OR TOTAL FROM OTHER SIDE

SUB TOTAL

LESS CASH

NET DEPOSIT $ 3000.00

Trans 00095 06-19-92 09:46

Deposit 3,000.00

EXHIBIT 8

9704384087 3

SPRINGFIELD TRAVEL AGENCY
33 SOUTH HOGAN ST. SUITE 250
JACKSONVILLE, FL 32202

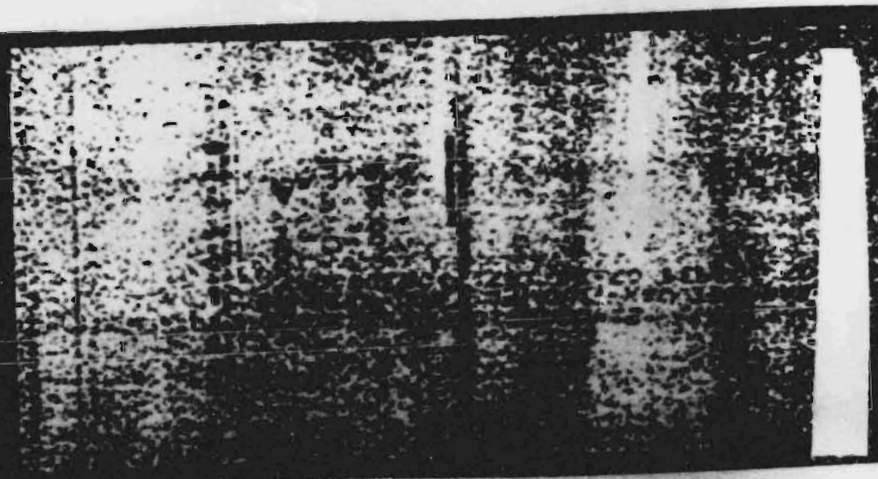
2117

July 20 92

PAY TO THE ORDER OF Cash $250.00

Two - hundred + fifty

FOR Cruise



HB Exh #8
DEPOSITION EXHIBIT
11-26-96

Corrine Brown

274 Talbot Ave.
Jacksonville, FL 32208

DATE July 20 91

250 00
10 00

[redacted]

[redacted]

[redacted]

CITY OF JACKSONVILLE, FLORIDA

LYNWOOD ROBERTS, CONSOLIDATED GOVERNMENT TAX COLLECTOR

JACKSONVILLE, FLORIDA

025074

DATE JULY 6, 1990

PAY ◇◇◇◇◇◇ LYNWOOD ROBERTS TAX COLLECTOR $ 10.00

TEN DOLLARS AND 00 CENTS

CONSOLIDATED BROWARD

07 3039MO 07-

EXHIBIT 9

9704384087 7

FIRST UNION NATIONAL BANK OF FLORIDA
CONVENIENCE CENTER TOWER

R3100
08/31/92

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	12	[illegible]	30	84034.24	60.24	10843.40

RECORD PAID

SERIAL	AMOUNT	DATE	SERIAL	AMOUNT	DATE
128	5,000.00	[illegible]	195*	[illegible]	08/13
130*	107.00	[illegible]	196	[illegible]	08/14
152*	[illegible]	[illegible]	197	[illegible]	08/21
154*	28.22	08/04	198	[illegible]	08/25
155	50.00	08/05	199	[illegible]	08/18
156	[illegible]	[illegible]	200	[illegible]	08/17
157	102.8[illegible]	08/05	203*	[illegible]	08/21
158	7[illegible].42	08/05	204	[illegible]	08/19
159	100.00	08/04	205	[illegible]	08/20
161*	75.00	08/05	206	[illegible]	08/18
162	30.00	08/05	207	[illegible]	08/21
163	62.70	08/05	208	[illegible]	08/19
164	50.00	08/04	209	[illegible]	08/21
165	[illegible]	08/13	210	[illegible]	08/19
167*	853.00	08/05	211	125.00	08/19
168	[illegible]	08/13	212	[illegible]	08/19
169	286.00	08/07	213	[illegible]	08/26
170	403.24	08/10	214	[illegible]	08/19
171	395.00	08/05	215	[illegible]	08/21
172	40.00	08/05	216	[illegible]	08/20
173	31.75	08/11	217	[illegible]	08/24
174	50.00	08/11	218	[illegible]	08/21
175	62.72	08/11	219	[illegible]	08/24
177*	150.00	08/10	220	[illegible]	08/24
178	774.26	08/11	221	[illegible]	08/26
179	30.00	08/11	222	[illegible]	08/27
180	[illegible]	08/13	223	[illegible]	08/25
181	150.00	08/12	224	[illegible]	08/21
182	300.00	08/11	226*	[illegible]	08/20
183	[illegible]	08/25	228*	[illegible]	08/21
185*	[illegible]	08/18	229	[illegible]	08/24
186	[illegible]	08/14	230	[illegible]	08/25
187	[illegible]	08/13	231	[illegible]	08/24
188	[illegible]	08/14	232	[illegible]	08/25
189*	[illegible]	[illegible]	233	[illegible]	08/26
191	[illegible]	[illegible]	234	[illegible]	08/26
192	[illegible]	[illegible]	235	[illegible]	08/25

