FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 526

DATE: 11/10/78

FILMED BY: [illegible]

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 26, 1978

William Gray
102 W. Whiting St.
Tampa, FL 33602

Re: MUR 526

Dear Mr. Gray:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

7 3 0 4 0 7 0 7 7 3

BEFORE THE FEDERAL ELECTION COMMISSION

78 JUL 14 PM 12:22

In the Matter of	)	
	)	
William Gray	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. William Gray (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g (a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

Date

William Gray

Acc # 4990

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

SEP 25 A 9:55

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Gray
102 W. Whiting St.
Tampa, FL. 33602

806439

RE: MUR 526

Dear Mr. Gray:

Enclosed, please find the check you forwarded to our offices with the signed conciliation agreement in the above-referenced matter. Please note that the check is not signed. We will expect its early return properly executed so that this matter can be resolved.

We will look forward to hearing from you.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

Mary - mail to him

3858

0864

MR. G. WILLIAM GRAY
107 S. O'BRIEN
TAMPA, FL 33609

August 7 19 78

63-579
631

PAY TO THE ORDER OF Federal Election Commission $ 50.00

FIFTYDOLLARS AND NO CENTS---------- DOLLARS

Atlantic Bank
Atlantic Bank of Tampa
Tampa, Florida

FOR

G. William Gray

⑆0631⑈0579⑆ 305 851 0⑈

Grey & Associates

102 West Whiting Street
Tampa, Florida 33602

public relations

SEP 25 A9:55

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Gray
102 W. Whiting St.
Tampa, FL. 33602

RE: MUR 526

Dear Mr. Gray:

Enclosed, please find the check you forwarded to our offices with the signed conciliation agreement in the above-referenced matter. Please note that the check is not signed. We will expect its early return properly executed so that this matter can be resolved.

We will look forward to hearing from you.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

3855

0864

MR. G. WILLIAM GRAY
107 S. O'BRIEN
TAMPA, FL 33609

August 7 19 78

PAY TO THE ORDER OF Federal Election Commission $ 50.00

FIFTYDOLLARS AND NO CENTS----------

Atlantic Bank
Atlantic Bank of Tampa
Tampa, Florida

FOR

⑆063⑈0579⑆ 305 851 0⑈

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

James R. Cope
301 Greencastle Ave.
Temple Terrace, Florida 33617

Re: MUR 526

Dear Mr. Cope:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, F. 33617

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 15 AM 9:13

In the Matter of)
)
James R. Cope) MUR 526

CONCILIATION AGREEMENT

803621

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. James R. Cope (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

III. The Respondent enters voluntarily into this Agreement with the Commission.

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser of guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

June 12, 1978
Date

James R. Cope

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

Norman S. Dudley
302 Belle Terre
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Dudley:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

003845
803713

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 19 PM 12:36

In the Matter of	)	
	)	
Norman S. Dudley	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Norman S. Dudley (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

Date

Norman S. Dudley

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

Robert E. Chapman
1910 Orient Rd.
Tampa, FL 33619

Re: MUR 526

Dear Mr. Chapman:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert E. Chapman	)	MUR 526

'93 JUL 17 AM 10:15

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804511

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert E. Chapman (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon it renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

Date

Rebert E. Chapman

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

George H. Sohl
7007 Shenandoah Ct., South
Tampa, FL 33615

Re: MUR 526

Dear Mr. Sohl:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

Doc 3866

FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 20 PM 12:53

In the Matter of	)	
	)	
George H. Sohl	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. George H. Sohl (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

003787

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

Date

George H. Sohl

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

Robert P. Andrews
8711 N. Temple Ave.
Tampa, FL 33617

Re: MUR 526

Dear Mr. Andrews:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

804149

BEFORE THE FEDERAL ELECTION COMMISSION

'83 JUL 12:22

In the Matter of)
)
Robert P. Andrews) MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert P. Andrews (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel
Federal Election Commission

6-26-78
Date

Robert P. Andrews

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

David C. Willis
P.O. Box 255
Brandon, FL 33511

Re: MUR 526

Dear Mr. Willis:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CC3902

BEFORE THE FEDERAL ELECTION COMMISSION

'79 JUN 23 AM 11:49

In the Matter of	)	
	)	
David C. Willis	)	MUR 526

CONCILIATION AGREEMENT

803830

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. David C. Willis (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel

6/19/78
Date

David C. Willis

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

September 15, 1978

Robert J. Owens
505 Brentwood Dr.
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Owens:

The Commission is in receipt of the conciliation agreement you have signed in connection with this matter as well as your payment of the civil penalty assessed.

Please find enclosed a copy of this agreement which has now been approved by the Commission and signed by the General Counsel.

This investigation is now terminated. Copies of the above-mentioned document will be placed in the public disclosure file in this matter.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	MUR 526

JUL 5 AM 12:15

804210

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert J. Owens (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(f) by accepting loan endorsements on a campaign-related loan in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent took out a loan for $10,000 in his own name on August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to his campaign committee.

B. Seven individuals endorsed the $10,000 note.

C. These seven endorsements were removed from the loan agreement upon the loan's renewal on December 15, 1976, after the Respondent's personal financial statements had been submitted to the bank.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. Each of the endorsements of this loan constituted a contribution of approximately $1,400 to Respondent's campaign under the Federal Election Campaign Act between the time the endorsers signed the note and the time their names were removed from the loan, December 15, 1976.

III. Respondent's acceptance of these endorsements is in violation of 2 U.S.C. § 441a(f).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

9/15/78
Date

William C. Oldaker
General Counsel
Federal Election Commission

6/28/78
Date

Robert J. Owens

September 7, 1978

MEMORANDUMTTO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached General Counsel's Report on MUR 526 distributed to the Commission on a 48 hour tally basis.

Thank you.

7 8 0 4 0 0 7 0 8 1 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 526
Robert J. Owens	)	
Robert P. Andrews	)	
George H. Sohl	)	
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman S. Dudley	)	

CERTIFICATION

I, Marjorie W. Emmons Secretary to the Federal Election Commission, do hereby certify that on September 11, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Approve the signed conciliation agreements attached to the General Counsel's Report dated August 24, 1978.

2. Send the letters attached to the same General Counsel's Report.

3. Close the file.

ATTEST

9-11-78
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Report signed: 9-6-78
Received in Office of Commission Secretary: 9-7-78, 11:19
Circulated on 48 hour vote basis: 9-7-78, 4:00

BEFORE THE FEDERAL ELECTION COMMISSION

AUGUST 24, 1978

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	
George H. Sohl	)	MUR 526
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman S. Dudley	)	

GENERAL COUNSEL'S REPORT

On May 17, 1978, the Commission found reasonable cause to believe that Robert Owens violated 2 U.S.C. § 441a(f) by accepting loan endorsements which exceeded contribution limits, and voted to send the conciliation agreement attached to the General Counsel's Report signed May 12, 1978. The Commission also found reasonable cause to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman S. Dudley violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a Federal candidate in excess of the statutory contribution limit and approved the sending of conciliation agreements to these respondents as well.

The Office of General Counsel has now received eight signed conciliation agreements as approved by the Commission calling for a civil penalty of $50. This office has also received payment of the civil penalty from each respondent.

A copy of the conciliation agreement signed by each respondent is attached.

RECOMMENDATION

Approve the attached signed conciliation agreements. Send attached letters. Close the file.

9/6/78
Date

William C. Oldaker
General Counsel

Packet contains:
1. G. C. Report
2. Draft letter
3. 8 conciliation agreements
4. Certification

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 15 AM 9:13

In the Matter of)
)
James R. Cope) MUR 526

CONCILIATION AGREEMENT

803621

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. James R. Cope (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

III. The Respondent enters voluntarily into this Agreement with the Commission.

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser of guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

June 12, 1978
Date

James R. Cope
James R. Cope

[redacted]

803713

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 19 PM 12:36

In the Matter of	)	
	)	
Norman S. Dudley	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Norman S. Dudley (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel
6-15 78 Date	Norman S. Dudley Norman S. Dudley

FEC 5866

FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 20 PM 12:33

In the Matter of	)	
	)	
George H. Sohl	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. George H. Sohl (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

803787

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

14 June 78
Date

George H. Sohl

6 CC 3402

FEDERAL ELECTION

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUN 23 AM 11:48

In the Matter of)
)
David C. Willis) MUR 526

CONCILIATION AGREEMENT 803830

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. David C. Willis (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel
4/19/78 Date	David C. Willis David C. Willis

804149

FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUL 3 PM 12:22

In the Matter of	)	
	)	
Robert P. Andrews	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert P. Andrews (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

6-26-78
Date

Robert P. Andrews
Robert P. Andrews

BEFORE THE FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION

'78 JUL 5 PM 12:15

In the Matter of	)	
	)	
Robert J. Owens	)	MUR 526

88423C

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert J. Owens (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(f) by accepting loan endorsements on a campaign-related loan in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent took out a loan for $10,000 in his own name on August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to his campaign committee.

B. Seven individuals endorsed the $10,000 note.

C. These seven endorsements were removed from the loan agreement upon the loan's renewal on December 15, 1976, after the Respondent's personal financial statements had been submitted to the bank.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. Each of the endorsements of this loan constituted a contribution of approximately $1,400 to Respondent's campaign under the Federal Election Campaign Act between the time the endorsers signed the note and the time their names were removed from the loan, December 15, 1976.

III. Respondent's acceptance of these endorsements is in violation of 2 U.S.C. § 441a(f).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

6/28/78
Date

Robert J. Owens

BEFORE THE FEDERAL ELECTION COMMISSION

'78 JUL 14 PM 12:22

In the Matter of	)	
	)	
William Gray	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. William Gray (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g (a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

7/12/78
Date

William Gray

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert E. Chapman	)	MUR 526

'78 JUL 17 AM 10:15

804518

804511

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert E. Chapman (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon it renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

7/12/78
Date

Robert E. Chapman

Robert E. Chapman

526

CCC # 4596

Mr William C Oldaker
General Counsel

FEDERAL ELECTION COMMISSION

8-15-78

'78 AUG 21 AM 9:29

Re - MUR 516

Your certified mail dated July 28, 1978 received. I mailed a check dated 7-17-78, check # 145 on my personal checking account with Pan American Bank of Tampa in the amount of $50.00. The check was made payable to the United States Treasury and sent to your office.

Please check your files and advise what has happened to the check. The check had not cleared my bank as of 8-9-78.

Norman P Sudley
* 3[illegible] Belle Terre
Temple Terrace, Fla 33617

* my correct mailing address

7 8 1 4 0 1 7 9 8 1

[illegible] Dudley
[illegible] Bell Terr
Tampa Terrace, Fla. 33617

AUG 21 [illegible]

[illegible] Election [illegible]

FEDERAL ELECTION

'78 AUG 11 AM 11:07

August 8, 1978

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Gray & Associates

Dear Mr. Oldaker:

Thank you for your letter of July 28th.

Before Mr. Gray left for a two week business trip, he asked that I send you the enclosed check in the amount of $50, in compliance with your request. We trust this will now satisfactorily close the matter.

Sincerely,

Mary Wilson
Secretary to
G. William Gray

GWG:mw

public relations

3858

0864

MR. G. WILLIAM GRAY
107 S. O'BRIEN
TAMPA, FL 33609

August 7 19 78

PAY TO THE ORDER OF Federal Election Commission $ 50.00

FIFTYDOLLARS AND NO CENTS---------- DOLLARS

Atlantic Bank
Atlantic Bank of Tampa
Tampa, Florida

FOR

⑈063⑆0579⑈ 305 851 0⑈

Gray & Associates

102 West Whiting Street
Tampa, Florida 33602

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

public relations

TAMPA, FL
PM
1978

AUG 11 AM 11:57

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: JULY 31, 1978

SUBJECT: MUR 526 - Interim Report, undated
Received in Office of Commission
Secretary: 7-28-78, 11:40

The above-named document was circulated on a 24 hour no-objection basis at 3:00 p.m. on July 28, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 4:00 p.m. this date.

Commissioners Harris, Springer, Staebler, Thomson, and Tiernan returned their papers by the deadline.

7 8 1 0 3 7 1 8 4 6

July 28, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached Interim Report on MUR 526 distributed to the Commission.

Thank you.

7 8 0 4 0 0 7 0 8 4 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	
George H. Sohl	)	MUR 526
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman S. Dudley	)	

INTERIM REPORT

On May 17, 1978, the Commission found reasonable cause to believe that Robert Owens violated 2 U.S.C. §441a(f) by accepting loan endorsements which exceeded contribution limits. The Commission also found reasonable cause to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman S. Dudley violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a Federal candidate in excess of statutory contribution limits.

The Office of General Counsel has received signed conciliation agreements from every respondent but is still awaiting the payment of the civil penalty by 3 respondents. Letters have been sent to these remaining 3 respondents requesting prompt payment.

Upon receipt of these payments, the Office will recommend that the file in this matter be closed.

7/20/78
Date

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman S. Dudley
302 Bell Terrace
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Dudley:

With reference to our letter of July 6, 1978, we remind you that this matter cannot be closed until you have complied with condition of IV of the Conciliation Agreement you signed which is the payment of a $50 civil penalty.

Please make your check payable to the United States Treasury and forward it to this Office within 5 days of receipt of this letter.

Failure to comply with this provision of the Conciliation Agreement may result in the Commission's finding of probable cause to believe that a violation of the Federal Election Campaing Act has occurred and the filing of a civil suit by the Commission in this matter.

Upon receipt of your payment, you will be sent a copy of the Conciliation Agreement signed by you and the General Counsel and this matter will be closed.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

CL 526 v

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Norman S Dudley

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943917	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
AUG - 4 1978

POSTMARK
AUG 4 1978

5. ADDRESS (Complete only if requested)
202 Bellfair
Tampa Fl 33617

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆ GPO 1977-O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Gray
102 W. Whiting St.
Tampa, FL 33602

Re: MUR 526

Dear Mr. Gray:

We are in receipt of the conciliation agreement which you have signed in regard to this matter. However, before we can close this case, you must comply with condition IV of the agreement by paying the civil penalty of $50.

Please make your check payable to the United States Treasury and forward it to this Office within 5 days of receipt of this letter.

Failure to comply with this provision of the conciliation agreement may result in the Commission's finding of probable cause to believe a violation of the Federal Election Campaign Act has occurred and the filing of a civil suit by the Commission in this matter.

Upon receipt of your payment, you will be sent a copy of the conciliation agreement signed by you and the General Counsel and this matter will be closed.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

NORMAN S. DUDLEY, JR.
MARGARET K. DUDLEY
302 BELLE TERRE AVE.
TEMPLE TERRACE, FLA. 33617

MUR 526

145

7-17 1978

63-553
631

PAY TO THE ORDER OF United States Treasury $ 50.00

Fifty and 00 DOLLARS

PAN AMERICAN BANK
OF TAMPA, N.A.
TAMPA, FLORIDA 33604

MEMO RE-MUR 526

Norman S. Dudley, Jr.

⑆0631⑈0553⑆ 125 364 9⑈

Norman J Dudley
3[redacted] Belle Terre
Temple Terrace, Fla 33617

Federal Election Comm
1325 K Street N W
Washington, D C 20463

Attn - Charles N Steele

Acc 4274

James R. Cope
301 Greencastle Avenue
Temple Terrace, Florida 33617

Telephone 813-988-3041

JUL 26 PM 12:13

July 19, 1978

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

004793

Re: MUR 526

Dear Mr. Steele:

Attached is my check #43 in settlement of MUR 526.

I understand that upon receipt of this payment you will forward a copy of the conciliation agreement signed by the General Counsel and me.

Very truly yours,

James R. Cope

James R. Cope

JRC:mck

Enclosure - check #43 - $50.00

MR. OR MRS. JAMES R. COPE

PHONE 813-988-3041
301 GREEN CASTLE AVENUE
TEMPLE TERRACE, FL 33617

43

63-689
631

7-19- 19 78

PAY TO THE ORDER OF United States Treasury $ 50 00

Fifty & no/100 DOLLARS

Exchange Bank
The Exchange Bank of Temple Terrace
9385-56th Street P.O. Box 16606 Temple Terrace, Florida 33617

FOR Settlement of MUR 526

James R. Cope

⑆063⑈0689⑆ 029 400 4⑈

James R. Cope
301 Greencastle Avenue
Temple Terrace, Florida 33617

Mr. Charles N. Steele
Associate General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

ROBERT E. CHAPMAN 1073 669

PHONE 621-2467
1910 ORIENT ROAD
TAMPA, FL 33619

7/12 19 78 63-805/631

PAY TO THE ORDER OF U.S. Treasury $ 50.00

Fifty and 00/00 DOLLARS

Barnett Bank 300 S. Parsons Avenue Brandon, Florida 33511

FOR MUR 526 Robert E. Chapman

⑆063⑆0805⑆ 00 10 517 ⑈

CHAPMAN CONTRACTING COMPANY
10 ORIENT ROAD / TAMPA, FLORIDA 33619

JUL 17 AM 10:15

[illegible]
1325 K Street N.W.
Washington, DC 20463

Grey & Associates

102 West Whiting Street
Tampa, Florida 33602

public relations

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 10, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: MUR 526 - Interim Report, dated 7-6-78
Received in Office of Commission
Secretary 7-6-78, 3:42

The above-mentioned document was circulated on a 24 hour no-objection basis at 9:00 a.m., July 7, 1978.

As of 9:30 a.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

July 6, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached Interim Report on MUR 526 distributed to the Commission.

Thank you.

7804070861

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	MUR 526
George H. Sohl	)	
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Nroman J. Dudley	)	

INTERIM REPORT

On May 17, 1978, the Commission found reasonable cause to believe that Robert Owens violated 2 U.S.C. §441a(f) by accepting loan endorsements which exceeded contribution limits. The Commission also found reasonable cause to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a Federal candidate in excess of statutory contribution limits.

On June 6, 1978, the letters of notification and amended conciliation agreements were mailed.

As of this date five of the eight respondents have signed the conciliation agreements. The minimum statutorily required time for conciliation has not yet elapsed however and responses are expected from the remaining respondents in the near future.

6 July 1978
Date

Charles N. Steele
Associate General Counsel

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 6, 1978

James R. Cope
301 Greencastle Ave.
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Cope:

We are in receipt of your letter of June 12, 1978 and signed conciliation agreement.

Please make your check for $50 dollars payable to the United States Treasury and send it to this office, making sure to include in your correspondence the reference number, MUR 526.

Upon receipt of your payment, this office will forward a copy of the conciliation agreement signed by you and the General Counsel.

We thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 6, 1978

Norman S. Dudley
302 Bell Terrace
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Dudley:

We are in receipt of your signed conciliation agreement.

Please make your check for $50 payable to the United States Treasury and send it to this office, making sure to include in your correspondence the reference number MUR 526.

Upon receipt of your payment, this office will forward a copy of the conciliation agreement signed by you and the General Counsel.

We thank you for your cooperation in this matter.