CPCB-BCB	CPCB-BCB
14359566	14982783
12394399	14846383
14013607	12238346
12177057	70404570
12908106	14701519
22475530	22506055
12388695	12259650
12436484	12841708
12240247	12802871
22029414	14894537
22029413	22087937
12714298	14091439
12247367	12285191
22045817	14904326
12078843	14726222
14501904	14087554
12093875	12319195
14879345	12689509
12035406	70763229
12001610	12209626
14047300	22347984
14038921	12274333
14038920	22345293
22049722	12578923
22259104	12206116
22474016	64400581
22743982	14403296
12528942	14754679
14124487	14050822
14491669	22100992
14701520	12614324
12787205	14517394
22910910	12571215
22169089	14483043
14888826	14481669
14831225	14831360
22678274	14483044

3

FIRST UNION NATIONAL BANK OF FLORIDA
DEPOSITORY CONTROL NUMBER 0 4 3 8 4 0 8 7 9

PAGE: 002
(10/31/[illegible])

[illegible]	CL. CDL.	NO. OF [illegible]	[illegible]	CL. OF CREDITS	[illegible]	[illegible]

CHECKS PAID

SERIAL	AMOUNT	DATE	SERIAL	AMOUNT	DATE
236	[illegible]	09/05	246	[illegible]	09/06
237	[illegible]	09/05	247	[illegible]	09/08
[illegible]	[illegible]	09/07	248	[illegible]	09/09
[illegible]	[illegible]	09/08	249	[illegible]	09/07
[illegible]	[illegible]	09/08	250	[illegible]	09/09
[illegible]	[illegible]	09/08	2504	[illegible]	09/07
245	[illegible]	09/08	2504	[illegible]	09/09

* INDICATES A BREAK IN CHECK NUMBER SEQUENCE.

DEPOSITS

DATE	AMOUNT		AMOUNT		AMOUNT	
09/04	2,100.00					
09/07	2,250.00					
09/10	130.00					
09/11	450.00					
09/12	1,400.00		2,005.00		5,000.00	
	4,000.00					
09/13	2,950.00					
09/17	750.00					
09/18	1,730.00	missing ck info	2,445.00	missing ck info	2,800.00	
	3,050.00					
09/20	400.00					
09/21	465.00		1,000.00	no info —	2,270.00	missing ck info
	2,475.00	missing ck info	2,525.00		2,545.00	
09/25	470.80		4,000.00			
09/26	2,825.00		3,700.00			
09/27	1,080.00		2,145.00	(missing ck info)	2,575.00	(missing ck info)
	2,730.00					
09/30	2,000.00	missing	3,484.34	(missing ck info)		
10/31	325.00		1,000.00		3,085.00	

CPC9-8C9	CPC9-8C9
12908886	22880187
22249884	14828486
12404154	12868782
14568632	12448879
22908015	18808861
14738482	12448880
12210547	22490347

CPC9-8C9	CPC9-8C9	CPC9-8C9
12247289		
14367871		
14703628		
14173298		
12571947	12571962	12571828
12571887		
22763390		
22604380		
14530305	14550213	14550278
14530247		
22887714		
12396513	12396556	12396574
12396403	12396545	12396516
14904846	12099192	
22015272	22886680	
12803301	12803733	12803384
12803382		
22398880	22347188	
22804748	22838183	22804731

9 7 0 4 3 8 4 0 8 8 C

[illegible] BANK OF FLORIDA
[illegible] CENTER TOWER

[illegible] DIVISION

PAGE 003

08/31/92

[illegible]