Sincerely,

William C. Oldaker
General Counsel

Charles N. Steele
Associate General Counsel

ROBERT J. OWENS
BETTY J. OWENS
505 BRENTWOOD DRIVE, PH. 988-2396
TEMPLE TERRACE, FL 33617

591

June 28 1978

63-914
631

PAY TO THE ORDER OF Federal Election Commission $ 50.00

Fifty & 00/100 DOLLARS

AMERICAN GUARANTY BANK
P. O. BOX 16191 6925 NORTH 56 STREET
TAMPA, FLORIDA 33617

FOR

Robert J. Owens

⑆0631⑈0914⑆ 01 36 691 6⑈01

OWENS
INTERNATIONAL
MARKETING, INC.
505 BRENTWOOD DRIVE TEMPLE TERRACE, FLORIDA 33617

12-11

RETURN RECEIPT
REQUESTED

CERTIFIED
No.
MAIL

TAMPA FL
FM
1975

Mr William C Oldaker
Federal Election Commission
1325 K Street N.W.
Washington DC 20463

ROBERT P. OR TERRY ANDREWS
A. I. M.
8711 N. Temple Avenue, Ph. 985-3071
Tampa, Florida 33617

493

6-26 1978

63-914
631

Pay to the order of The Federal Election Com. $ 50.00

Exactly Fifty ——— Dollars

AMERICAN GUARANTY BANK
P. O. BOX 16997, 8925 NORTH 56 STREET
TAMPA, FLORIDA 33617

Memo

Robert P. Andrews

⑆0631⑈0914⑆ 01 42 504 4⑈01

ROBERT P. & TERRY ANDREWS
8711 N. TEMPLE AVE.
TAMPA, FLORIDA 33617
(813) 985-3071

'77 JUL 3 PM 12:21

Federal Election Commission
1325 K Street N.W.
Washington D.C.
20463

MR. OR MRS. DAVID C. WILLIS 1172

PHONE 689-5040
P. O. BOX 255
BRANDON, FL 33511

3722

6/20 19 78 63-805 / 631

PAY TO THE ORDER OF Federal Election Commission $ 50.00

Fifty and 00/100 DOLLARS

Barnett Bank
300 S. Parsons Avenue
Brandon, Florida 33511

FOR Mrs. David C. Willis

⑆0631⑈0805⑆3722 0000200115⑈

David C. Willis
P.O. Box 255
Brandon, Fla. 33511

TAMPA, FL 116
1PM
JUN
19

JUN 23 AM 11:48

Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

GEORGE H. SOHL OR PATRICIA L. SOHL
INTERNATIONAL MARKETING CONSULTANTS
PHONE 813-884-4909
7037 SHENANDOAH COURT SOUTH
TAMPA FL 33615

1743

14 June 1978

63-26
631

PAY TO THE ORDER OF Federal Election Commission $ 50 00/XX

50 DOLS 00 CTS DOLLARS

DOWNTOWN OFFICE
FIRST NATIONAL BANK
OF FLORIDA
TAMPA FLORIDA 33616

FOR Conciliation Agreement No. 526

George H. Sohl

⑆0631⑈0026⑆ 025544 ⑈

George Sohl
7007 Shenandoah Ct. S.
Tampa, Fla. 33615

RETURN RECEIPT
REQUESTED

CERTIFIED
No.
MAIL

William C. Oldaker
Federal Election Commission
7325 K Street N. W.
Washington, D. C. 20463

Norman S Dudley
[illegible] Belle Terre
Temple Terrace, Fla 33617

JUN 1978

'78 JUN 19 PM 12 36

Federal Election Commission
1325 K Street NW
Washington, DC 20463

attn - William C Oldaker

Mr. Oldakov -

Please send me signed photo copy and tell me where to send check -

Lamont Copy

6/12/78

James R. Cope
301 Greencastle
Temple Terrace, Fla. 33617

JAN 15 AM 9 13

Mr. WILLIAM C. OLDAKER
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington
D.C. 20463

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 16, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: MUR 526 - Interim Report dated 6-14-78
Received in OCS: 6-15-78, 11:04

The above-mentioned document was circulated on a 24 hour no-objection basis at 4:30 p.m., June 15, 1978.

As of 5:00 p.m., this date, no objections have been received in the Office of Commission Secretary to the Interim Report.

June 15, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached Interim Report on MUR 526 distributed to the Commission.

Thank you.

7 8 0 4 0 0 7 0 8 7 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens et. al.	)	MUR 526
	)	

Interim Report

On May 17, 1978, the Commission voted to find reasonable cause to believe that Robert J. Owens violated 2 U.S.C. §441a(f) by accepting loan endorsements which exceeded contribution limits. The Commission also found reason to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a Federal candidate in excess of statutory contribution limits.

The letters of notification and conciliation agreements, as revised per the Commission's order, were mailed on June 6, 1978. This office is still awaiting responses to these letters and conciliation agreements.

6/14/78
Date

William C. Oldaker
General Counsel

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Owens:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. §441a(f) by accepting endorsements on a campaign related loan for $10,000, dated August 25, 1976, which exceeded the contribution limits of the individual endorsers.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Robert J. Owens

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438536	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: Addressee / Authorized agent

4. DATE OF DELIVERY: 6-2-78 | POSTMARK

5. ADDRESS (Complete only if requested): 505 [illegible]

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆ GPO 1977—O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert J. Owens (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(f) by accepting loan endorsements on a campaign-related loan in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent took out a loan for $10,000 in his own name on August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to his campaign committee.

B. Seven individuals endorsed the $10,000 note.

C. These seven endorsements were removed from the loan agreement upon the loan's renewal on December 15, 1976, after the Respondent's personal financial statements had been submitted to the bank.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. Each of the endorsements of this loan constituted a contribution of approximately $1,400 to Respondent's campaign under the Federal Election Campaign Act between the time the endorsers signed the note and the time their names were removed from the loan, December 15, 1976.

III. Respondent's acceptance of these endorsements is in violation of 2 U.S.C. § 441a(f).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Robert J. Owens

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norman S. Dudley
302 Bell Terrace
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Dudley:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete item(s) 1, 2, 3, 4. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [ ] Show to whom and date delivered ___¢
- [x] Show to whom, date, and address of delivery ___¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ___¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $ ___
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Norman S. Dudley

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438544	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: Addressee / Authorized agent
X [illegible]

4. DATE OF DELIVERY: 6-5-78

POSTMARK

5. ADDRESS (Complete only if requested)
302 Bella Terra
Tampa FL 33617

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆ GPO: 1977-241-311

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Norman S. Dudley	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Norman S. Dudley (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

_____ Date

_____
William C. Oldaker
General Counsel

_____ Date

_____
Norman S. Dudley

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Willis
502 Orangelawn
Brandon, FL 33511

Re: MUR 526

Dear Mr. Willis:

On May 17 , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [ ] Show to whom and date delivered ____¢
- [✓] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
David C Willis

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438545	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mrs. David Willis

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE | CLERK'S INITIALS

☆ GPO: 1977-O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
David C. Willis	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. David C. Willis (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

_____
Date

_____
William C. Oldaker
General Counsel

_____
Date

_____
David C. Willis

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Gray
102 W. Whiting St.
Tampa, FL 33602

Re: MUR 526

Dear Mr. Gray:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
William Gray

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	439546	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Pati Bost

4. DATE OF DELIVERY
6-12-78

POSTMARK
JUN 13 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1977—O-234-837

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
William Gray	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. William Gray (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g (a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

District of Columbia.

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel

Date

William Gray

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert E. Chapman
707 Debra Lynn Dr.
Brandon, FL 33611

Re: MUR 526

Dear Mr. Chapman:

On May 17 , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- ☐ Show to whom and date delivered ¢
- ☑ Show to whom, date, and address of delivery ¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Robert E Chapman

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438547	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY ¢ | POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert E. Chapman	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert E. Chapman (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon it renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

_____ Date

_____
William C. Oldaker
General Counsel

_____ Date

_____
Rebert E. Chapman

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George H. Sohl
7007 Shenandoah Ct. S.
Tampa, FL 33615

Re: MUR 526

Dear Mr. Sohl:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- ☐ Show to whom and date delivered ¢
- ☑ Show to whom, date, and address of delivery ¢
- ☐ RESTRICTED DELIVERY. Show to whom and date delivered ¢
- ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery $
- (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO: George H. Sohl

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438548	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY: 6-8-78

POSTMARK

5. ADDRESS (Complete only if requested): 7007 Shenandoah Ct. Tampa Fla 33615

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO: 1977: O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
George H. Sohl	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. George H. Sohl (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel
Date	George H. Sohl

7 0 6 0 7 0 0 1 0 3

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Andrews
8711 N. Temple Ave.
Tampa, FL 33617

Re: MUR 526

Dear Mr. Andrews:

On May 17, 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § $37g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Robert P. Andrews

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438549	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☑ Authorized agent

4. DATE OF DELIVERY 6-9-78 | POSTMARK

5. ADDRESS (Complete only if requested)
8711 N. TEMPLE AV.
TAMPA FL 33617

6. UNABLE TO DELIVER BECAUSE: | CLERK'S INITIALS

☆ GPO : 1977—O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert P. Andrews	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert P. Andrews (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Robert P. Andrews

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James R. Cope
301 Greencastle Ave.
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Cope:

On May 17 , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. § 437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. § 437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it

and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

CL 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- ☐ Show to whom and date delivered ____¢
- ☑ Show to whom, date, and address of delivery ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- ☐ RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
James R. Cope

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438542	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE	Addressee	Authorized agent
Mrs. James R. Cope		

4. DATE OF DELIVERY
8-5-78

POSTMARK

5. ADDRESS (Complete only if requested)
301 Greencastle
Tampa FL 33617

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
James R. Cope	)	MUR 526

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. James R. Cope (hereinafter referred to as "Respondent") violated 2 U.S.C. § 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

III. The Respondent enters voluntarily into this Agreement with the Commission.

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976, from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this

same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. § 431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser of guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. § 441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Fifty ($50) Dollars pursuant to 2 U.S.C. § 437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel
Date	James R. Cope

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	
George H. Sohl	)	MUR 526
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman J. Dudley	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on May 17, 1978, the Commission determined by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe that Robert Owens violated 2 U.S.C. Section 441a(f) by accepting loan endorsements which exceeded contribution limits, and send the letter and conciliation agreement attached to the General Counsel's Report signed May 12, 1978, subject to the General Counsel's amendments to drop the names of all but Robert J. Owens from the proposed conciliation agreement and revising the civil penalty from $40.00 to $50.00.

2. Find reasonable cause to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. Section 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limit, and send the conciliation reports and letters attached to the General Counsel's report signed May 12, 1978.