[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

DESCRIPTIVE TRANSACTIONS

DATE	AMOUNT	TYPE	DESCRIPTION			CPCS-BCD
[illegible]	1,910.00	[illegible]	DEPOSIT COUNTER DOCUMENT			14864088
[illegible]	.00	[illegible]	BANK ASSISTED INQUIRY	08/05	11:50	70024485
08/11	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:04	70025000
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:03	70025001
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:04	70025002
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:05	70025003
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:05	70025004
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:01	70025005
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:00	70025006
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:01	70025007
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:02	70025008
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:02	70025009
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:03	70025010
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:03	70025011
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:00	70025012
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	12:00	70025013
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	11:59	70025014
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	11:59	70025015
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	11:58	70025016
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	11:50	70025017
	.00	[illegible]	PUSH BUTTON INQUIRY	08/10	11:54	70025018
08/13	.00	[illegible]	PUSH BUTTON INQUIRY	08/12	17:42	70003006
	.00	DEBIT	PUSH BUTTON INQUIRY	08/12	17:39	70003007
	[illegible]	DEBIT	DEBIT-ANALYSIS SERVICE CHARGE FOR JULY			70005245
08/14	.00	DEBIT	PUSH BUTTON INQUIRY	08/13	14:34	70024757
	.00	DEBIT	PUSH BUTTON INQUIRY	08/13	14:34	70024758
08/18	30.00	DEBIT	DEBIT-DEP ITEM CHARGEBACK MC			70018206
08/20	[illegible]	DEBIT	DEBIT-WIRE TRANSFER DEBIT			70012431
08/21	.00	DEBIT	PUSH BUTTON INQUIRY	08/20	10:00	70024543
	.00	DEBIT	PUSH BUTTON INQUIRY	08/20	11:35	70024544
08/24	25.00	DEBIT	DEBIT-DEP ITEM CHARGEBACK MC			70018315
08/25	[illegible]	DEBIT	DEBIT-WIRE TRANSFER DEBIT			70011904
08/27	.00	DEBIT	PUSH BUTTON INQUIRY	08/26	16:55	70023907
	100.00	DEBIT	DEBIT-DEP ITEM CHARGEBACK MC			70019824
	[illegible]	DEBIT	DEBIT-WIRE TRANSFER DEBIT			70014097

[illegible]

[illegible]

9 7 0 4 3 8 4 0 8 8 1

FIRST UNION

FIRST UNION NATIONAL BANK OF FLORIDA
ENTERPRISE CENTER TOWER

CORRINE BROWN CAMPAIGN

08/31/02

BEGINNING BALANCE	NO. DEB.	AMT. OF DEBITS	NO. CR.	AMT. OF CREDITS	SERVICE CHARGE	ENDING BALANCE

DESCRIPTIVE TRANSACTIONS

DATE	AMOUNT	TYPE	DESCRIPTION	CPCS-SEQ
08/28	5,000.00	CREDIT	DEPOSIT COUNTER DOCUMENT	14068762
	15.00	DEBIT	DEPOSIT CORRECTION DEBIT	22347051
	.00	DEBIT	PUSH BUTTON INQUIRY 08/27 12:52	70027321
	[illegible]	DEBIT	DEBIT-WIRE TRANSFER DEBIT	70014190
08/31	.00	DEBIT	PUSH BUTTON INQUIRY 08/28 11:37	70031526
	1,500.00	DEBIT	DEBIT-WIRE TRANSFER DEBIT	70013970

DAILY BALANCE SUMMARY

DATE	AMOUNT	DATE	AMOUNT	DATE	AMOUNT
08/03	2,998.76	08/12	18,989.78	08/21	19,980.87
08/04	4,980.54	08/13	20,285.01	08/24	16,751.50
08/05	3,836.75	08/14	16,550.01	08/25	8,937.94
08/06	2,388.75	08/17	15,868.76	08/26	11,506.10
08/07	4,412.75	08/18	25,547.38	08/27	5,960.46
08/10	3,989.51	08/19	24,649.58	08/28	6,938.40
08/11	3,154.78	08/20	10,177.73	08/31	10,843.40

ASK ABOUT C-P - A COMPREHENSIVE ASSET MANAGEMENT ACCOUNT
THAT COMBINES TRADITIONAL BANKING AND INVESTMENTS.