Commissioner Thomson was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date 5/22/78

EXECUTIVE SESSION
May 17, 1978

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	MUR 526
Robert P. Andrews	)	
George H. Sohl	)	
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman J. Dudley	)	

GENERAL COUNSEL'S REPORT

I. Summary of Allegations and Commission Action

During the course of auditing the Owens for Congress Committee, the Audit Division discovered a loan dated August 25, 1976, to candidate Robert Owens for $10,000, the proceeds of which were given over to his campaign committee.

On March 23, 1978, the Commission voted to find reason to believe that Robert Owens violated 2 U.S.C. §441a(f) by accepting endorsements on a campaign-related loan which exceeded statutory contribution limits of the individual endorsers. The Commission also voted to find reason to believe the seven remaining above-named respondents violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a federal candidate Owens in excess of statutory contribution limits.

II. Facts

Respondent Owens contends that in the flurry of activity just before the Florida Primary, September 7, 1976, he did not have the time to compile the personal financial statements needed to secure an immediate loan in his own name for the last-minute financing of his campaign. The bank's loan officer

however, offered to approve a loan to Owens if he could provide endorsers. (A total of six endorsers was the bank's minimum requirement.) The seven above-named respondents signed as endorsers.

The candidate's personal financial statements were compiled and submitted to the bank in late October, 1976. As the loan's first renewal had just been negotiated on October 25, 1976, the endorsers were not dropped until December, 1976, when the loan became due for its next renewal. At this time, the seven endorsers were removed and Owens became the sole signature on the note. The obligation has since been completely liquidated. A couple of payments were made by the campaign committee and the remaining payments were made by Owens personally.

All parties concerned maintain that they knew that Robert Owens was capable of repaying in full the obligation and that their endorsement would serve as nothing more than a means to expedite the processing of a loan which Owens could have obtained without delay and without endorsers had he had the time to compile a detailed personal financial statement during the final month of the primary campaign. Each of the endorsers agreed with Owens prior to endorsing that he would take the full responsibility of repaying the note.

Although the endorsements of this $10,000 loan and the acceptance of the loan by Owens constitute a violation of the Act's contribution limits, it is the opinion of this office that the seriousness of the offense is mitigated to an extent by Respondents' good faith belief that they were acting in compliance with the law (they were aware of the

$1,000 limit as regards an outright contribution), and their exemplary cooperation in assisting the staff in its investigation.

Recommendation

1. Find reasonable cause to believe that Robert Owens violated 2 U.S.C. §441a(f) by accepting loan endorsements which exceeded contribution limits. Send attached conciliation agreement and letter.

2. Find reasonable cause to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits. Send attached conciliation reports and letters.

12 May 1978
Date

William C. Oldaker
General Counsel

7 8 0 1 0 7 0 9 2 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	MUR 526
George H. Sohl	)	
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman J. Dudley	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr. Robert J. Owens (hereinafter referred to as "Respondent") violated 2 U.S.C. §441a(f) by accepting loan endorsements on a campaing-related loan in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent took out a loan for $10,000 in his own name on August 25, 1976, from the Exchange Bank of

Tampa, Florida, the proceeds of which were turned over to his campaign committee.

B. Seven individuals endorsed the $10,000 note.

C. These seven endorsements were removed from the loan agreement upon the loan's renewal on December 15, 1976, after the Respondent's personal financial statements had been submitted to the bank.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. §431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. Each of the endorsements of this loan constituted a contribution of approximately $1,400 to Respondent's campaign under the Federal Election Campaign Act between the time the endorsers signed the note and the time their names were removed from the loan, December 15, 1976.

III. Respondent's acceptance of these endorsements is in violation of 2 U.S.C. §441a(f).

IV. Respondent will pay a civil penalty in the amount of Forty ($40) Dollars pursuant to 2 U.S.C. §437g(a)(5)(B).

7 3 1 0 0 7 0 9 2 1

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. §437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Robert J. Owens

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens	)	
Robert P. Andrews	)	
George H. Sohl	)	MUR 526
James R. Cope	)	
Robert E. Chapman	)	
William Gray	)	
David C. Willis	)	
Norman J. Dudley	)	

CONCILIATION AGREEMENT

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable cause to believe that Mr._____ (hereinafter referred to as "Respondent") violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. §437g (a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

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

A. Respondent endorsed a loan of $10,000 to Federal Candidate Robert J. Owens dated August 25, 1976,

from the Exchange Bank of Tampa, Florida, the proceeds of which were turned over to Owens' campaign committee.

B. Respondent was one of seven endorsers for this same loan.

C. This Respondent's endorsement was removed from the loan agreement upon its renewal on December 15, 1976.

WHEREFORE, Respondent agrees that:

I. Under 2 U.S.C. §431(e)(5)(G), a loan of money by a national or State bank shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance thereof that each endorser or guarantor bears to the total number of endorsers or guarantors.

II. The endorsement of this loan constituted a contribution of approximately $1,400 to Candidate for Federal office, Robert J. Owens, from each endorser from the time he signed the loan until his name was removed on December 15, 1976.

III. Respondent's $1,400 contribution is in violation of the $1,000 individual contribution limit as set forth in 2 U.S.C. §441a(a)(1)(A).

IV. Respondent will pay a civil penalty in the amount of Forty ($40) Dollars pursuant to 2 U.S.C. §437g(a)(5)(B).

General Conditions

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

II. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. §437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

III. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

(Name of Endorser)

SAMPLE LETTER TO BE SENT TO
ENDORSERS OF LOAN

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 526

Dear Mr. :

On May , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. §441a (a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-

4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

Re: MUR 526

Dear Mr. Owens:

On May , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. §441a(f) by accepting endorsements on a campaign related loan for $10,000, dated August 25, 1976, which exceeded the contribution limits of the individual endorsers.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-4040 or toll free 800-424-9530 ext. 50 to discuss your objections to this agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

SAMPLE LETTER TO BE SENT TO
ENDORSER OF LOAN

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 526

Dear Mr. :

On May , 1978, the Federal Election Commission found reasonable cause to believe that you violated 2 U.S.C. §441a (a)(1)(A) by endorsing a $10,000 loan dated August 25, 1976 for Robert J. Owens, candidate for Federal office, thereby exceeding your $1,000 contribution limit to that candidate.

Please be advised that the Commission has a duty to make every endeavor for a period of not less than 30 days to correct such a violation by informal methods of conference, conciliation and persuasion and to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). If we are unable to reach agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit. 2 U.S.C. §437g(a)(5)(B).

Enclosed please find a conciliation agreement which this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If not, please contact Clare Lindsay at 202-523-

4040 or toll free 800-424-9530 ext. 50 to discuss your objection to the agreement.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: Robert J. Owens
505 Brentwood
Temple Terrace, FL 33617

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

APRIL 24, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE EMMONS

RE: REPORTS FROM GENERAL COUNSEL ON MURS

At 3:30 p.m. on Friday, April 21, 1978, the Office of the Secretary to the Commission circulated the following MUR reports to the Commissioners on a no-objection basis:

MUR 546

MUR 373

MUR 467

MUR 473

MUR 526

At 4:00 p.m. on Monday, April 24, 1978, we have received no objections to the recommendations in the above-named reports.

April 21, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached Interim Report on MUR 526 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7 8 0 4 0 0 7 0 9 3 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Andrews, Sohl, Gray, Chapman, Owens, Cope, Willis and Dudley.	)	MUR 526(78)
	)	

INTERIM REPORT

On March 23, 1978, the Commission adopted the recommendations of the General Counsel by finding reason to believe that the respondent candidate, Robert J. Owens violated 2 U.S.C. §441a (f) by accepting loan endorsements which exceeded contribution limits. The Commission also found reason to believe that the remaining respondents violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

As of this date, responses have been received by all of the respondents but two. The staff has been in contact with the two remaining respondents and their responses are forthcoming.

20 April 1978
DATE

Charles N. Steele
Associate General Counsel

PC 3368

892182

Robert E. Chapman
[illegible]
[illegible]

PM

PROCLAIM LIBERTY THROUGHOUT ALL THE LAND
USA 13

001858

George H. Sohl
7007 Shenandoah Ct. S.
Tampa, Florida 33615

April 11, 1978

'78 APR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: MUR 526

Dear Mr. Oldaker:

This is in response to your letter which I received on April 4, 1978. I have no factual or legal materials to submit, other than the following explanation.

During the Congressional Campaign of Robert J. Owens, in the month of August 1976, the Campaign Committee determined that an additional $10,000.00 was needed to meet pressing current campaign expenses. Mr. Owens agreed to contribute the additional $10,000.00 to the Campaign Fund. Since he did not have that amount of cash available, he indicated he would sign a note at the bank. However, upon making application at the bank, he found that there would be a delay while he submitted a financial statement, then there would be a further delay while waiting for the loan committee to meet.

It was suggested that if Mr. Owens obtained several endorsers, the loan application could be processed immediately. It was with this thought in mind that Mr. Owens asked several of us to endorse the note. There was a complete and full understanding between Mr. Owens and myself that this was his loan and that he would be fully responsible for it. It was to be another of his contributions to the campaign. Mr. Owens was in full agreement that he was solely responsible for the note and that my signature was there simply to expedite the loan.

Since the campaign, Mr. Owens has repaid the note in full with his personal check.

I hope this explanation will give you enough information to close this matter, and show that no further action should be taken. Please note the above change of address if additional correspondence is required.

Sincerely,

George H. Sohl

eorge H. Sohl
007 Shenandoah Ct. S.
ampa, Fla. 33615

William C. Oldaker
Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20463

CERTIFIED
No.
MAIL

881842

4-11-78

Federal Election Commission
William C Oldaker
General Counsel

In reply to your letter of March 30, 1978 I wish to advise that the loan in question was arranged solely by Robert J. Owens. All arrangements with the bank were made by Mr. Owens. As a personal friend I endorsed the note, as I have done many times in the past for personal friends for various reasons. I was assured by Mr Owens that he would personally repay the loan. I understand the loan has been repaid by Mr. Owens. I made no payment on the loan. I consider Robert J Owens an honorable man, far more so than most of our candidates for public office.