IMPORTANT NOTICE ON REVERSE SIDE

ST 1050 (05-97)

EXHIBIT 10

NAME

DATE

TOTAL

NET DEPOSIT

DEPOSIT TICKET

DOLLARS

CHECKS

TOTAL (THIS SIDE ONLY)

FEC EXH #10
DEPOSITION
EXHIBIT
11-25-96

EXHIBIT 11

The Robinson State Bank

003187

REMITTER Dr. Melvin Stith AUG 27 1992 19

PAY TO THE ORDER OF CORRINE BROWN $2,500.00

TALLAHASSEE STATE BANK 250000

DOLLARS

CASHIER'S CHECK

PEL Exhibit 4
DEPOSITION EXHIBIT
11-25-96

EXHIBIT 12

9704508486

Sun Bank/Tallahassee,
National Association
Tallahassee, Florida 32312

No 086460

Dr. Howard R. Scott, II

August 27, 19 92

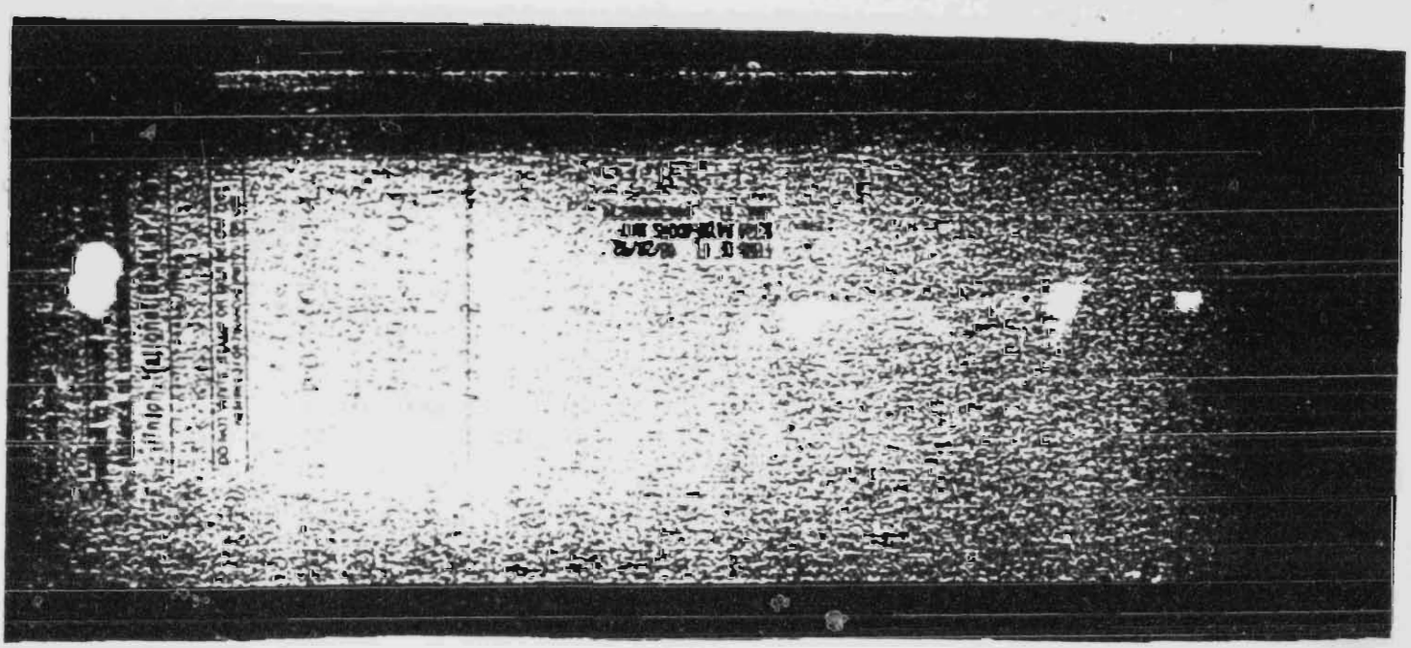
SUN BANK/N.A.
TALLAHASSEE 250000 CTS

$ *2,500.00*

Corrine Brown

CASHIER'S CHECK

Kathleen Bradford



Plt Exh #72
DEPOSITION
EXHIBIT
4-25-96

EXHIBIT 13

Fac Exh #13
DEPOSITION EXHIBIT
11-25-96

RECEIVED
1993 MAY 14 AM 11:12

(5)