My correct name is NORMAN S. Dudley, not Norman J. Dudley.

Sincerely yours
Norman S Dudley

Norman S Dudley
302 Belle Terre
Temple Terrace, FLA. 33617

TAMPA, FL 335
PM
APR
1978

PROCLAIM LIBERTY
USA 13

Federal Election Commission
1325 K. Street N.W.
Washington, D C 20463

attn - William C Oldaker - Gen. Counsel

April 4, 1978

801758

Gentlemen,

In response to your letter of March 30, 1978 concerning a possible violation of the Federal Election Campaign Act.

Please understand that the campaign of Robert J. Owens was a first effort, at the federal level, of those of us involved in his campaign. We tried to be very careful not to violate the law; however at time it seemed quite confusing. All of our efforts were made in good faith with no attempt to slight either the letter or the spirit of the law.

Now, concerning the loan you asked about. It was my understanding from the very

beginning that Robert J. Owens was securing a personal loan to help finance his campaign. I futher understood that the only reason additional signatures were needed was to satisfy bank policy. I had no idea that I was contributing to the campaign and did not intend to. I have never payed a cent on any loan taken out by Robert J. Owens. I understand that Mr. Owens has personally paid the loan in full.

This is all the information that I have on this matter

Sincerely, Robert P. Andrews

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 10, 1978

Mr. Robert P. Andrews
8711 N. Temple Ave.
Tampa, Fla. 33617

Dear Mr. Andrews:

This is to respond to your letter of April 4 with regard to the Federal Election Campaign Act and your statement with regard to a matter of a transaction with Mr. Robert J. Owens.

Your information has been recorded and received.

If we can be of any assistance to you, please do not hesitate to write or call toll free at 800/424-9530.

Sincerely,

John K. Reynolds, Chief
Public Communications

ROBERT P. & TERRY AUDREWS

(813)

TAMPA, FL 33
PM
15 APR
1978

Federal Election Commission
1325 K Street N.W
Washington, D.C. 20463

801752

FAILS AND ASSOCIATES OF TAMPA, INC.

9501 EAST HILLSBOROUGH AVENUE, TAMPA, FLORIDA 33610 PHONE (813) 621-6157

April 10, 1978

Mr. William C. Oldaker, General Counsel
Federal Electinn Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 526

Dear Mr. Oldaker:

I would like to say that this was my first involvement in a campaign on the federal level and every attempt was made to comply with the campaign laws as far as I knew them to be.

In reference to the endorsement on the note, it was my understanding that this was a personal note and that the bank policy was to have more signatures than just Mr. Owens'. Consequently, others signed the note, including me. However, to my knowledge, this loan has been paid off and I did not pay one cent of the amount borrowed. Therefore, it is difficult for me to see that I contributed any part of the $10,000 to the campaign.

I hope that I have explained this situation to your satisfaction. If I can be of further help, please let me know.

Sincerely yours,

David C. Willis

David C. Willis

DCW:du

FAILS AND ASSOCIATES
OF TAMPA, INC.

9501 EAST HILLSBOROUGH AVENUE

TAMPA, FLORIDA 33610

TAMPA, FL 336
PM
1978

Mr. William C. Oldaker, General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

801754

Come join our world

Amway
SHOP WITHOUT GOING SHOPPING

DISTRIBUTORS OF AMWAY PRODUCTS

April 5, 1978

Mr. William C. Oldaker
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 526

Dear Mr. Oldaker:

In this letter I wish to state my position, actions and intent pertaining to your letter of March 30, 1978, in which you stated that the Federal Election Commission may charge me with violation of certain regulations surrounding my personal loan of $10,000.

In August of 1976, we determined that $10,000 would be needed to finance certain aspects of our campaign, [illegible] our headquarters open. I offered to make the contribution, realizing it would necessitate borrowing from the Exchange Bank of Tampa.

I contacted Mr. Robert Morris, a vice-president and loan officer, who informed me that I would have no difficulty getting the money on my signature as long as I submitted a financial statement. I told Mr. Morris that I did not have a current one [illegible] on [illegible] I did not want to take time out from my campaign activities. [illegible] problem getting the money, but to satisfy his policy, I would [illegible] to [illegible] this information to our committee.

In discussing this situation, [illegible] that they would [illegible] 1000 each. [illegible] this option we would have [illegible] felt they [illegible] time [illegible] obligated for a $1000 contribution, I, [illegible] contribution [illegible] $10,000.

Furthermore, I [illegible] though they were [illegible] their [illegible] policy, I would [illegible] which [illegible] quently did in a series of payments.

Come join our world

Amway
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Mr. Morris understood this loan to be personal and agreed to release the endorsement at the time I would submit a current financial statement, which was done in that manner. In the audit file you will find copies of these renewal notes and a letter by Mr. Morris.

May I draw your attention to the fact that we willingly cooperated with the audit team, opening our records readily and conversing on any subject freely. We have nothing to hide. We tried to comply with every regulation though it was difficult because at times no one seemed to know what was going on in Washington. Try to put together a political campaign when the rules that will govern your actions haven't been written yet.

The key to this issue is the intent behind the loan. We understood the regulation limiting contributions (other than the candidate) to $1000 per person, but we considered the $10,000 as a personal contribution. The fact that every people on the committee signed the note was to satisfy the bank policy. If I had taken the time to submit a financial statement, Mr. Morris would have given us the personal loan without endorsement.

The action was not to violate [illegible] regulations but to comply.

If you have another question [illegible] contact me.

Sincerely

Rusty Owens

R. R. Rusty Owens

jb

Amway

SHOP WITHOUT GOING SHOPPING

Dusty & Lenny Owens
505 Brentwood Drive
Temple Terrace, Fla. 33617

CERTIFIED
No.
MAIL

1:15

001667

MCC3214

James R. Cope
301 Greencastle Avenue
Temple Terrace, Florida 33617

Telephone 813-988-3041

78 APR 10 AM 1:35

April 7, 1978

Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Re: MUR 526

Attention: William C. Oldaker, General Counsel

Gentlemen:

I respectfully submit the following in reply to yours of March 30, 1978.

1. The note referred to was not nor was it intended to be a contribution to Robert J. Owens as a candidate for Congress but as a personal loan to him from a bank, which loan I would have gladly endorsed had he not been a candidate.

2. It was and is my understanding that the bank officer handling this matter understood that this loan was to and for Mr. Owens personally and was routinely handled as personal loans requiring endorsement are usually handled.

3. I also understand that the same bank officer has said under oath that this was his understanding of the loan prior to and following its execution.

4. In no sense did I understand my signing the note was a contribution in any amount to the campaign of Mr. Owens.

5. I further understood that Mr. Owens intended to repay the bank for the money he borrowed and that he has made good his pledge of repayment.

6. I reported a $200 "gift to political candidates" on my 1976 IRS return. This was the full amount I understood that I "contributed" to any or all political candidates that year.

7. If indeed I violated any law of the United States or the State of Florida in signing the note referred to herein, I did it in good faith and conscience as a personal friend of Mr. Owens and with no thought of performing any unlawful act. Furthermore, had I known or suspected that there was or could be any illegality in such signing of said note, I would not have done so. Finally, I had such confidence in The Exchange National Bank of Tampa, Florida, that I assumed that that Bank would not have loaned or permitted to be loaned any funds in violation of legal statutes.

I beg the honorable Federal Election Commission to look with favor upon this explanation of alleged violation as per your letter of March 30, 1978.

Very truly yours,

James R. Cope

James R. Cope

JRC:mck

James R. Cope
301 Greencastle Avenue
Temple Terrace, Florida 33617

Federal Election Commission

1325 K Street N.W.

Washington, D. C. 20463

Attention: William C. Oldaker, General Counsel

801660

FEC 3200

April 5, 1978

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Gray & Associates

Dear Mr. Oldaker:

I have your letter of March 30th. Re: MUR 526.

The endorsement of the loan you mentioned was just that. No monies were ever paid by me in connection with the loan for the congressional candidacy of Robert J. Owens.

The loan was a device to expedite funds in setting up the campaign office. It was repaid, personally, by the candidate shortly thereafter.

I hope this answers the questions you raised.

Sincerely,

G. William Gray

GWG:mw

public relations

Gray & Associates

public relations

TAMPA, FL
PM
5 APR
1978
33E

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Norman J. Dudley
302 Bell Terrace
Temple Terrace, Florida 33617

Re: MUR 526

Dear Mr. Dudley:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 300-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
[illegible] I. [illegible]
32 BELL TERRACE
TEMPLE TERRACE, FLA. 33617

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943395	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
[illegible]

4. DATE OF DELIVERY
[illegible]

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
[illegible]

☆ GPO: 1977—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David C. Willis
502 Orangelawn
Brandon, Florida 33511

Re: MUR 526

Dear Mr. Willis:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $ ....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
502 ORANGE LAWN
BRANDON, FLA 33511

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943394	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [X] Authorized agent

4. Peggy Willis

DATE OF DELIVERY: 4-6-78

POSTMARK: BRANDON APR 3 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1977—O-234-337

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Gray
102 W. Whiting
Tampa, Florida 33603

Re: MUR 526

Dear Mr. Gray:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
102 W. WATING
TAMPA, FLA 33603

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943393	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. DATE OF DELIVERY 4-3-78 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO 1977—O-234-

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert E. Chapman
707 Debra Lynn Drive
Brandon, Florida 33611

Re: MUR 526

Dear Mr. Chapman:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
   - [x] Show to whom and date delivered ____¢
   - [ ] Show to whom, date, and address of delivery ____¢
   - [ ] RESTRICTED DELIVERY
     Show to whom and date delivered ____¢
   - [ ] RESTRICTED DELIVERY
     Show to whom, date, and address of delivery $____
     (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
   707 OLBRA LYNN DR.
   BRANDON, FLA 33611

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943392	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

Nick Chapman

4. DATE OF DELIVERY: 4-1-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1977-O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George H. Sohl
7008 Shenandoah
Tampa, Florida 33615

Re: MUR 526

Dear Mr. Sohl:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 528

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
George H. Suhl
7008 SHENANDOAH
TAMPA, FLA 33615

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943391	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY 4/4/78

POSTMARK APR 4 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO : 1977—O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James R. Cope
301 Greencastle
Temple Terrace, Florida 33617

Re: MUR 526

Dear Mr. Cope:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 300-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [x] Show to whom and date delivered ____¢
- [ ] Show to whom, date, and address of delivery ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ____¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
[illegible]
301 GREENCASTLE
TEMPLE TERRACE FLA 33617

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943390	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. [illegible]

DATE OF DELIVERY	POSTMARK
4/1/78	

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆ GPO 1977 C-234 337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert P. Andrews
8711 N. Temple Avenue
Tampa, Florida 33617

Re: MUR 526

Dear Mr. Andrews:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 536

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $ .....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
[illegible]

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943389	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: [X] Addressee [ ] Authorized agent

4. DATE OF DELIVERY: 4-3-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆ GPO 1977 O-234-537

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ..... ¢
- [ ] Show to whom, date, and address of delivery ..... ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ..... ¢
- [ ] RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery $ .....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
[illegible]

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943389	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: [X] Addressee [ ] Authorized agent

4. DATE OF DELIVERY: 4-7-78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

U.S. GPO 1977 O-234-337

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 30, 1978

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Robert J. Owens
505 Brentwood
Temple Terrace, Florida 33617

Re: MUR 526

Dear Mr. Owens:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that you have violated 2 U.S.C. §441a (f) of the Federal Election Campaign Act, as amended ("the Act"), in that you accepted endorsements on a campaign related loan for $10,00, dated August 25, 1976, which exceeded the contribution limits of the individual endorsers.

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan form each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. §431(e)(1). No contributions from an individual to a candidate for federal office may exceed $1,000 in the aggregate according to 2 U.S.C. §441a(a)(1)(A). Finally 2 U.S.C. §441a(f) provides that no candidate or political committee shall knowingly accept any contribution which exceeds the statutory limitations.

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process please submit copies of the original August 25, 1976, loan agreement for $10,000 as well as all renewal agreements including copies of the endorsement

pages for all. We would appreciate your response within 10 days of receipt of this letter as well as any other factual or legal materials you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

Lindsay MUR 526

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- [X] Show to whom and date delivered ¢
- [ ] Show to whom, date, and address of delivery ¢
- [ ] RESTRICTED DELIVERY
  Show to whom and date delivered ¢
- [ ] RESTRICTED DELIVERY
  Show to whom, date, and address of delivery $
  (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Mr.Robert J.Owens
505 Brentwood
Temple Terrace, Fla 33617

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943387	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE [ ] Addressee [ ] Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

GPO 1977-O-232-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Robert J. Owens,	)	
Robert E. Chapman,	)	MUR 526
Robert P. Andrews,	)	
George H. Sohl,	)	
James R. Cope,	)	
William Gray,	)	
David C. Willis, and	)	
Norman J. Dudley	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 23, 1978, the Commission approved the General Counsel's recommendation to take the following actions in the above-captioned matter:

1. Find reason to believe that Robert Owens violated 2 U.S.C. Section 441a(f) by accepting loan endorsements which exceeded contribution limits.

2. Find reason to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. Section 441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

3. Send the draft letters attached to the General Counsel's Report

Marjorie W. Emmons

Date: March 24, 1978

Marjorie W. Emmons
Secretary to the Commission

7 8 1 1 0 7 0 9 7 5

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 14, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: MUR 526 (78) - OBJECTION

The above-mentioned document, received in the Office of Commission Secretary on March 10, 1978 at 3:17, was circulated to the Commissioners on a 24 hour no-objection basis at 12:30, March 13, 1978.

Commissioner Tiernan has submitted an objection thereby placing MUR 526 on the Executive Session Agenda for March 23, 1978.

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March 10, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 526

Please have the attached 7 day report on MUR 526 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7 8 0 4 0 0 7 0 9 7 5

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION _____

MUR # 526
DATE COMPLAINT RECEIVED
BY OGC _____

STAFF MEMBER Lindsay

SOURCE: Internally generated (Audit)

RESPONDENT'S NAME: Robert J. Owens, Robert E. Chapman, Robert P. Andrews, George H. Sohl, James R. Cope, William Gray, David C. Willis, Norman J. Dudley.

RELEVANT STATUTE: 2 U.S.C. §431(e)(5)(G); 2 U.S.C. §441a(a)(1)(A); 2 U.S.C. §441a(f).

INTERNAL REPORTS CHECKED: Audit findings

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

That respondent Candidate Owens violated 2 U.S.C. §441a(f) by knowingly accepting and signing a loan endorsed by respondent individuals who, by endorsing this loan, exceeded their contribution limits in violation of 2 U.S.C. §441a(a)(1)(A).

PRELIMINARY LEGAL ANALYSIS

During the course of auditing the Owens for Congress Committee, auditors found evidence of a pre-primary loan to the Candidate for $10,000 dated August 25, 1976. (See Attachment I.) (The Florida Primary took place September 7, 1976.) The proceeds of this loan were given over to the Candidate's campaign committee. (See Attachment II).

A copy of the endorsement page of the original loan agreement is not on file in the bank nor has it been produced by Owens, but the loan application shows James Cope, David Willis and Norman Dudley as the designated endorsers. A copy of the loan renewal dated October 25, 1976, shows these same endorsers as well as Robert Andrews, George Sohl, Robert Chapman and William Gray. (See Attachment III).

Correspondence from the Bank's Vice-President states that the endorsers were initially required to guarantee the loan until the candidate was able to submit personal financial statements, at which time the candidate's signature alone would be sufficient security. The bank received these statements in late

October, 1976, after the October 25th renewal had already been negotiated. However, a memo to the loan file states that the endorsers were to be dropped with the December 15, 1976, loan renewal. The auditors have not yet seen a copy of this renewal agreement.

The Committee reports also disclose pre-primary contributions ranging from $150 to $1,000 from four of the above-named endorsers.

2 U.S.C. §431(e)(5)(G) provides, in part, that a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Consequently, each of the seven named endorsers was, for purposes of the definition of contribution under the Act, responsible for at least $1,400 security on the candidate's loan, over the course of at least two months.

Direct contributions aside, each of the endorsers exceeded his contribution limit for the Candidate's primary campaign in violation of 2 U.S.C. §441a(a)(1)(A). By knowingly accepting this endorsement arrangement, Owens himself violated 2 U.S.C. §441a(f).

RECOMMENDATIONS

1) Find reason to believe that Robert Owens violated 2 U.S.C. §441a(f) by accepting loan endorsements which exceeded contribution limits.

2) Find reason to believe that Robert P. Andrews, George H. Sohl, James R. Cope, Robert E. Chapman, William Gray, David C. Willis and Norman J. Dudley violated 2 U.S.C. §441a(a)(1)(A) by endorsing a loan to a federal candidate in excess of statutory contribution limits.

3) Send attached letters.

ATTACHMENT I

Exchange Bank

January 4, 1977

To Whom It May Concern:

This is to certify that on August 25, 1976, a loan in the amount of $10,000 on an unsecured basis was negotiated by Mr. Robert J. "Dusty" Owens. At the time of the negotiation, we had not received a personal financial statement on Mr. Owens, therefore, we requested he provide some endorsers. This note has been renewed on several occasions with various reductions being made by Mr. Owens personally. As a result of a substantial personal financial statement, his signature only was required on subsequent renewals. The note was paid in full on January 3, 1978, with a personal check of Mr. Owens.

To my knowledge these funds were used for the personal requirements of Mr. Owens and did not have anything to do with the election campaign. Mr. Owens has been well known to me for the past six or seven years and I have a high regard for his integrity.

Sincerely,

Robert N. Morris
Vice President

RNM/cas

The principal campaign Cmte. made payments of $569.36 in 1 and $2247.09 in 1977.

The Exchange National Bank of Tampa

ATTACHMENT II

[illegible] of FEC Form 3

(see instructions on back)

[illegible] Commission
1125 K Street, N.W.
Washington, D.C. 20463

(Use [illegible] numbered line)

Name of Candidate or Committee in full		Amount of Original Debt, Contract, Agreement, or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Owens for Congress				
Full Name, mailing address and ZIP code, and nature of obligation Exchange National Bank of Temple Terrace Temple Terrace Fla. 33617	Date (month, day, year) 8/26/76	$ 10,000.00	$ -0-	$ 10,000.00
Full Name, mailing address and ZIP code, and nature of obligation General Telephone Co. PO Box 110 Tampa, Fla.	Date (month, day, year) 9/20/76	$ 458.12	$ -0-	$ 458.12
Full Name, mailing address and ZIP code, and nature of obligation IBM Corp PO Box 1281 Atlanta, GA.	Date (month, day, year) 9/15/76	$ 330.72	$ -0-	$ 330.72
Full Name, mailing address and ZIP code, and nature of obligation Bill Gray & Assoc 102 Whiting Tmapa, Fla.	Date (month, day, year) 9/15/76	$ 824.14	$ -0-	$ 824.14
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	$	$	$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	$	$	$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	$	$	$
Full Name, mailing address and ZIP code, and nature of obligation	Date (month, day, year)	$	$	$
Subtotals this period this page (optional) ▷		$	$	$
Total this period (last page this line number only) ▷		$ 11,612.[illegible]	$ -0-	[illegible]

ATTACHMENT III

AGR 8½%

Note No. Ren. 91142

$ 10,000.00

Tampa, Florida October 25, 1976

---Thirty Days--- after date the undersigned (and if more than one, each of them jointly and severally), for value received, promises to pay to the order of

THE EXCHANGE NATIONAL BANK OF TAMPA

the principal sum of ---Ten Thousand and No/100--- Dollars at its office in Tampa, Florida, with interest thereon from date hereof at the rate of 8½ % per annum until maturity, and at the rate of ten percent per annum thereafter until paid.