BOOB DELIVERER
MC
Office Use Only

UNITED STATES HOUSE OF REPRESENTATIVES

FINANCIAL DISCLOSURE STATEMENT FOR CALENDAR YEAR 1992

FORM A
For use by Members, officers, and employees

Rep. Corrine Brown
(Full name)

1037 Longworth H.O.B.
(Mailing Address)

Washington, D.C. 20515
(Digital Telephone)
(202) 225-0123

Filer Status	[X] Member of the U.S. House of Representatives — State: Florida, District: 3	[ ] Officer or Employee	Employing Office:
Report Type	[X] Annual (May 15)	[ ] Amendment	[ ] Termination — Termination Date:

PRELIMINARY INFORMATION — ANSWER EACH OF THESE QUESTIONS

Did you or your spouse have "earned" income (e.g., salaries or fees) of more than $200 from any source in the reporting period? If yes, Complete and Attach Schedule I.	Yes [X]	No [ ]	Did you, your spouse, or a dependent child receive any reportable gift in the reporting period (i.e., aggregating more than $250 and not otherwise exempt)? If yes, Complete and Attach Schedule VI.	Yes [ ]	No [X]
Did any individual or organization make a donation to charity in lieu of paying you for a speech, appearance, or article in the reporting period? If yes, Complete and Attach Schedule II.	Yes [ ]	No [X]	Did you, your spouse, or a dependent child receive any reportable travel or reimbursements for travel in the reporting period (worth more than $250 from one source)? If yes, Complete and Attach Schedule VII.	Yes [ ]	No [X]
Did you, your spouse, or a dependent child receive "unearned" income of more than $200 in the reporting period or hold any reportable asset worth more than $1,000 at the end of the period? If yes, Complete and Attach Schedule III.	Yes [X]	No [ ]	Did you hold any reportable positions on or before the date of filing in the current calendar year? If yes, Complete and Attach Schedule VIII.	Yes [X]	No [ ]
Did you, your spouse, or dependent child purchase, sell, or exchange any reportable asset worth more than $1,000 in the reporting period? If yes, Complete and Attach Schedule IV.	Yes [ ]	No [X]	Did you have any reportable agreement or arrangement with an outside entity? If yes, Complete and Attach Schedule IX.	Yes [ ]	No [X]
Did you, your spouse, or a dependent child have any reportable liability (more than $10,000) during the reporting period? If yes, Complete and Attach Schedule V.	Yes [X]	No [ ]	Each question in this part must be answered and the appropriate schedule attached for each "Yes" response.		

EXCLUSION OF SPOUSE, DEPENDENT, OR TRUST INFORMATION — ANSWER EACH OF THESE QUESTIONS

TRUSTS — Details regarding "Qualified Blind Trusts" approved by the Committee on Standards of Official Conduct and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or a dependent child? (See instructions, page 10.)	Yes [ ]	No [X]
EXEMPTION — Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption? (See instructions, page 11.)	Yes [ ]	No [X]

CERTIFICATION — THIS DOCUMENT MUST BE SIGNED BY THE REPORTING INDIVIDUAL AND DATED

The Financial Disclosure Statement is required by the Ethics in Government Act of 1978, as amended (5 U.S.C. app. 6, § 101 et seq.). The Statement will be available to any requesting person upon written application and will be reviewed by the Committee on Standards of Official Conduct. Any individual who knowingly and willfully falsifies, or who knowingly and willfully fails to file this report, may be subject to civil and criminal sanctions. (See 5 U.S.C. app. 6, § 104 and 18 U.S.C. § 1001.)

SIGNATURE OF REPORTING INDIVIDUAL: Corrine Brown

DATE (Month, Day, Year): May 15, 1993

Reporting Individual's Name
Rep. Corrine Brown

SCHEDULE I—EARNED INCOME

List the source, type, and amount of earned income from any source (other than the filer's current employment by the U.S. Government) totaling $200 or more during the preceding calendar year. For a spouse, list the source and amount of any honoraria; only the source need be reported for other spouse earned income. For further information, see instructions, page 12.