Each maker, endorser, and other party liable hereon, jointly or severally, promises and agrees to pay all costs of collection incurred in enforcing this note, including a reasonable attorney's fee, and each specifically waives presentment, demand, protest and notice of dishonor and consents and agrees to any and all extensions and renewals, in whole or in part, and all delays in time of payment which the holder hereof may grant or permit from time to time, without limitation and without any notice to or further consent of any such party.

Due: _____

[signature] (SEAL)
Robert W. Owens

Address: 505 [illegible] Drive
Temple Terrace, Fla.
33617

_____ (SEAL)

SINGLE PAYMENT NOTE - Interest in addition

5 00393-1

Pg 8.7
Fen. 91142

Robert P. Andrews

George P. [illegible]

James P. [illegible]

Robert E. Chapman

William Grey

Donald C. Hill,
Norman J. Bulley, Jr.

7 9 9 1 0 1 7 0 9 8 1

SAMPLE LETTER TO BE SENT TO LOAN ENDORSERS

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUEST

Re: MUR 526

Dear _____:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities the Federal Election Commission has determined that it has reason to believe that you have violated the Federal Election Campaign Act, as amended ("the Act"), in that you endorsed a loan for $10,000 dated August 25, 1976, for Robert J. Owens, candidate for Federal Office, thereby exceeding the contribution limitations of 2 U.S.C. §441a(a)(1)(A).

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. § 431 (e)(1). All contributions from an individual to a candidate for federal office are subject to the $1,000 aggregate limitation as set forth in 2 U.S.C. §441a(a)(1)(A).

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please submit, within 10 days of receipt of this letter, any factual or legal materials which you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

7 8 0 1 0 2 7 1 9 3 3

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert J. Owens
505 Brentwood
Temple Terrace, Florida 33617

Re: MUR 526

Dear Mr. Owens:

This letter is to inform you that on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has determined that it has reason to believe that you have violated 2 U.S.C. §441a(f) of the Federal Election Campaign Act, as amended ("the Act"), in that you accepted endorsements on a campaign related loan for $10,000, dated August 25, 1976, which exceeded the contribution limits of the individual endorsers.

Under 2 U.S.C. §431(e)(5)(G), a loan from a national or state bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors. Further, a loan comes under the statutory definition of contribution as found in 2 U.S.C. § 431 (e)(1). No contributions from an individual to a candidate for federal office may exceed $1,000 in the aggregate according to 2 U.S.C. §441a(a)(1)(A). Finally 2 U.S.C. §441a(f) provides that no candidate or political committee shall knowingly accept any contribution which exceeds the statutory limitations.

Upon making a determination that there is reason to believe that a violation has occurred, the Commission is required to make an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process please submit copies of the original August 25, 1976, loan agreement for $10,000 as well as all renewal agreements including copies of the endorsement

pages for all. We would appreciate your response within 10 days of receipt of this letter as well as any other factual or legal materials you deem relevant to the Commission's investigation of this matter.

This letter of notification shall remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, (telephone number 202-523-4040 or toll free number 800-424-9530.)

Sincerely yours,

William C. Oldaker
General Counsel

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A 134

MUR 532

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON D.C. 20463

February 6, 1978

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER
Rett for BOB COSTA

FROM: KARYL BILLUPS/JOE STOLTZ

SUBJECT: CONTRIBUTIONS IN EXCESS OF THE LIMITS

The following is a matter noted during a recent audit of the Owens for Congress Committee, principal campaign committee of Mr. Robert J. Owens (7th, FL), which is referred to your office for consideration of further action.

Section 441a(a)(1)(A) of Title 2, United States Code, provides that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000. Furthermore, Section 431(e)(5)(G) of Title 2, United States Code, provides, in part, that a loan from a national or State bank made in the ordinary course of business is a loan from each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors.

We found that the Candidate received a loan in the amount of $10,000 from the Exchange National Bank of Tampa on August 25, 1976, which was reported as being endorsed by the Candidate and five (5) individuals, three (3) of whom made contributions prior to the date of the loan. The Florida primary election occurred on September 7, 1976.

Of the five (5) individuals, which were originally reported as being endorsers, two (2) made contributions of $100.00 each, and one (1) individual made a contribution of $1,000 prior to their endorsement of the loan. To date, we are uncertain when or if the two (2) individuals which appear last on the list of endorsers were in fact endorsers. (See Attachment).

Subsequent to our fieldwork, the Candidate submitted a letter dated January 23, 1978 accompanied by copies of two (2) loan renewal agreements and a letter of explanation from the Vice-President of the Exchange National Bank of Tampa.

The letter from the officer of the bank states that after a personal financial statement was received from the Candidate, only his signature was required for subsequent renewals. We note that the 30-day renewal dated October 25, 1976 still contained the names of the endorsers. Therefore, without copies of subsequent renewals, we cannot determine when the endorsers were dropped from the note. However, the $2,000.00 renewal dated September 15, 1977 contains no endorsers.

The Committee erroneously reported this loan as a loan made to the Committee, instead of showing the Candidate as the borrower. The Committee made direct repayment of $500.00 on the principal and $69.86 in interest to the bank on November 28, 1976 and reported a debt owed of $9,500.00 on the year-end report. Bank records showed that an additional payment of $2,247.09 was made on March 14, 1977. The Committee reported a payment of $9,500.00 to the bank on that date and a corresponding receipt of $8,204.81 from the Candidate as the source of funds for repayment. The Assistant-Treasurer of the Committee explained that the loan was reported in this manner because he was not aware for some time that the loan was actually made in the name of the Candidate, and that after the last payment was made from Committee funds, the outstanding balance of $7,400.00 was repaid by the Candidate personally. The proceeds from the loan were deposited into the Committee's account within five (5) days after the date of the loan.

In our opinion, it is apparent that at least five (5) individuals have exceeded the contribution limitations by endorsement of the $10,000 loan. The Committee will be advised of the need to amend its reports to show the actual transactions involved in repaying the loan.

If you have further questions concerning this matter, please contact Ms. Karyl Billups at extension 3-4155.

Attachment

DISTRIBUTORS OF AMWAY PRODUCTS

January 23, 1978

Ms. Meryl Billups
Audit Division
1325 K St. N.W.
Washington, D.C. 20463

Dear Ms. Billups,

Enclosed, please find the following:

1.) Copy of original note from Exchange Bank for $10,000, Co-endorsed in case of default. My intention was to pay back the money personally.

2.) Copy of note for the last $2,000, Co-endorsers were dropped.

3.) Copy of letter from Bank dated Jan. 10, 1978, indicating note paid in full.

4.) Copy of letter from V.P. Robert H. Morris explaining entire financial transaction.

The money ($10,000) was borrowed personally and was paid back personally. Those original co-endorsers did not make any contribution to the pay-off of this note.

Trusting this answers any and all questions.

Sincerely,

Robert J. Owens

Robert J. Owens

jb

GIVE REPAID A TOTAL of $569.66 in 1976 AND $2347.07 in 1977.

Exchange Bank

January 4, 1977

To Whom It May Concern:

This is to certify that on August 25, 1976, a loan in the amount of $10,000 on an unsecured basis was negotiated by Mr. Robert J. "Dusty" Owens. At the time of the negotiation, we had not received a personal financial statement on Mr. Owens, therefore, we requested he provide some endorsers. This note has been renewed on several occasions with various reductions being made by Mr. Owens personally. As a result of a substantial personal financial statement, his signature only was required on subsequent renewals. The note was paid in full on January 3, 1978, with a personal check of Mr. Owens.

To my knowledge these funds were used for the personal requirements of Mr. Owens and did not have anything to do with the election campaign. Mr. Owens has been well known to me for the past six or seven years and I have a high regard for his integrity.

Sincerely,

Robert N. Morris
Vice President

RNM/cas

The principal campaign Cmte. made payments of $569.86 in 1976 and $2247.09 in 1977.

The Exchange National Bank of Tampa

Exchange Bank

January 19, 1978

Mr. Robert J. Owens
505 Brentwood Drive
Temple Terrace, Florida 33617

Dear Mr. Owens:

Enclosed please find your note, our No. 91142, in the amount of $2,000.00, dated September 15, 1977, which has been paid in full.

I hope everything is satisfactory. Thank you.

Sincerely,

Ellen P. Hornsby
Loan Operations Officer

Enclosure

AGR 8'

Note No. R-91142

$ 2,000.00 Tampa, Florida September 15, 19 77

----------December 15, 1977----------after date the undersigned (and if more than one, each of them jointly and severally), for value received, promises to pay to the order of

THE EXCHANGE NATIONAL BANK OF TAMPA

the principal sum of----------Two Thousand Dollars and No/100----------Dollars at its office in Tampa, Florida, with interest thereon from date hereof at the rate of 8½ % per annum until maturity, and at the rate of ten percent per annum thereafter until paid.

Each maker, endorser, and other party liable hereon, jointly or severally, promises and agrees to pay all costs of collection incurred in enforcing this note including a reasonable attorney's fee, and each specifically waives presentment, demand, protest and notice of dishonor and consents and agrees to any and all extensions and renewals, in whole or in part, and all delays in time of payment which the holder hereof may grant or permit from time to time, without limitation and without any notice to or further consent of any such party.

Due: _____ Robert J. Owens (SEAL)

Address: 50[illegible] Brentwood Drive
Temple Terrace, FL 33617 _____ (SEAL)

SINGLE PAYMENT NOTE - Interest in Addition. 5 00398 1

AGR 8½%

Note No. Ren. 91142

$ 10,000.00

Tampa, Florida October 25, 1976.

---Thirty Days--- after date the undersigned (and if more than one, each of them jointly and severally), for value received, promises to pay to the order of

THE EXCHANGE NATIONAL BANK OF TAMPA

the principal sum of ---Ten Thousand and No/100--- Dollars at its office in Tampa, Florida, with interest thereon from date hereof at the rate of 8½ % per annum until maturity, and at the rate of ten percent per annum thereafter until paid.

Each maker, endorser, and other party liable hereon, jointly or severally, promises and agrees to pay all costs of collection incurred in enforcing this note, including a reasonable attorney's fee, and each specifically waives presentment, demand, protest and notice of dishonor and consents and agrees to any and all extensions and renewals, in whole or in part, and all delays in time of payment which the holder hereof may grant or permit from time to time, without limitation and without any notice to or further consent of any such party.

Due: _____

Robert J. Owens (SEAL)

Address: 5[illegible] Brentwood Drive
Temple Terrace, Fla.
33617

_____ (SEAL)

SINGLE PAYMENT NOTE - Interest in addition

5 00393 1

pg 2 of
Rcn. 91142

Robert P. Andrews

George P. [illegible]

James P. [illegible]

Robert E. Chapman

William Grey

David C. [illegible]
Norman J. [illegible]

[illegible] FIVE (5) INDIVIDUALS REPORTED BY CMTE ON AMENDMENT [illegible]

THESE INDIVIDUALS UNKNOWN TO AUDIT STAFF PRIOR TO SUBMISSION OF CANDIDATE'S LETTER OF 1/23/78. THEY DO NOT APPEAR ON ENDORSERS REPORTED BY CMTE.

INTERNATIONAL
MARKETING, INC.

525 BRENTWOOD DRIVE TEMPLE TERRACE, FLORIDA 33617

'78 JAN 27 PM 2:12

TAMPA, FL
PM
23 JAN
1978

Ms. Karyl Billups
Audit Division
1325 K St. N.W.
Washington, D.C. 20463

A 154

MUR 526

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

February 6, 1978

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER
Rec'd for BOB COSTA

FROM: KARYL BILLUPS/JOE STOLTZ

SUBJECT: CONTRIBUTIONS IN EXCESS OF THE LIMITS

The following is a matter noted during a recent audit of the Owens for Congress Committee, principal campaign committee of Mr. Robert J. Owens (7th, FL), which is referred to your office for consideration of further action.

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We found that the Candidate received a loan in the amount of $10,000 from the Exchange National Bank of Tampa on August 25, 1976, which was reported as being endorsed by the Candidate and five (5) individuals, three (3) of whom made contributions prior to the date of the loan. The Florida primary election occurred on September 7, 1976.

Of the five (5) individuals, which were originally reported as being endorsers, two (2) made contributions of $100.00 each, and one (1) individual made a contribution of $1,000 prior to their endorsement of the loan. To date, we are uncertain when or if the two (2) individuals which appear last on the list of endorsers were in fact endorsers. (See Attachment).

Subsequent to our fieldwork, the Candidate submitted a letter dated January 23, 1978 accompanied by copies of two (2) loan renewal agreements and a letter of explanation from the Vice-President of the Exchange National Bank of Tampa.

The letter from the officer of the bank states that after a personal financial statement was received from the Candidate, only his signature was required for subsequent renewals. We note that the 30-day renewal dated October 25, 1976 still contained the names of the endorsers. Therefore, without copies of subsequent renewals, we cannot determine when the endorsers were dropped from the note. However, the $2,000.00 renewal dated September 15, 1977 contains no endorsers.

The Committee erroneously reported this loan as a loan made to the Committee, instead of showing the Candidate as the borrower. The Committee made direct repayment of $500.00 on the principal and $69.86 in interest to the bank on November 28, 1976 and reported a debt owed of $9,500.00 on the year-end report. Bank records showed that an additional payment of $2,247.09 was made on March 14, 1977. The Committee reported a payment of $9,500.00 to the bank on that date and a corresponding receipt of $8,204.81 from the Candidate as the source of funds for repayment. The Assistant-Treasurer of the Committee explained that the loan was reported in this manner because he was not aware for some time that the loan was actually made in the name of the Candidate, and that after the last payment was made from Committee funds, the outstanding balance of $7,400.00 was repaid by the Candidate personally. The proceeds from the loan were deposited into the Committee's account within five (5) days after the date of the loan.

In our opinion, it is apparent that at least five (5) individuals have exceeded the contribution limitations by endorsement of the $10,000 loan. The Committee will be advised of the need to amend its reports to show the actual transactions involved in repaying the loan.

If you have further questions concerning this matter, please contact Ms. Karyl Billups at extension 3-4155.

Attached

SHOP WITHOUT GOING SHOPPING

DISTRIBUTORS OF AMWAY PRODUCTS

January 23, 1978

Ms. [illegible] Billups
[illegible] Division
[illegible] St. N.W.
Washington, D.C. 20463

Dear Ms. Billups,

Enclosed, please find the following:

1.) Copy of original note from Exchange Bank for $10,000, Co-endorsed in case of default. My intention was to pay back the money personally.

2.) Copy of note for the last $2,000, Co-endorsers were dropped.

3.) Copy of [illegible] from Bank dated Jan. 10, 1978, indicating note paid in full.

4.) Copy of letter from V.P. Robert N. Morris explaining intire financial transaction.

The money ($10,000) was borrowed personally and was paid back personally. Those original co-endorsers did not make any contribution to the pay-off of this note.

Trusting this answers any and all questions.

Sincerely,

Robert J. Owens

Robert J. Owens

jb

[illegible] a total of $567.66 in 1977 and [illegible] in 1977.

Exchange Bank

January 4, 1977

To Whom It May Concern:

This is to certify that on August 25, 1976, a loan in the amount of $10,000 on an unsecured basis was negotiated by Mr. Robert J. "Dusty" Owens. At the time of the negotiation, we had not received a personal financial statement on Mr. Owens, therefore, we requested he provide some endorsers. This note has been renewed on several occasions with various reductions being made by Mr. Owens personally. As a result of a substantial personal financial statement, his signature only was required on subsequent renewals. The note was paid in full on January 3, 1978, with a personal check of Mr. Owens.

To my knowledge these funds were used for the personal requirements of Mr. Owens and did not have anything to do with the election campaign. Mr. Owens has been well known to me for the past six or seven years and I have a high regard for his integrity.

Sincerely,

Robert N. Morris
Vice President

RNM/cas

The principal campaign [illegible] payments of $569.86 in 1976 and $2247.09 in 1977.

Barnett Bank

January 19 1978

Mr. Robert J. Owens
505 Brentwood Drive
Temple Terrace, Florida 33617

Dear Mr. Owens:

Enclosed please find your note, our No. 91142, in the amount of $2,000.00, dated September 15, 1977, which has been paid in full.

I hope everything is satisfactory. Thank you.

Sincerely,

Ellen P. Hornsby
Loan Operations Officer

Enclosure

The Barnett National Bank of Tampa

AGR 8½%

Note No. R-91142

$ 2,000.00 Tampa, Florida September 15, 19 77

----------December 15, 1977----------after date the undersigned (and if more than one, each of them jointly and severally), for value received, promises to pay to the order of

THE EXCHANGE NATIONAL BANK OF TAMPA

the principal sum of----------Two Thousand Dollars and No/100----------Dollars at its office in Tampa, Florida, with interest thereon from date hereof at the rate of 8½ % per annum until maturity, and at the rate of ten percent per annum thereafter until paid.

Each maker, endorser, and other party liable hereon, jointly or severally, promises and agrees to pay all costs of collection incurred in enforcing this note, including a reasonable attorney's fee, and each specifically waives presentment, demand, protest and notice of dishonor and consents and agrees to any and all extensions and renewals, in whole or in part, and all delays in time of payment which the holder hereof may grant or permit from time to time, without limitation and without any notice to or further consent of any such party.

Due: _____ Robert J. Owens (SEAL)

Address: 505 Brentwood Drive
Temple Terrace, FL 33617 _____ (SEAL)

SINGLE PAYMENT NOTE - Interest in Advance

5 00398 1

AGR 8½%

Note No. Ren. 91142

$ 10,000.00

Tampa, Florida October 25, 1976

---Thirty Days--- after date the undersigned (and if more than one, each of them jointly and severally), for value received, promises to pay to the order of

THE EXCHANGE NATIONAL BANK OF TAMPA

the principal sum of ---Ten Thousand and No/100--- Dollars at its office in Tampa, Florida, with interest thereon from date hereof at the rate of 8½ % per annum until maturity, and at the rate of ten percent per annum thereafter until paid.

Each maker, endorser, and other party liable hereon, jointly or severally, promises and agrees to pay all costs of collection incurred in enforcing this note, including a reasonable attorney's fee, and each specifically waives presentment, demand, protest and notice of dishonor and consents and agrees to any and all extensions and renewals, in whole or in part, and all delays in time of payment which the holder hereof may grant or permit from time to time, without limitation and without any notice to or further consent of any such party.

Due: _____

Robert J. Evans (SEAL)

Address: 505 Brentwood Drive
Temple Terrace, Fla.
33617

_____ (SEAL)

SINGLE PAYMENT NOTE - Interest in addition

5 00393 1

pg 2 of
Rcn. 91142

Robert P. Andrews

George D. [illegible]

[illegible]

Robert E. Chapman

William Grey

[illegible]

THESE FIVE (5) INDIVIDUALS REPORTED BY CMTE ON AMENDMENT FILED

THESE INDIVIDUALS UNKNOWN TO AUDIT STAFF PRIOR TO SUBMISSION OF CANDIDATE'S LETTER OF 1/23/78. THEY DO NOT APPEAR ON ENDORSERS REPORTED BY CMTE.

INTERNATIONAL
MARKETING, INC.
505 BRENTWOOD DRIVE TEMPLE TERRACE, FLORIDA 33617

TAMPA, FL
PM
23 JAN
1976

'76 JAN 27 PM 2 12

Ms. Karyl Billups
% Audit Division
1325 K St. N.W.
Wahington, D.C. 20463

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 524