	Source	Type	Amount
Sheet_Item	State College	Approved Teaching Fee	[illegible]
	State of Maryland	Legislative Pension	[illegible]
	Civil War Roundtable (Oct. 2nd)	Spouse Speech	$1,000
	Fulton County Board of Education	Spouse Salary	NA
	State of Florida, Tallahassee, Florida	Legislative Salary	$19,307.01
	Florida Community College at Jacksonville (Fl)	Salary	$25,812.60

For payments to charity in lieu of honoraria, use Schedule II

Schedule I

9/0438408 9C

Reporting Individual's Name

Rep. Cordell Brown

SCHEDULE III—ASSETS AND "UNEARNED" INCOME

In BLOCK A report (a) the identity of each asset held for investment or production of income which had a fair market value exceeding $1,000 as of the close of the year and (b) any other asset or source of "unearned" income which generated $200 or more in income during the reporting period. Exclude: Any personal liability owed to you by your spouse, or by your spouse's child, parent, or sibling; any deposits aggregating $5,000 or less in personal savings accounts; and, financial interests in or income derived from U.S. Government retirement programs. For rental property or land, provide the city and a street address or lot number.

In BLOCK B indicate the category of value for each asset listed in Block A. If you use a valuation method other than fair market value, explain the method used. If an asset was sold and is included only because it generated income, the value should be "None".

In BLOCK C indicate the type and category of value of "unearned" income aggregating more than $200 received from assets and sources listed in Block A. For IRA's and retirement plans that are not self-directed, you may list only year and value and indicate "N/A" for income. You must, however, name the institution holding the IRA.

In BLOCK D indicate if the asset was purchased, sold, or exchanged during the year. If so, provide details on Schedule IV. For more details, see instructions, pages 14–16.

If you wish to indicate that an asset, income source, or income is that of your spouse or dependent child, or owned jointly, so indicate in the column for that purpose on the far left. (This is optional.) See instructions, page 17.

SP/DC/JT	BLOCK A Asset and/or Income Source	BLOCK B Year End Value (X) A None	B Less Than $1,000	C $1,001 - $15,000	D $15,001 - $50,000	E $50,001 - $100,000	F $100,001 - $250,000	G $250,001 - $500,000	H Over $1,000,000	Indicate if other valuation method (G) Attach explanation	BLOCK C Type of Income (X) RENT	INTEREST	DIVIDEND	CAPITAL GAIN	DEBT/TAX TRUST	Other Income (Specify type)	Category of Amount of Income (X) I None	II Less Than $1,000	III $1,001 - $2,500	IV $2,501 - $5,000	V $5,001 - $15,000	VI $15,001 - $50,000	VII $50,001 - $100,000	VIII $100,001 - $1,000,000	IX Over $1,000,000	Block D Transaction (X)
SP	Bank Misc.	ABC Corporation Bank		X							X								X							X
		George Wash. Credit Union Accounts			X							X								X						
		100 Main Street, Dover, Delaware				X						X								X						
	6844 Willowood Drive Jacksonville, Florida				X							X								X						
	Gator Travel Agency, Inc. Gainesville, Florida					X											X									

For additional assets and unearned income, use next page

Reporting Individual's Name

Rep. Corrine Brown

SCHEDULE V—LIABILITIES

Report liabilities of over $10,000 owed to any one creditor at any time during the reporting period by you, your spouse, or dependent child. Check the highest amount owed during the reporting period. Include a mortgage on your personal residence (unless it is rented out); loans secured by automobiles, household furniture, or appliances; and liabilities owed to a spouse, child, parent, or sibling of the reporting individual or the reporting individual's spouse. For further information, see instructions, page 21.

Sub-Ref	Creditor	Type of Liability	Category of Amount or Value (X)						
			A $10,000 or less	B $10,001 - $15,000	C $15,001 - $50,000	D $50,001 - $100,000	E $100,001 - $250,000	F $250,001 - $500,000	G $500,001 - $1,000,000	H1 $1,000,001 - $5,000,000	H2 Over $5,000,000
	Example: First Bank of Wilmington, Delaware	Mortgage on 100 Main St. Dover, Del.				X					
	Housing Investment, Inc. Jacksonville, Florida	Mortgage on 1844 Willowood Drive Jacksonville, Florida		X							
	Barnett Bank of Florida	Loan - Personal			X						
	First Union National Bank	Loan - Business		X							

SCHEDULE VI—GIFTS

Report the source, a brief description, and the value of all gifts totaling more than $250 in value received by you, your spouse, or a dependent child from any source during the calendar year.

Exclusions: Gifts from relatives, gifts of personal hospitality of an individual, and food meals need not be reported. Gifts with a value of $100 or less need not be aggregated towards the $250 disclosure threshold. Gifts to a spouse or dependent child that are totally independent of his or her relationship to you need not be disclosed.

Note: House Rule 25.5, clause 4, limits the total value of gifts a Member, officer, or employee of the House may accept from any one source in a calendar year to $250 in most instances. For further information, see instructions, page 22.

Source	Brief Description	Value
Example: Mr. Joseph H. Smith, Anytown, USA	Bowl Pewter tankard received from Committee on Resources	$175

Use additional sheets if more space is required.

Schedules V and VI

9704384089 2

Reporting Individuals Name

Rep. Corrine Brown

SCHEDULE VIII—POSITIONS

Report all positions, compensated or uncompensated, held during the current calendar year as an officer, director, trustee of an organization, partner, proprietor, representative, employee, or consultant of any corporation, firm, partnership, or other business enterprise, any nonprofit organization, any labor organization, or any educational or other institution other than the United States. Include positions listed on Schedule I. For further information see Instructions, page 20.

EXCLUSIONS: Positions held in any religious, social, fraternal, or political entities, and positions solely of an honorary nature need not be shown.

Positions	Name of Organization
President (uncompensated)	Gater Travel Agency, Inc.

SCHEDULE IX—AGREEMENTS

Identify the date, parties to, and terms of any agreement or arrangement with respect to: future employment; a leave of absence during the period of government service; continuation or deferral of payments by a former or current employer other than the U.S. Government; or continuing participation in an employee welfare or benefit plan maintained by a former employer. For further information, see Instructions, page 20.

Date	Parties To	Terms of Agreement

OPA 1400 (5-2000 ed)

363

9 7 0 4 3 2 4 0 8 9 3

EXHIBIT 14

2704384089 4

Charles Brown

371 Bayard Ave.
Jacksonville, FL 32208

G 41 0 3441

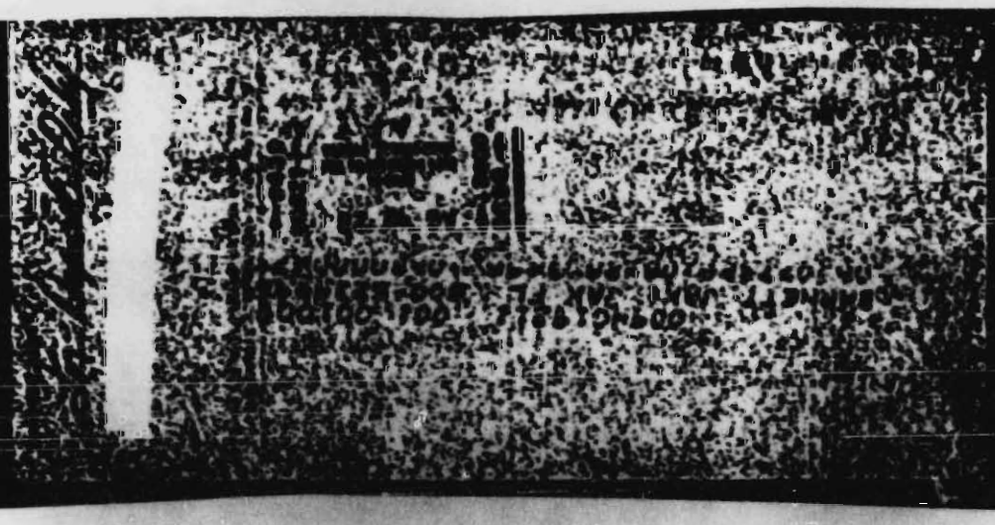
Aug 28 19 77

Pay to the order of $2000.00

Two thousand Dollars

[redacted]

For LOAN



HFEC Exhibit 14
DEPOSITION
EXHIBIT
11-25-96

EXHIBIT 15

9704384089 6

EXHIBIT 16

9704384089 7

2000.00

2000.00

FEC Exh #16
DEPOSITION
EXHIBIT
11-25-96

6 2 173

Aug 26 92

Corey Brown $ 2000.00

Two Thousand and 00/100

Legal

Giles R. Sim

Fr Dennis Corey

EXHIBIT 17

9704384090C

Loan:

Crew meno 8/25/92 $ [illegible]

8/31/92 1500

8/28/92 2000

$ [illegible]

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4160

DATE FILMED 10-6-97 CAMERA NO. 1

CAMERAMAN JMU

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